



2023-2031 Housing Element City of East Palo Alto

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1 INTRODUCTION

Housing is a basic human necessity and the need for housing is shared by all residents. People want living spaces where they feel a sense of dignity, where they can express their individuality, and where they can be comfortable and healthy. Safe, well-maintained housing is a basic need that transcends age, race, income, and marital status. As such, the City of East Palo Alto encourages a diversity of housing types, costs, and locations to serve the variety of needs and wants of local residents.

1.1 ROLE OF HOUSING ELEMENT

The California State Legislature has identified the attainment of a decent home and suitable living environment for every resident as the State's major housing goal. Recognizing the important role of local planning programs in the pursuit of this goal, the Legislature has mandated that all cities and counties prepare a Housing Element as part of the comprehensive General Plan. Section 65583 of the Government Code sets forth the specific components to be contained in a Housing Element. State law further requires Housing Elements be updated at least every eight years to reflect the changing housing needs of a community. As East Palo Alto's Housing Element was last updated in 2016, this Update is for the planning period of 2023-2031.

The Housing Element Update consists of the following major components:

- Overview of the public participation and outreach process (Chapter 1)
- Analysis of East Palo Alto's demographic profile, housing characteristics, units at risk of conversion to market rate, and existing and future housing needs (Chapter 2).
- Review of potential market, governmental, and environmental constraints to housing development (Chapter 3).
- Affirmatively furthering fair housing assessment (Chapter 4)
- Evaluation of the land, financial, and organizational resources available to address the identified housing needs (Chapter 5).
- Housing plan to address the identified housing needs, including a statement of goals, policies, and actions (Chapter 6).
- Review of the progress and challenges in the prior Housing Element (Chapter 7)

1.2 DATA SOURCES

Various sources of information contribute to the Housing Element, including the American Community Survey (ACS) from the U.S. Census Bureau that provides the basis for population and household characteristics. In addition, several data sources were used to supplement the survey include economic and demographic

projections by the Association of Bay Area Governments (ABAG) and population estimates by the California Department of Finance (DOF).

Housing market information is based on City surveys and property tax assessor's files, such as home sales, rents, and vacancies.

Public and non-profit agencies input on data regarding special needs groups and the services available to them or gaps in the service delivery system.

1.3 OUTREACH AND PUBLIC PARTICIPATION PROCESS

East Palo Alto has a long history of extensive community involvement, and the 2023–2031 City of East Palo Alto Housing Element is no exception. It was developed with the collaborative efforts of residents and elected/appointed officials. Several opportunities for input on the Housing Element were provided through various forums as discussed below.

21 ELEMENTS COLLABORATIVE OUTREACH

East Palo Alto partnered with other San Mateo County jurisdictions for a first-of-its-kind countywide outreach effort, through an award-winning collaboration called [21 Elements](#). 21 Elements facilitated several panel presentations and discussion with advocates representing people with special needs, affordable housing developers and advocates, and funders. The panelists discussed their perspective on the unique housing needs of San Mateo County, and provided some policy suggestions.

HOUSING ELEMENT SPECIFIC OUTREACH

To accomplish the City’s goal of developing a Housing Element that reflects the vision of the people who make it special, the City of East Palo Alto developed a broad and diverse outreach plan designed to reach as many community members who live and work here as possible. A summary of public participation and community outreach activities and key takeaways are included here.

The City’s outreach goals were as follows:

- Reduce barriers to access to ensure a robust community participation process that is representative of the full range of demographics, perspectives, and experiences in East Palo Alto
- Build a level of transparency in the update process to ensure successful support and implementation after adoption

- Raise awareness among residents of the importance of the Housing Element update on shaping the future of our community

Given the inability to hold in-person events due to the COVID-19 pandemic, the City developed different community outreach and engagement strategies, including virtual meetings, digital tools, and safe in-person interactions to ensure that community members who do not have access to technology were still able to participate and provide their input. The City also proactively engaged residents for whom English is not spoken at home, families that would need childcare in order to participate and engage in conversations, and renters living in multi-family and in single-family housing with little access to public transportation.

For many years, the community has participated and engaged in conversations about affordable housing, tenant rights, displacement and fair housing. In addition to conversations focused on the Housing Element, the City's efforts to establish sustainable funding sources for affordable housing production and homelessness prevention, to discuss the Ravenswood Business District/Four Corners Specific Area Plan, develop an affordable housing workplan, among many other initiatives, have provided opportunities for many additional collaborative outreach activities.

For other outreach work, we partnered with [21 Elements](#). Specific activities are summarized below:

Social Media and Printed Mailing. The City of East Palo Alto launched a [Housing Element Update webpage](#), and conducted extensive social media outreach beginning March 2021. Physical mailers were sent City-wide in April 2022.

We also participated in and helped shape the [Let's Talk Housing](#) initiative. City staff and consultants developed a countywide website available in five languages, a City [webpage](#) detailing our timeline, engagement activities, and resources that also linked to our City 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.

Email Alerts. We sent alerts and updates via the City's City-wide weekly newsletter and created a Housing Element Update mailing list where residents interested in the Housing Element process received updates on upcoming community meetings or ways to participate in the Housing Element Update.

Community Meetings: The City organized three public Housing Element community meetings and presented at 6 public commission/council meetings. These include:

- Planning Commission Informational Update 05/10/21 (virtual)
- Community Meeting about Outreach Strategies 06/02/21 (virtual)

- Community Meeting #1 07/19/21 (virtual)
- Community Meeting #2 02/24/22 (virtual)
- Planning Commission Meeting 03/14/22 (virtual)
- City Council Meeting 03/15/22 (virtual)
- Planning Commission and City Council Joint Study Session 04/26/22 (virtual)
- Community Meeting #3 05/05/22 (hybrid meeting in-person and virtual)
- Planning Commission Meeting 07/11/22 (virtual)
- City Council Meeting 07/19/22 (virtual)

The City also participated in several meetings and webinars in partnership with 21 Elements, including:

- Let's Talk Housing - Introduction to the Housing Element – A housing element overview with breakout discussion rooms that was part of a series of introductory meetings attended by one community member and two East Palo Alto stakeholders and over 1,000 community members countywide.
 - 03/25/21 (Joint with Millbrae, Burlingame, Hillsborough and San Mateo); continued on 05/06/21 due to technological issues
 - 07/26/21 (Virtual countywide meeting about the Housing Element update in Spanish)
- All About RHNA webinar – An in-depth dive into sites methodology. (4/23/21 - countywide)
- Stakeholder Listening Sessions – Four virtual meetings where jurisdictions could listen to and interact with stakeholder groups arranged by topic. More than 30 groups participated.
 - Fair Housing 09/27/21
 - Housing Advocates 10/18/21
 - Builders 10/01/21
 - Service Providers 11/15/21
- Creating an Affordable Future webinars – A four-part series to help educate community members about local housing issues.
- Equity Focus Group Presentation – The City also conducted a virtual focus group presentation with the San Mateo County Equity Advisory Group on 05/02/22 to ensure outreach was set up to meet people where they were at as much as possible.

Surveys: City staff conducted three online surveys, an in-person intercept survey at pop-up Farmer's Markets, and a Balancing Act survey with sites inventory-specific questions. These efforts included:

- Online Surveys 02/24/22 to 07/15/22
- Balancing Act Survey 05/25/22 to 07/15/22
- Intercept Survey at East Palo Alto Farmer's Market 06/08/22
- Intercept Survey at East Palo Alto Farmer's Market 06/15/22

WHAT WE ACCOMPLISHED

It is more important than ever to include as many voices as possible in the Housing Element. Housing Elements at their best can provide an opportunity for everyone to add their voice to the conversation. However, many people are too often 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:

- Ensured foreign language translation and interpretation was included in our meetings and materials¹
- Designed a website that was mobile friendly, with accessibility features and available in multiple languages. (Lower income residents, young adults and people of color are more likely to use their phones)
- Formed 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
- Held meetings in partnership with community organizations (including an Introductory meeting in Spanish with English interpretation focusing on community outreach strategies)
- Developed an Affirmatively Furthering Fair Housing survey

The following is more a detailed description of the City's engagement efforts to hear from as many community members as possible. Appendices C and E provide more details.

1. Website and Social Media

As a starting point for accomplishing extensive outreach, the City of East Palo Alto developed a clear online presence with all the information needed to understand the update process and know how to participate.

- **City of East Palo Alto Website and Social Media**

The City launched a [Housing Element Update webpage](#) on its City website in March 2021, where community members can find the latest updates on the Housing Element Update and a list of upcoming community meetings. The City webpage also provides links to previous commission/council reports and recordings to community meetings and public meetings. The City

¹ The City provided translation of materials and interpretation of public meetings in Spanish. The City is currently working on a language access plan to identify additional translation and interpretation needs in the community. This may include translation and interpretation to Tongan and Samoan, which are the next most spoken languages in the City. According to the 2019 American Community Survey 5-Year Estimates, approximately 8.3% of East Palo Alto households speak Asian and Pacific Island languages, and 11.7% of East Palo Alto households who speak Asian and Pacific Island languages are limited English speaking households.

also provided updates and invitations to community meetings on social media. All outreach communications were conducted in English and Spanish. Appendix A1 provides an overview of the webpage outreach performance and Appendix A2 provides an overview of the social media outreach performance.

- **Let's Talk Housing Website and East Palo Alto Webpage**

To reach a broader audience and supplement the City webpage, we launched the Let's Talk Housing website with 21 Elements 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 included accessibility features. As part of this effort, we also developed an East Palo Alto webpage with our timeline, engagement activities like surveys and housing balancing exercises, and resources that also linked to our City website. As of January 2022, the Let's Talk Housing website has been viewed more than 17,000 times, with more than 20 percent 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 event.

- **Informational Videos on the Housing Element Update**

After completing a series of introductory Meetings to the Housing Element Update (see below), we supported 21 Elements in developing shorter 4-minute snippets to ensure information was more accessible and less onerous than watching an hour-long meeting. Two videos were produced—What is a Housing Element and How it Works and Countywide Trends and Why Housing Elements Matter—in Arabic, Chinese, English, Spanish, and Tagalog. They were made available on the Let's Talk Housing YouTube channel and website and shared on social media.

2. Email Alerts

The City sent updates about the Housing Element process via the City's City-wide weekly newsletter, which updates residents on any upcoming City meetings and programs. The City also created a Housing Element Update mailing list to provide updates. Appendix A3 provides an overview of these email alerts.

3. Public Meetings and Hearings

The City of East Palo Alto held and participated in a variety of virtual and in-person meetings to inform the public about the Housing Element and hear what matters to the community.

- **Countywide Introductory Meeting to the Housing Element Update**

The City of East Palo Alto helped develop and facilitate a 90-minute virtual countywide meeting about the Housing Element update. Held on March 30, 2021, and continued May 6, 2021, due to technological issues, 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. The City of East Palo Alto staff then 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 us and more importantly who was missing from the conversation, including if they rent or own, who they live with, their age, and ethnicity. Time for questions was allotted throughout, and meeting surveys were provided to all participants after the meeting along with all discussed resources and links. Appendix A5 summarizes this countywide meeting.

In total six introductory meetings were held across the county between March and May 2021, and 1,024 registered for the series. Of those who registered, the majority identified as White (66%) or Asian (15%) and were 50 years or older; nearly half were 50 to 69 years old and almost a fifth were over 70. Almost half had lived over 21 years in their homes and three-fourths owned their homes. One East Palo Alto resident and fourteen other stakeholders participated in the East Palo Alto breakout group. A meeting summary can be found in Appendix A4.

On July 26th, the City of East Palo Alto joined a virtual countywide meeting about the Housing Element update in Spanish, hosted by El Comité, a trusted community organization. English interpretation was provided for non-Spanish speaking staff to participate in the conversation. In total, 57 people participated. A recording of this meeting was made available after and can be viewed [here](#).

- **All About RHNA Webinar**

The City of East Palo Alto joined a webinar with 21 Elements in April 2021 to provide information and answer community questions about the Regional Housing Needs Allocation (RHNA) process. 264 people registered and 80 questions were answered over three hours. The recording of this meeting and the FAQ can be found [here](#).

- **Community Meetings**

- **Outreach Strategies Community Meeting:** The City conducted a community meeting virtually on June 2, 2021, that focused on outreach strategies.
- **Housing Element Update Community Meeting #1:** The City conducted its first City-specific community meeting virtually on July 19, 2021, which provided introductory information on the Housing Element Update and sought community input. Spanish interpretation was available. A recording of this meeting was made available after and can be viewed [here](#).
- **Housing Element Update Community Meeting #2:** The City conducted a second community meeting virtually on February 24, 2022, which provided introductory information and sought input on RHNA, policies and programs, and environmental constraints. Spanish interpretation was available. A recording of this meeting was made available after and can be viewed [here](#) in English and [here](#) in Spanish.

- **Housing Element Update Community Meeting #3:** The City conducted a third community meeting and first hybrid meeting (held both in-person and virtually) on May 5, 2022. Spanish and Tongan interpretation were available both in-person and on Zoom. The meeting also had childcare, free food, and a free shuttle bus. The meeting provided introductory information and sought input on policies and programs and sites inventory. A recording of this meeting was made available after and can be viewed in both English and Spanish [here](#). Due to technological issues, we were unable to record the Tongan interpretation.

- **Public Hearings**

- May 10, 2021, Brief Informational Update on the Housing Element to the Planning Commission
- March 14, 2022, Update on 2021 Housing Element and General Plan Annual Progress Report
- March 15, 2022, City Council Authorization to Submit 2021 Housing Element Annual Progress Report, 2021 General Plan Annual Progress Report, and Housing Successor Agency Report to State Agencies
- April 26, 2022, Joint study session with Planning Commission and City Council
- July 11, 2022, Planning Commission update
- July 19, 2022, City Council update

- **Stakeholder Listening Session Series**

The City of East Palo Alto joined 21 Elements for a facilitated series of listening sessions held between September and November 2021 to hear from various stakeholders who operate countywide or across multiple jurisdictions. The four sessions convened more than 30 groups including fair housing organizations, housing advocates, builders/developers (affordable and market-rate), and service providers, to provide observations on housing needs and input for policy consideration.

Summaries for each session can be found [here](#). Key themes and stakeholder groups included:

- **Fair Housing:** Concern for the end of the eviction moratorium, the importance of transit-oriented affordable housing and anti-displacement policies, and the need for education around accessibility regulations and tenant protections. 8 stakeholder groups provided this feedback, including the following:
 - Center for Independence www.cidsanmateo.org
 - Community Legal Services of East Palo Alto (CLSEPA) www.clsepa.org
 - Housing Equality Law Project www.housingequality.org
 - Legal Aid for San Mateo County www.legalaidsmc.org
 - Project Sentinel www.housing.org

- Housing Choices www.housingchoices.org
 - Public Interest Law Project www.pilpca.org
 - Root Policy Research www.rootpolicy.com
- **Housing Advocates:** Concern for rent increases and the need for ongoing outreach to underserved and diverse communities, workforce housing, deeply affordable and dense infill, and tenant protections for the most vulnerable. 6 stakeholder groups provided this feedback, including the following:
 - Housing Leadership Council www.hlcsmc.org
 - Faith in Action www.faithinactionba.org
 - Greenbelt Alliance www.greenbelt.org
 - San Mateo County Central Labor Council www.sanmateolaborcouncil.org
 - Peninsula for Everyone www.peninsulaforeveryone.org
 - San Mateo County Association of Realtors www.samcar.org
- **Builders and Developers:** Local funding, tax credit availability, and concern that appropriate sites limit affordable housing while sites, construction costs, and City processes limit market-rate housing. 12 stakeholder groups provided this feedback, including the following:
 - Affirmed Housing (Affordable) www.affirmedhousing.com
 - BRIDGE Housing (Affordable) www.bridgehousing.com
 - The Core Companies (Affordable, Market Rate) www.thecorecompanies.com
 - Eden Housing (Affordable) www.edenhousing.org
 - Greystar (Market Rate) www.greystar.com
 - Habitat for Humanity (Affordable) www.habitatsf.org
 - HIP Housing (Affordable) www.hiphousing.org
 - Mercy Housing (Affordable) www.mercyhousing.org
 - MidPen Housing (Affordable) www.midpen-housing.org
 - Sand Hill Property Company (Affordable, Market Rate) www.shpco.com
 - Sares | Regis (Market Rate) www.srgnc.com
 - Summerhill Apartment Communities (Market Rate) www.shapartments.com
- **Service Providers:** More affordable housing and vouchers or subsidies for market-rate housing are needed, along with on-site services and housing near transit, and jurisdictions should work with providers and people experiencing issues before creating programs. 10 stakeholder groups provided this feedback, including the following:
 - Abode Services www.adobeservices.org
 - Daly City Partnership www.dcpartnership.org
 - El Concilio www.elconcilio.org

- 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**

The City of East Palo Alto and 21 Elements offered a 4-part countywide webinar series in the fall of 2021 to help educate community members about local housing issues. The sessions were advertised and offered in Cantonese, Mandarin and Spanish, though participation in non-English channels was limited. All meetings and materials can be found [here](#). The following topics, and how each intersects with regional housing challenges and opportunities, were explored:

- **Why Affordability Matters:** Why housing affordability matters to public health, community fabric and 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 & Climate Readiness Toolkit.
- **Putting it All Together for a Better Future:** How design and planning for much-needed new infill housing can be an opportunity to address existing challenges in our communities.

The series included speaker presentations, audience Q&A, breakout sessions for connection, and debrief discussions. Participants were eager to discuss and learn more about housing challenges in their community. They asked questions and commented in the chat and shared their thoughts in a post-event survey. Overall, comments were mostly positive and in favor of more housing, though some were focused on the need for new affordable housing. There was a lot of interest in seeing more housing built (especially housing that is affordable), concern about change or impact to schools, parking, and quality of life, and personal struggles with finding housing that is affordable and accessible shared. Some participants wanted more in-depth education and discussion of next steps, while others had more basic questions they wanted answered.

In total, 754 registered for the series. Of those who shared, the majority identified as White (55%) or Asian (24%) and ranged between 30 and 70 years old. Over half have lived in the county for over 21 years and nearly two-thirds owned their homes. For more information, see the Summary [here](#).

4. Other Outreach Activities

The City of East Palo Alto set out to collect as much feedback as possible from the community, from their general concerns and ideas to where new housing could go. It was also important to us to consider community outreach best practices and consult and partner with organizations working in the community, to ensure we were reaching as many people as possible and doing so thoughtfully. Appendix A6 provides an overview of the survey results.

- **Jamboard Survey**

An online whiteboard where community members can provide their input on what types of housing they want to see, what locations/sites they want to see explored, what environmental issues bring them the most concern, and what environmental considerations should we have when zoning for new housing. See the survey [here](#).

- **Policies and Programs Survey**

A survey to hear residents' thoughts on how we are doing with our housing policies and programs, which policies we should keep, and which new policies we should consider prioritizing for the next 8 years. See the survey in English [here](#) and in Spanish [here](#).

- **East Palo Alto Balancing Act Survey**

The Balancing Act is a housing simulation tool where residents may provide their input on the location of potential housing sites to be included in the 2023-2031 Housing Element. This simulation tool is a great way for residents to explore the location of housing sites and the number of potential housing units on those identified sites. See the Balancing Act page [here](#).

- **Intercept Survey**

Intercept surveys on housing inventory and density were also conducted at two of the East Palo Alto Farmer's Markets. This in-person survey helped reach Spanish-speaking residents and lower-income residents who may not necessarily be active in public meetings.

- **Equity Advisory Group**

In alignment with community outreach best practices, it was important to include the guidance of and foster partnerships with community organizations to help ensure everyone's voices were heard during the Housing Element update. In response, an Equity Advisory Group (EAG) was formed consisting of 15 organizations or leaders across the county that are advancing equity and affordable housing. A stipend of \$1,500 was originally provided for meeting four to five times over 12 months to advise on Housing Element outreach and helping get the word out to the communities they work with.

After meeting twice in 2021, it was decided the best use of the EAG moving forward would be to provide more focused support in 2022 based on jurisdiction need and organization expertise. To date, EAG

members have facilitated and hosted community meetings in partnership with 21 Elements, collected community housing stories to put a face to housing needs, advised on messaging, and amplified events and activities 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.alasdreams.com
- 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
- East Palo Alto Community Alliance and Neighborhood Development Organization (EPA CAN DO) 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

- **Affirmatively Furthering Fair Housing Survey**

A Fair Housing Assessment was conducted for all San Mateo County jurisdictions and had a statistically significant number of East Palo Alto residents participate (53 East Palo Alto residents total). Some primary findings in the Fair Housing Assessment include:

- Hispanic/Latinx & Black/African American households have a high-cost burden
- The entire city is considered vulnerable to displacement.
- There is a lack of sidewalks, good street lighting and walkability in some neighborhoods
- East Palo Alto has high rates of fair housing discrimination
- Applicants for mortgage face high rates of denial, highest for Black/African American and Hispanic/Latinx applicants
- East Palo Alto has a higher portion of children than county going to lower-performing schools

The Affirmatively Furthering Fair Housing Chapter provides an overview of the survey results. In addition, Appendix A7 shows the Equity Advisory Group’s recommendations as a minimum to Affirmatively Furthering Fair Housing.

- **Public Review Period**

The City released the draft Housing Element for the 30-day public review period from August 29, 2022 to October 3, 2022. During this time, the City received comment letters from 18 individuals. Common themes in the comments submitted include:

- Language Access: Need for Spanish and Tongan translation, as well as easier to understand language and broken-down abbreviations.
- Process Timelines: Need for development streamlining and shorter process timelines.
- ADU Streamlining: Need for ADU incentives and streamlining.
- Water Infrastructure: Need for water infrastructure in new development sites.
- Housing affordability: Need to target development of lower-income housing.
- Homeownership opportunities: Need for affordable homeownership programs.

Appendix A8 provides an overview of comments submitted during this public review period.

1.4 HOW WE INCORPORATED WHAT WE HEARD INTO THE PLAN

Comments from community workshops and correspondence received during the update process have helped to identify housing needs and issues of concern in the community and possible strategies for the City to pursue in addressing housing needs. Feedback and insights from people who face the greatest barriers to participation, including tenants, non-English speakers, and lower-income residents helped to highlight new policy opportunities and ways to strengthen and improve existing policies. There was an overarching need and appetite for more housing affordability and availability. In addition, themes such as investing in infrastructure and anti-displacement measures and addressing climate change helped inform policies in the Housing Element Update.

KEY TAKEAWAYS

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

- **Need for affordable rents** – The community is very concerned about promoting more affordable housing, particularly in light of rapid increases in prices in East Palo Alto. They want the Rent Stabilization and renter protection ordinances protected.

- **More housing overall is needed:** Generally, people believe we need 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.
- **Housing protection, preservation, and production are top priorities:** The community is very concerned about addressing the rapid displacement in East Palo Alto. They want tenant rent relief and protections, housing preservation and housing production. They also felt that developers should be eligible for incentives and opportunities that make them more competitive.
- **Overcrowding is an issue:** Because prices are so high, many residents are forced to share apartments. This causes overcrowding and associated problems.
- **Need for improved living conditions:** Many residents had concerns about the condition of their apartments. They feel they are not being maintained at an acceptable level.
- **The price of housing is a major concern:** Many 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.
- **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 the comments reflected people’s current housing situation. Those with safe, stable housing that they can afford were more concerned with street and infrastructure conditions, and the value of homes. Those without were more interested in bolder policies that support tenants 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. Click [here](#) for a sample story.
- **Single-family neighborhoods are polarizing:** While some people voiced their interest in upzoning single-family neighborhoods or eliminating them altogether, other homeowners want to protect them and in turn, the investment they have made.
- **The process is too complicated:** There was significant concern that the development process was too slow and there was too much uncertainty.
- **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, 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.

- **Equity is on people’s minds:** People want to talk about housing inequities and, even more so, discuss how to solve them. There was interest in ways to create new opportunities for housing and asset building for all that also address past exclusions.
- **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 challenging to engage non-resident community members on jurisdiction-specific input.
- **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.

INCORPORATION INTO THE HOUSING ELEMENT

The following is a summary list of topics that were added or improved as a result of that community and stakeholder feedback.

- Theme: Environmental Constraints
 - Use environmental “overlay” to avoid housing in at-risk areas
 - Resolve issues with the East Palo Alto Sanitary District (EPASD) to improve sanitary sewer infrastructure
- Theme: Incentives for affordable housing development
 - Affordable housing overlay zone
- Theme: Encouraging smaller-scale, “missing middle” housing like duplexes/triplexes and (market-rate) ADUs
 - Streamlining
 - Fee reductions
 - Outreach targeting smaller developers
- Theme: ADUs as lower-income affordable housing
 - Amnesty and legalization of unpermitted second units
 - Public/private partnerships to fund rehab/repairs
 - Additional loan programs to build deed restricted affordable ADUs
- Theme: Promote homeownership opportunities
 - Leverage all available federal funding support for down payment and first-time homebuyer assistance
 - Advocate for these programs at regional level

- Theme: Need for anti-displacement
 - Jobs-housing linkage that links production of commercial office space to affordable housing production
 - Strengthen housing replacement requirements
 - Preservation/rehabilitation
 - Exploring establishment of cooperatives/community ownership of housing
- Theme: Need for infrastructure improvements
 - Seeking funding from the private sector to add neighborhood improvements communities that have the greatest needs and establishing a land banking program with that funding

The following is an overview of the rationale behind some of the policies and programs recommended.

Policy or Program	Rationale
Overlay for nonprofit-owned properties of a certain size that commit to building 100% affordable housing	Some nonprofit property owners, such as faith communities, own sufficiently large (and “underutilized”) parcels to build affordable housing and have interest in serving community need. With an overlay, the City may reduce costs by allowing projects of a certain scale.
City-level streamlining for SB 9 projects	SB 9 facilitates multiple units on parcels zoned single family. Duplexes, triplexes, and ADUs can help to add “missing middle” units to the housing stock.
Encouraging ADU production	ADUs address the “missing middle” problem and allow for additional units on a variety of parcels. The City has made ADUs a priority since 2018 and may wish to update this strategy as a Housing Element “program” to support the City’s development project of ADU production over the next 8 years.
Temporary Use Permit for temporary housing for unhoused individuals	City Council directed staff to develop a “Master Temporary Use Permit (TUP)” process as described in the April 5, 2022, staff report. Facilitating temporary housing for unhoused individuals helps to address the needs of special populations, as required in the Housing Element.
Requiring minimum residential density on Sites Inventory/Housing Opportunity sites in the Ravenswood Business District	Different uses are allowed in the Ravenswood Business District (RBD). Allowing residential as one of multiple uses, e.g., office or R&D, does not guarantee that affordable housing units will be built on a parcel. Therefore, minimum residential density requirements on Sites Inventory/Housing Opportunity sites are needed to encourage development of housing in the RBD, especially affordable housing opportunities (such as density bonus law) that typically align with higher density requirements and make it cheaper to build more units.

Waiving fees for affordable projects	Analysis by 21 Elements partner firm EcoNorthwest found that waiving some fees for affordable projects would increase market feasibility for affordable units citywide, in many cases more than upzoning certain parcels
Reduced parking for affordable projects	Analysis by 21 Elements partner firm EcoNorthwest found that reducing parking requirements for affordable projects would increase market feasibility for affordable units citywide, in many cases more than upzoning certain parcels.

1.5 CONSISTENCY TO OTHER CITY PLANS

The Housing Element update is a required Element of the City of East Palo Alto General Plan, which was updated in 2016. The changes proposed by this Housing Element update were reviewed against the General Plan, Vista 2035, and found to be consistent. Additionally, while the Housing Element is not currently consistent with the Ravenswood / 4 Corners TOD Specific Plan, this plan is also undergoing a targeted update. The proposed housing sites, policies and programs, and any other aspects of the Housing Element update that are related to the Ravenswood/4 Corners TOD Specific Plan—including the rezoning program planned for 2023—will be consistent with the final updated Specific Plan.

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2 HOUSING NEEDS ASSESSMENT

The Housing Needs Assessment consists primarily of data provided by the Association of Bay Area Governments/Metropolitan Transportation Commission in partnership with 21 Elements in preparation for the Housing Element. Each jurisdiction received a “data packet” prepared to specifically address each of the statutorily required data points. These data help to describe the state of housing in East Palo Alto and to provide a basis for planning for development over this eight-year planning period.

Several highlights from this extensive data compilation have been incorporated into the community meetings and outreach referenced in other sections of this Housing Element and have directly informed the Policies & Programs section. These include:

2.1 POPULATION SIZE

East Palo Alto’s population has been growing, but less than the Bay Area region overall with 4.4% growth in the City from 2000 to 2020, compared to 9% for the county and 15% for the Bay Area. This increase throughout the region is mostly due to natural growth (births minus deaths) and our strong economy drawing new residents to the region.

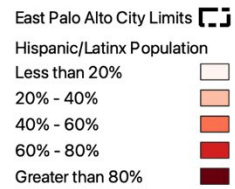
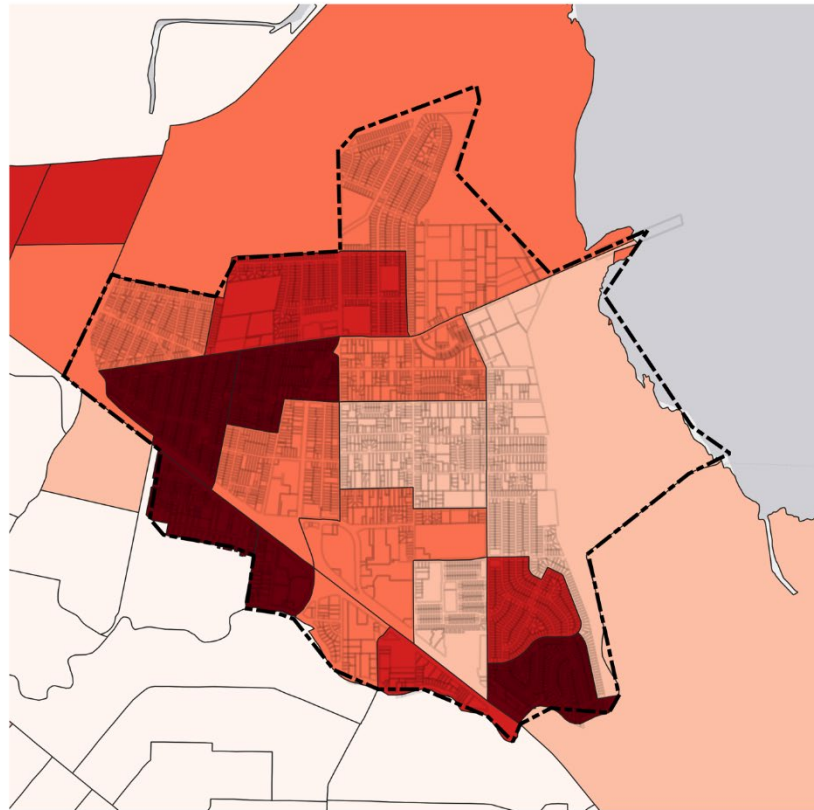
2.2 DEMOGRAPHIC SHIFTS

The majority of East Palo Alto is made up of people of color, including 66.1% Latinx, 10.9% African American, and 9.6% Asian and Pacific Islander, while approximately 10% of the population is White. This is a far larger proportion of people of color, particularly Latinx, African American, and Pacific Islander, than the rest of San Mateo County.

Since 2000, the percentage of residents in East Palo Alto identifying as White has increased, and the percentage of residents of all other races and ethnicities has decreased, by 3.4 percentage points. The largest absolute increase in residents identified as Latinx, while the largest absolute decrease in residents identified as African American.

The following maps show the spatial distribution of different racial/ethnic groups as reported to the U.S. Census:

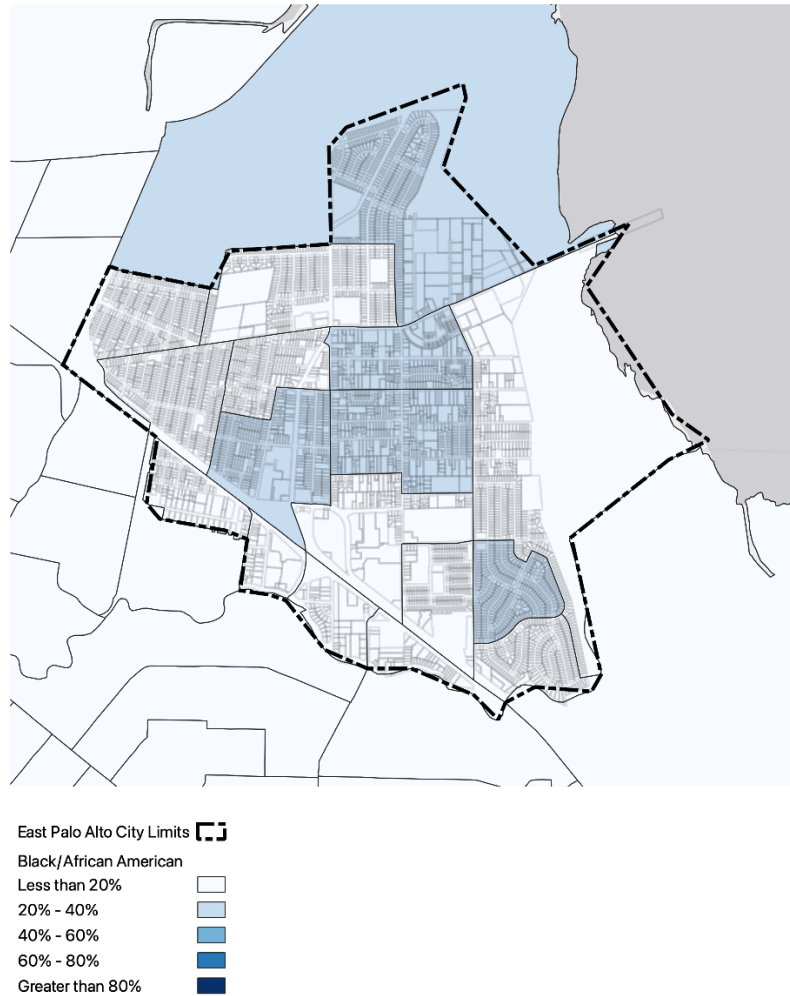
Hispanic/Latinx Population (2020)



Source: ACS Table B03002, 2016-2020 5-Year Estimate.

The City of East Palo Alto is currently a majority Hispanic/Latinx community. A high concentration of Hispanic/Latinx residents live on the Westside (west of Highway 101) in multi-family dwellings, and in specific single-family home neighborhoods in the eastside of the City.

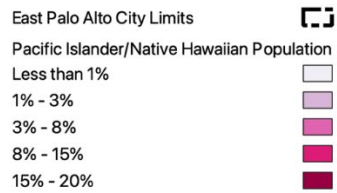
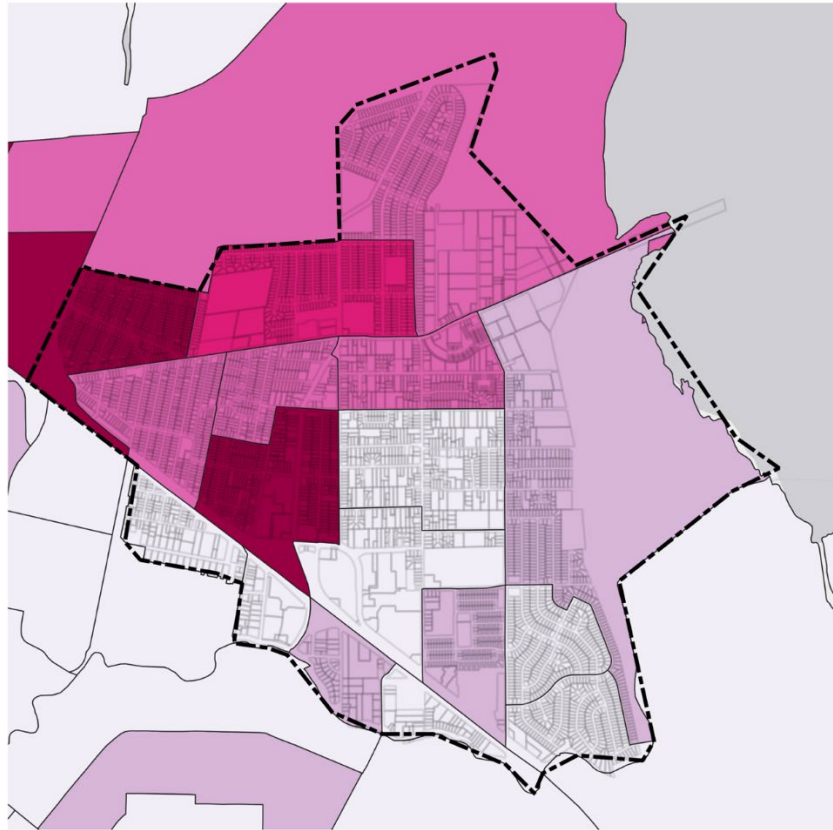
Black/African American Population (2020)



Source: ACS Table B03002, 2016-2020 5-Year Estimate.

East Palo Alto used to be a predominately Black/African American community, but due to gentrification and displacement pressures, only a few Black/African American residents now live primarily in single family home neighborhoods throughout the City (on the eastside of Highway 101).

Pacific Islander/Native Hawaiian Population (2020)



Source: ACS Table B03002, 2016-2020 5-Year Estimate.

The City has the largest share of Pacific Islander/Native Hawaiian population in San Mateo County. A large portion of Pacific Islander/Native Hawaiian residents live in single-family home neighborhoods throughout the northeast side of Highway 101.

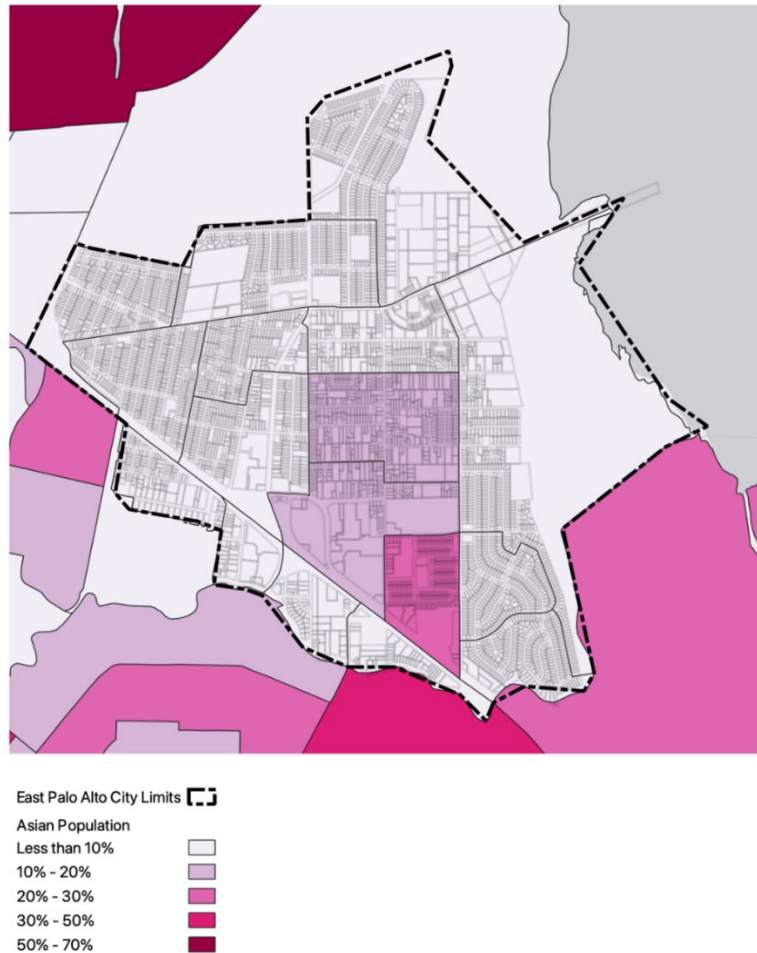
American Indian/Alaska Native Population (2020)



Source: ACS Table B03002, 2016-2020 5-Year Estimate.

The City has a small share of the American Indian/Alaska Native population concentrated in a mixed multi-family home and single-family home neighborhood in the northern part of the City, south of Bay Road.

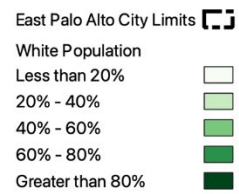
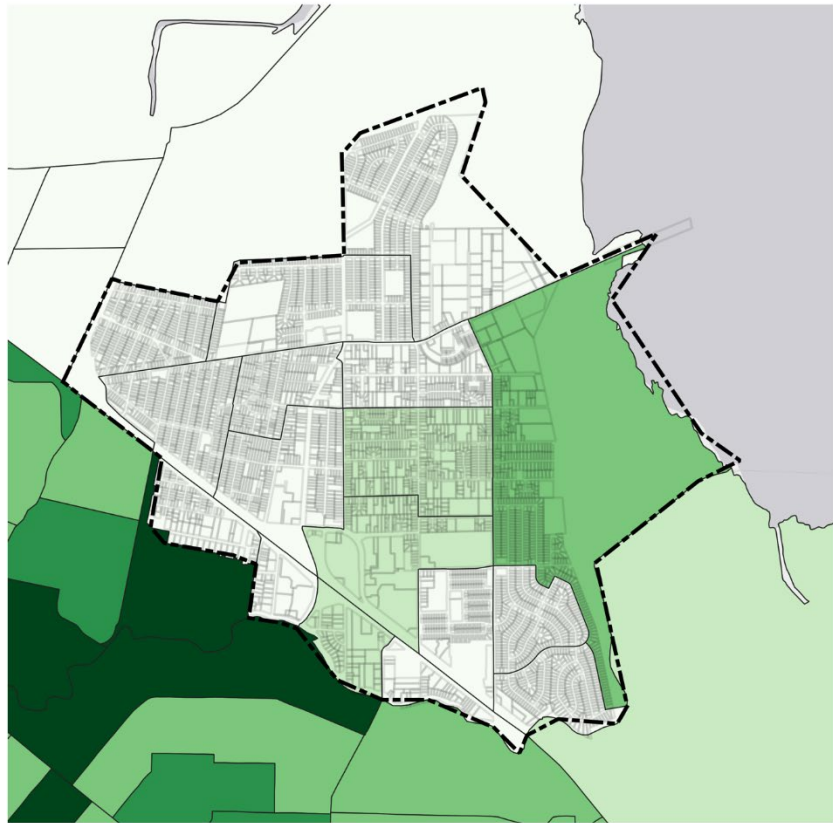
Asian Population (2020)



Source: ACS Table B03002, 2016-2020 5-Year Estimate.

The City has a concentrated share of the Asian population in its mobile home park neighborhood (Palo Mobile Estates recently underwent condominium conversion), and a smaller share in surrounding newer single-family home neighborhoods (built in the early 2000's).

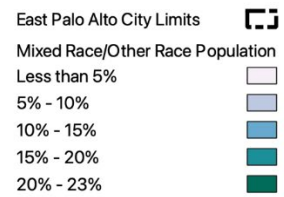
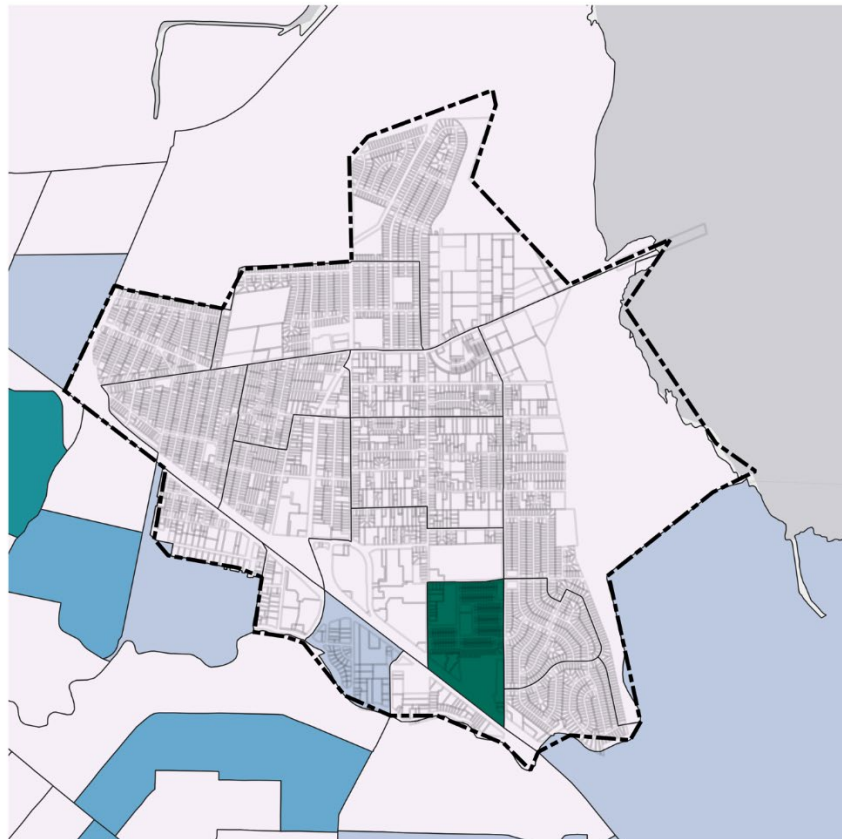
White Population (2020)



Source: ACS Table B03002, 2016-2020 5-Year Estimate.

East Palo Alto has a smaller share of the White population than in the region. A larger portion of White residents live in the newer single-family home and townhome neighborhoods on the southeast side of Highway 101.

Mixed Race/Other Race Population (2020)



Source: ACS Table B03002, 2016-2020 5-Year Estimate.

A higher concentration of Mixed-Race or Other Race population lives in the Palo Mobile Estates mobile home park of East Palo Alto (which recently underwent condominium conversion).

2.3 LANGUAGE

Language access can play a major role in determining who can participate in the City's housing policy and development decision-making process. Over two thirds of East Palo Alto's population speak a language other than English at home.

The language most spoken other than English is Spanish, with over 51.5% of households who speak Spanish and 19.2% of households who speak Spanish with limited English.

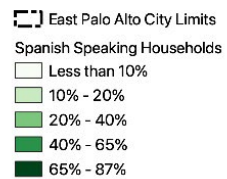
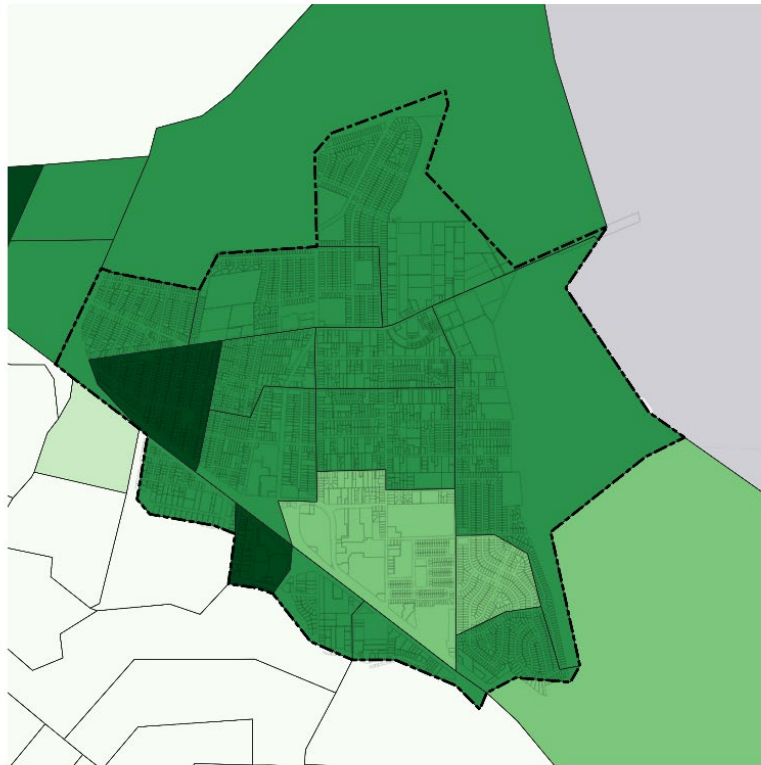
East Palo Alto has a large Tongan and Samoan population compared to the region, and the next most spoken languages are Tongan, Samoan, or some other Asian or Pacific Islander language. According to the 2019 American Community Survey 5-Year Estimates, an estimated 8.3% of East Palo Alto households speak Asian and Pacific Island languages, and 11.7% of East Palo Alto households who speak Asian and Pacific Island languages are limited English speaking households.

About 5.8% of East Palo Alto households speak Other Indo-European languages, and 3.6% who speak Other Indo-European languages are limited English-speaking households.

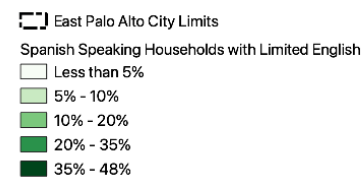
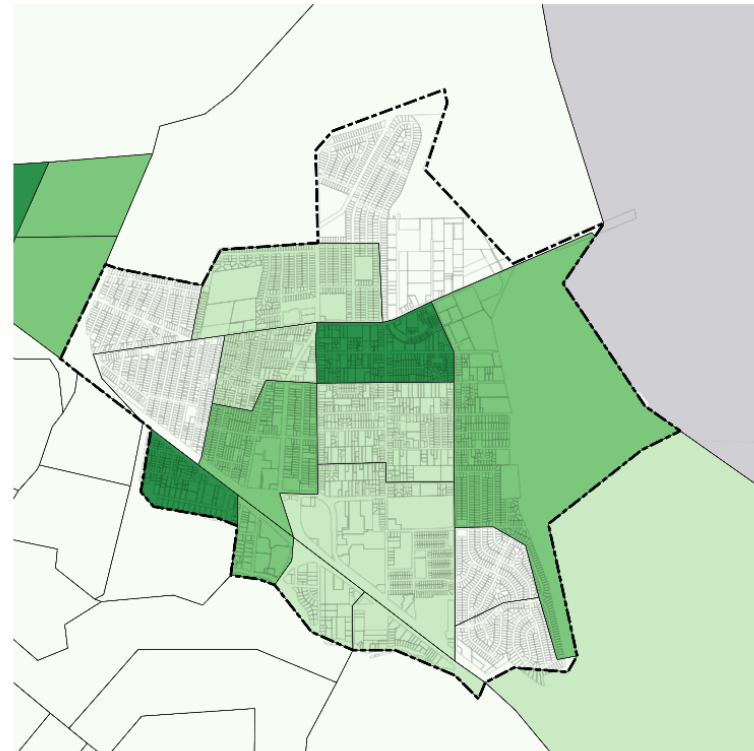
The following maps show the distribution in East Palo Alto by language groups and limited English households:

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Spanish Speaking Households (2019)



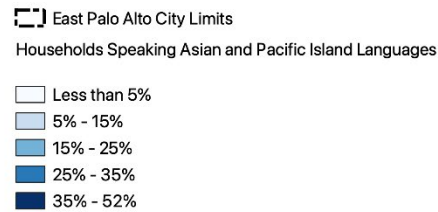
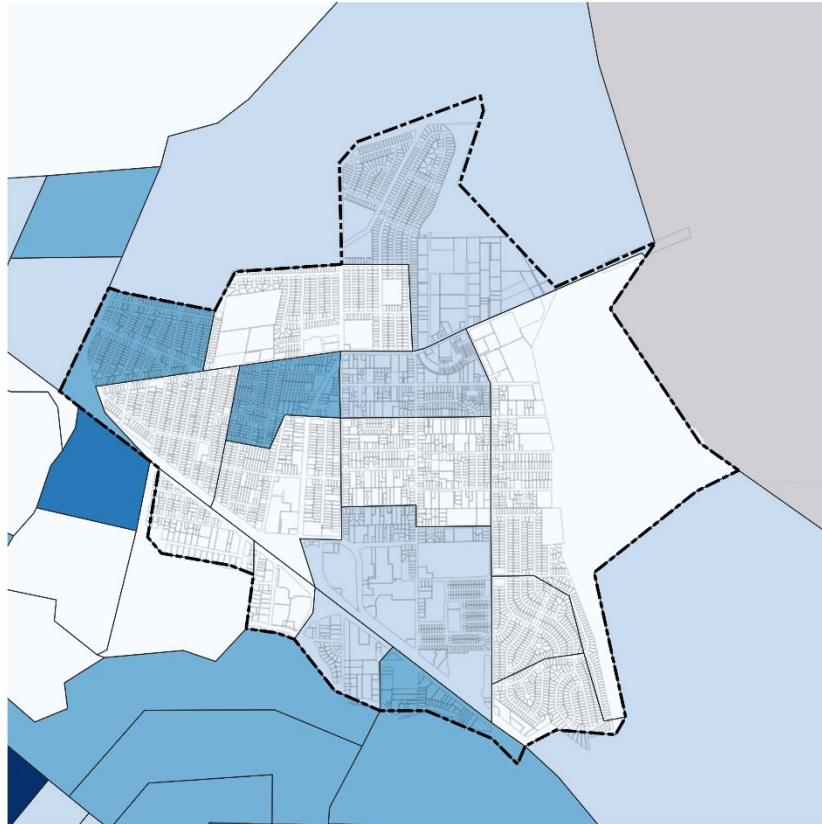
Spanish Speaking Households with Limited English (2019)



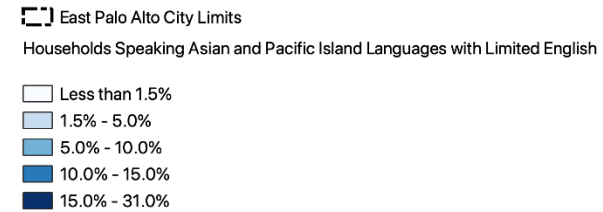
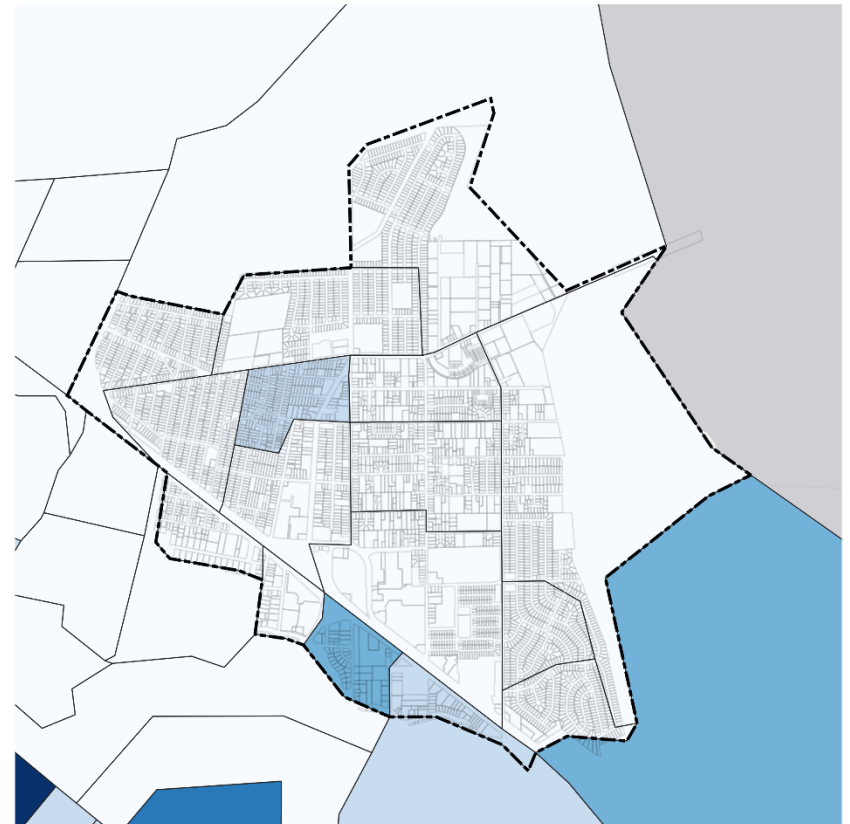
Source: ACS Table S1602, 2015-2019 5-Year Estimate.

Most East Palo Alto census block groups have over 40% of Spanish-speaking households, with two block groups that have over 65% of the households speaking Spanish and two census blocks that have over 20% of the households speaking Spanish with limited English.

Asian or Pacific Island-Speaking Households (2019)
(2019)



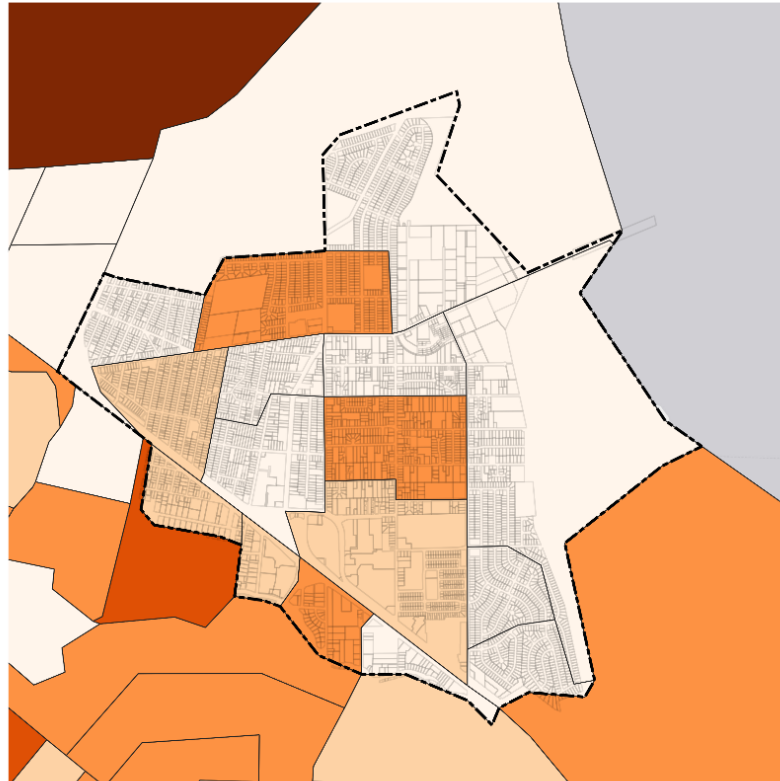
Asian or Pacific Island-Speaking Households with Limited English



Source: ACS Table S1602, 2015-2019 5-Year Estimate.

Three East Palo Alto census block groups have between 1.5% and 10% of the households speaking Tongan, Samoan or some other Asian or Pacific Islander language with limited English.

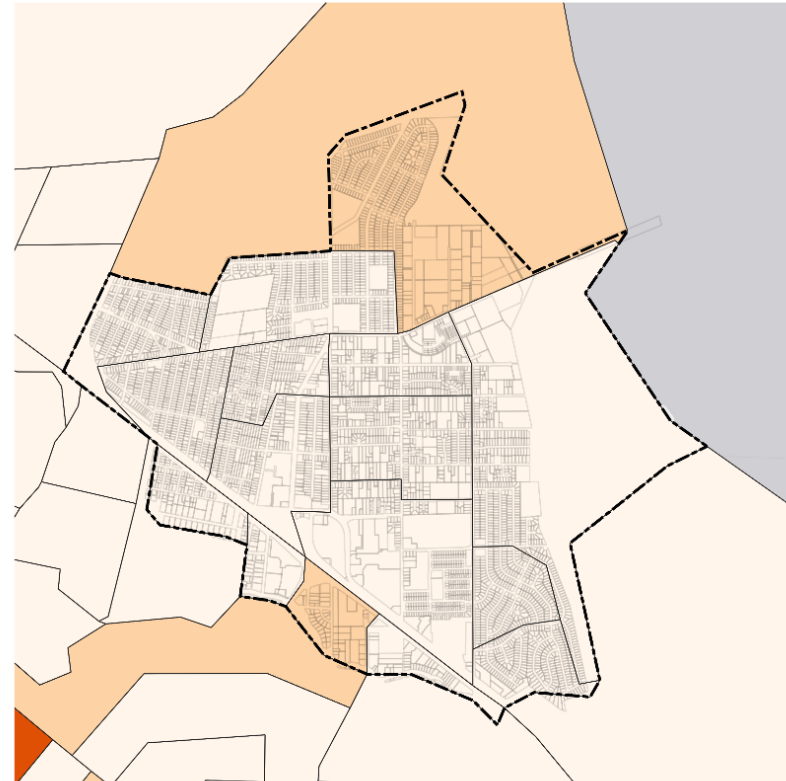
Other Indo-European-Speaking Households (2019)



East Palo Alto City Limits
Households Speaking Other Indo-European Languages

- Less than 5%
- 5% - 10%
- 10% - 20%
- 20% - 35%
- 35% - 64%

Other Indo-European-Speaking Households with Limited English (2019)



East Palo Alto City Limits
Households Speaking Other Indo-European Languages with Limited English

- Less than 0.7%
- 0.7% - 2%
- 2.0% - 4.0%
- 4.0% - 9.0%
- 9.0% - 50%

Source: ACS Table S1602, 2015-2019 5-Year Estimate.

Two East Palo Alto census block groups have between 0.7% and 2% of households speaking Other Indo-European languages with limited English.

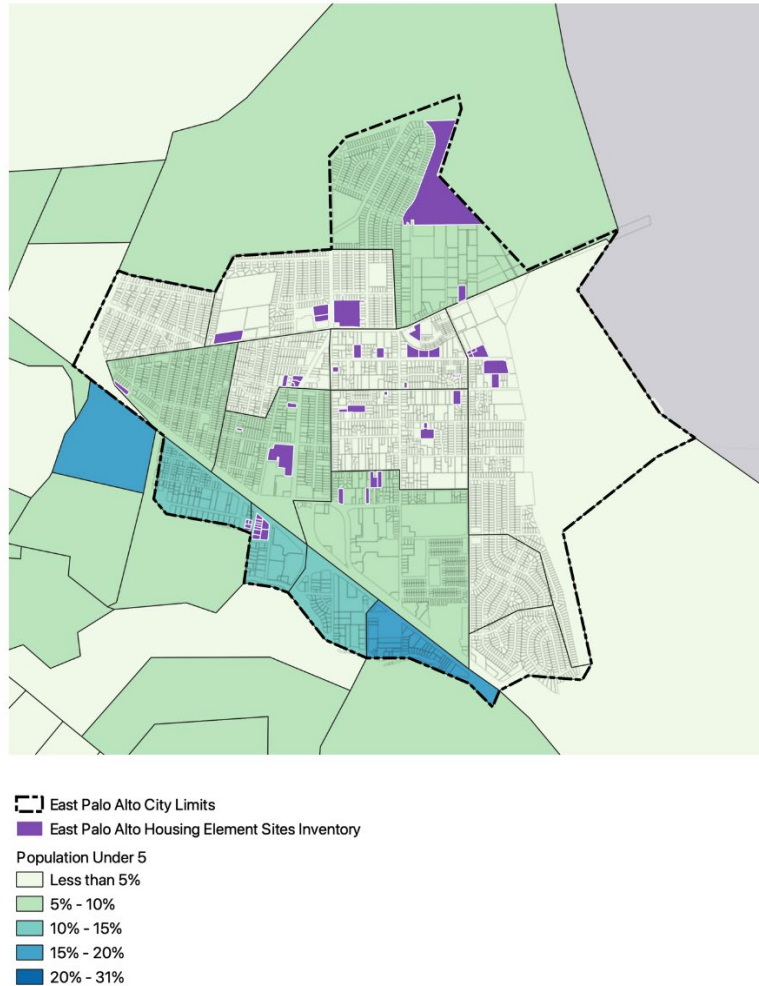
2.4 AGE

East Palo Alto is a relatively “young” City, especially in comparison to surrounding cities, with 28.3% of the population under age 18 and 49% of the population under age 40. This includes many families with children, illustrating the need for more affordable housing opportunities for both families and for adult children who are still living at home or are returning home.

The following maps show the distribution in East Palo Alto by age groups and households with children:

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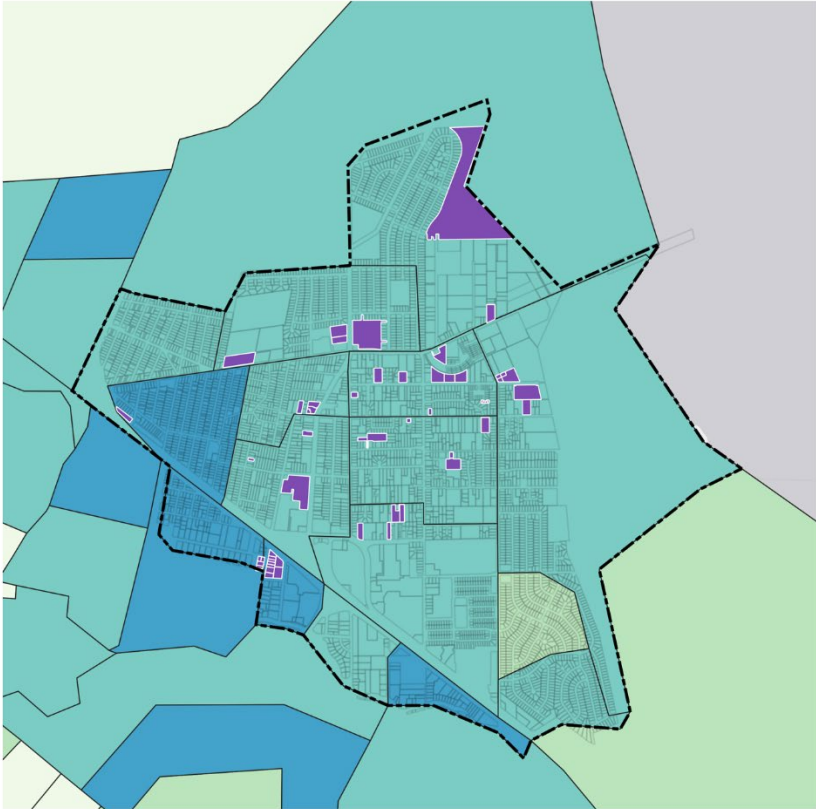
Population Under 5 (2019)



Source: ACS Table B01001, 2015-2019 5-Year Estimate.

The block groups in the Westside, west of Highway 101 have the highest percentage of young children. Between 10% and 20% of the people living in the Westside are below the age of five. There may also be correlation between number of young children in the Westside with low median household income and overcrowding.

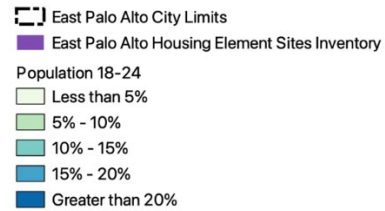
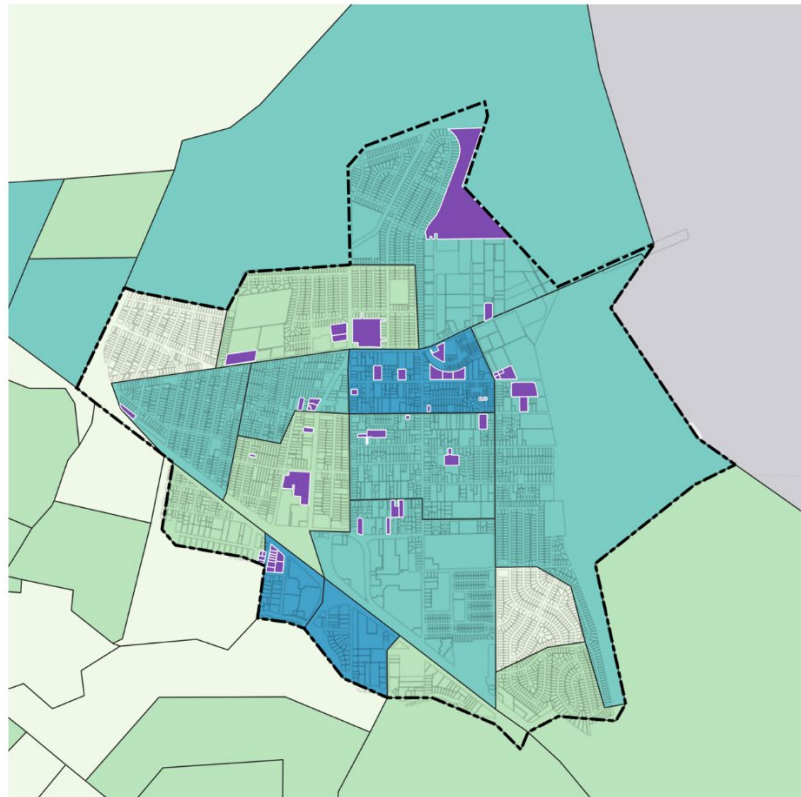
Population Under 18 (2019)



East Palo Alto City Limits
East Palo Alto Housing Element Sites Inventory
Population Under 18
Less than 15%
15% - 20%
20% - 30%
30% - 40%
40% - 60%

Source: ACS Table B01001, 2015-2019 5-Year Estimate.
A concentration of children under the age of 18 live on the Westside (west of Highway 101), in multi-family housing

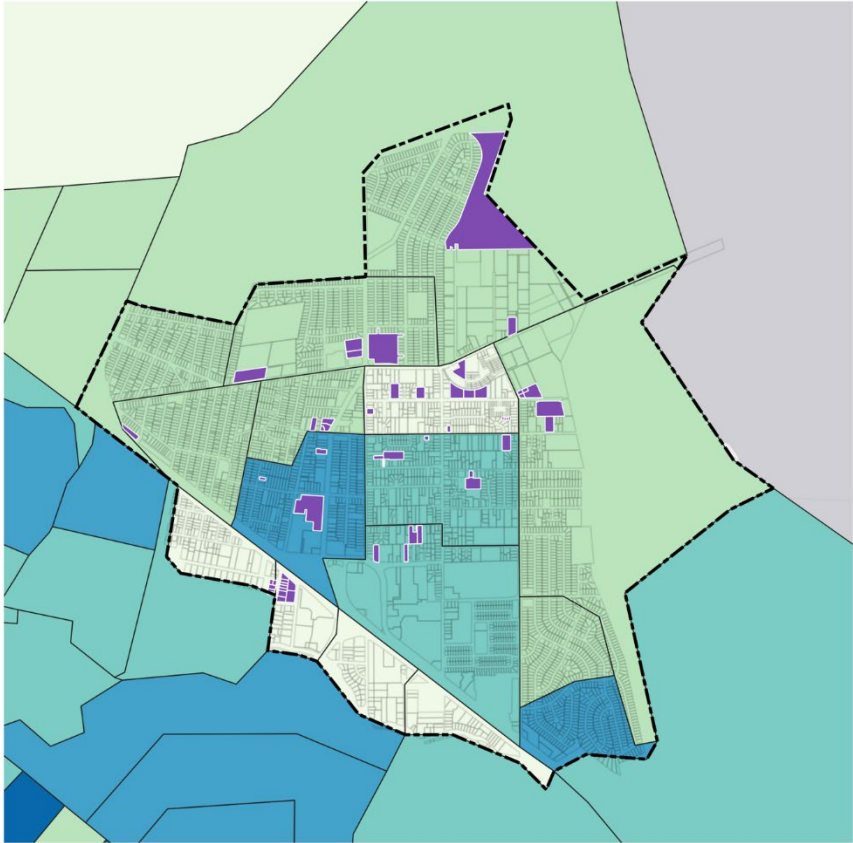
Population Age 18-24 (2019)










Source: ACS Table B01001, 2015-2019 5-Year Estimate.

The East Palo Alto population is young in comparison to surrounding cities, with 49% of the City’s population under the age of 30.

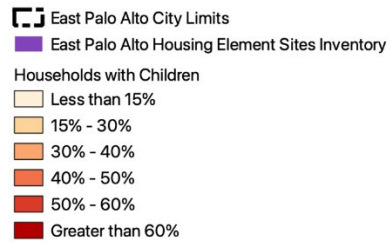
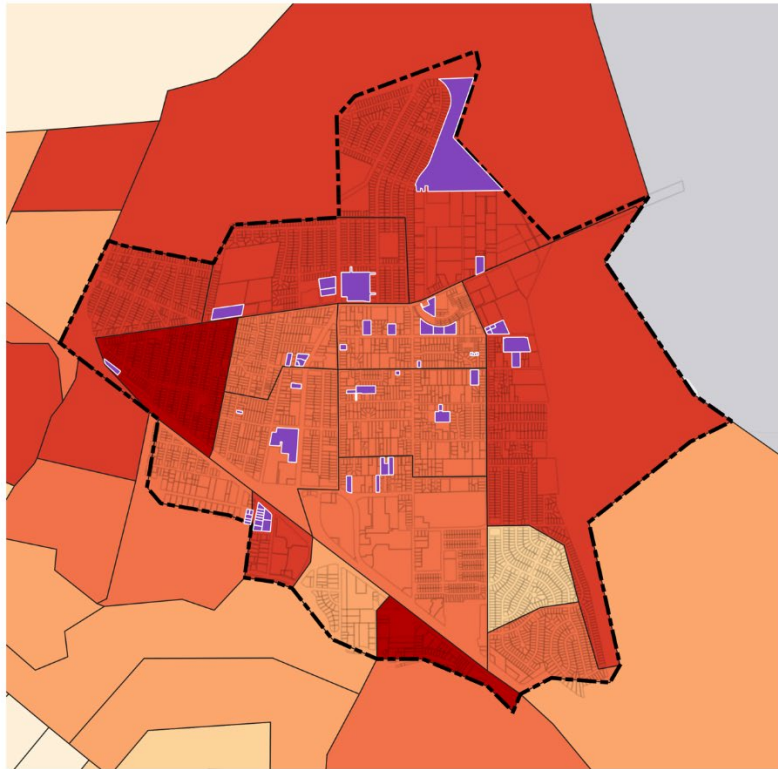
Population Age 65 and Up (2019)



 East Palo Alto City Limits
 East Palo Alto Housing Element Sites Inventory
Population 65+
 Less than 5%
 5% - 10%
 10% - 15%
 15% - 20%
 20% - 50%

Source: ACS Table B01001, 2015-2019 5-Year Estimate
The majority of residents over the age of 65 live in single family home neighborhoods on the eastside (East of Highway 101).

Households with Children (2019)



Source: ACS Table B1005, 2015-2019 5-Year Estimate.

East Palo Alto has a higher share of children compared to the region. A high concentration of households with children resides in multi-family housing on the Westside (west of Highway 101) and in a single-family home neighborhood on the eastside.

2.5 INCOME

East Palo Alto has a higher percentage of lower income households than the rest of the county and region, with 72% of households earning less than 80% of the Area Median Income (AMI) compared to 40% of households in San Mateo County and 39% of households in the Bay Area as a whole.

25.5% of households in East Palo Alto make less than 30% of AMI, which is considered extremely low-income (“ELI”), compared to 14% countywide. Only 17.4% make more than 100% of the AMI, compared to 49% countywide. These percentages align with tenure: the largest proportion of renters is ELI, while the largest proportion of homeowners earns more than 100% AMI.

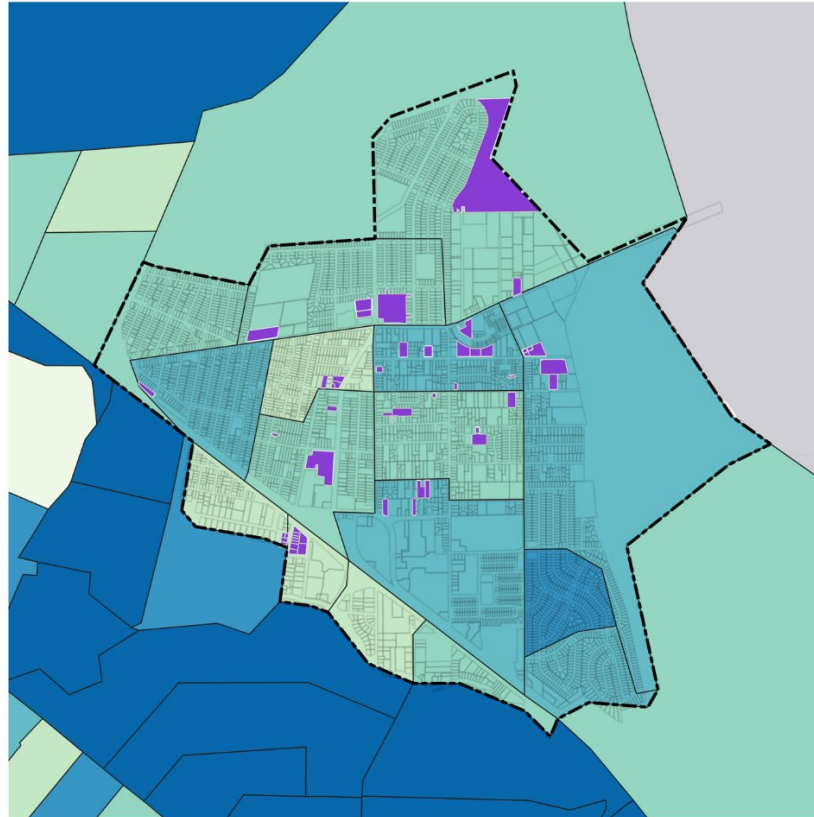
The groups with the highest poverty rates in East Palo Alto are American Indian/Alaska Native residents (22% poverty rate), multi-racial residents (14% poverty rate), Latinx residents (14% poverty rate) and Asian/Pacific Islander residents (14% poverty rate). Non-Hispanic White residents have the lowest poverty rate (7.5%).²

This is directly tied to the risk of housing insecurity and displacement and its disproportionate impact on households of color, discussed below and at length in the Affirmatively Furthering Fair Housing section of the Housing Element.

The following map shows Median Income in East Palo Alto, based on 2019 Census data, against sites in the Housing Element Sites Inventory:

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Median Household Income (2019)



Source: ACS Table B19013, 2015-2019 5-Year Estimate.

Most Census Block Groups in the City's Westside, west of Highway 101, have a median household income less than \$54,800, which is considered Extremely Low for a household of four people in San Mateo County.

Some of the Block Groups in single family zoned areas have higher median income in comparison to other parts of East Palo Alto.

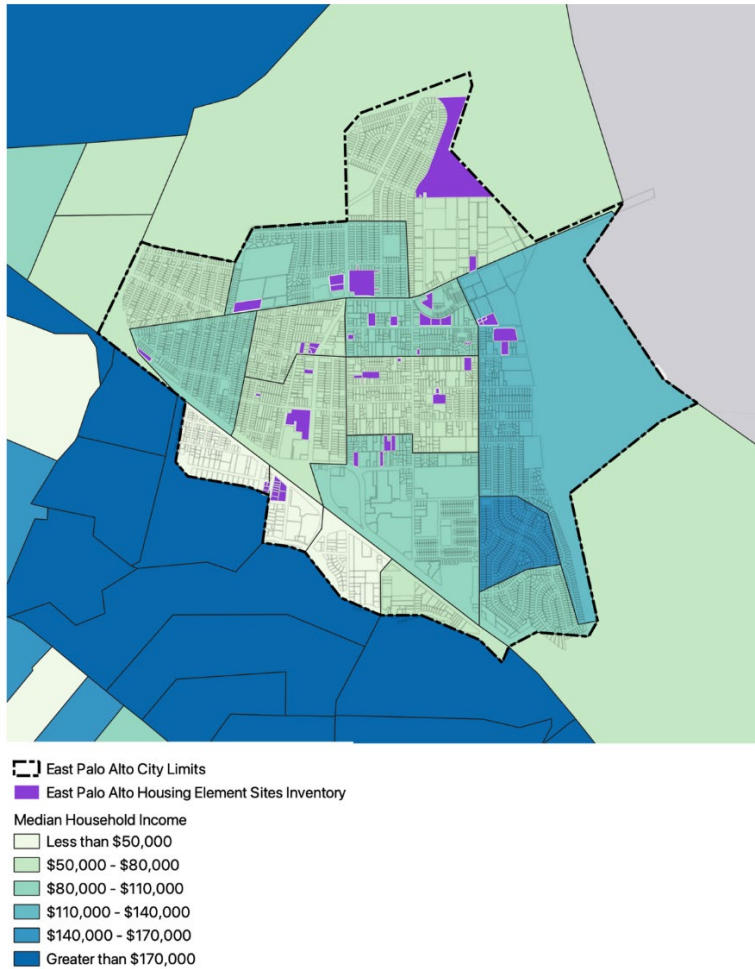
However, median incomes in these single-family zoned areas are not comparable to the \$179,500 or greater median household incomes of Block Groups in neighbor cities Palo Alto and Menlo Park.

This contrast in income across jurisdictions implies that East Palo Alto's housing affordability is affected by surrounding jurisdictions and regional economic forces. This should impact local and regional housing policies. The Ravenswood Business District (RBD) has a median household income of \$54,8000 -\$91,350, which is considered Very Low Income for a household for four people in San Mateo Count. Future development of the RBD should consider how to mitigate risk of gentrification and displacement of current residents.

The following Median Household Income (2019) map provides different ranges in incomes to identify differences between neighborhoods in the City.

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Median Household Income (2019)



Source: ACS Table B19013, 2015-2019 5-Year Estimate.

While this map shows variation in median household income across the different neighborhoods in East Palo Alto, all block groups except one have a median household income that is Low Income, Very Low Income, or Extremely Low Income for a household of four people in San Mateo County.

2.6 DISPLACEMENT RISK

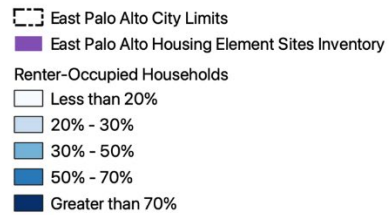
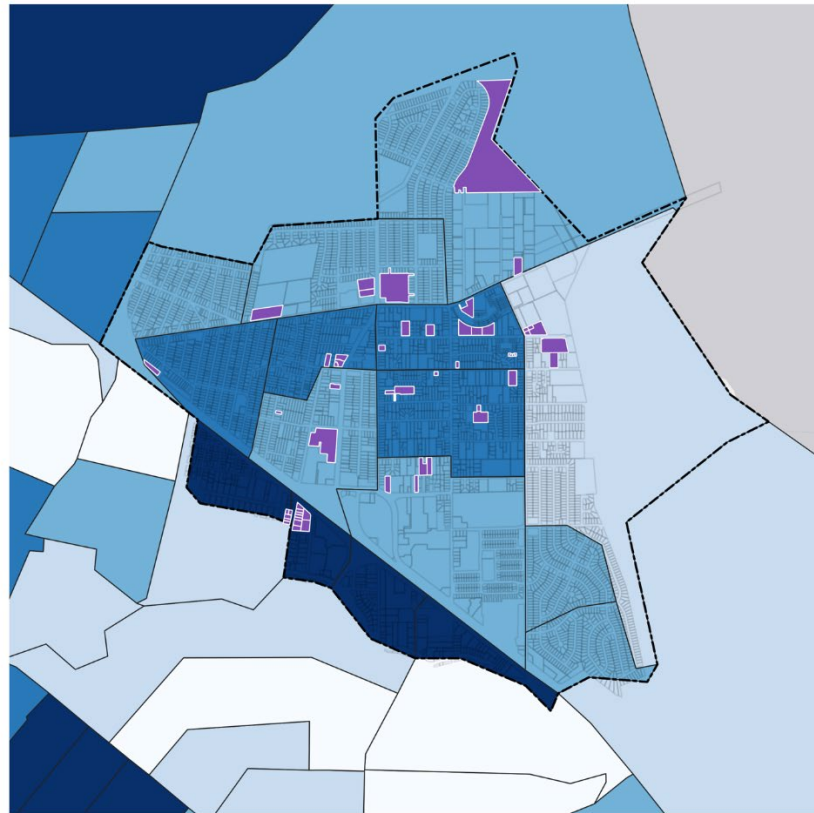
64.7% of households in East Palo Alto live in neighborhoods that are “susceptible to or experiencing displacement.” Additional data illustrate some of the factors contributing to displacement risk:

- The City’s housing stock consists of 54.1% single family detached, 4.1% single family attached, 3.4% small multiple-family (2-4 units), and 36.6% medium or large multiple-family (5+ units). The City has a higher proportion of single-family home renters relative to the rest of the County, and a higher proportion of renters overall– 60% in East Palo Alto versus 40% countywide. In addition, while single-family renters benefit from just cause eviction, they are not protected from high rent increases that is one of the major contributing factors to displacement, meaning that many renter households are without most rental/tenant protections.
- One quarter (25%) of households in East Palo Alto are severely cost-burdened, meaning they spend more than 50% of their income on housing costs, and 28.8% of households spend 30%-50% of their income on rent.
- 8.6% of very low-income households (below 50% AMI) experience severe overcrowding, defined as units with more than 1.5 persons per room.

The following maps show the areas of the City with the highest concentrations of renters, cost-burdened households and overcrowded households:

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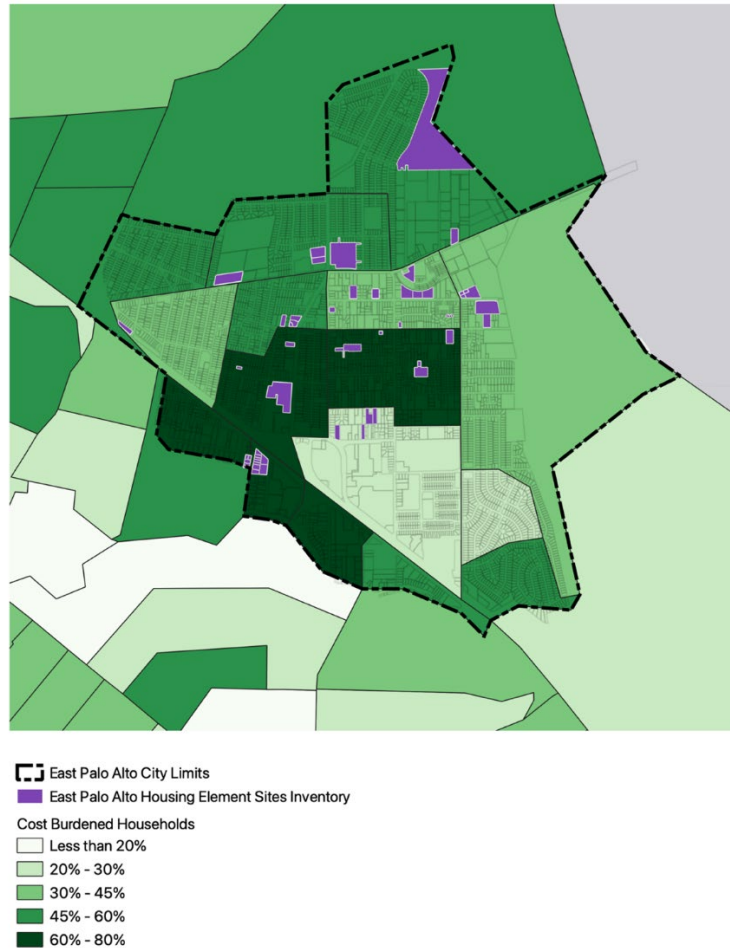
Renter-Occupied Households (2019)



Source: ACS Table B25003, 2015-2019 5-Year Estimate.

A majority of East Palo Alto's renters live on the Westside (west of Highway 101) and in single family neighborhoods throughout the City.

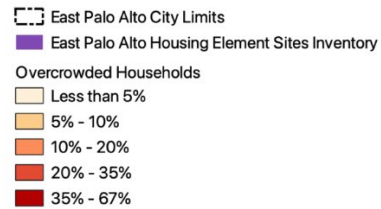
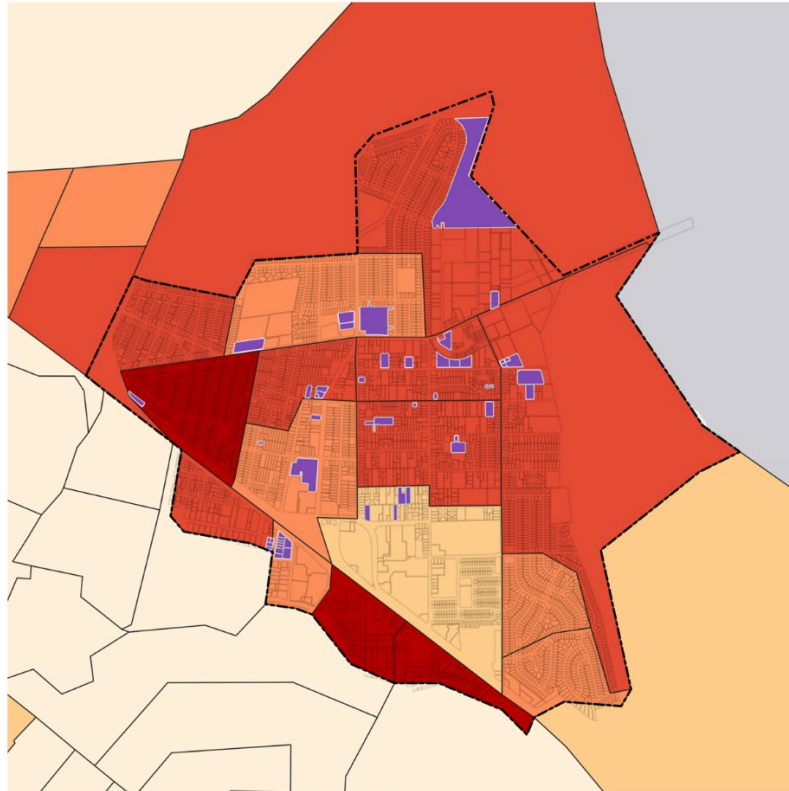
Cost Burdened Households (2019)



Source: ACS Table B25091, 2015-2019 5-Year Estimate.

Cost Burdened Households is defined as gross rent of 30% or more of household income for renter-occupied households or selected monthly owner costs of 30% or more of household income for owner occupied households. A majority of block groups in East Palo Alto are greater than 45% cost burdened, with many areas that are greater than 60% cost burdened. In contrast, neighboring areas in Menlo Park and Palo Alto have less cost burdened households. This can be a result of many factors including low incomes, low wages, and low amounts of jobs overall. Policies focused on rental assistance as well as on homeowners are needed

Overcrowded Households (2019)



Source: ACS Table B25014, 2015-2019 5-Year Estimate.

Overcrowded Households is defined as more than 1.00 occupants per room. Many East Palo Alto households experience overcrowding, especially in contrast to neighboring areas in Palo Alto and Menlo Park. More housing is needed to decrease overcrowding.

2.7 DRAMATIC SHIFTS IN HOUSING MARKET

The reported vacancy rate is 7.4% (for all housing unit types).

The estimated “typical home value” was \$936,680 in December 2020, compared to \$1,418,330 in San Mateo County. This represents an increase of 151% since 2001 – higher than in the rest of the County and the rest of the Bay Area. Similarly, since 2009, the median rent has increased by 65.7% in East Palo Alto, from \$1,210 to \$1,630 per month – a much higher increase than in San Mateo County or the Bay Area.

2.8 EMPLOYMENT, JOBS-TO-HOUSING RATIO, AND JOBS-HOUSING FIT

Generally, having a similar number of jobs and employed residents produces more benefits for a community, such as reducing traffic and climate impacts, and allowing people who work in the community to also live there. San Mateo County is jobs-rich, meaning it has more jobs than employed residents. In contrast, East Palo Alto has a very low jobs-to-housing ratio. There are 15,101 employed residents and 5,225 jobs in East Palo Alto, resulting in a jobs-to-resident-workers ratio of 0.35. Between 2002 and 2018, the number of jobs in East Palo Alto increased by 47%. However, this increase does not show the types of jobs that were added (i.e., with higher or lower wages, and in what sectors) or the absolute number that were added, indicating that jobs-housing fit and the jobs-to-housing ratio remain a challenge to residents accessing high-cost housing in East Palo Alto.

2.9 UNEMPLOYMENT

Jurisdictions throughout the region experienced a sharp rise in unemployment in 2020 due to impacts related to the COVID-19 pandemic, though with a general improvement and recovery in the later months of 2020. As of January 2021, East Palo Alto’s unemployment rate was 8.6%, which was slightly higher than the regional unemployment rate of 6.6% but much lower than its pandemic-related high rate of 13.1% in April 2020. East Palo Alto’s pre-pandemic unemployment rate was 2.9% (January 2020).³ Based on reporting from City partners who assist East Palo Alto residents with applying for state emergency COVID-19 relief funds, the impact of COVID-19-related unemployment continues to affect households’ ability to cover both current and past accumulated housing costs.

2.10 “HIGH” VERSUS “LOW”-RESOURCE NEIGHBORHOODS

Some neighborhoods are identified as “Highest Resource” or “High Resource” by the State of California based on a range of indicators such as access to quality schools, proximity to jobs and economic opportunities, low pollution levels, and other factors. However, neighborhoods don’t always receive an equitable share of these community resources and may be designated as “Low Resource” if they lack these amenities. All East Palo

Alto residents live in neighborhoods identified as “Low Resource”, meaning there are no “High Resource” neighborhoods in East Palo Alto. This lack of high-resource neighborhoods and its implications are further discussed in the Affirmatively Furthering Fair Housing section.

2.11 SPECIAL NEEDS POPULATIONS

Individuals with disabilities: Some population groups may have special housing needs such as mobility and accessibility barriers. 6.4% of residents in East Palo Alto have a disability, and the most common living arrangement for individuals with disabilities in East Palo Alto is the home of parent /family /guardian.

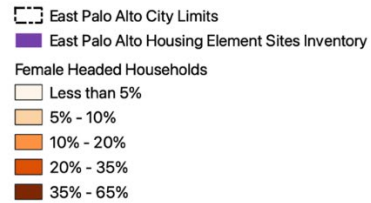
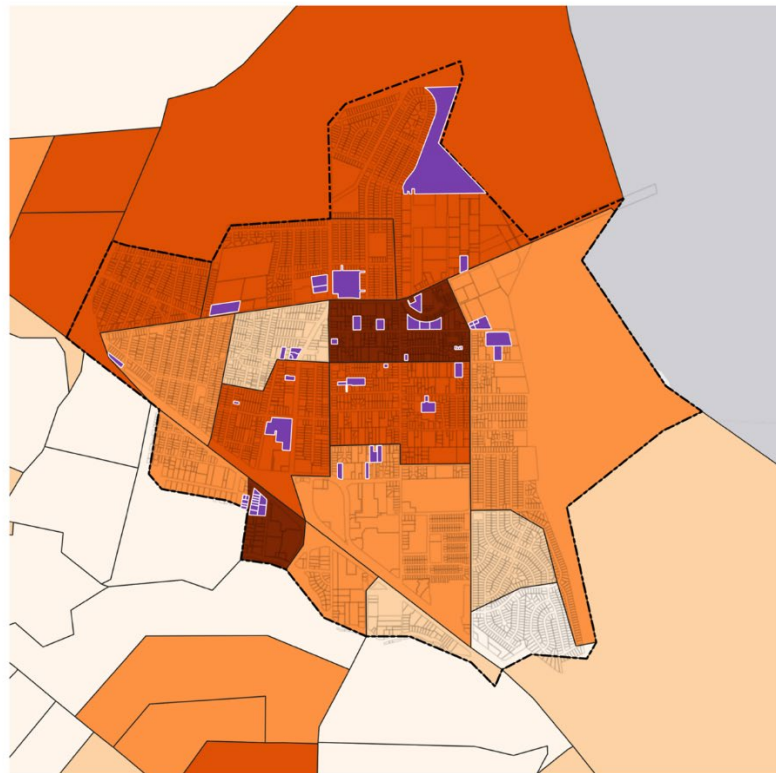
Individuals with development disabilities: East Palo Alto is home to 313 people with developmental disabilities. This represents an 82% increase from the 172 people with developmental disabilities reported in the 2015-2023 Housing Element, much faster than the 6% increase in the County’s total population of people with developmental disabilities over the same time period.⁵ 86% of adults continuing to live in the family home, a larger share than the County, likely due to the lack of any licensed care facility in the East Palo Alto. Individuals with developmental disabilities who do not live in a licensed care facility or who cannot live with family need affordable housing options with supportive services. The current lack of affordable housing with services, combined with the need for transit access and access to amenities, has led to a growing population of individuals with developmental disabilities in East Palo Alto that is at higher risk of displacement than other groups.

Female-headed households: Approximately 21% of households are female-headed families, which are often at greater risk of housing insecurity, or being at risk of losing their home.

The following map shows the distribution of female-headed households in the City:

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Female Headed Households (2019)



Source: ACS Table B11001, 2015-2019 5-Year Estimate.

Note that female-headed households include family households with a female householder and no spouse present. A higher concentration of female-headed household resides in multi-family housing zones on the Westside (west of Highway 101) and on the eastside (east of Highway 101). A smaller portion reside in single family neighborhoods.

Individuals experiencing homelessness:

The population of homeless individuals in the City of East Palo Alto also experiences major barriers to both temporary and permanent housing. This population includes a high number of school-age children: the number of students in East Palo Alto experiencing homelessness in 2019-20 (514) represented 43.9% of the San Mateo County total.

Larger households:

27.5% of East Palo Alto households are larger households with five or more people.

2.12 AFFORDABLE HOUSING UNITS AT-RISK OF CONVERSION TO MARKET RATE

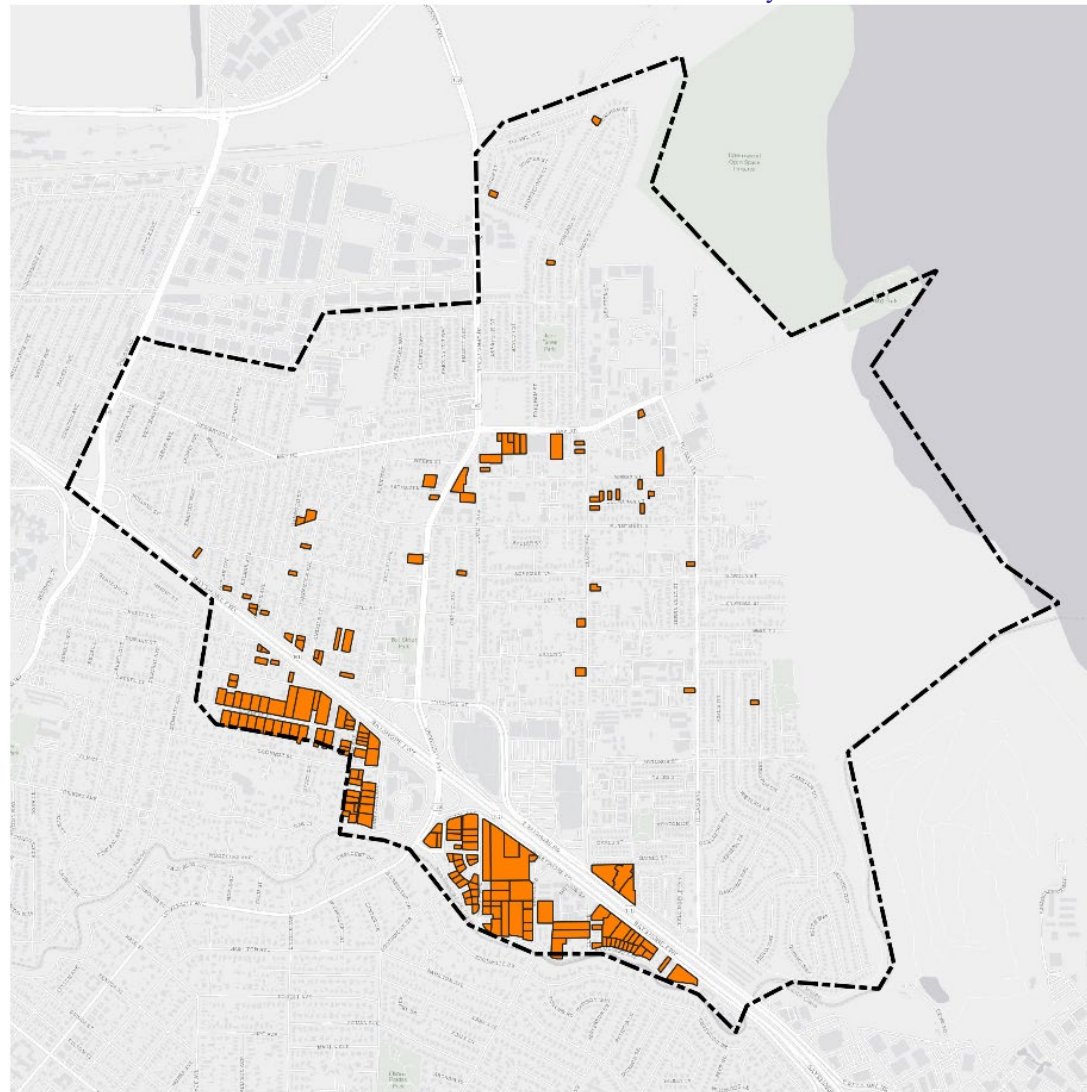
Jurisdictions are required to report in their Housing Element on any affordable units at-risk of conversion to market-rate over the eight-year Housing Element period (Government Code section 65583, subdivision (a)(9)). Conversion to market-rate can result from a) expiration of funding-related affordability restrictions, b) turnover of rent-stabilized units, or c) foreclosure of BMR units.

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Existing Affordable Housing

As shown in Table 2.12 below, the City of East Palo Alto currently has over 10 deed-restricted affordable housing developments, 53 below market-rate (BMR) ownership units, and 2,500 rent-stabilized units (see map of rent stabilized inventory). Most affordable rental housing developments received some form of City assistance and are subject to affordability restrictions imposed by the City and other funding entities. The City's ownership BMR units are the result of the former Redevelopment Agency's assistance or market-rate developer obligations to create affordable units under an Inclusionary Housing or other program. Units in the rent-stabilized portfolio are subject to the 2010 Rent Stabilization and Just Cause for Eviction Ordinance.

East Palo Alto Rent Stabilized Units Inventory





-  East Palo Alto City Limits
-  East Palo Alto Rent Stabilized Housing, 2020

Table 2.12.1: Existing Housing Units in East Palo Alto

Project Name	Address	Owner	Tenure	Type	Risk Level	Affordability End Year	Government Assistance	Affordable	RSO	Market Rate	Total	
Courtyard at Bay Rd.	1730 Bay Rd	N/A	Rental	Deed-restricted	Low	2060	LIHTC	76			76	
Nugent Square	2361 University Ave	Eden Housing	Rental	Deed-restricted	Low	2059	LIHTC	32			32	
Serenity Senior	2358 University Ave	MidPen Housing	Rental	Deed-restricted	Low	2069	LIHTC	40		1	41	
Light Tree	1805 E Bayshore Rd	Eden Housing	Rental	Deed-restricted	Low	2074	LIHTC, HUD, HCD	182		3	185	
Peninsula Park*	1977 Tate Street	BRIDGE Housing	Rental	Deed-restricted	Low	2053	LIHTC	65		64	129	
Bay Oaks	2400 Gloria Way	MidPen Housing	Rental	Deed-restricted	Low	2075	LIHTC	37		1	38	
Clarke Ave.	2397 Clarke Ave.	EPA CAN DO	Rental	Deed-restricted	Low		-	15			15	
Woodlands Newell	1761 Woodland Ave	MidPen Housing	Rental	Deed-restricted	Low	2068	LIHTC	47		2	49	
Runnymede Gardens	2301 Cooley Ave	MidPen Housing	Rental	Deed-restricted	Low	2055	LIHTC; HUD; CalHFA	77		1	78	
BMR Units	-	-	For-Sale	Deed-restricted	Low	-	-	53			53	
Woodland Park RSO	-	Sandhill Property Co.	Rental	Rent Stabilized	N/A	Upon Vacancy	-		1,838		1,838	
All Other RSO	-	-	Rental	Rent Stabilized	N/A	Upon Vacancy	-		709		709	
All Other Housing Units	-	-	Rental & For-Sale	Market Rate	N/A	N/A	-			4,740	4,740	
								Units	624	2547	4812	7983
								Percentage	8%	32%	60%	100%

*NOTE: Peninsula Park – many units marked “market-rate” are currently rented by Section 8 households.

At-Risk Affordable Housing Analysis

According to the California Housing Partnership Corporation and the City of East Palo Alto, there are no affordable rental units with affordability contracts expiring.

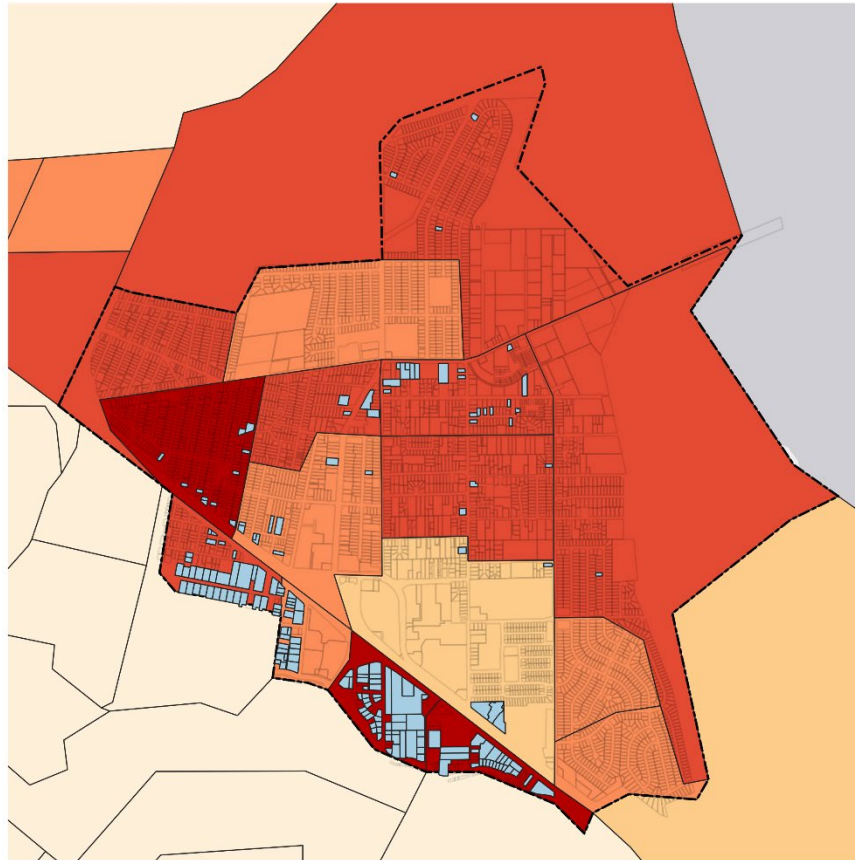
BMR ownership units are an important source of Moderate-Income housing, or housing affordable to households at 81-120% of the Area Median Income. These units may be at risk of being “lost” from the BMR program due to noncompliance, foreclosure, or other means. Prior to the release of a Request for Proposals (RFP) to identify a qualified organization to administer the City’s BMR Program in 2018, due to low staffing levels, units in the BMR Program were not under consistent monitoring, and actions such as refinances, loan subordinations, re-sales were difficult and inefficient for the City to facilitate.








Of the 74 BMR files that EPACANDO verified to be within the City’s BMR portfolio, 4 were lost to foreclosure, 3 were sold in violation of the resale restriction agreement, and 14 reverted to market-rate as a result of the expiration of a five-year affordability term. With a BMR contractor in place conducting annual monitoring, overseeing transactions, and maintaining regular contact with BMR homeowners, these 53 units are at very low risk of “exiting” the program.

Rent-stabilized units revert to market-rate when the occupant vacates, with rental increases limited to the Annual General Adjustment adopted by the City’s Rent Board each year thereafter. Referred to as “vacancy decontrol,” the reversion to market-rate occurs more frequently with higher turnover, making many units in the rent-stabilized portfolio unattainable for lower-income households. Each year, approximately 300-400 rent stabilized units (12-16%) become vacant and return to market-rate. Due to this turnover, the City often cannot count all rent stabilized units as affordable rental units.

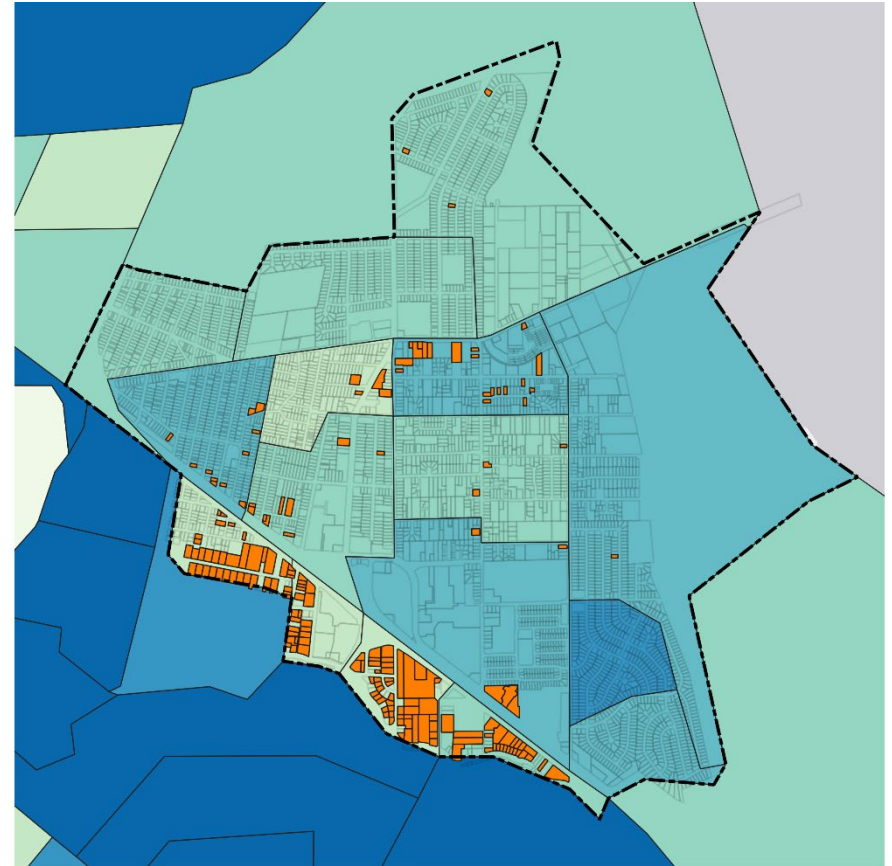
The following maps overlay rent stabilized units over median household incomes and overcrowded households, two factors that may contribute to turnover.









Rent Stabilized Units Inventory and Overcrowded Households



-  East Palo Alto City Limits
-  East Palo Alto Rent Stabilized Housing, 2020
- Overcrowded Households
-  Less than 5%
-  5% - 10%
-  10% - 20%
-  20% - 35%
-  35% - 67%

Rent Stabilized Units Inventory Median Household Incomes



-  East Palo Alto City Limits
-  East Palo Alto Rent Stabilized Housing, 2020
- Median Household Income
-  Data Unavailable
-  Less than \$54,800
-  \$54,800 - \$91,350
-  \$91,350 - \$146,350
-  \$146,350 - \$179,500
-  Greater than \$179,500

Deed-restricted units in East Palo Alto have a low risk level of conversion to market-rate. Table 2.12.2 lists the deed-restricted affordable housing developments in the City and their risk level of conversion to market rate.

Table 2.12.2: Deed-Restricted Units by Risk Level

Name	Address	Affordable Units	Total Units	Funding Program	Estimated Affordability End Year	Risk Level
Light Tree Three	1805 East Bayshore Road	56	57	LIHTC; HUD; CalHFA	2074	Low
Runnymede Gardens	2301 Cooley Avenue	77	78	LIHTC; HUD; CalHFA	2055	Low
Peninsula Park Apartments	1977 Tate Street	65	129	LIHTC	2053	Low
Nugent Square	2361 University Avenue	31	32	LIHTC	2059	Low
Light Tree Two	1805 East Bayshore Road	126	128	LIHTC; HUD; HCD	2074	Low
Gloria Way Community Housing	2400 Gloria Way	37	38	LIHTC	2050	Low
Woodlands Newell (Site A)	1761 Woodland Ave.	47	49	LIHTC	2068	Low
University Avenue Senior Housing	2358 University Avenue	40	41	LIHTC	2069	Low
The Courtyard at Bay Road	1730 Bay Road	76	77	LIHTC	2060	Low
Wisteria House	211 Wisteria Avenue	4	4	HCD	2041	Low

Source: California Housing Partnership's Preservation Database, 21 Elements.

Entities Qualified to Preserve At-Risk Units

There are several organizations in the region that have the capacity to own and manage affordable rental projects. These organizations include affordable housing developers such as Eden Housing, MidPen Housing, BRIDGE Housing, Mercy Housing, and others. The City can also directly purchase at-risk units, although the management, processing, and maintenance of these units can pose a funding challenge.

Since 2020, the City has researched various preservation models as part of the San Francisco Foundation's Partnership for the Bay's Future Policy Grants (the City started with the 2020-2022 Challenge Grant and continues to do so with the 2022-2024 Breakthrough Grant). Other East Palo Alto community-based entities such as East Palo Alto Community Alliance & Neighborhood Development Organization (EPACANDO) and Preserving Affordable Housing Long-Term, Inc. (PAHALI) community land trust have expressed interest in acquiring and preserving at-risk properties, to create community empowerment and maintain community control. The City currently has a contract with EPACANDO and PAHALI to preserve affordable spaces at the Palo Mobile Estates mobile home park by supporting residents in purchasing their lots. The park underwent conversion to a resident-owned park in 2021.

Preservation Costs

According to Enterprise Community Partners, Inc. (Enterprise), acquisition-rehab can be a direct anti-displacement strategy that advances racial and economic equity, a fast and cost-effective strategy, a flexible strategy that expands housing choices, and a long-term, environmentally sustainable strategy.

There are different types of affordable housing models for acquisition-rehab projects, including: affordable rental (deed-restricted) housing models where the nonprofit acquires and retains ownership of the land and property, and the rental units are held affordable; Limited Equity Housing Cooperatives (LEHC) models, where the residents form an entity that acquires the property and residents purchase and own shares in the LEHC at an affordable price, entitling them to reside in their unit and build some equity; and Community Land Trust (CLT) models, whereby the CLT acquires the land and property, but the property may be sold and owned by the residents at an affordable price, or retained and operated as a rental.

Between 2015-2019, the per-unit cost of completed acquisition-rehab projects in San Mateo County averaged \$433,203 total per unit (75% of which was the purchase price, and the rest included rehab costs, financing costs, soft costs, developer fees, among other costs). Of that total, the per-unit subsidy averaged nearly \$224,000.

Table 2 compares new affordable housing production per-unit cost and preservation per-unit cost to illustrate the magnitude of funding needed in production projects compared to preservation projects.⁶

Table 2: San Mateo County Acquisition-Rehab and New Construction Per-Unit Cost Comparison (Enterprise 2020 Report)					
New Affordable Housing Production Per-Unit Cost				Occupied Acquisition-Rehab Per-Unit Cost (Study Sample)	
2016	2017	2018	2016-2018 Average	Average	Compared to New Production
\$479,262	\$665,831	\$729,458	\$627,681	\$433,203	69%

Potential Funding Sources to Preserve Affordable Housing

Financing for housing preservation will come from a combination of private and public funding, including local, regional and state subsidies, loans from banks and lending institutions like credit unions and Community Development Finance Institutions (CDFIs), and the private capital of tenants (if applicable).

City Funding Sources

In November 2020, City Council placed Measure V on the ballot to help fund affordable housing development, acquisition and rehabilitation. Measure V was projected to provide approximately \$390,000 per year, with an additional amount upon recovery from the COVID-19 pandemic. While it was unsuccessful in passing by a two percent margin, City Council can decide to put forth another ballot measure in the future to help fund these specific activities. City Council may also choose to use existing General Funds for affordable housing preservation efforts.

Regional Funding Sources

Regional funding sources include the Metropolitan Transportation Commission (MTC)'s Bay Area Preservation Pilot (BAPP), a \$49 million program launched in 2018 to provide flexible, relatively low-cost loans for up to 10 years to mission-driven developers and community-based organizations seeking to acquire, and preserve existing, unsubsidized affordable multi-family properties located in areas with high-frequency transit service. The Bay Area Transit-Oriented Affordable Housing Fund (TOAH), a \$50 million public-private financing resource providing seven-year loan products at favorable interest rates and loan to value ratios (LTV), is aimed at supporting nonprofit and for-profit developers to help finance the purchase or improvement of properties near transit.² TOAH is sponsored by a collaborative public-private partnership with the MTC and the Great Communities Collaborative.

State Funding Sources

² <https://mtc.ca.gov/funding/investment-strategies-commitments/housing-solutions/transit-oriented-affordable-housing-fund-toah>

The state allocated \$300 million for the preservation of existing affordable homes in the 2021-2022 California budget, creating a new Affordable Housing Preservation Program at the Department of Housing and Community Development (HCD).³ With the expansion of HCD programs and increasing awareness about the importance of housing preservation, the state is anticipated to allocate more funds towards housing preservation.

Funding Initiatives and Lending Institutions

Other potential funding sources include, but are not limited to:

- The Housing for Health Fund (HFHF), a collaboration among Enterprise Community Partners, Kaiser Permanente, and JP Morgan Chase, provides \$85 million to promote health and the preservation of affordable housing.⁴
- Enterprise's Equitable Path Forward Fund is a five-year, \$3.5 billion nationwide initiative to counter racial inequities rooted in housing, and focuses on supporting Black, Indigenous, and People of Color and housing providers who create and preserve affordable homes.⁵
- The Partnership for the Bay's Future Bay's Future Fund (BFF) and Community Housing Fund (CHF), a \$500 million initiative to bridge funding gaps throughout the region's rental housing market and address critical housing needs. The funds are managed by LISC and originated by the San Francisco Foundation, Bay Area LISC, the Corporation for Supportive Housing (CSH), Capital Impact Partners, and other public-private partners.⁶

CDFIs as well as credit unions, cooperative banks, and other banks are willing to work with resale-restricted properties, LEHCs and CLTs under the Ordinance.⁷

³ <https://calhsng.org/2021-2022-california-budget-update/>

⁴ https://www.enterprisecommunity.org/news-releases/2020-03_housing-health-fund-makes-48-million-oakland-investment

⁵ <https://www.enterprisecommunity.org/impact-areas/racial-equity/equitable-path-forward>

⁶ <https://www.lisc.org/bay-area/what-we-do/affordable-housing/partnership-bays-future/>

⁷ https://www.lisc.org/media/filer_public/f0/e0/f0e07be0-1ca5-4720-b78c-3a0d7a0181dd/022519_white_paper_community_land_trusts.pdf; <https://groundedsolutions.org/tools-for-success/resource-library/mortgage-financing-options>.

2.13 EAST PALO ALTO HOUSING NEEDS DATA PACKET

The Housing Needs Data Packet (Appendix B1) provided by ABAG/MTC and 21 Elements outlines more extensively the City's housing needs.

2.14 SAN MATEO COUNTY HOUSING NEEDS

Appendix B2 summarizes of housing needs in San Mateo County as a whole.

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3 HOUSING CONSTRAINTS

To facilitate the development, maintenance, and improvement of housing (especially affordable housing), the Housing Element must assess the potential constraints imposed by both City regulations and policies (i.e., “governmental constraints”), and by factors outside of City influence, such as market conditions (i.e., “non-governmental constraints”). This assessment must address housing for all income levels, including housing for persons with disabilities.

Therefore, this Element analyzes the potential impacts of governmental regulations and policies on housing, including land use controls, fees and exactions, building codes, processing and permit procedures, codes and enforcement, and on/off-site improvement standards. Likewise, it also assesses nongovernmental or potential market impacts, including land costs, construction costs, and the availability of financing. The findings of the analysis are outlined below. For any constraints to housing found within this section (via regulatory and/or market conditions), a program has been included in the Policies and Programs to address and mitigate the constraint



3.1 GOVERNMENTAL CONSTRAINTS

Governmental policies and regulations can result in both positive and negative effects on the availability and affordability of housing. While government policies and regulations are intended to meet legitimate public purposes and further the public good, it is possible that they indirectly constrain the availability and affordability of housing to meet the community’s future needs.

This section describes City policies and regulations that could potentially constrain the City’s ability to achieve its housing objectives. Each Housing Element must contain an “analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures” (Government Code Section 65583(a)).

This section addresses every aspect of the residential development process: the regulations currently in place, the responsible City Departments and Divisions, and the role of the City Council and Planning Commission, developers, and the general public. This is followed by analysis of the potential of any of these to constrain residential development, and how this may be mitigated.

The governmental constraints analysis focuses on factors the City can control and does not include State, federal, or other governmental policies or regulations that East Palo Alto cannot affect or modify. These City policies and regulations typically affect the City’s ability to meet future housing needs and secure adequate funding for the construction of affordable housing

General Plan Residential Uses and Zoning Controls in East Palo Alto

The City adopted Vista 2035, its General Plan, in October 2016, following the adoption of the RHNA 5 Housing Element. As described in the Land Use Element, residential uses are now permitted within eight General Plan designations. Each of these is described in Table 1 below alongside the zoning area that corresponds to it.

In addition to the below General Plan land uses, the Ravenswood/4 Corners Specific Plan, which was adopted in 2013 and established City’s only Priority Development Area,⁸ permits residential in three zoning areas: 4 Corners, Bay Road Central, and Urban Residential.

Table 3.1: General Plan Land Use Designations and Related Zoning			
General Plan Land Use Designation	Density (du/acre)	Related Zoning	Density (du/acre)
Low Density Residential	12	R-LD	0-12
Medium Density Residential	12.1-22	R-MD 1/RM-D 2	12 to 15/12-22
High Density Residential	22.1-43	R-HD 3/R-HD 5	22-43
Urban Residential	43.1-86	R-UHD	43-86
Mixed Use Corridor	up to 65	MUC 1/MUC 2	22-65
Mixed Use Low	up to 22	MUL	0-22
Mixed Use High	up to 86	MUH	43-86
Neighborhood Commercial	up to 22	CN	0-22
Ravenswood/4 Corners Specific Plan Zoning			
Ravenswood/4 Corners Specific Plan	Density (du/acre)	Related Zoning	Density (du/acre)
4 Corners	up to 60	n/a	n/a
Bay Road Central	up to 50	n/a	n/a
Urban Residential	up to 40	n/a	n/a

The above zoning designations are found in Chapter 18 of the East Palo Alto Municipal Code (Development Code). The Development Code describes in detail the development standards for each zone, including minimum and maximum density, parcel area and width, lot coverage, floor area ratio (“FAR”), height, open space,

⁸ A Priority Development Area is an ABAG/MTC-designated area near public transit planned for new homes, jobs and community amenities. Ravenswood/4 Corners Specific Plan Area is a Connected Community PDA, meaning that it offers basic transit services, and the City has committed to policies that increase mobility options and reduce automobile travel.

setbacks, and parking. The zoning standards for residential and mixed-use zones are summarized in Table 3.2 below.

Table 3.2: Zoning Standards for Residential Zones								
Zoning	Min/Max Dwelling Unit/Acre	Min Parcel Area	Lot Coverage	Height (feet)	Open Space (square feet)*	Floor Area Ratio (FAR)	Setback (ft)	Parking (spaces)
R-LD	0 to 12	5,000s.f. 50f wide	.5	26	750	.55	front 10 rear 10 side 5	1
R-MD 1	12 to 15	5,000s.f. 50f wide	.6	30	250 common 1-200 private	.65	front 20 rear 20 side 10	1
R-MD 2	12 to 22	5,000s.f. 50f wide	.6	36	250 common 1-200 private	.65	front 20 rear 20 side 10	1
R-HD 3	22 to 43	12,000s.f. 50f wide	.7	36	100 common 50-100 private	.7	front 15 rear 20 side 10	1
R-HD 5	22 to 43	12,000s.f. 50f wide	.7	60	100 Common 50-100 private	.7	front 15 rear 20 side 10	1
MUL	0 to 22	12,000.s.f 100f wide	1	36		1	front 0 rear 5 side 5	1
MUC 1	22 to 65	12,000.s.f 100f wide	1	60		1.25	front 0 rear 5 side 5	1
MUC 2	22 to 65	12,000.s.f 100f wide	1	60		1.25	front 0 rear 5 side 5	1
MUH	43 to 86	12,000.s.f 100f wide	1	8 stories or 100', whichever is greater		2.5	front 0 rear 5 side 5	1
R-UHD	43 to 86	12,000s.f. 50f wide	.7	7 stories or 75',	50 common 50 private	None	front 20 rear 20 side 10	1

				whichever is greater				
UR	0 to 40	n/a	1	60	n/a	1	front 5 rear 20 side 5	1 for 1br .5 for additional
BRC	0 to 50	n/a	1	5 stories above grade	n/a	2.0 for non- residential area	front 6 rear 30 side 10	1 for 1br .5 for additional
4 Corners	0 to 60	n/a	1	6 stories above grade	n/a	1.5	front 6 rear 30 side 10	1 for 1br .5 for additional

* Per dwelling unit

Type of Residential Development Permitted in Each Zone – Zoning for a Variety of Housing Types

Table 3.3 below shows which residential or mixed-use zones allow for different types of residential development.

Table 3.3: Types of Residential Development Permitted in the City’s Residential and Mixed-Use Zones										
Type	Single Family*	Duplex	Triplex	Quad-plex	Multi (5+)	Mobile Home	SRO	Assist. Living*	Supportive Housing	Transitional Housing
R-LD	Yes	No	No	No	No	No	Yes	Yes	Yes	Yes
R-MD	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes
R-UHD	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes
MUC	No	Yes	Yes	Yes	Yes	No	No	Yes	Yes	Yes
MUL	No	Yes	Yes	Yes	Yes	No	No	Yes	Yes	Yes
MUH	No	Yes	Yes	Yes	Yes	No	No	Yes	Yes	Yes
UR	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes	Yes
BRC	No	No	Yes	Yes	Yes	No	No	Yes	Yes	Yes
4 Corners	No	No	Yes	Yes	Yes	No	No	Yes	Yes	Yes

*Detached and attached single family dwellings.

*Requires Administrative Use Permit for 7 or more occupants.

Supportive, Transitional, and Emergency Housing Uses

As shown in Table 3, Supportive and Transitional Housing are permitted uses within all residential zones in the City.

Emergency Shelters are permitted by-right in the City's Industrial Transition zone, which is located in the Ravenswood/4 Corners Specific Plan Area.

This is compliant with Government Code Sections 65583(a)(4) and (5), which specify that local governments must identify at least one zone where emergency shelters are permitted by-right and that transitional housing and supportive housing must be considered a residential use subject to the same restrictions as other multifamily dwellings in the same zone.

The City has one Low-Barrier Navigation Center (LBNC), a shelter operated by Project WeHOPE at 1836-54 Bay Rd. Consistent with Assembly Bill (AB) 101, a LBNC is a use by right in areas zoned for mixed use and nonresidential zones permitting multifamily uses. A LBNC is defined as a Housing First, low barrier, temporary, service-enriched shelter focused on helping homeless individuals and families to quickly obtain permanent housing. Low barrier includes best practices to reduce barriers to entry, such as allowing partners, pets, storage of personal items, and privacy (Gov. Code, § 65660).

Housing for People with Disabilities

Housing Element law requires jurisdictions to analyze potential governmental constraints to the development, improvement, and maintenance of housing for people with disabilities.

Residential Care Facilities

As shown in Table 3, residential care facilities for six or fewer persons are permitted by-right in all residential zones in East Palo Alto. For seven or more individuals, a conditional use permit is required. Residential care facilities for seven or more individuals are subject to the requirements of the base residential zone where the facility is located, in addition to the following standards:

1. Applicable requirements of the California Building, Housing, and Fire Codes are met;
2. No sign which calls attention to the fact that the property is a residential care facility is posted;
3. Is not located within 500 feet of the boundaries of a parcel with a residential care facility (whether licensed or unlicensed), with six or fewer residents; and
4. Is not located within 750 feet of the boundaries of a parcel with another residential care facility with seven or more individuals.

Definition of Family

The definition of *family* in the Development Code of the City of East Palo Alto is: *One or more persons occupying a premises and living as a single nonprofit housekeeping unit as distinguished from persons occupying a club, fraternity, hotel, or sorority house. A family shall be deemed to include necessary servants.*

This definition encompasses different living arrangements, including individuals with disabilities that may live with a caregiver or adults living in a group setting.

Reasonable Accommodations

Chapter 18.98 of the East Palo Alto Municipal Code lays out the process for “Reasonable Accommodations” for individuals with disabilities, which are described as *an adjustment to physical design standards to accommodate the placement of wheelchair ramps or other exterior modifications to a dwelling in response to the needs of a disabled resident.* A request for Reasonable Accommodation may be made to the City to modify zoning or other land use regulations or policies that act as a barrier to accessing fair housing. Requests for Reasonable Accommodations are reviewed at the staff level.

Housing for Adults with Developmental Disabilities

With the increase in adults with developmental disabilities across San Mateo County and in East Palo Alto since the prior Housing Element, the lack of an existing licensed care facility in East Palo Alto for adults with developmental disabilities may pose a barrier to living independently in affordable housing or put individuals with developmental disabilities at risk of displacement. The Policies & Programs section attempts to address some of these barriers as part of Goal 7, *Create more housing opportunities for special needs households, including large households, people at risk of or experiencing homelessness, and individuals with disabilities.*

Permit Types and Levels of Review

The “level of review” and total processing time required for different types of residential developments will vary based on the permit types associated with each development. Table 3.4 summarizes the typical types of permits required for residential projects.

Table 3.4: Permit Types and Levels of Review		
Permit Type	Description	Review Time (approx.)
Administrative/Staff Level		
Zoning Clearance	Review to determine compliance with Development Code and clear for Building review	2-4 weeks
Administrative Use Permit	Permit for an allowable use; review to ensure specific use is compatible with other existing or surrounding uses	1-2 months
Temporary Use Permit	Review to permit specific limited-term uses	45 days to 3 months
Lot split/line adjustment/merger	Creation of multiple lots or a single lot	2-4 months
Reasonable accommodations	Permit to make modifications to residential properties to accommodate people with disabilities	
Public Hearing/Planning Commission Action		
Design Review	Review of projects for compliance with provisions of Development Code and architectural design guidelines	2-3 months
Tentative Map	Review of map required when subdividing a parcel	3-4 months
Condominium Subdivision*	Review of subdivision for creation of condominiums	3-4 months

**Requires City Council approval*

General Plan Findings for Residential Projects

Review and approval of a residential project are based upon findings of consistency with the General Plan. These findings are provided below.

For Subdivision Tentative Map (18.52.060 of the East Palo Alto Municipal Code):

- A. *The proposed map, subdivision design, and improvements are consistent with the General Plan, any applicable specific plan, and this Article.*
- B. *The site is physically suitable for the type and proposed density of development.*
- C. *The design of the subdivision and the proposed improvements are not likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat.*

- D. *The design of the subdivision or type of improvements is not likely to cause serious public health or safety problems.*
- E. *The discharge of sewage from the proposed subdivision into the community sewer system will not result in violation of existing requirements specified by the California Regional Water Quality Control Board.*
- F. *The design of the subdivision provides, to the extent feasible, passive, or natural heating and cooling opportunities.*
- G. *The proposed subdivision, its design, density, and type of development and improvements conform to the regulations of the Development Code and the regulations of any public agency having jurisdiction by law.*

For Site Plan and Design Review (18.86.050 of the East Palo Alto Municipal Code):

- A. *The proposed development is consistent with the General Plan and any application specific plan and is in compliance with all applicable provisions of the Development Code and all other City ordinances and regulations.*
- B. *The proposed development is to be constructed on a suitable site, adequate in shape, size, topography, and other circumstances to accommodate the proposed development.*
- C. *The proposed development complies with the applicable standards of review.*
- D. *The proposed development is designed and arranged to provide adequate consideration to ensure the public health, safety, and general welfare, and to prevent adverse effects on neighboring property.*

Ministerial Processes and Compliance with Other State Mandates

The City has adapted to changes in state law over the last eight years, incorporating state-mandated ministerial review into Planning review processes for eligible projects and creating forms for applicants to streamline review.

SB 35 Projects. East Palo Alto is subject to the SB 35 Streamlined Ministerial Review Process for projects with a minimum of 10% of units affordable to lower-income households. The Planning Division developed an application checklist and conformance letter for these projects to allow for the City to process the application within the time periods required by state law. As of the date of publication, the City has successfully processed two SB 35 applications.

SB 9 Projects. The Planning Division developed an SB 9 checklist for developers to efficiently determine compliance with the new state law. As of the date of publication, the City has successfully completed reviews for four preliminary SB 9 applications, which will enable them to proceed to apply for building permits.

Accessory Dwelling Units. ADUs and JADUs are processed ministerially through a Zoning Clearance process. Applicants fill out the Zoning Clearance form as part of their application and can be efficiently cleared for Building review and inspection if they meet all development standards.

Low-Barrier Navigation Centers (AB 101). Pursuant to state law, Low-Barrier Navigation Centers (or “LBNCs”) are a use by-right in areas zoned for mixed use and nonresidential zones permitting multifamily uses if it meets specified requirements. The single LBNC in East Palo Alto, located at 1836 Bay Rd., is an example of this type of use.

SB 330. The City is compliant with SB 330, also known as the Housing Crisis Act, by allowing for applicants to submit a “preliminary application” for a residential development; limiting the number of hearings associated with a single project, as provided by the law; processing applications within the timeframes provided by the law; only applying the standards permitted by the law; and adhering to the prohibition of demolition or housing and/or requiring replacement units (when applicable).

Housing Accountability Act. The City complies with the Housing Accountability Act (Government Code section 65589.5) in its review of each residential development, and City staff is well-versed in the limitations of local government to deny, reduce the density of, or make infeasible residential developments on any basis except for non-compliance with objective local development standards. The City has committed resources to refining its objective development and design standards to further streamline approval of residential developments and provide clarity to the City’s decision-making bodies, including the Planning Commission and City Council, in addition to the general public.

State Density Bonus law. The City applies state Density Bonus law in reviewing projects that request additional density, concessions, or waivers pursuant to Government Code Sections 65915 – 65918. Applicants are required to submit a letter to the City with their Density Bonus request. Housing staff works closely with planning staff to implement the local ordinance that implements the state law. The City has processed several applications with a Density Bonus, including 100% affordable housing projects and projects with an inclusionary obligation, and executed multiple Density Bonus agreements.

Inclusionary Housing

On November 19, 2019, the East Palo Alto City Council adopted Ordinance No. 425, the Inclusionary Housing Ordinance (Ordinance), adding Chapter 18.37 to the City of East Palo Alto Development Code. All residential development projects that create new dwelling units are subject to the Ordinance. The Inclusionary Housing

Plan for a residential development must be submitted concurrently to the Housing Division with the Planning application and is considered in the first round of application review.

For projects with fewer than 5 units, the inclusionary obligation is either payment of a proportional percentage of an in-lieu fee or providing one inclusionary unit on-site. Projects with 5 or more units are required to provide 20% of the total number of units on-site at affordability levels ranging from 35% of the Area Median Income (AMI) to 120% AMI. Developers may propose an alternative compliance option to the inclusionary requirement, which requires approval by the City Council.

Since the Ordinance's effective date, several residential development projects with inclusionary units have been successfully entitled or cleared for Building permit review. Smaller development projects, such as those with two units or single-family dwellings with ADUs, have provided deed-restricted affordable ADUs as an alternative compliance option to the fee payment requirement.

Accessory Dwelling Units

The City adopted Ordinance No. 08-2020 on November 17, 2020, updating the City's Development Code to reflect recent changes in state law. Applicants for ADUs and JADUs submit a Zoning Clearance application, available on the City's Planning website, to confirm that all development standards are met. Once cleared by the Planning Division, the applicant may proceed to apply for a Building permit.

As a ministerial action, the Zoning Clearance process has significantly reduced processing times for ADUs and JADUs, with turnaround time on complete applications within a few days to a week. The majority of processing time is required for the Building permit phase, and can vary significantly depending on the project, the number and length of time between resubmittals, and the time required to obtain approvals from outside agencies such as Menlo Park Fire Protection District and East Palo Alto Sanitary District.

The number of ADU applications has also increased significantly since the start of 2020, with 30 Building permits issued in 2021 versus 13 in 2020.

Public Works and Engineering Review

The Public Works and Engineering Division reviews all residential development applications in the Design Review phase and following Planning entitlements. Engineering issues permits for on- and off-site improvements and grading, calculates City impact fees, and reviews tentative maps prior to Building Division review. This includes the subdivision improvement agreement, which lays out the public improvements, installation of utilities, grading, and drainage will be completed on the property.

Several City requirements for providing on- and off-site improvements apply to housing development, such as:

- Green infrastructure
- On-site Low Impact Development (LID) improvements
- Street right-of-way dedications
- Street frontage improvement (e.g., curb, gutter, sidewalks and streetlights)
- Water line improvement, including the water main installation along the property frontage and lateral service line with meter boxes and fire hydrants
- Sanitary sewer main installation along property frontage and lateral service lines; each parcel must be served by sanitary sewer or an individual sewage disposal system
- Storm water drainage lines along property line street frontage
- Street trees
- Regulated street widths for public urban residential roads, varying from 18 feet for a residential one-way loop to 40 feet for a residential collector
- Water, provided through a connection to a water supply system or through establishing a new water system; if neither is feasible, the Planning Director may allow the subdivider to provide water through an on-site well.

Building Division Review

The Building Division of the City of East Palo Alto enforces the Residential Building Code for the City of East Palo Alto, which is found in Chapter 15 of the East Palo Alto Municipal Code. This Chapter adopts the most recent California Residential Building Code (California Code of Regulations, Title 24) by reference. A Building permit is required prior to beginning any construction, reconstruction, addition, conversion, or alteration covered under the adopted California Codes.

The Building Division ensures that all new dwelling units meet all of the latest construction and safety standards. The division enforces building, plumbing, mechanical, electrical installations, accessibility, and energy compliance.

REACH Codes

Since the adoption of the RHNA 5 Housing Element, the City has adopted stricter standards to reduce carbon emissions, known as the Building Electrification and Electric Vehicle Infrastructure REACH Codes Ordinance. This Ordinance (07-2020), adopted in October 2020, amends East Palo Alto Municipal Code Chapter 15 to include REACH Codes that apply to California Energy Code and Green Building Code. The East Palo Alto Reach Codes were approved by the California Energy Commission on December 9th, 2020, and took effect on January 1st, 2021, on all new submissions for new construction. Learn about the REACH Code updates [here](#).

The REACH Code requirements in effect as of 2022 are summarized in Table 3.5*:

Table 3.5: Summary of Reach Code Requirements

Building Type	Building Electrification	Solar	EV Infrastructure
Single Family Homes and Townhouses with Private Garages	All electric; <ul style="list-style-type: none"> • Exception for Accessory Dwelling Units (ADUs) • Exception for 100% affordable housing 	N/A – Solar already required by the Residential Code.	<ul style="list-style-type: none"> • One Level 2 (dryer plug/220 volt) + One Level 1 (110 volt) • Single space garages to have one Level 2 charging. • Exception for ADUs. • Exception allowed if utility infrastructure installation cost exceeds \$400/dwelling for tax credit-financed affordable housing.
Multi-Family	All electric; <ul style="list-style-type: none"> • Exception if demonstrated to be infeasible. • Exception for domestic water heating projects granted entitlements, with electrical pre-wiring. • Exception for existing buildings with physical constraints. • Exception for 100% affordable housing 	15% of roof area Exceptions for buildings with limited solar access or vegetative roofs.	<ul style="list-style-type: none"> • 10% of units with Level 2 charging; 90% of units with Level 1 charging. • Outlets may be shared between parking spaces. • Local management software allowed. • Exception allowed if utility infrastructure installation cost exceeds. • \$4,500/dwelling for market rate, \$400/dwelling for tax credit financed affordable housing. • Exception for projects granted entitlements.
Commercial	All electric; <ul style="list-style-type: none"> • Exception for restaurants, cafeterias, with pre-wiring. • Exception for emergency operation centers, with pre-wiring. • Exceptions for Life Science buildings, with pre-wiring. • Exception for existing buildings with physical constraints. 	15% of roof area Exceptions for buildings with limited solar access or vegetative roof.	Office: <ul style="list-style-type: none"> • 10 or more parking spaces – 10% of parking spaces with Level 2 charging; • Additional 10% with Level 1 ready; • Additional 30% EV capable. • Exception for mechanical parking systems and locations without commercial power supply.
Other Nonresidential Buildings (non-office)	Same as commercial	Same as commercial	<ul style="list-style-type: none"> • 10 or more parking spaces – 6% Level 2 Charging Station • Additional 5% Level 1 ready

* Note that Reach Code requirements will be updated in 2023.

Total Processing Times for Residential Projects

The development review and permit process allow the City to ensure that residential development is accomplished in an orderly manner and complies with adopted building standards. This process can potentially act as a constraint to development if the associated time delays or costs place an undue burden on the developer.

As outlined above typical process varies depending on whether the process is administrative or discretionary; the main difference is the addition of a review and decision by the Planning Commission and/or City Council. If an applicant is submitting an application for an ADU, an SB 35 project, an SB 9 project, or other state-mandated ministerial review, the process is administrative. City staff reviews the application, works with the applicant to address comments, and approves the application if the comments are addressed.

East Palo Alto requires developers to obtain a series of approvals, or entitlements, before constructing any new development in the City, in order to ensure that new development is consistent with the City standards of design, health and safety. The entitlement process can be lengthy depending on the environmental analysis required for the project and requires payment of Planning Division permit and Engineering and Building Division plan check and permit fees.

Applicable submittal requirements for all application types are outlined in the Zoning Ordinance and in the Planning Department “Submittal Checklist” handouts. All applications, submittal requirements, and fee information are available on the City’s website. The City’s practice is to request that the Planning Commission review all development applications as a whole (for example, an application for a rezoning is typically taken to the Commission along with a subdivision, design review and other entitlements). The Planning Commission typically meets twice each month, and projects subject to a CEQA categorical or statutory exemption typically do not delay the project further.

Table 3.6 shows average total processing times for “typical” residential projects:

Table 3.6. Average Total Processing Times for Typical Residential Developments		
Type	Assumed Actions	Length of Time
ADU/JADU	Zoning Clearance and Building review/inspection	1-2 months
Single Family (1 unit)	Administrative Design Review, Site Plan Review, Building review/inspection	4-6 months
Moderate-Sized Multiple-Family (2-4 units)	Tentative Map Review, Design Review, CEQA – Categorical Exemption, On/Offsite Improvements, Building review/inspection	8-10 months for less complex projects 12-18 months if Initial Study required, consultant team, etc.
Large Multiple-Family	Tentative Map Review, Design Review, CEQA – EIR, Zoning Change, major grading, On/Offsite Improvements, Building review/inspection	18-24 months

Note: Assume 30 days for initial review and 30 days maximum upon resubmittal for Planning and 30 days initial review and 2 weeks maximum upon resubmittal for Engineering or Building.

There are several other typical actions not included in the “assumed actions” above that may affect a project’s timeline but are not directly related to staff processing of the application.

For example, Planning Commission approval is required for projects not subject to ministerial review (SB 35 projects, ADUs/JADUs) or single-family homes. Allotting time to each development on the Planning Commission agenda with a limited number of meetings and several developments in the queue can increase the amount of time a project requires to obtain Planning approval.

Similarly, the City’s community outreach policy,² which was adopted in May 2019, requires developers to engage in different levels of outreach based on the size of their project. While community outreach is a necessary and desired component of the development process, it is incumbent upon the applicant to fulfill these requirements, and they must do so in a timely manner.

The above timeframes may still reflect unforeseen delays due to several additional factors, both internal and external. As with all jurisdictions processing unprecedented numbers of development applications, City staff has made strides towards processing of ADUs and other types of Zoning Clearance, such as SB 35 projects, but staff also continue to seek ways to improve processing of applications. Beyond processing times, it is necessary to acknowledge that outside agency review times and infrastructure demands, as discussed above, have placed delays on projects, in some cases by months to years.

Cumulative Impact of Development Standards on Development of Housing

Taking into account the above development standards and required review processes for different types of residential projects, there is clearly a relationship between the project's requirements and the length of processing time. More complex projects require multiple levels of review—some relating to the City's Development Code, and others relating to outside agencies, the need for environmental review, or the completeness of a development application – and so require additional time for approval.

The City has committed to updating the Development Code to further clarify and streamline residential development review, including through the adoption of objective development and design standards. These can be found in the Policies & Programs section under *Goal 1 – Create more housing opportunities, and more housing that is affordable to East Palo Alto residents*, and they are intended to remove barriers to housing development that are within the City's control while balancing the need for robust community input and adhering to the goals of the General Plan.

During the period of high development activity from 2019 to the present, smaller projects have also seen lengthier processing times than usual due to limitations on staffing and other resources. However, staff experience with processing of ADUs and other ministerial review processes continues to lead to improvements in this area. The Policies & Programs section addresses further activities that City staff commit to completing over the coming eight-year period, under *Goal 1 – Create more housing opportunities, and more housing that is affordable to East Palo Alto residents*.

Permitting Fees and Impact Fees

The City charges processing fees for each type of development permit and fees to mitigate the impacts of development on the City's infrastructure. These fees are posted on the City's website in compliance with the requirements of Gov. Code 65940.1 sudv. (a)(1)(A)).

Permitting Fees

Planning and application fees offset the costs the City incurs in the development review process. All current planning and permit fees as adopted by City Council are included in the Master Fee Schedule: <https://www.cityofepa.org/finance/page/comprehensive-fee-schedule>

Outside Agency Fees

Development review and impact fees are collected by agencies separate from the City and must be paid prior to issuance of a Building permit. These include school district fees, fire district fees, and sanitary district fees. Sequoia Union High School District, Menlo Park Fire Protection District, and East Palo Alto Sanitary District

are responsible for these fees and applicants are required to contact each agency for a fee estimate for their project.

Table 3.7 illustrates the types of fees that are typically required for common residential development types:

Table 3.7: Fees by Residential Development Types			
Single Family Home			
Planning – Entitlements	Building – Construction	Impact Fees	Other Agency Fees
<ul style="list-style-type: none"> • Administrative Design Review • Engineering Design Review support • Building Design Review support * 	<ul style="list-style-type: none"> • Processing • Plan Check • Building Inspection • Engineering Offsite Improvements • Engineering Review of Building Permit • Address Assignment (per unit) 	See table below	<ul style="list-style-type: none"> • Menlo Park Fire Protection District • Sequoia Union High School District • East Palo Alto Sanitary District
10-Unit Multifamily Development			
Planning – Entitlements	Building – Construction	Impact Fees	Other Agency Fees
<ul style="list-style-type: none"> • Planning Application Fees • Engineering Review • Building Design Review* • CEQA 	<ul style="list-style-type: none"> • Engineering Grading Permit • Engineering Review of Building Permit Multi-Family • Building Processing Fee • Building Plan Check • Building Inspection • Final Map 	See table below	<ul style="list-style-type: none"> • Menlo Park Fire Protection District • Sequoia Union High School District • East Palo Alto Sanitary District
100-Unit Multifamily Development			
Planning – Entitlements	Building – Construction	Impact Fees	Other Agency Fees
<ul style="list-style-type: none"> • Planning Application Fees • Engineering Design Review • Building Design Review* • CEQA 	<ul style="list-style-type: none"> • Engineering Grading Permit • Engineering Review of Building Permit Multi-Family • Building Processing Fee • Building Plan Check • Building Inspection • Final Map 	See table below	<ul style="list-style-type: none"> • Menlo Park Fire Protection District • Sequoia Union High School District • East Palo Alto Sanitary District

*Note that a Planning permit (Building Design Review) is not required when SB 9 or SB 35 is applied.

Development Impact Fees

The City collects development impact fees to fund capital infrastructure project or public facilities costs attributable to development impacts. Development impact fees are typically due at the time of building permit issuance. The legal requirements for enactment of an impact fee program are set forth in Government Code Sections §66000 – 66025 (the “Mitigation Fee Act”), also commonly referred to as AB 1600.

In July 2020, the City Council adopted Resolution No. 108-2020, the first major revision of the City’s Comprehensive Fee Schedule, effective September 20, 2020. Development impact fees are studied and adopted separately from user and regulatory fees and are generally amended annually by the change in the Construction Cost Index, or CCI, published by Engineering News Record. Since 2020, the City’s development impact fees have risen annually by this amount. Most recently, in FY 2022-23, development impact fees increased by 8.9%, in accordance with CCI. The authorizing Municipal Code section and resolution adopting each fee is summarized in Table 3.8 below:

Table 3.8: Authorizing Municipal Code and Resolutions by Fee Type		
Fee Type	Authorizing Municipal Code	Authorizing Fee Setting and Annual Increase
Parks & Trails	13.28.040	Reso – 5093 & MC – 13 .28.100
Public Facilities		
Storm Drainage:		
Inside Ravenswood Business District		
Outside Ravenswood Business District		
Transportation		
Water Capacity	13.24.100	Reso – 5004
Affordable Housing Commercial Linkage	18.40.010	Reso – 118-2020

Projects Subject to Impact Fees

Table 3.9 below shows the types of development projects that are subject to each of the development impact fees, and the amount in FY 2022-23:

Table 3.9. Development Impact Fees			
Fee Type	How It Is Charged	Development Type	Amount
Commercial Linkage	Per sq ft	Office/Medical/R&D above 10,000 sq ft	\$12.81
Parks & Trails	Per dwelling unit	Detached ADU	\$1,885.61
		Single Family	\$4,714.61
		Multifamily	\$3,247.64
Public Facilities	Per dwelling unit	Detached ADU	\$3,306.96
		Single Family	\$8,267.96
		Multifamily	\$5,695.63
Storm Drainage	Per dwelling unit – single family and ADU	Detached ADU in RBD	\$2,208.45
		Single Family in RBD	\$5,521.10
		Detached ADU outside RBD	\$1,277.61
		Single Family outside RBD	\$3,194.03
	Per impervious acre – all other land uses	In RBD	\$138,027.50
Outside RBD		\$79,850.62	
Transportation	Per dwelling unit	Detached ADU	\$1,075.70
		Single Family	\$2,689.83
		Multifamily	\$2,024.79
Water Capacity	Per dwelling unit	Detached ADU	\$5,719.58
		Single Family	\$9,293.47
		Multifamily	\$5,719.58

The current Development Impact Fees can be found in the City’s Comprehensive Fee Schedule, which is published online on the City website: <https://www.cityofepa.org/finance/page/comprehensive-fee-schedule>

Fee Comparisons across Jurisdictions in San Mateo County

Table 9 shows a comparison of East Palo Alto’s responses with the other jurisdictions in San Mateo County to a survey conducted by 21 Elements in preparation for the Housing Element. The responses were provided for single family homes, a prototypical 10-unit multiple-family building, and a prototypical 100-unit multiple-family building.

Table 3.10. Fee Comparison Across Jurisdictions in San Mateo County			
Jurisdiction	Single Family	Small Multiple-Unit	Large Multiple-Unit
Atherton	\$15,941	No Data	No Data
Brisbane	\$24,940	\$11,678	No Data
Half Moon Bay	\$52,569	\$16,974	No Data
Hillsborough	\$71,092	No Data	No Data
Pacifica	\$33,725	\$40,151	No Data
Portola Valley	\$52,923	No Data	No Data
Woodside	\$70,957	\$82,764	No Data
Redwood City	\$20,795	\$18,537	\$62,696
Millbrae	\$97,756	\$6,824	\$55,186
San Mateo	\$99,003	\$133,658	\$44,907
San Bruno	\$58,209	\$72,148	\$39,412
South San Francisco	\$81,366	\$76,156	\$32,471
Burlingame	\$69,425	\$30,345	\$23,229
East Palo Alto	\$80,866	\$30,812	\$19,181
Colma	\$6,760	\$167,210	\$16,795
Daly City	\$24,202	\$32,558	\$12,271
Foster City	\$67,886	\$47,179	\$11,288
Unincorporated San Mateo County	\$36,429	\$27,978	\$10,012

Source: 21 Elements Fee survey; East Palo Alto. (Note that this survey was conducted in 2021 and contains fees from FY 2021-22.

As is shown above, East Palo Alto's fees for multiple-family units fall within the mid- to lower range, while the per-unit single family home fee is among the higher fees. This may be attributed to the City's Inclusionary Housing In-Lieu Fee, a portion of which is required for a single-family development and are most easily calculated for this type; it is unclear if inclusionary fees were assumed in other jurisdictions. Please note that the fee survey did not include outside agencies' fees, such as school districts, fire districts, or sanitary districts.

21 Elements placed these costs into the context of total development costs for multiple-family housing in the area, based on a report by Century Urban.³ Based on the estimated development costs, East Palo Alto's fees comprise approximately 4% of those costs for all three development types. This is comparable to other jurisdictions.

3.2 INFRASTRUCTURE CONSTRAINTS

Water and Sewer Infrastructure Availability

In addition to requiring jurisdictions to analyze each site for water and infrastructure availability, the Housing Element also should include a detailed description of existing or planned water, sewer, and other utilities supply citywide, past challenges related to infrastructure, and how the City has responded since the last Housing Element.

In East Palo Alto, one of the main impediments to the production of residential units has historically been lack of water supply, ultimately leading to a 2016 moratorium on all new development due to the water emergency. In July 2017, the City entered into an agreement with the City of Mountain View for \$5 million to receive an allocation of 1 million gallons of water per day from San Francisco Public Utility Commission (SFPUC), and in 2018, the City received an allocation of .5 million gallons per day from Palo Alto, allowing the City to resume development. Since the end of the water moratorium, the City has seen a major increase in development proposals.

While the City’s securing of these permanent water transfers has improved the overall water supply, the City continues to face the challenge of water distribution and storage. However, the City has taken major steps to address these shortfalls over the last five years.

The City worked with EKI Environment & Water to draft an updated Water System Master Plan (“WSMP”), which is available [online](#). The WSMP identifies cost-effective strategies to upgrade the existing distribution system to meet the current and future water demand by providing a 20-year capital improvement program to help guide future capital expenditures in the City and a calibrated distribution system hydraulic model using the City’s geographical information system.

On October 4, 2022, the City approved the 2022 Water System Master Plan (WSMP) and appropriated nearly \$8.4 million to design and build several key City water infrastructure projects over the next two years. The WSMP is intended to provide the City with an overall plan for potable water infrastructure improvements for the next twenty (20) years to maintain water system reliability and support anticipated development within the City.

Final designs for the water infrastructure projects are underway, with construction to begin in Summer 2023 and be completed by the end of the year. The 965 Weeks Street affordable housing development is scheduled to break ground in early 2023.

The City also has initiated and completed several key capital improvement projects aimed at improving water storage and distribution citywide:

- O'Brien Turnout Connection Upgrade Project – **completed**
- Purdue Ave. 16-inch transmission main, which includes installation of a new turnout connection to the SFPUC (San Francisco Public Utilities Commission) system to feed the Ravenswood Business District – **design complete**
- Gloria Bay Well – **completed**
- Pad D Standby Well to secure an emergency source of potable water supplies in the event of an emergency interruption of supplies from the San Francisco Public Utilities Commission) – **under construction**
- University Ave and Cooley Ave 12-inch Water Transmission Main – **design 100% complete and projected completion early 2023**
- Water System Master Plan 2022 which will be used to create a water capital improvement program that includes both maintenance and expansion of the City system- Adopted by resolution
- Weeks Street Water Line Improvements – Funds have been allocated for the design and construction of the Weeks Street Improvements which will help serve 965 Weeks Street and the surrounding neighborhood.
- Woodland Avenue Gap Closure and Palo Alto Emergency Intertie – Design 100% complete and being reviewed by the City of Palo Alto for connection to their system for emergency flow.

With these improvements in place, the City will be much better positioned to accommodate existing and future water demand and to ensure the health and safety of residents. As of 2022, the City has enough water now for 95% of development, with the remainder likely to come from reclaimed water.

Many development projects have experienced delays due to the lack of a sewer connection from the East Palo Alto Sanitary District (“EPASD”). If sewer issues with EPASD are not resolved, East Palo Alto will continue to fall behind on its RHNA. It will be essential to document in the Housing Element the process and outcomes of the San Mateo County Local Agency Formation Commission (“SMCLAFCo”)

Municipal Service Review (“MSR”) and sphere of influence update, adopted by SMCLAFCo on June 15, 2022, and subsequent actions by EPASD addressed by City Council on June 21, 2022. A City Council study session to discuss next steps based on the SMCLAFCo recommendations was held on July 26, 2022. These steps have been incorporated into the Policies & Programs section of this Housing Element.

3.3 NON-GOVERNMENTAL CONSTRAINTS

Land costs, construction costs, and market financing contribute to the cost of housing reinvestment and can sometimes hinder the production of new affordable housing. Although many constraints are driven by market conditions, jurisdictions have some leverage in instituting policies and programs to address potential constraints.

Land Costs

21 Elements engaged Century Urban⁴ to provide an analysis of residential development costs in San Mateo County that may be used in this analysis. The report includes an analysis of three years of San Mateo County residential sales data for single family and multifamily developments, with the San Mateo County-wide average land costs of approximately \$1,000,000 for prototypical single-family developments, \$1,000,000 for small multifamily developments, and \$10,000,00 for large multifamily developments.

According to the report, in East Palo Alto, the land cost for single family homes ranges from \$72 to \$135 per square foot, with a median of \$92. There were no data available specific to East Palo Alto for multifamily development.

While East Palo Alto land costs may be slightly lower than in surrounding jurisdictions, dramatic increases in East Palo Alto home prices since the last Housing Element cycle demonstrate the amount of development interest in the City and the upward pressure on prices from highly constrained housing development in the region.

Site Development Costs

The Century Urban report finds that the San Mateo County-wide total development costs range from \$2,500,000 to \$4,400,000 for a prototypical single family home development and range from \$7,900,000 for a small multifamily development to \$74,100,000 for a large multifamily development.

The high cost of development can be attributed both to the “hard costs” of development, including construction materials and labor, and to the “soft costs” of development, such as architecture, design, and engineering costs, in addition to permitting and other fees.

Hard costs constitute the much larger share of total development costs –approximately 60%, according to a 2020 analysis by the Turner Center.⁵ The same report found that Bay Area construction costs are the highest in the state. Labor and materials cost increases are also reflected in the Construction Cost Index; the March 2022 Construction Cost Index for the San Francisco area, as published by Engineering News Record, showed an increase of 8.9%, compared to 3.1% in 2021 and 1.6% in 2020.

Construction costs are not within the control of local jurisdictions. However, jurisdictions must consider that additional costs placed on a development from both fees and delays to a project can make the difference between a feasible and infeasible project.

High development costs translate into higher rents and sales prices, a trend that is visible in recent data on East Palo Alto housing costs. This places rental and purchasing opportunities in East Palo Alto out of reach for many residents and contributes to an already high risk of housing insecurity, overcrowding, and displacement.

Financing Availability

The current median home price of approximately \$941,300⁹ is about 2-3 times the approximately \$378,000 price that would be affordable to a buyer with a median household income of \$83,511.¹⁰ In addition to high housing prices in East Palo Alto and the surrounding County, many potential homebuyers are constrained by the lack of financing to purchase a house. Credit history, down payment, and closing costs are three major factors in a household's ability to obtain a mortgage in East Palo Alto.

Interest rates remained low at the start of 2022 but have increased throughout the year; further interest rate increases are anticipated. According to the Freddie Mac Mortgage Market Survey, the current interest rate as of August 11, 2022, for a fixed-rate, 30-year mortgage is 5.22%, compared to 3.22% the week of January 6, 2022.⁶ This constrains the ability of developers to finance both market-rate and affordable housing, and the ability of potential homebuyers to purchase a home.

As we look outside the typical borrower, it is important to also note that 43.1 percent of the population in East Palo Alto is foreign-born, and that lack of legal status can restrict the ability of migrants to obtain mortgages, build credit, and achieve financial security. While significant resources exist to help achieve homeownership, regulatory guidelines are increased for those without legal status. The burden of risk assessment is often displayed by requiring higher down payments, extensive work history, and vast documented income. It should also be noted that those without legal status often do not qualify for federal government assistance and can be barred from financial resources.¹¹

Requests for Housing Developments at Reduced Densities

Jurisdictions are required to report on any projects where a lower density was requested for a site as provided in the Sites Inventory. A review of the RHNA 5 Housing Element and current pipeline (i.e., entitled projects, SB 35 projects in process, or projects under construction) shows that this small number of sites from the Sites

⁹ Medium home price, income, foreign born: <https://www.census.gov/quickfacts/eastpaloaltocitycalifornia>

¹⁰ Assumed 30-year fixed rate mortgage at 5.250% interest rate, and no more than 30% of income toward housing.

¹¹ Information regarding the legal status of East Palo Alto residents and mortgage information comes from the local non-profit, EPACANDO.

Inventory were proposed at densities at or above those assumed for the site. Generally speaking, residential development proposals that the City has received in recent years have requested close to the maximum or more through the Density Bonus.

Typical Timeframes between Approval for Housing Development and Application for Building Permits

Given the delays imposed by the City’s Water Moratorium from 2016-2018 and the continued delays related to the East Palo Alto Sanitary District and remaining lack of water flow to some areas of the City—discussed in detail elsewhere in this Constraints Analysis—it is challenging to estimate a “typical” timeframe between approval and application for Building permits. The majority of the City’s pipeline projects have only recently received entitlements, Zoning Clearance, or other streamlined clearance.

However, the City has seen a pattern among a small number of projects where the developer has not moved to apply for a Building permit despite being able to do so. This may be for a variety of reasons; chief among them may be the COVID-19 pandemic. For this reason, the City adopted a blanket extension through December 31, 2022, on Planning and Building permits set to expire between March 17, 2020, and December 31, 2021.

In some cases, the developer may attempt to sell the property with entitlements to a buyer who is interested in developing the project. A small number of developers may choose to change course after receiving project approvals if it becomes clear that there remains some project uncertainty, such as unresolved issues with the East Palo Alto Sanitary District. This constraint is discussed elsewhere in this analysis and is addressed in the Policies & Programs section.

Environmental Constraints

Flood Risk

Flood risk places a physical constraint on the availability of land for new housing.

Removing flood risk requires raising buildings at least 18 Inches above the base flood elevation established by FEMA floodplain maps. In some areas this can require the building to be raised at least 4 feet from the existing ground. This is a costly portion of many of the large developments projects located within the floodplain and can be cost prohibitive on smaller residential projects.

Additional levee improvements are proposed along the rest of the City’s Bayfront from the O’Connor Pump Station to Menlo Park. These improvements are intended to reduce flood risk of the 100-year storm while maintaining access to the bayfront. These projects are currently being spearheaded by the San Francisco Creek Joint Powers Authority (SFCJPA) and are under preliminary design with coordination with the

development projects within the Ravenswood Business District. Furthermore, creek widening is being conducted downstream to further decrease flood risk.

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4 AFFIRMATIVELY FURTHERING FAIR HOUSING - AN ASSESSMENT OF FAIR HOUSING

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"¹²

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. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, 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.

¹² 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, author of the 2017 book *The Color of Law: A Forgotten History of How Our Government Segregated America*, adds to ABAG's characterization of segregation in the Bay Area by chronicling how the public and private sectors contributed to segregation through practices of blockbusting—a scheme where real estate agents and speculators convinced White families their neighborhoods were turning into slums and property values would drop; bought their homes less than their worth; and rented or sold them to African Americans above market prices. Rothstein's analysis goes beyond blockbusting, however, as he describes the ways in which federal, state, and local governments imposed residential segregation throughout the Bay Area region: racial zoning, public housing, subsidies to create Whites-only suburbs, tax exemptions, and support for resistance to African Americans in White neighborhoods.

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.

Residential segregation and the segregatory effects 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, 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. Convincing White families that their neighborhoods were turning into “African American slums,” speculators purchased their homes for less than their worth and rented/sold them to African Americans at inflated prices, most of whom struggled to make their payments and had to double-up in their homes, creating overcrowding and deteriorating living conditions. Blockbusting practices in East Palo Alto quickly became widespread as agents recognized African Americans' increasing need for housing. Within three months, one agent sold sixty previously White-owned homes to Black/African American families.¹³

Federal and state agencies exacerbated these effects through unlawful lending policies and practices. The Federal Housing Administration (FHA) and Veterans Administration, for instance,

¹³ Richard Rothstein, *The Color of Law: A Forgotten History of How our Government Segregated America*, New York: Liveright Publishing Corporation (2017), pp. 12-13.

not only refused to insure mortgages for African Americans in designated White neighborhoods, but once East Palo Alto was integrated, White families could no longer obtain government-insured mortgages where African Americans were present. State-regulated insurance companies and leading California banks had similar policies with the consent of federal banking regulators.

Within six years, East Palo Alto—initially considered a jurisdiction with “Whites only” neighborhoods—became 82% Black/African American. Excluded from neighborhoods throughout the region and unable to make payments on homes purchased at inflated prices, many Black/African Americans were forced to double up in single-family homes, creating a “slum in East Palo Alto.”¹⁴ With increased density, the school district could no longer accommodate all East Palo Alto students, leading board members, in 1958, to propose the construction of a segregated second high school. Ignoring pleas from Black/African Americans and liberal White activists that it draw a boundary to establish two integrated secondary schools, the school board contemplated forcing Black/African American students to withdraw and attend school in the eastern section of East Palo Alto. In ways like these, Richard Rothstein writes, “federal, state, and local governments purposely created segregation in every metropolitan area of the nation.”

Importantly, segregation and resistance to racial integration was not unique to East Palo Alto as it represented a larger problem effecting all of San Mateo County. 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.

Throughout San Mateo County, neighborhood associations and City leaders responded to the influx of African Americans by thwarting the integration of communities. Some neighborhood residents supported or were indifferent to integration, but most fiercely opposed it. Neighborhood associations often required the acceptance of all new buyers and builders with intentions to develop for buyers despite race faced significant barriers: development sites were rezoned by planning councils, large minimum lot size requirements, and/or were denied public infrastructure to support their developments or charged prohibitively high amounts for infrastructure.

These events and patterns were not limited to San Mateo County, either. They were instead prominent throughout the country, as portrayed in the timeline of major federal Acts and court decisions concerning fair housing choice and zoning and land use on the following page.

¹⁴ Ibid., pp. 12-13.

Exclusive zoning practices were common in the early 1900s. Courts struck down only the most discriminatory and allowed those that would be considered today to have a “disparate impact” on classes protected by the Fair Housing Act. For example, the 1926 case *Village of Euclid v. Amber Realty Co.* (272 U.S. 365) supported the segregation of residential, business, and industrial uses, justifying separation by characterizing apartment buildings as “mere parasite(s)” with the potential to “utterly destroy” the character and desirability of neighborhoods. At that time, multifamily apartments were the only housing options for people of color, including immigrants.

The Federal Fair Housing Act was not enacted until nearly 60 years after the first racial zoning ordinances appeared in U.S. cities. This coincided with a shift away from federal control over low-income housing toward locally-tailored approaches (block grants) and market-oriented choice (Section 8 subsidies)—the latter of which is only effective when adequate affordable rental units are available.

Resegregation. Though racial segregation has been seemingly addressed and solved through local, state, and federal policies, East Palo Alto and its lower-income and minority communities are being resegregated due to gentrification efforts, housing shortages, and rapidly rising rents and home prices. Gentrification in East Palo Alto dates back to the 1980s when developers began buying significant portions of land in the region. In recent years, however, gentrification has intensified as large tech companies—Meta (formerly Facebook), Google, and Amazon—move to the area. The Silicon Valley tech boom in East Palo Alto presents multiple problems for long-time residents. With the presence of large technology companies, places such as Meta have begun allocating money and resources to improve communities surrounding their headquarters. Job openings rarely go to residents, but rather young, well-paid tech professionals migrating to East Palo Alto in search of housing. This increase in workers has turned East Palo Alto into a “hunting ground” for real estate speculators eager to turn properties and apartments into sites for the tech sector.

Gentrification efforts and processes have resulted in resegregation as lower-income individuals and people of color in East Palo Alto are forcefully displaced and/or voluntarily leaving the City for cheaper alternatives. In fact, a study conducted by researchers at the University of California at Berkeley found that East Palo Alto “lost thousands of low-income black households from 2010 to 2015 with no similar effects reported in predominantly white neighborhoods” during the same time period.¹⁵ Providing background on this trend, the University mapped all Bay Area neighborhoods to identify gentrification risks and found that in East Palo Alto, 64.7% of households live in neighborhoods that are susceptible to or experiencing displacement and 0% live in neighborhoods at risk of or undergoing gentrification.¹⁶ Landlords are also contributing to

¹⁵ <https://gunnoracle.com/19991/uncategorized/a-tale-of-two-cities-how-racism-in-housing-deeds-redlining-and-gentrification-led-to-the-stark-divide-between-palo-alto-and-east-palo-alto/>.

¹⁶ https://www.cityofepa.org/sites/default/files/fileattachments/housing/page/19915/c2_abag_mtc_housing_needs_data_report_east_palo_alto_w_toc_1.pdf.

displacement in the region and are reportedly using evictions and rent hikes to prepare residential neighborhoods for redevelopment.¹⁷

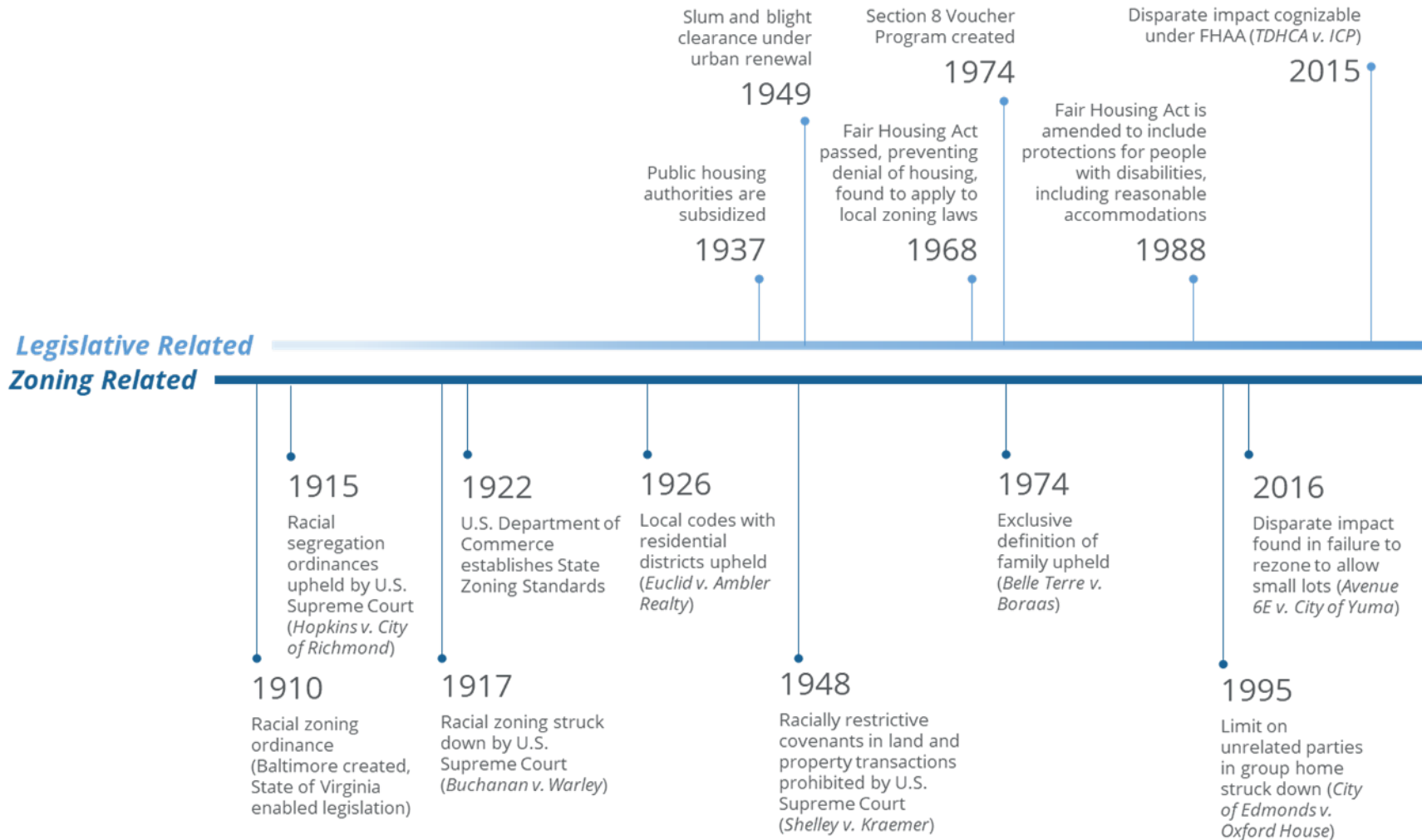
Local opposition to affordable housing. Affordable housing policies and measures in East Palo Alto have been a subject of severe controversy since the 1980s when rent stabilization ordinances were proposed.¹⁸ In 2021, debates over affordable housing policy arose again with the City's proposed ordinance called the Opportunity to Purchase Act (OPA).¹⁹ The proposed policy is aimed to help further housing preservation and anti-displacement efforts, by requiring owners to give renters, affordable housing nonprofits, or the City the opportunity to make an offer on the property before hitting the market. The City will be further studying this policy for consideration at the end of 2022 or in-2023.

¹⁷ https://www.washingtonpost.com/national/a-semi-feudal-society-in-east-palo-alto-the-influx-of-tech-companies-pushes-residents-to-a-breaking-point-over-gentrification/2018/11/02/03e1004c-d17c-11e8-b2d2-f397227b43f0_story.html.

¹⁸ <https://shelterforce.org/2022/03/22/the-nexus-between-rent-control-and-incorporation-in-east-palo-alto/>.

¹⁹ <https://www.paloaltoonline.com/news/2021/12/21/east-palo-alto-to-discuss-controversial-housing-purchase-policy>.

Major Public and Legal Actions that Influence Fair Access to Housing



Access to resources and opportunity. Several other factors have limited the city's ability to provide fair access to resources and opportunity. The widening of the Highway 101 in the late 1950's destroyed the city's once-thriving business district, the Whiskey Gulch. In the same decade, Palo Alto and Menlo Park annexed land from East Palo Alto, decreasing the area and size of the city to 2.5 square miles and limiting the number of vacant sites the City can develop on. Today, some sites in the Ravenswood Business District/Four Corners Specific Plan, the new designated area for the city's missing business district, lie on contaminated land that requires further remediation to allow for mixed-use development. Romic Environmental Technologies and its predecessor hazardous waste management facilities that operated in East Palo Alto from the 1950's until 2007, contaminated the soil and ground water beneath.

The lack of political power and agency over County and regional agency decisions was one contributing factor that led to the City's long fight for incorporation from the late 1950's until the City's incorporation in 1983. Following incorporation, the City struggled with its revenue sources as it had previously depended on San Mateo County resources.

East Palo Alto is allocated 1.9 million gallons per day from the Hetch Hetchy Reservoir by the San Francisco Public Utilities Commission (SFPUC). The city was not incorporated when San Mateo County made the deal with SFPUC to divide the shares, which resulted in East Palo Alto receiving the lowest per-capita allocation on the Peninsula. In 2016, East Palo Alto adopted a water moratorium due to its city-wide water supply shortage, creating a de facto development moratorium. In 2017, the city went into an agreement with the City of Mountain View to pay \$5 million for the allocation of 1 million gallons of water per day that would help supply the northern part of the city. In 2018, East Palo Alto received the allocation of a half-million gallons per day of water at no cost from Palo Alto. The city lifted the water moratorium in 2018, creating an influx of development proposals, including the development of a 120-unit low-income affordable housing development at 965 Weeks Street, two commercial developments and a primary school.

The City of East Palo Alto is at a crossroads. Today, the majority of the City's multi-family affordable housing lies west of the Highway 101, while the majority of the single-family housing, unaffordable to younger generations, lies east of the highway. The City has the potential to allocate more affordable housing development on the eastside to balance the housing stock disparity created by the Highway 101. Data show that East Palo Alto residents have higher rates of asthma, diabetes, and poor health outcomes than the County. Continued exposure to carbon emissions due to the city's high-transit location, low access to affordable 2-3-bedroom housing for larger family sizes, limited infrastructure and active public transportation systems, and ongoing home and rent increase pressures from the tech industry, as well as other issues will continue to impact resident's health and access to opportunities if transformational steps are not taken.

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.

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. Disparate Housing Needs identifies which groups have disproportionate housing needs including displacement risk.

Appendices.

- Resident survey results—findings from a survey of San Mateo County residents on their experience finding and remaining in housing
- Disparate Access to Educational Opportunities—findings from a countywide analysis of access to education and educational outcomes by protected class.
- Dissimilarities and Isolation Indices—summary of findings from an AFFH Segregation Report of Unincorporated San Mateo County, completed by UC Merced Urban Policy Lab and ABAG/MTC Staff.
- State Fair Housing Laws and Regulations—summary of key state laws and regulations related to mitigating housing discrimination and expanding housing choice
- Fair Housing Organizations in San Mateo County—mission, services, and contact information

Primary findings. This section summarizes the primary findings from the Fair Housing Assessment for East Palo Alto including the following sections: fair housing enforcement and outreach capacity, integration and segregation, access to opportunity, disparate housing needs, and contributing factors and the city's fair housing action plan.

- **9% (five complaints) of fair housing complaints filed in San Mateo County from 2017 to 2021 were in East Palo Alto—the city accounts for only 4% of the county's population.** The issues cited were terms, conditions, privileges, or services and facilities (4 complaints), and refusal to rent (one complaint).

- **The majority of residents living in East Palo Alto are renters (60%).** Female headed households are the most likely to be renters, with seven out of ten female-headed households renting. The area of the city bordering Menlo Park has a higher concentration of households made up of female-headed households with children.
- Compared to the county, East Palo Alto has a relatively high share of households that include children (49% in the city v. 33% countywide).
- East Palo Alto is also home to larger share of Hispanic/Latinx and Black or African American residents compared to the county (Figure II-1). The share of the Black or African American population decreased significantly from 23% to 11% since 2000, while the Hispanic/Latinx population increased from 60% to 66% and the non-Hispanic White population increased from 7% to 10%.
- Most Racial and ethnic minority populations are **disproportionately impacted by poverty, low household incomes, overcrowding, and homelessness** compared to the non-Hispanic White population in East Palo Alto. Additionally, racial and ethnic minorities, especially Hispanic/Latinx and Black or African American residents, **are more likely to be denied for a home mortgage loan.**
 - Racial and ethnic minorities have higher rates of poverty (Figure II-5) and lower household incomes (Figure II-4) compared to the non-Hispanic White population in East Palo Alto.
 - Overcrowding in the city is significantly higher than the county (Figure IV-15). Hispanic/Latinx households have the highest share of overcrowded households, while Black or African American households have the lowest (Figure IV-17)
 - Countywide, people who identify as American Indian or Alaskan Native, Black, White, and Hispanic/Latinx are overrepresented in the homeless population compared to their share of the general population (Figure IV-22).
 - Hispanic/Latinx, American Indian or Alaska Native, and Black or African American households have the highest denial rates for mortgage loan applications in 2018 and 2019 (Figure IV-33).
- Compared to the county, **East Palo Alto residents are more likely to be living in poverty** (Figure II-28).
- Geospatially, the **area bordering Menlo Park and west of Highway 101** tends to be disproportionately impacted by high poverty, low education opportunity, low economic opportunity, low environmental scores, high social vulnerability scores, concentrations of cost burdened households, overcrowding, and low resource scores. This area **also has a concentration of renter households, and female headed households** (Figure IV-13 and Figure II-22). These areas have:

- Education opportunity scores between 0 and 0.25—meaning they have the lowest education scores compared to the rest of the city (Figure III-1).
- Low economic opportunity scores between zero and 0.25 (Figure III-7).
- The composite opportunity score for East Palo Alto shows census tracts in this area of the city fall within low resource areas while the rest of the city is within moderate areas (Figure III-14).
- The Social Vulnerability Index (SVI) provided by the CDC—ranks census tracts based on their ability to respond to a disaster. This area of the city is more vulnerable according to the SVI (Figure III-15).
- Concentration (60% to 80% of households) of cost burdened renter households (Figure IV-13). Overcrowded households are concentrated in the same areas as cost burdened households (Figure IV-19).
- The entire city is considered vulnerable to displacement (Figure IV-28).
- The share of the population living with at least one disability is 6% in East Palo Alto, a slightly lower incidence than in San Mateo County. **Unemployment is disproportionately high among residents living with a disability at 18% compared to 4% for residents without a disability** in East Palo Alto—particularly when compared to the county (Figure III-20).
- East Palo Alto is served by the Ravenswood City Elementary School District; and the Sequoia Union Unified High School District. Eighty-three of students qualify for reduced lunch in Ravenswood City Elementary, and 30% of students are experiencing homelessness. This is an outlier in the county, where overall just 2% are experiencing homelessness. Ravenswood also has a much higher share of Hispanic/Latinx students than San Mateo County (84% v. 38%).
- The city has relatively **low education opportunity scores overall and disparities are present for minority students:**
 - Hispanic/Latinx students at Ravenswood City Elementary are the least likely to have met or exceeded mathematics and English testing standards in the county.
 - At the high school level, Sequoia Union district has the highest dropout rate in the county (10%), and dropout rates among Pacific Islander (20%), Hispanic/Latinx (16%), and Black/African American (12%) students are much higher.
- **Almost 60% of all renter households in East Palo Alto are cost burdened**, spending more than 30% of their gross income on housing costs, and close to one-third are extremely cost burdened, spending more than 50% of their gross income on housing costs (Figure IV-9). Hispanic/Latinx **(58%) households experience the highest rates of cost burden, followed by Black or African American households (55%)**. Racial and ethnic minorities are also more likely than non-Hispanic White households to experience overcrowding in East Palo Alto.

Contributing factors and Fair Housing Action Plan. The disparities in housing choice and access to opportunity discussed above stem from historical actions; the inability of the broader region to respond to housing demand leading residents seeking affordability into East Palo Alto; East Palo Alto's relative affordability compared to the broader region; and the city's very limited resources to respond to needs. Specifically,

Fair housing issue: Residents of color—especially Black or African American residents—have been displaced from East Palo Alto due to rising rents.

Contributing factors:

Lack of housing production the region overall, incentivizing property owners to raise rents.

Redevelopment of naturally occurring affordable housing, despite city policies to help mitigate high rent increases.

Fair housing issue: Families with children are disproportionately represented in East Palo Alto compared to the region and have lower access to quality educational environments.

Contributing factors:

Lack of affordable family housing in the county.

School district policies that concentrate low income families in under-resourced schools in East Palo Alto.

Lack of resources for schools with children living in poverty to adequately students' address needs.

Fair housing issue: Renters and female headed households with children are concentrated in neighborhoods with high poverty and low resources.

Contributing factors:

Lack of affordable family housing in the county.

Concentration of affordable housing in the area bordering Menlo Park and west of Highway 101.

Fair housing issue: East Palo Alto residents have high rates of cost burden, overcrowding, and denials when seeking mortgage loans.

Contributing factors:

- Historical discrimination in housing and employment markets that has limited the ability of residents of color to build family wealth and access high paying jobs.
- Significant shortage of affordable housing in the city, county, and region overall.

Fair housing issue: Residents with disabilities have very high rates of unemployment (18%) compared to non-disabled residents and the county overall.

Contributing factors:

- Discrimination in the job market and lack of training and education.
- Inability of employers to accommodate the needs of persons with disabilities.

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."²⁰

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.²¹ 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)—9% of complaints were in East Palo Alto (five complaints)**. Countywide, most complaints cited disability status as the bias (56%) followed by race (19%), and familial status (14%). In East Palo Alto, the issues cited were terms, conditions, privileges, or services and facilities (4 complaints), and refusal to rent (one complaint).

²⁰ <https://www.dfeh.ca.gov/aboutdfeh/>.

²¹ <https://www.dfeh.ca.gov/complaintprocess/>.

Countywide, no cause determination was found in 27 complaints followed by successful conciliation or settlement with 22 complaints. Fair housing inquiries in 2020 were primarily submitted from the City of San Mateo, followed by 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 has 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.²²

²² <https://nationalfairhousing.org/2021/07/29/annual-fair-housing-report-shows-increase-in-housing-harassment/>

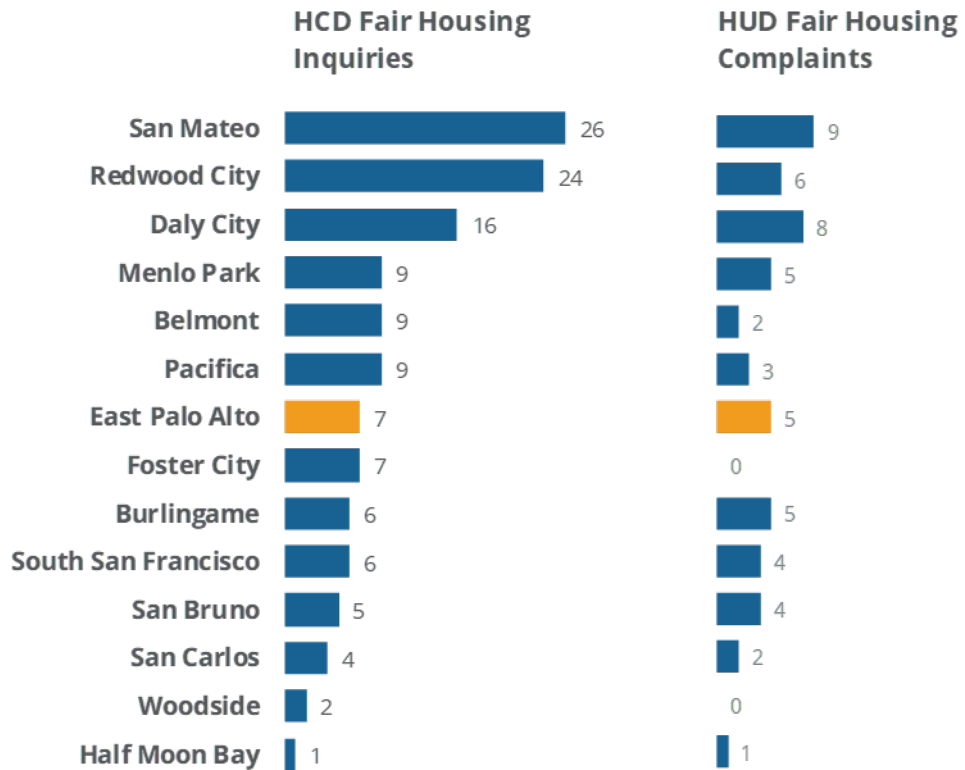
Fair Housing Complaints and Inquiries

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)



Outreach and capacity. East Palo Alto City’s website provides easy to follow links to their rent stabilization program and housing programs, as well as the opportunity to share input on the Housing Element. The City could improve the accessibility of fair housing information on their website and resources for residents experiencing housing discrimination. This could be improved by providing contact information for local fair housing organizations, legal assistance, and general information about the Fair Housing Act and discrimination.

Language accessibility could be improved by providing some information in both English and Spanish, as well as placing the option to select a different language at the top of the website.

Compliance with state law. East Palo Alto is compliant with the following state laws that promote fair and affordable housing and has not been found or alleged in violation of the following.

- Government Code Section 65852.2 (a), requiring cities to implement ordinances allowing for the creation of second units in single-family or multi-family residential zones;
- Government Code Section 65915, giving housing developments the right to add density bonuses and incentives that reduce affordable housing costs;
- Ellis Act, providing that cities do not bar the redevelopment and reconstruction of Rent Stabilization Program units;
- State laws SB 1069 and AB 2299, allowing for the development of Accessory Dwelling units (ADUs) on most single-family lots to increase opportunities for housing production;
- Fair Employment and Housing Act (FEHA), prohibiting discrimination in housing based on race, color, national origin, religion, sex, gender identity/expression, sexual orientation, familial status, disability, age, citizenship, language, source of income, or any other arbitrary basis.

East Palo Alto also complies with all provisions included in the Fair Housing Act and Fair Housing laws are appropriately followed with Planning Division staff making exceptions to the Zoning Code when appropriate.

Housing specific policies enacted locally. East Palo Alto identified, according to the 21 Elements AFFH Resident Survey and based on community input, the following local policies and programs that contribute to the regulatory environment for affordable housing development in the city.

Local policies and programs in place to encourage housing development.

- ADU Working Group
- CalHOME program for the creation of affordable ADU units
- Inclusionary housing
- Measure HH commercial office space special parcel tax revenue
- Measure O gross receipts tax revenue

Local barriers to affordable housing development.

- Development impact fees
- High parking requirements
- Infrastructure needs in sanitary sewer services
- Lengthy processing times and requirements to develop properties
- Low staffing capacity in the Building, Code Enforcement, Planning and Housing departments
- Missing ADU legalization program to complement ADU streamlining

Local policies and programs that are NOT in place but would provide the best outcomes in addressing housing shortages.

- Homebuyer assistance programs
- Mortgage and rental assistance (beyond pandemic)
- Tenant Opportunity to Purchase Act/ Community Opportunity to Purchase Act

Local policies that are NOT in place, but have potential Council interest for further exploration.

- Acquisition and rehab program
- Anti-Displacement Plan
- Foreclosure assistance
- Housing counseling
- Living wage employment ordinances
- Rental Registry

Local policies and programs in place to mitigate or prevent displacement of low income households.

- Affordable housing impact linkage fee on new commercial development
- Community land trusts
- Condominium conversion regulations
- Fair housing legal services
- First source hiring ordinances
- Funding home sharing program (HIP Housing)
- Inclusionary zoning
- Just cause eviction
- Local preference
- Mobile home displacement prevention
- Rent review board and/or mediation
- Rent stabilization
- Rental assistance and tenant education and empowerment
- Tenant relocation requirements

According to the California Department of Housing and Community Development AFFH Data Viewer (HCD data viewer), East Palo Alto does not have any public housing buildings. However, the city does have a moderate (5% to 15%) share of households using housing vouchers.

Compared to nearby Menlo Park and Palo Alto, **East Palo Alto appears accommodating to renters with housing vouchers** because the city has a greater share of voucher holders compared to the surrounding communities. The presence of housing voucher users indicates available rental supply to house these residents and a lack of exclusionary behavior from landlords in the city.

Legal challenges. Legal challenges in the past two decades have placed East Palo Alto's affordable rental housing stock in a unique situation and increased displacement among East Palo Alto residents unable to afford rising rent prices.

In 2006, Page Mill Properties, a Palo Alto-based real estate investment firm, assumed management of over 1,800 rental units in the Woodland Park neighborhood of East Palo Alto. The property management group purchased the units at market value, intending to rehabilitate units with deferred maintenance issues such as new roofs, gates, seismic upgrades, night security, and surveillance cameras. To pay for such improvements, the majority of tenants' rents increased twice during 2008—an average of 9% in the first rent change, followed by an average 7.7% increase.²³

However, according to East Palo Alto's 1988 Rent Control Ordinance, rents can be increased annually at 100% of the Consumer Price Index (CPI) as set by the United States Department of Labor for the San Francisco/Oakland Metropolitan Area which was approximately 2.9% in 2008. Property managers claimed that because the previous property owner did not annually increase rents, they should be able to legally recapture the unused annual rent increases. Despite East Palo Alto's efforts to declare the rent change unlawful, the San Mateo Superior County ruled in favor of property managers.²⁴

In 2009, Page Mill Properties defaulted in its loan obligations, allowing Wells Fargo Bank to take title of the rental properties after foreclosure proceedings in 2010. In December 2011, Wells Fargo Bank sold the properties to a Chicago-based corporation, Equity Residential. As a result of rent increases, families have reportedly been displaced due to rent increases.

²³ <https://www.hcd.ca.gov/housing-elements/docs/east-palo-alto-5th-draft021215.pdf>.

²⁴ Ibid.

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. The population distribution by race and ethnicity in East Palo Alto is more diverse compared to the county. East Palo Alto shows the largest portion of the population being Hispanic/Latinx (66% v. 39% in the county), followed by Black or African American (11% v. 2% in the county).²⁵ The Asian and non-Hispanic White population make up 10% of the population each. **The share of the Black or African American population decreased significantly from 23% to 11% since 2000**, while the Hispanic/Latinx population increased from 60% to 66% and the non-Hispanic White increased from 7% to 10%. The share of the Asian population has remained stable.

The share of the population age 65 and over that is Black or African American is 30% compared to only 6% of the population under age 17.

Racial and ethnic minority populations generally have higher rates of poverty and lower household incomes compared to the non-Hispanic White population in East Palo Alto.

Geospatially, East Palo Alto has no non-Hispanic White majority census tracts²⁶ and several census tracts have Hispanic/Latinx majority.²⁷

²⁵ The share of the population that identifies as American Indian or Alaska Native is less than 1%.

²⁶ Majority census tracts show the predominant racial or ethnic group by tract compared to the next most populous.

²⁷ Redlining maps, otherwise known as Home Owners’ Loan Corporation (HOLC) maps, are not available for San Mateo County.

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.

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.

ABAG and UC Merced completed an analysis of racial and income segregation by both census tracts and block groups in East Palo Alto and the Bay Area region. Throughout the analysis, several indices were used to assess segregation in the city to determine how the city differs from patterns of segregation and integration in the region overall. A detailed explanation of their analysis is featured in Appendix I of the analysis; however, primary findings include:

- **Racial isolation indexes in East Palo Alto are relatively similar to that of neighboring jurisdictions (e.g., Redwood City) and the Bay Area region.** In East Palo Alto and the Bay Area, Asian/Pacific Islander and Hispanic/Latinx isolation have progressively increased between 2000 and 2020 while segregation levels for White and Black or African American residents have declined.
- Since 2000, Hispanic/Latinx isolation indexes in East Palo Alto have been significantly higher than that of White residents, most likely due to the jurisdiction's large population of Hispanic/Latinx residents. However, this differs from the rest of San Mateo County and the Bay Area overall where White residents have long been the most isolated racial group. In 2020, unincorporated San Mateo County's isolation index for White residents was 0.599, the Bay Area 0.491, and 0.084 in East Palo Alto (compared to 0.672 for Hispanic/Latinx residents in East Palo Alto).
- Dissimilarity indexes across all racial groups included in the analysis have declined between 2000 and 2020 in East Palo Alto and the Bay Area region, though DI values in the region have declined slower than East Palo Alto.
- Overall, DI values show that the highest segregation in East Palo Alto is between and Black or African American and White residents. As noted above, however, values declined sharply between 2010 (0.439) and 2020 (0.225). **Segregation between and Black or African American and White residents in East Palo Alto was similar to the Bay Area**

region in 2020 but differed from San Mateo County where segregation between Hispanic/Latinx and White residents is highest on average.

- In line with surrounding jurisdictions and the Bay Area, very low-income residents (0%-50% AMI) in East Palo Alto became more segregated between 2010 and 2015, with isolation index values increasing by approximately six percentage points. Unlike other areas, however, during the same time-frame moderate-income residents (80%-120% AMI) also became more isolated, though not as severe as very low-income residents.
- Comparing East Palo Alto to San Mateo County shows a different story. **In East Palo Alto, lower-income groups are significantly more segregated and higher-income groups are much less segregated than the county overall.** In 2015, isolation index values for very low-income residents was 0.561 and 0.116 for above moderate-income residents (>120% AMI). This compares to San Mateo County's overall 0.410 (very low-income) and 0.496 (above moderate-income) isolation values.
- Similar to the Bay Area, DI values across income groups between 2010 and 2015 either remained the same or declined slightly (approximately one percentage point).

In terms of declining segregation for White and Black or African American residents **in East Palo Alto, there is a notable decline in the jurisdiction's population of Black or African American residents.** In two decades, the population declined from 6,641 people to 3,190 people. Segregation for White residents, however, cannot be determined by population levels alone as numbers have shifted over the years. It should be noted that White residents comprise a relatively small portion of East Palo Alto's total population. ABAG and UC Merced advise paying close attention to small populations as DI values can be less reliable.

These indices also show inconsistencies in income segregation between East Palo Alto and San Mateo County. This is largely due to differences in household income. As shown in Figure II-25 of the Map and Data Packet, only 17% of households in East Palo Alto earn greater than 100% of AMI compared to the overall county's 49%. Compared to both the Bay Area region and San Mateo County, noticeably more households in East Palo Alto earn 50% below the AMI.

Increased segregation for very low-income residents in East Palo Alto can also be attributed to the Silicon Valley tech boom which many say has "created two parallel societies where the people at the top benefit a lot and the people at the bottom do not."²⁸

Disability status. The **share of the population living with at least one disability is 6% in East Palo Alto**, slightly lower than in San Mateo County's 8%. There are no census tracts in the city with a share of the population living with a disability that reach 10%. Geographic

²⁸ <https://www.paloaltoonline.com/news/2019/09/15/equity-ripples-east-palo-alto-continues-to-struggle-amidst-neighboring-tech-boom>.

concentrations of people living with a disability may indicate the area has ample **access to services, amenities, and transportation that support this population.**

Familial Status. East Palo Alto is home to **more large households (5-person or more)** than the county with 27% of households compared to only 11% in the county. Additionally, there are **fewer married couple households in the city and more female-headed family households compared to the county (21% v. 10% in the county).** Female-headed households tend to have higher poverty rates, be younger and more diverse than the overall population.

East Palo Alto also has a higher share of households with children compared to the county (49% v. 33%). The area of the city bordering Menlo Park has a higher concentration of single female with children households.

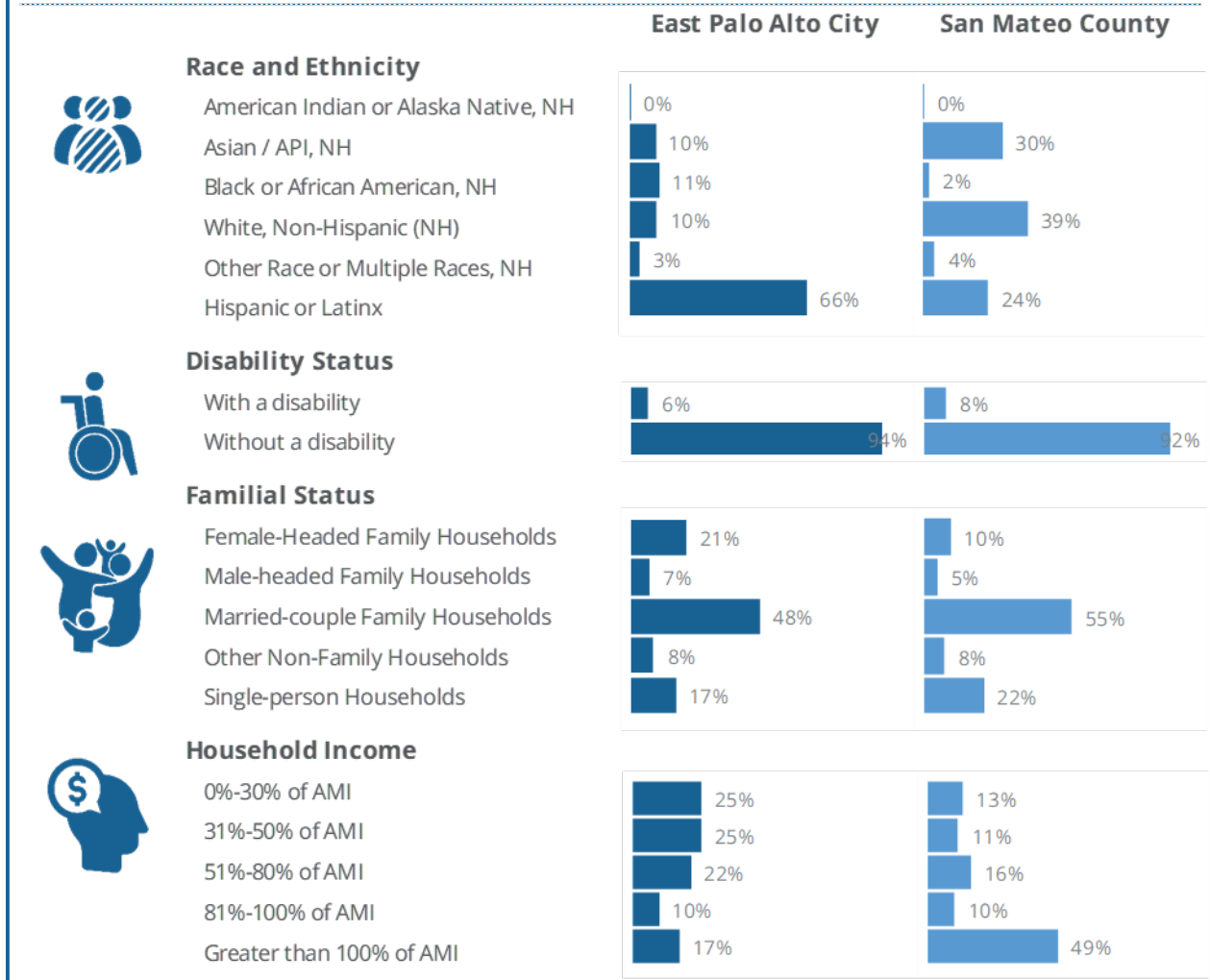
The majority of residents living in East Palo Alto are renters (60%). Female-headed households are the most likely to be renters, with seven out of ten female-headed households renting.

Household income. The household income distribution by percent of area median income (AMI) in East Palo Alto is more concentrated at lower incomes than the county. In East Palo Alto 50% of households have income below 50% AMI compared to 24% in the county.

There are several census block groups in the city that have median incomes below the 2020 state median income of \$87,100. In addition, census block groups with median incomes below \$55,000 are located in the central part of the city and west of Highway 101. **Compared to the county, East Palo Alto has higher poverty rates** between 10% and 20% but the city has no concentrations of census tracts with poverty rates between 20% and 30%.

Segregation and Integration

Population by Protected Class



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 non-Hispanic 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.²⁹

²⁹ 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

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.

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 percent or more (majority-people of color) or, for non-urban areas, 20 percent, AND a poverty rate of 40 percent or more; OR
- A census tract that has a non-White population of 50 percent or more (majority-people of color) AND the poverty rate is three times the average tract poverty rate for the County, whichever is lower.

Source: California Department of Housing and Community Development Guidance, 2021.

For this study, the poverty threshold used was three times the average tract poverty rate for the County—or 19.1%. In addition to R/ECAPs that meet the HUD threshold, this study includes edge or emerging R/ECAPs which hit two thirds of the HUD defined threshold for poverty—emerging R/ECAPs in San Mateo County have 2 times the average tract poverty rate for the county (12.8%).

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). One of the R/ECAPs was located in East Palo Alto in 2010, and 2 edge R/ECAPs were located in East Palo Alto covering the entire are of the city east of Highway 101.

In 2019 there are 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). **Three of the 2019 edge R/ECAPs are located in East Palo Alto**—which means they are majority people of color and have a poverty rate two times higher than the countywide census tract average, and **none of the census tracts that qualify as R/ECAPs are located in East Palo Alto**. The area that used to be an R/ECAP is located west of Menlo Park Business Park area but east of Highway 101. The poverty rate in this area decreased from 26% in 2010 to 11% in 2019. While the overall share of residents who are people of color remained stable, the share of Black or African American residents decreased and the shares of Asian/Pacific Islander and Hispanic/Latinx residents increased.

RCAAs. HCD's definition of a Racially Concentrated Area of Affluence is "A census tract with a median income 1.25 times and more higher than in the region and a White population of 1.5

times and more higher than the region.” While many jurisdictions in San Mateo County are considered RCAAs, **East Palo Alto is not a RCAA**, as shown in Figure IV-34. This is most likely due to the greater portion of lower-income communities located in East Palo Alto and the small population of non-Hispanic White residents. In fact, **people of color comprise more of East Palo Alto’s population than the Bay Area region as a whole**. Historical local, state, and federal housing policies outlined in the beginning of this Assessment contributed to these patterns in neighborhood characteristics and disparities as many policies excluded people of color from accessing the same opportunities as White residents.

Unlike neighboring RCAAs, East Palo Alto is considered to be an overall low opportunity area and a moderate to low resource area with low education, economic, and environmental outcomes. Though access to schools and other opportunities will be discussed in greater detail in Section III, it is important to note that although East Palo Alto residents have adequate access to schools, education results are severely low, nearly all students come from low-income households (91%), and over half are English learners (54%).³⁰ Consistent with 5-year trends, in the 2018-2019 school year, less than 2 in 10 students were on grade level in English and math.³¹ Given these outcomes, many families in East Palo Alto have tried getting their children into the Tinsley Program—a 1986 initiative allowing a small number of children from Ravenswood School District to transfer to schools in the surrounding K-8 districts: Belmont-Redwood Shores, Las Lomas, Menlo Park, Palo Alto, Portola Valley, San Carlos, and Woodside; all of which are mapped as RCAAs (Figure IV-34).

In terms of job proximity, however, East Palo Alto scores higher or in line with surrounding RCAAs.

Addressing inequities. East Palo Alto has taken numerous steps to address inequities in the area. Solutions to enhancing access to opportunities, reducing segregation, and providing increased affordable housing have been proposed and/or implemented in the form of policies, programs, goal setting, strategies, and more. Examples include:

- Financial support policies to discourage gentrification and the displacement of existing residents;
- Coordinating with Ravenswood School District, Sequoia School District, and private schools to improve transportation to/from school;
- Development outreach—require sponsors of major development and/or infrastructure projects to initiate early and frequent communication with communities and show how community input was incorporated into plan prior to City Council approval;
- CalHome ADU/JADU Loan Program—joint effort between City staff and EPA CAN DO, launched January 2022;

³⁰ <https://innovateschools.org/wp-content/uploads/2021/01/2020-Spotlight-on-Schools-within-RESA.pdf>.

³¹ Ibid.

- Implement Affordable Housing Program—ongoing requirements for housing staff to maintain Inclusionary Housing program, Commercial Linkage Fee program, and Local Preference program;
- Affordable housing overlay zone;
- Jobs-housing linkage that links the production of commercial office spaces to affordable housing production;
- Leverage available federal funding support for down payment and first-time homebuyer assistance.

In addition to the above, the City of East Palo Alto works with the following groups to advance and improve affordable housing and human services programs:

- Adults toward Independent Living;
- Bayshore Community Resources Center;
- Community Association for Rehabilitation, Inc.;
- Community Overcoming Relationship Abuse;
- Community Legal Services in East Palo Alto;
- EDEN Housing;
- El Comité del Lado Oeste;
- Elder Care Locator;
- EPA CAN DO;
- Habitat for Humanity;
- HIP Housing;
- Housing Choices;
- Housing Leadership Council of San Mateo County;
- Human Investment Project;
- MidPen Housing;
- Nuestra Casa;
- Preserving Affordable Housing Longterm, Inc;
- Project Sentinel;
- Samaritan House;
- Shelter Network;
- Spring St. Shelter/Mental Health Association;
- WeHOPE;
- Women and their Children’s Housing (WATCH);
- Youth united for Community Action in East Palo Alto

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. These maps were developed to align funding allocations with the goal of improving outcomes for low-income residents—particularly children.

The opportunity maps highlight areas of highest resource, high resource, moderate resource, moderate resource (rapidly changing), low resource and high segregation and poverty. TCAC provides opportunity maps for access to opportunity in quality education, employment, transportation, and environment. Opportunity scores are presented on a scale from zero to one and the higher the number, the more positive the outcomes.

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 areas in East Palo Alto score below 0.50**—opportunity scores are presented on a scale from zero to one and the higher the number, the more positive the outcomes. **Census tracts bordering Menlo Park and east of Highway 101 score below 0.25.**

East Palo Alto is served by the Ravenswood City Elementary School District; and the Sequoia Union Unified High School District.

Enrollment in Ravenswood City Elementary decreased 30%. This represents a much larger decrease than the 1% decrease experienced in the county.

Enrollment in Sequoia Union increased by 18% from 2010 to 2020.

Ravenswood City Elementary has a much higher share of Hispanic/Latinx students than San Mateo County (84% v. 38%). The enrollment composition in Sequoia Union is similar to the countywide distribution.

Overall, 29% of public school students in San Mateo County qualify for reduced lunch. This was substantially higher in Ravenswood City Elementary School District, where 83% of students qualify for reduced lunch. **In Ravenswood City Elementary, 30% of students are experiencing homelessness. This is an outlier in the county, where overall just 2% are experiencing homelessness.**

County-wide, 20% of public school students are English learners. Again, this rate is highest at Ravenswood City Elementary, where 53% of students are English learners.

In addition to the high concentration, **Hispanic/Latinx students at Ravenswood City Elementary are the least likely to have met or exceeded mathematics and English testing standards in the county.**

Countywide 27% of Hispanic/Latinx students met or exceeded mathematics testing standards and 40% met or exceeded English testing standards. These almost double the 15% and 21% in Ravenswood City.

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/Latinx, and Black/African American students in the Sequoia Union district were less likely to meet the admission standards** with rates of 38%, 55%, and 50% respectively.

Despite the high share of students meeting college admission standards, Sequoia Union has the second to lowest college going rate, at 70%. The highest rate was 77% in San Mateo Union High.

In addition, **Sequoia Union district has the highest dropout rate in the County (10%), and dropout rates among Pacific Islander (20%), Hispanic/Latinx (16%), and Black/African American (12%) students are much higher.**

Employment. The top industry by number of jobs in East Palo Alto is the health and educational services, followed by retail, and arts, recreation, and other services. The top industries by workers living in East Palo Alto are the health and educational services, professional and managerial services, and arts, recreation, and other services.

East Palo Alto has a lower job to household ratio when compared to the county at 0.57 and 1.59 respectively. This makes the city an exporter of workers to other communities.

The city also has a higher unemployment rate than the county and the Bay Area.

TCAC's economic opportunity score is comprised of poverty, adult educational attainment, employment, job proximity, and median home value. East Palo Alto scores are below 0.50 and

areas with the lowest economic opportunity scores—below 0.25— are concentrated in the part of the city that borders Menlo Park and are east of Highway 101.

HUD's job proximity index shows these areas are in relatively close proximity to jobs. On a scale from zero to 100 where 100 is the closest proximity to jobs the majority of the city scores above 60.

Transportation. This section provides a summary of the transportation system that serves East Palo Alto and the broader region including emerging trends and data relevant to transportation access in the city. 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. SamTrans provides bus services in San Mateo County, including Redi-Wheels paratransit service.

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 San Mateo and the county overall. Below is a summary of comments relevant to East Palo Alto and San Mateo County.

“San Mateo’s PCC and County Health System, as well as the Peninsula Family Service Agency provided feedback. The most common themes expressed had to do with pedestrian and bicycle needs at specific locations throughout the county, though some covered more general comments such as parked cars blocking sidewalk right-of-way and a desire for bike lanes to accommodate motorized scooters and wheelchairs. Transportation information, emerging mobility providers, and transit fares were other common themes.

While some comments related to the use of car share, transportation network companies (TNCs), or autonomous vehicles as potential solutions, other comments called for the increased accessibility and affordability of these services in the meantime.”³²

Transit improvements recommended for East Palo Alto include:

“East Palo Alto individuals do not have direct, fixed-route service to San Mateo Medical Center. A transfer and drop off is located at El Camino Real and 37th Avenue, but patients are still required to walk the remaining distance up a hill to the SM Medical Center (County Hospital). The cost of this trip and transfers is a great hardship for low income individuals. Craig added that getting to this medical facility is a hardship for many people because of the distance to the stop and the terrain.”

³² https://mtc.ca.gov/sites/default/files/MTC_Coordinated_Plan.pdf

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."³³

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."**

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.³⁴

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.³⁵

Environment. TCAC's opportunity areas environmental scores are based on the CalEnviroScreen 3.0 indicators, which identify areas disproportionately vulnerable to pollution sources such as ozone, PM2.5, diesel PM, pesticides, toxic release, traffic, cleanup sites, groundwater threats, hazardous waste, impaired water bodies, and solid waste sites.

East Palo Alto has worse scores than neighboring communities. The city also scores lower on the California Healthy Places Index (HPI) developed by the Public Health Alliance of Southern California (PHASC).

The HPI includes 25 community characteristics in eight categories including economic, social, education, transportation, neighborhood, housing, clean environment, and healthcare.³⁶ The area east of Highway 101 close to Menlo Park scores the lowest on the HPI.

Disparities in access to opportunity. Data show that racial and ethnic minorities are more likely to live in low resource areas compared to non-Hispanic White residents. Two thirds (64%) of the population living in low resource areas are Hispanic/Latinx. TCAC's composite opportunity score for East Palo Alto shows census tracts in the west of Highway 101 and Tracts

³³ <https://wid.org/transportation-accessibility/>

³⁴ https://www.samtrans.com/Planning/Planning_and_Research/Mobility_Plan_for_Older_Adults_and_People_with_Disabilities.html

³⁵ <https://mtc.ca.gov/planning/transportation/access-equity-mobility/clipperr-startsm>

³⁶ <https://healthyplacesindex.org/about/>

closer to Menlo Park fall within low resource areas while the rest of the city is within moderate resource areas.

The Social Vulnerability Index (SVI) provided by the 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. **The area east of Highway 101 and close to Menlo Park is most vulnerable according to the SVI.**

Most of the area east of Highway 101 in East Palo Alto qualifies as a disadvantaged community 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.”³⁷

Disparities specific to the population living with a disability. Six percent of the population in East Palo Alto are living with at least one disability, a lower share than the county. The most common disabilities in East Palo Alto are ambulatory (4%), cognitive (2.6%), and independent living (2.5%).

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.

For the population 65 and over the share of the population with an ambulatory or independent living difficulty increases. As mentioned above under access to transportation, San Mateo County is rapidly aging, therefore this population with a disability is likely to increase.

Unemployment is disproportionately high among residents living with a disability at 18% compared to 4% for residents without a disability. High unemployment rates among this population points to a need for increased services and resources to connect this population with employment opportunities.

³⁷ <https://oehha.ca.gov/calenviroscreen/sb535>

Access to Opportunity

Regional Access



	East Palo Alto	San Mateo County
Jobs to Household Ratio	0.57	1.59
Unemployment Rate	9%	6%
LEP Population	14%	7%

Share of Population by Race in Resource Areas in East Palo Alto



Low Resource or High Segregation and Poverty Area

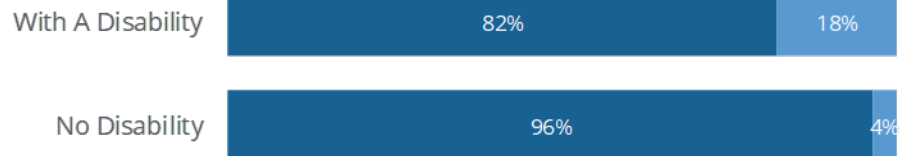


- American Indian or Alaska Native, NH
- Asian / API, NH
- Black or African American, NH
- White, Non-Hispanic (NH)
- Other Race or Multiple Races, NH
- Hispanic or Latinx

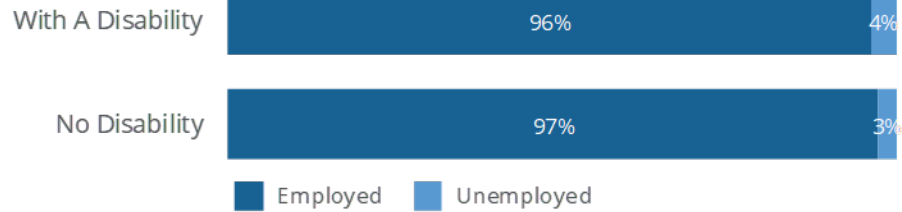
Employment by Disability Status



East Palo Alto



San Mateo County



- Employed
- Unemployed

SECTION IV. Disparate Housing Needs

This section discusses disparate housing needs for protected classes including cost burden and severe cost burden, overcrowding, substandard housing conditions, homelessness, displacement, and other considerations.

Disproportionate Housing Needs

“**Disproportionate housing needs** generally refers to a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing need when compared to the proportion of members of any other relevant groups, or the total population experiencing that category of housing need in the applicable geographic area. For purposes of this definition, categories of housing need are based on such factors as 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. Population growth in East Palo Alto accelerated during the 2000’s and experienced a sharp decrease after the Financial Crisis. Between 2009 and 2010 the city lost around 5,000 residents (15%). Since then, population trends have followed countywide trends more closely.

Since 2015, the housing permitted to accommodate growth has largely been priced for above moderate- and low-income households with 35 and 34 permits issued respectively. During the same period 20 permits were issued for very low-income households and 6 for above moderate income households. The majority of the housing inventory in East Palo Alto was constructed between 1940 to 1980. The Housing Needs Data Report for East Palo Alto indicates new construction has not kept pace with demand throughout the Bay Area, “resulting in longer commutes, increasing prices, and exacerbating issues of displacement and homelessness.”³⁸

The variety of housing types available in the city in 2020 are predominately single family (54%) and medium to large scale multifamily (37%). From 2010 to 2020, the multifamily inventory increased less than single family, and the city has a lower share of multifamily housing compared to other communities in the region.³⁹

Compared to San Mateo County, **East Palo Alto’s owner-occupied housing market has a greater share of units priced below \$1 million—77% of units in the city fall within this price range compared to 44% in the county.** According to the Zillow home value index, home prices

³⁸ Housing Needs Data Report: San Mateo, ABAG/MTC Staff and Baird + Driskell Community Planning, 2021.

³⁹ Housing Needs Data Report: San Mateo, ABAG/MTC Staff and Baird + Driskell Community Planning, 2021.

experienced remarkable growth in the city but have slowed since 2018. East Palo Alto home values remain more affordable than home values in the County and the Bay Area.

Compared to the county, **East Palo Alto has more affordable rental units**—42% of units rent for less than \$1,500 in the city compared to 19% in the county.

Cost burden and severe cost burden. Fifty eight percent of all renter households in East Palo Alto are cost burdened—spending more than 30% of their gross income on housing costs—and close one third are extremely cost burdened—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.

The rates of cost burden in East Palo Alto higher than the county overall. Lower income households are more likely to experience housing cost burden. **Over two thirds of households earning less than 30% AMI—considered extremely low-income households—are severely cost burdened.**

There are disparities in housing cost burden in East Palo Alto by race and ethnicity. Hispanic/Latinx (58%) and other or multi racial (58%) households experience the highest rates of cost burden in the city, followed by Black or African American (55%) households. Non-Hispanic White (45%) and Asian/API (47%) experience the lowest cost burden.

Overcrowding. The majority of households (74%) in East Palo Alto are not overcrowded—indicated by more than one occupant per room. However, **the rates of overcrowdings are significantly higher than the county (26% v. 8% in the county).** Renter households are significantly more likely to be overcrowded with 35.8% of households with more than one occupant per room compared to 11.1% of owner households.

Racial and ethnic minorities are more likely than non-Hispanic White households to experience overcrowding. Hispanic/Latinx households (44%), and other or multiple race households (36%), experience the highest rates of overcrowding. Low- and moderate-income households are also more likely to be overcrowded.

Geographically, overcrowded households are concentrated in the same areas as cost burdened renter households, to the west of Highway 101 and closer to Menlo Park.

Substandard Housing. Data on housing condition are very limited, with the most consistent data available across jurisdictions found in the American Community Survey (ACS)—which captures units in substandard condition as self-reported in Census surveys. In East Palo Alto, renter households are also more likely to have substandard kitchen and plumbing facilities compared to owner households. Generally, a low share of households are lacking kitchen or plumbing. For renters, 2% are lacking kitchen facilities while 1.6% are lacking plumbing. For owners, 1.5% are lacking or plumbing facilities.

As shown in Figure IV-35, excluding Redwood City, East Palo Alto has the highest percentage of households experiencing severe housing problems in the region. As previously noted, housing condition data are limited, making it difficult to explain why a greater proportion of households in East Palo Alto live in substandard conditions. It could, however, be attributed to East Palo Alto's housing costs being some of the highest in the region for its lower income population. With such high costs, households—especially lower-income households and renters—may have no option but to live in substandard conditions as that is all they can afford. Alternatively, it may also be related to East Palo Alto's higher proportion of residents over the age of 5 identifying as speaking English not well or not at all (13.8% v. 8% throughout the entire region)⁴⁰ as residents may be unaware of their rights, resources to contact, or hesitant to engage with landlords or property owners and managers.

Homelessness. In 2019, 1,512 people were experiencing homelessness in the county (107 people in East Palo Alto), 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 identify as American Indian or Alaskan Native (6% homeless, less than 1% general population), Black/African American (13%, 2%), White (67%, 51%), and Hispanic/Latinx (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.

Displacement. Owner households generally enjoy a greater amount of housing stability whereas renter households are more mobile. In East Palo Alto all of the 466 **income assisted rental units are at low risk for displacement.** In San Mateo County, 417 units are at risk—8% of the total assisted housing units in the county.

⁴⁰https://www.cityofepa.org/sites/default/files/fileattachments/housing/page/19915/c2_abag_mtc_housing_needs_data_report_east_palo_alto_w_toc_1.pdf.

Displacement Sensitive Communities

“According to the Urban Displacement Project, communities were designated sensitive if they met the following criteria:

- They currently have populations vulnerable to displacement in the event of increased redevelopment and drastic shifts in housing cost. Vulnerability is defined as:
 - Share of very low income residents is above 20%, 2017
 - AND
 - The tract meets two of the following criteria:
 - Share of renters is above 40%, 2017
 - Share of people of color is above 50%, 2017
 - Share of very low-income households (50% AMI or below) that are severely rent burdened households is above the county median, 2017
 - They or areas in close proximity have been experiencing displacement pressures. Displacement pressure is defined as:
 - Percent change in rent above county median for rent increases, 2012-2017
- OR
- Difference between tract median rent and median rent for surrounding tracts above median for all tracts in county (rent gap), 2017”

Source: <https://www.sensitivecommunities.org/>.

According to the Urban Displacement Project, the entire East Palo Alto area is vulnerable to displacement. An estimated 1,818 owner and 3,158 renter households are susceptible to or experiencing displacement. The highest concentration of renter households (over 80%) is found west of Highway 101.

Natural disasters. Natural disasters, specifically flooding, also places East Palo Alto residents at greater risk for displacement. As shown in Figure IV-31, over half of East Palo Alto is federally considered a flood hazard area, with areas located North and Northeast of Highway 101 at particular high risk of natural disasters.

To preemptively address this threat to residents, the City implemented an ordinance in Chapter 14.12 of its Municipal Code titled “Tenants Displaced by Disasters.”⁴¹ The ordinance qualifies a disaster as any unforeseen circumstance that causes damage or loss including, but not limited to, fires, floods, earthquakes, and other accidents. According to the City’s Code, once repairs (due to a disaster) are completed, landlords must offer to the tenant the same unit under the same terms and conditions within 30 days. The tenant then has 30 days to accept or reject the offer and, if accepted, has 45 days to reoccupy the unit. Costs to repair damage not covered by insurance can legally be “passed through to the tenant”⁴² but tenants must be notified 30 days prior to rent increases.

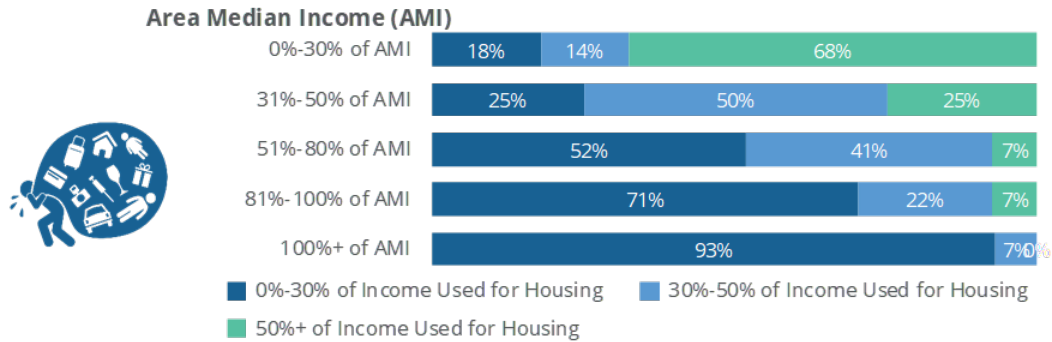
Access to mortgage loans. Disparities by race and ethnicity are also prevalent for home mortgage applications, particularly in denial rates. **Hispanic/Latinx (41% denial rate), and Black or African American (43%) have the highest denial rates for mortgage loan applications in 2018 and 2019. Conversely, non-Hispanic Asian (22%), and White households (18%) have the lowest rates during the same time.**

⁴¹https://library.municode.com/ca/east_palo_alto/codes/code_of_ordinances?nodeId=EAPAALCA.

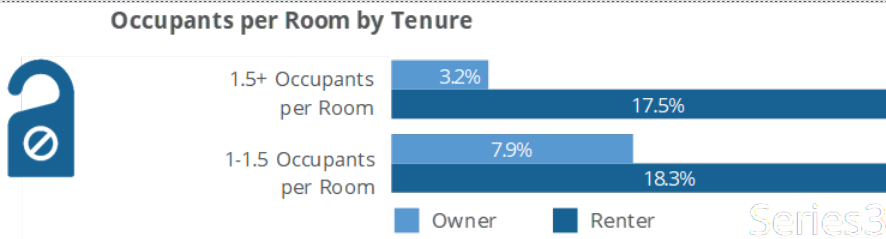
⁴² Ibid.

Disproportionate Housing Needs

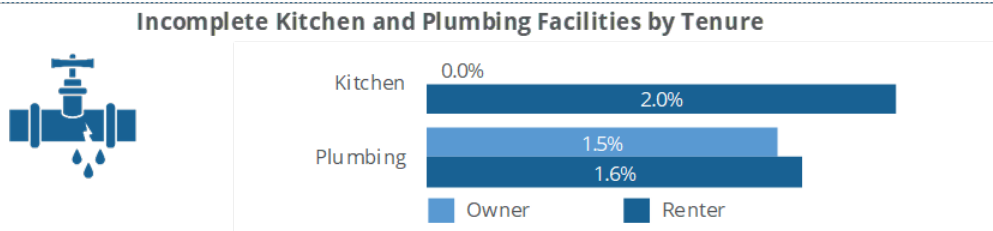
Cost Burden, East Palo Alto, 2019



Overcrowding, East Palo Alto, 2019



Substandard Housing, East Palo Alto, 2019



Homelessness, San Mateo County, 2019

Race and Ethnicity	Share of Homeless Population	Share of Overall Population
American Indian or Alaska Native	6%	0%
Asian / API	6%	30%
Black or African American	13%	2%
White	67%	51%
Other Race or Multiple Races	8%	17%

Displacement, 2020

Assisted Units at High or Very High Risk of Displacement	East Palo Alto City	San Mateo County
Number of Units	0	417
% of Assisted Units	0%	8%

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5 SITES INVENTORY ANALYSIS

For the Sites Inventory, jurisdictions must provide a site-by-site analysis of parcels in the City where housing development is expected to occur over the eight-year planning period. Using an HCD-provided form, jurisdictions must provide information about each site to illustrate the key assumptions used to calculate the estimated number of units. This form is included as Appendix A. The total number of units, by income category, from the sites in the Sites Inventory must meet or exceed the City’s RHNA.

According to HCD guidance for choosing suitable sites to accommodate the RHNA, lower-income housing is best accommodated on sites larger than 0.5 acres or smaller than 10 acres and zoned for a minimum 30 dwelling units per acre density.⁴³ Nonvacant sites should not exceed 50% of all sites in the Sites Inventory.

Not all sites in the City’s Sites Inventory fall within the 0.5-to-10-acre limits. These sites may be used to account for Above-Moderate (market-rate) units only. There are currently 6 sites smaller than 0.5 acres and 1 site larger than 10 acres on the list. Well over half of the sites are vacant, with some key redevelopment sites.

Each site must be detailed in the Sites Inventory list with the following:

Entry	Description
APN	Assessor’s Parcel Number
Size	HCD considers the appropriate size range for lower-income housing to be sites that can support 50 to 150 units, or between .5 acres and 10 acres. Smaller or larger sites can be considered for market-rate housing.
General Plan land use designation	As identified in General Plan.
Zoning designation	Existing zoning, e.g., RMD-1, in General Plan and Specific Plan, if applicable
Allowable density (minimum and maximum)	Density, or dwelling units per acre (“du/acre”)
Development capacity	Estimate the number of units likely to be built on the site. Jurisdictions must justify these estimates and state their assumptions in the narrative section of the Housing Element. See “capacity adjustment” below.
RHNA affordability levels	Indicate which levels of affordability will be served by the site (lower-income, moderate, above-moderate). For lower-income RHNA, default density of the site must be a minimum of 30 du/acre. HCD encourages jurisdictions to choose sites near transit, high-performing schools, jobs, amenities (e.g., parks, grocery stores, healthcare), with good infrastructure and no environmental mitigation needed.

⁴³ This is the “default density” for lower-income housing for San Mateo and other metropolitan jurisdictions, according to HCD: <https://www.hcd.ca.gov/analysis-of-sites-and-zoning>

Existing use	If site is nonvacant, describe what is currently on the site.
Publicly owned	Any sites owned by City, County or federal government.
Site status	Indicate whether the site is available or whether there is a pending project on it.
Infrastructure availability	Address whether there are sufficient water, sewer, and dry utilities available and accessible to support housing Development. If not, include a program in the Housing Element that ensures access and availability to infrastructure to accommodate development within the planning period.
Environmental constraints	To the extent the information is available, provide a general description of any known environmental or other features (e.g., presence of floodplains, protected wetlands, oak tree preserves, very high fire hazard severity zones) that have the potential to impact the development viability of the identified sites.
Included in prior Housing Element(s)	If the site was used in a prior sites inventory, the jurisdiction must demonstrate why it is likely that the parcel will develop in the next RHNA cycle.

5.1 OVERVIEW OF TYPES OF SITES IN THE SITES INVENTORY

The number of estimated units total over the RHNA 6 period from all sites included in the Sites Inventory, also referred to as “Housing Opportunity Sites,” is summarized in Table 5.1.A. These Housing Opportunity Sites serve as quantified objectives because they provide the maximum number of housing units that can be constructed and redeveloped in the City over an eight-year timeframe. For the 2023-2031 housing cycle, the city’s quantified objectives for construction are 1,885 units, with 753 of those being affordable to East Palo Alto residents (very low income or low income).

	VLI	LI	MOD	Above-Mod	Total
Housing Opportunity Sites	509	244	107	1025	1885
RHNA 6	165	95	159	410	829
Difference	344	149	-52	615	1056
Percentage difference	208% over	157% over	33% under	150% over	127% over

Note: Assumed 125 additional ADU’s (30% VLI, 30% LI, 30% MOD, and 10% Above-Mod) based on prior years’ ADU counts. Assumed 36 additional moderate-income ADU’s based on SB 9 projections. See methodology below.

The East Palo Alto Sites Inventory or Housing Opportunity Sites contains many “pipeline units,” or units in projects that have been entitled or received SB 35 Zoning Clearance, and that are expected to apply for a

building permit or begin construction after July 1, 2022, or in subsequent years. All such units are included in the Sites Inventory and will count towards the 6th RHNA cycle. Taking these unit counts into account, the City can meet or slightly exceed the RHNA in nearly every category, except for Moderate-Income units.

For other sites in the Sites Inventory, there is an active development application with a high level of confidence they will lead to construction of units within the eight-year Housing Element cycle (2023-2031) – or there is significant developer interest and potential feasibility, but the ability to develop residential units relies on a rezoning of the parcel. For these reasons, in many the development proposal or preapplication was used to calculate the realistic capacity of the sites.

The Sites Inventory is broken down into the following types of sites, each with its own description:

Table 5.1.B: Entitled or Ministerially Approved Projects								
Site	Size	Zoned Density	Assumed Density	VLI	LI	MOD	Above-Mod	Total
965 Weeks	2.52	22 to 43 or 40	54	42	93		1	136
1804 Bay Rd.	.99	22 to 65 or 50	75	10			65	75
2331 University	.89	22 to 65	37		4	3	26	33
1201 Runnymede	.932	22 to 43 or 40	34		3	3	26	32
760 Weeks	.52	12 to 22	19		1	1	8	10
120-126 Maple Lane	.177 (total)	12 to 15	15				4	4
APN 063265300 Runnymede/Clarke	.156	12 to 15	12		1		2	3
Lincoln St. (APN 063186270)	.254	up to 12	8	1			3	4

Here and in all subsequent charts, “Zoned Density” refers to the density permitted for that zoning type; “Assumed Density” is the density of the proposed project and/or the density used to calculate the number of units in each income category. It is provided in dwelling units per acre. Some contain two zoned densities: one from the General Plan and one from the Ravenswood/4 Corners Specific Plan.

5.2 PROJECTS NOT APPROVED, BUT HIGH PROBABILITY OF DEVELOPMENT

This additional “pipeline” category includes sites with a minimum 30 du/acre and size between 0.5 and 10 acres, which can support lower-income housing, in addition to some lower-density or smaller infill sites with an active Planning application. Multiple sites zoned RMD-2, with allowable density between 12-22 du/acre, have seen development interest. Where the developer has agreed to meet the requirements of the City’s inclusionary housing ordinance, this results in a small number of affordable units in the project.

Table 5.2: Projects Not Approved, but High Probability of Development

Site	Size (acres)	Zoned Density	Assumed Density	VLI	LI	MO D	Above-Mod	Total
Woodland Park Euclid Improvements*	3.9	22 to 43 or 43 to 86	155				444	444
Four Corners	6.02	43 to 86 or up to 40	30	36			144	180
717 Donohoe	.66	12 to 22	21		1	1	12	14
990 Garden	1.32	up to 12	6		2		6	8
2340 Cooley	.26	12 to 22	31		1		7	8

**Note: Woodland Park is proposing to provide between 75 and 89 inclusionary units off-site (an in-lieu fee will be paid for the difference if not all 89 are built off-site), which will be deed-restricted to 35-60% AMI. The project will demolish and rebuild 160 rent-stabilized units as a part of the new development, which remain restricted to the Annual General Adjustment (AGA) each year or revert to market-rate if these units are or become vacant upon the completion of the new development. In this chart, only the net-new, market-rate units are counted. The 16 very low-income and 10 low-income units that will be constructed off-site are counted separately in the next chart under the site name of 851 Weeks due to its lower probability of development.*

5.3 PROJECTS WITH LOWER PROBABILITY OF DEVELOPMENT, BUT DEVELOPMENT INTEREST

This category consists largely of very low-density, above-moderate developments with single family-home or townhome subdivisions and some smaller sites (less than 0.5 acres). It contains one site suitable for lower-income housing.

Table 5.3: Projects with Lower Probability of Development, But Development Interest								
Site	Size (acres)	Zoned Density	Assumed Density	VLI	LI	MOD	Above-Mod	Total
547 Runnymede	.45	12 to 22	15				7	7
1062 Runnymede	.92	up to 12	6				6	6
812 Green	.89	up to 12	6				5	5
842 Green	.59	up to 12	6				4	4
801 Donohoe	.45	12 to 22	6				5	5
755 Schembri	1.435	12 to 15	4				17	17
807 E. Bayshore	.55	up to 22	15				12	12
851 Weeks	.65	22 to 43 or up to 40	40	16	10			26

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5.4 PUBLICLY OWNED SITES WITH POTENTIAL FOR DEVELOPMENT OR REDEVELOPMENT

These sites include a City-owned site, the Senior Center, County-owned Government Center, and a site owned by the Ravenswood Elementary School District. Appendix D2 is a letter from the Ravenswood Elementary School District stating their interest in development.

Site	Size	Zoned Density	Assumed Density	VLI	LI	MOD	Above-Mod	Total
2277 University	.36	up to 60	30	19			1	20
560 Bell	.736	n/a	30	14	8			22
2415 University	2.045	22 to 65 or up to 50	55	60		1		61
Bay Rd. (APN 063090080)	2.59	n/a	30	26	26	26		78

5.5 SITES WITH NONRESIDENTIAL ZONING, BUT RESIDENTIAL DEVELOPMENT APPLICATION IN RAVENSWOOD BUSINESS DISTRICT

These nonresidential zoning sites are in the Ravenswood Business District (RBD) area and have potential for rezoning to allow for residential development.

Site	Size	Zoned Density	Assumed Density	VLI	LI	MOD	Above-Mod	Total
EPA Waterfront	9	n/a	30	52			208	260
1103 Weeks St (Harvest the Landing)	1.6	n/a	60	95				95
1200 Weeks St (South of Weeks)	2.7	n/a	30	51	30			81

5.6 SITES WITH (RE)DEVELOPMENT POTENTIAL IN RAVENSWOOD BUSINESS DISTRICT

These sites are located in the RBD area and are zoned for relatively dense housing.

Site	Size	Zoned Density	Assumed Density	VLI	LI	MOD	Above -Mod	Total
791 Weeks	.89	22 to 43 or up to 40	30	22	12			34
1923 Bay Rd.	.99	22 to 65 or up to 50	40	25	15			40

5.7 ACCESSORY DWELLING UNITS (ADUS)

This category includes projected ADUs and JADUs for the eight-year planning period. These units may be counted towards the RHNA; numbers based on past production.

Since 2019, the City has issued an average of 15.6 ADU permits per year.⁴⁴ Based on the annual average since 2019, the City projects 125 ADUs being permitted over the eight-year planning period. Using ABAG's survey data to distribute the projected units by income category produces the following estimates:

Income Category	Percentage	Total
Very low	30%	38
Low	30%	37
Moderate	30%	37
Above moderate	10%	13

⁴⁴ The number of ADUs per year since 2019: 8 in 2019, 10 in 2020, 29 in 2021.

5.8 MODERATE-INCOME UNITS FROM SB 9 PROJECTS

There has been significant interest from local developers in the use of Senate Bill 9 (SB 9) for projects on parcels zoned R-LD, or Low Density Residential. SB 9 allows for urban lot splits and a minimum of two units on each parcel zoned for single family homes. The application of SB 9 allows for a single-family zoned parcel to be split into two and for more units to be built on a lot than a single-family zoning designation.

Most lots in East Palo Alto are not large enough to be split into two lots of at least 5,000 square feet (sq ft) each, the minimum lot size to develop a single unit required in the City’s Development Code. Of the 189 lots with more than 10,000 sq ft that can split in half, 10 are vacant. Most of these >10,000 sq ft vacant parcels are in the Weeks neighborhood (southeast in the City) or in the Palo Alto Park neighborhood (Northeast in the City).

By enabling an urban lot split or two units on a single lot, SB 9 allows for housing types such as duplexes, or duplexes with ADUs, on parcels where it was previously not possible. Smaller units or attached units tend to be more affordable than large single-family homes, potentially resulting in a less expensive housing option, with rents that approximate a Moderate-Income unit (up to 120% of the Area Median Income).

As part of the Sites Inventory Analysis, a small number of parcels were considered as high-potential SB 9 sites based on their size and current R-LD zoning. Given the interest in SB 9 in East Palo Alto, it is reasonable to assume that a significant percentage of eligible parcels could be the subject of an SB 9 application over the next eight years.

Of the 3,328 parcels zoned R-LD and with less than 10,000 square feet in size—and therefore not suitable for more than a single unit under the City’s Development Code—approximately 70 of these are vacant. Most of these <10,000 sq ft vacant parcels are also in the Weeks neighborhood (Southeast in the City) or in the Palo Alto Park neighborhood (northeast in the City). Staff assumed that 25% of these vacant parcels could be developed with two units via SB 9. This would result in 18 lots, where 36 units could be developed. These 36 units were counted as Moderate-Income units in the Sites Inventory.

All R-LD parcels	Count, Total	Vacant
Less than 2,400 sq ft	18	14
2,401 – 9,999 sq ft	3,310	55
More than 10,000 sq ft	189	10
Total	3,517	79

Source: Raimi + Associates

5.9 AFFIRMATIVELY FURTHERING FAIR HOUSING CONSIDERATIONS FOR SITES INVENTORY

AB 686 requires an analysis of sites identified to meet RHNA obligations for their ability to affirmatively further fair housing.

The Sites Inventory must demonstrate that the sites chosen are not concentrated in one area of a jurisdiction, especially when a jurisdiction has sites of varying “opportunity” levels, as based on the TCAC Opportunity Map.⁴⁵ Furthermore, the Sites Inventory should limit the number of lower-income housing sites in areas deemed Racially/Ethnically Concentrated Areas of Poverty (“R/ECAPs”).⁴⁶

As the maps provided in the Affirmatively Furthering Fair Housing overview demonstrate, East Palo Alto does not have high variation in terms of “opportunity” areas, nor does it contain R/ECAPs. However, in 2019, three Census tracts deemed “edge R/ECAPs” existed in East Palo Alto—which means they are majority people of color and have a poverty rate two times higher than the countywide Census tract average. Given the overall data on housing needs, location of housing sites is less of a concern within the city than within the region in which East Palo Alto is situated.

The selection of sites in the Sites Inventory reflects different areas of the city, with an emphasis on larger parcels in the Ravenswood/4 Corners Specific Plan Area (“RBD”). The Sites Inventory also reflects denser housing development not concentrated on the Westside, where most of the city’s rental housing stock is located, with the exception of the Woodland Park Communities Euclid Improvements project. Staff does not find that the selection of sites in the Sites Inventory would contribute further to the trends identified in the Affirmatively Furthering Fair Housing assessment.

The following is an analysis of the proposed sites for future development or “Sites Inventory,” which includes: sites that have been ministerially approved or entitled projects; projects not yet approved, but highly probable; projects with lower probability of development, but with development interest; and non-residential zoning sites with residential development applications.

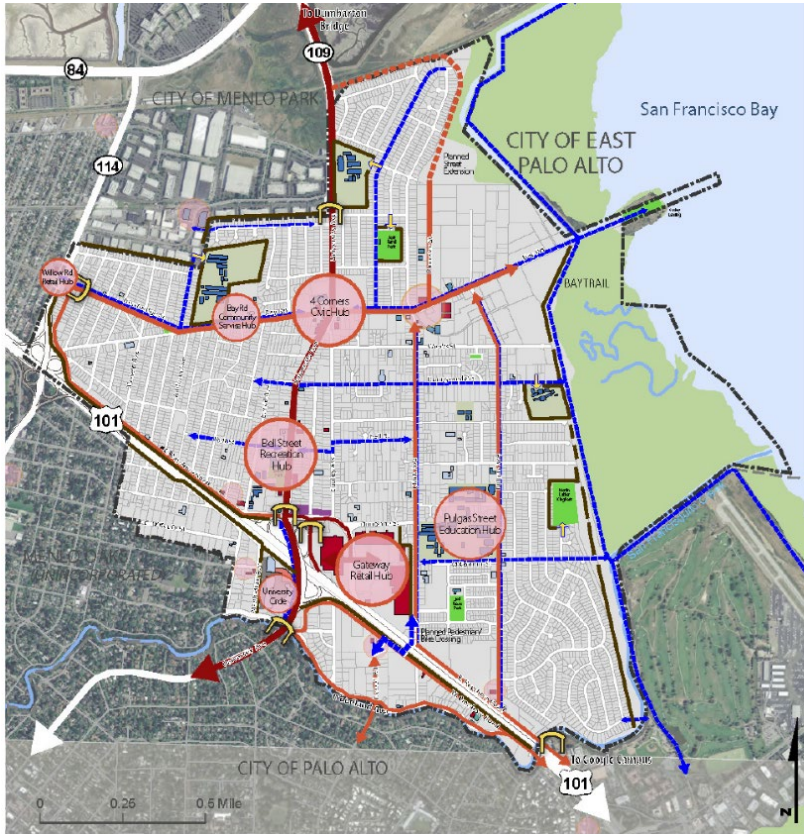
The sites inventory is well-distributed throughout the city, with the exception of the Ravenswood Business District (RBD) / 4 Corners Specific Plan area in the northeast of the city, which is uniquely available to address

⁴⁵ TCAC opportunity map: <https://belonging.berkeley.edu/2022-tcac-opportunity-map>

⁴⁶ According to the AFFH analysis provided, R/ECAPs “are meant to identify areas where residents may have historically faced discrimination and continue to be challenged by limited economic opportunity.” Racial Concentrated Areas of Affluence (“RCAAs”), on the other hand, “are meant to identify areas of particular advantage and exclusion.” 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 percent or more (majority people of color) AND a poverty rate of 40% or more; OR a census tract that has a non-White population of 50 percent or more (majority-people of color) AND the poverty rate is three times the average tract poverty rate for the County, whichever is lower.

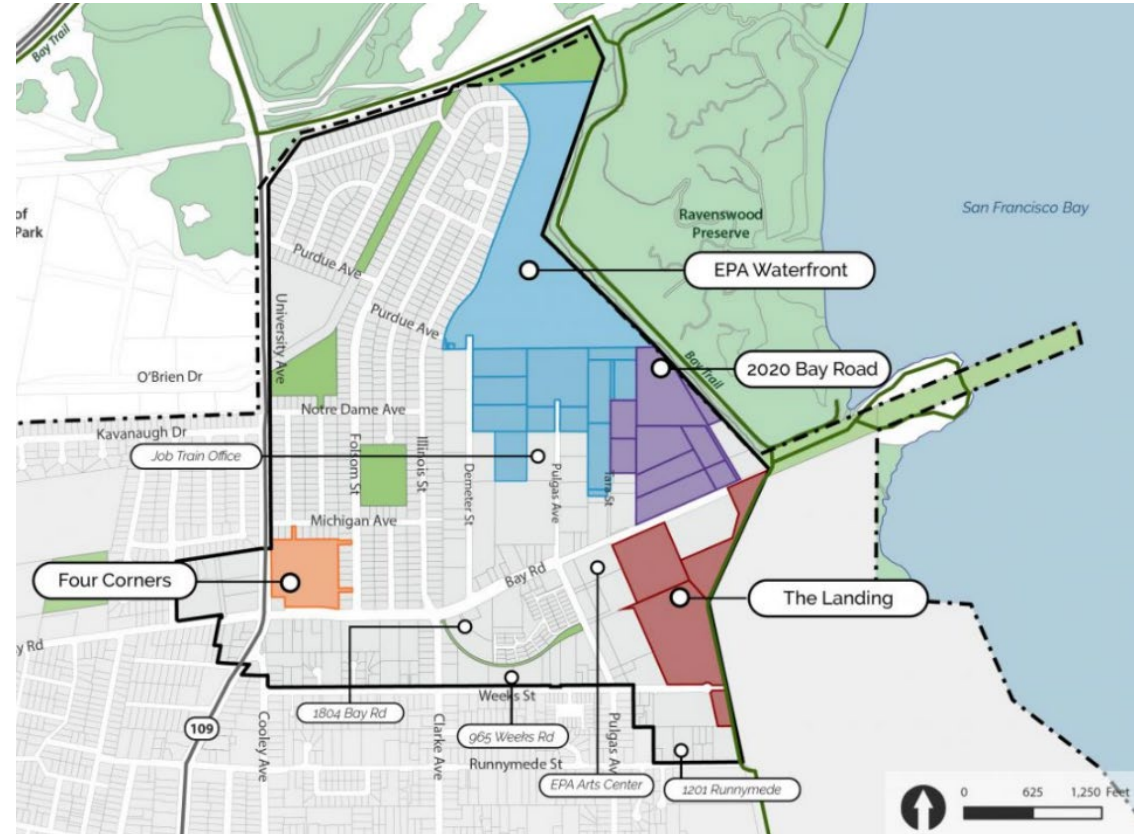
the community's jobs and housing needs. Maps 1 and 2 illustrate the city's structure and where referenced RBD/4 Corners Specific Plan area sites reside.

Map 1: City Structure, Activity Centers, and Transit Hubs



Source: Vista 2035 General Plan, City of East Palo Alto

Map 2: RBD / 4 Corners Specific Plan Update



Source: Vista 2035 General Plan, City of East Palo Alto

Sites Inventory and Area Median Income

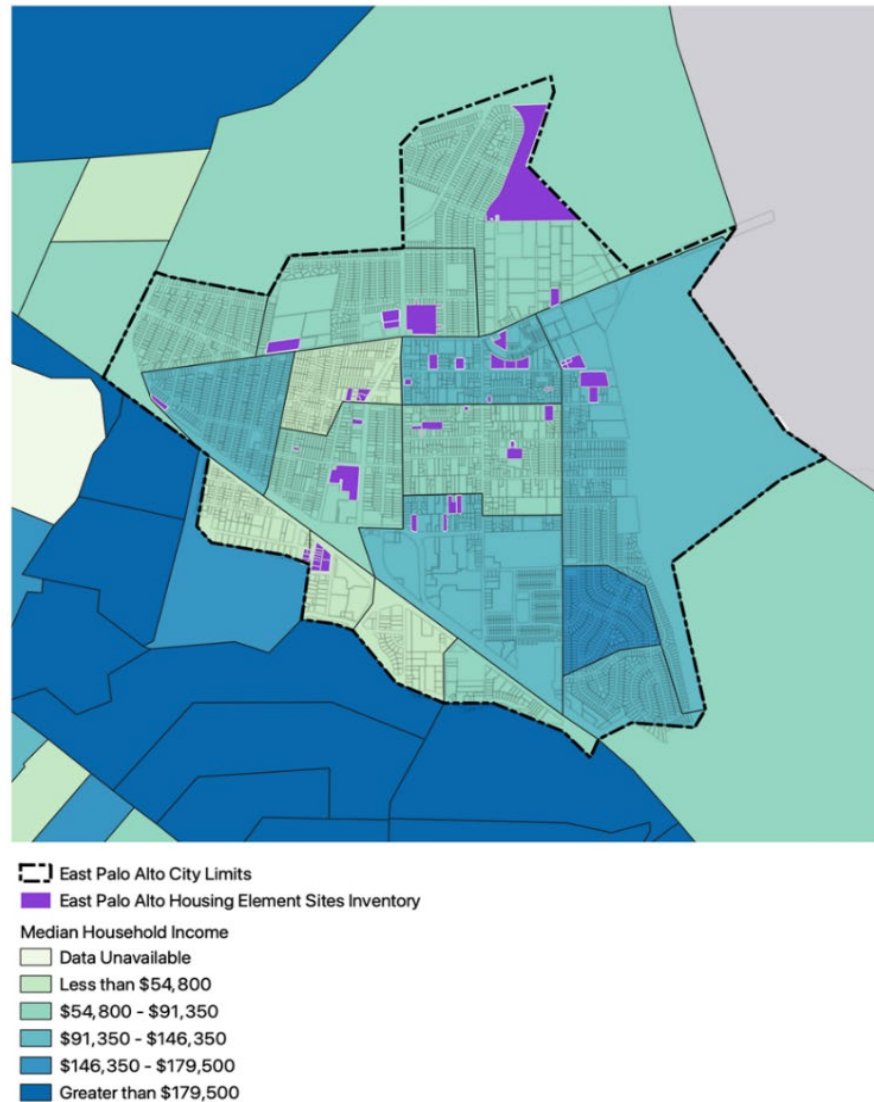
Map 3 provides the sites inventory overlaid on median household incomes based on the 2022 State Income Limits for San Mateo County.

The majority of the sites inventory is in census block areas with very low-income households (area median incomes between \$54,800 - \$91,350) and low-income households (area median incomes between \$91,350-\$146,350). There is only one census block area that consists of higher-income earners, and that is a single-family home neighborhood in the lower east side with no proposed housing development.

Sites Inventory and R/ECAPs

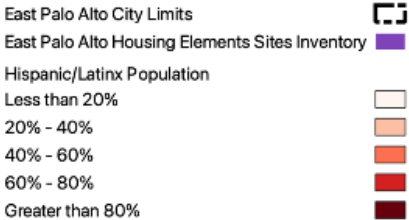
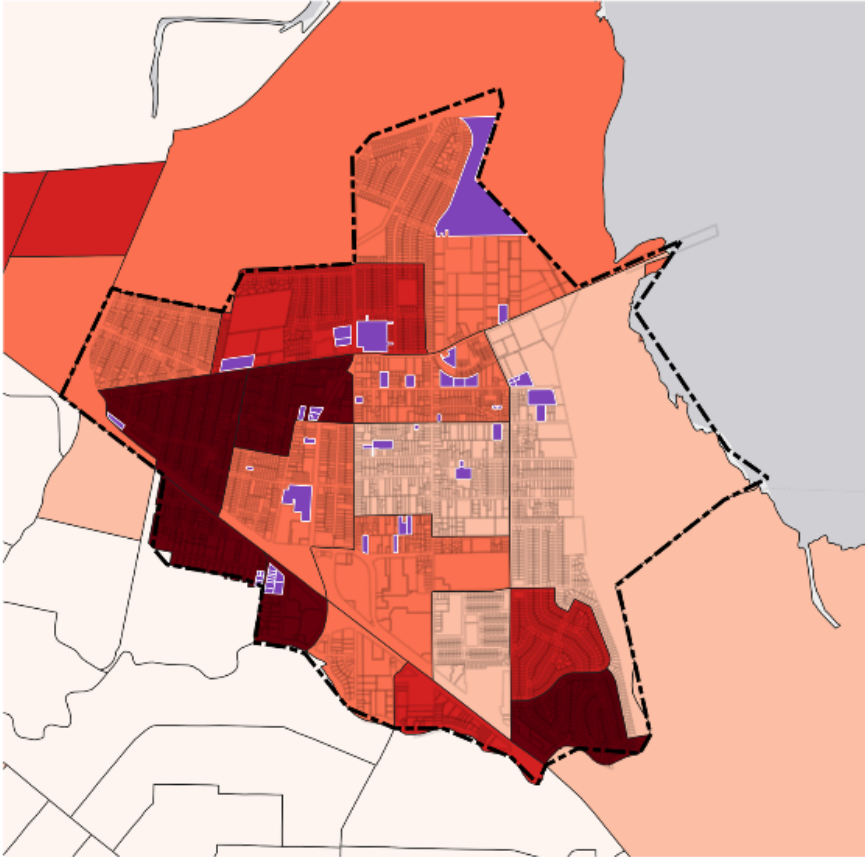
Three Racially/Ethnically Concentrated Areas of Poverty (R/ECAP)s are located in East Palo Alto, west of the Highway 101. Maps 4 to 7 provide insight into the location of these R/ECAP areas, as they demonstrate the location of racial and ethnic populations, and the lowest income areas. The maps show that three census blocks in East Palo Alto, which are located west of Highway 101, are extremely low-income and have a majority of people of color. One redevelopment project (Woodland Park Communities Euclid Improvements) is located in this area.

Map 3: Sites Inventory and Median Household Income

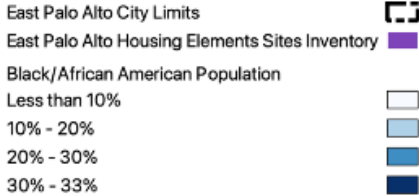
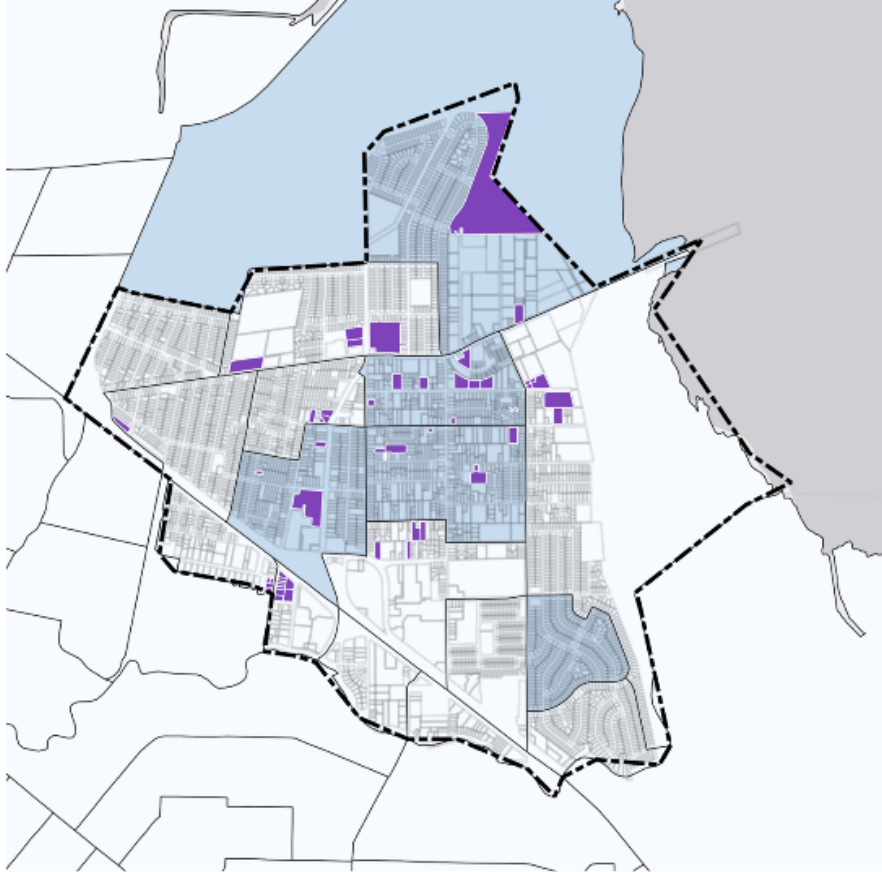


Source: ACS Table B19013, 2015-2019 5-Year Estimate.

Map 4: Sites Inventory and Hispanic/Latinx Population (2020)

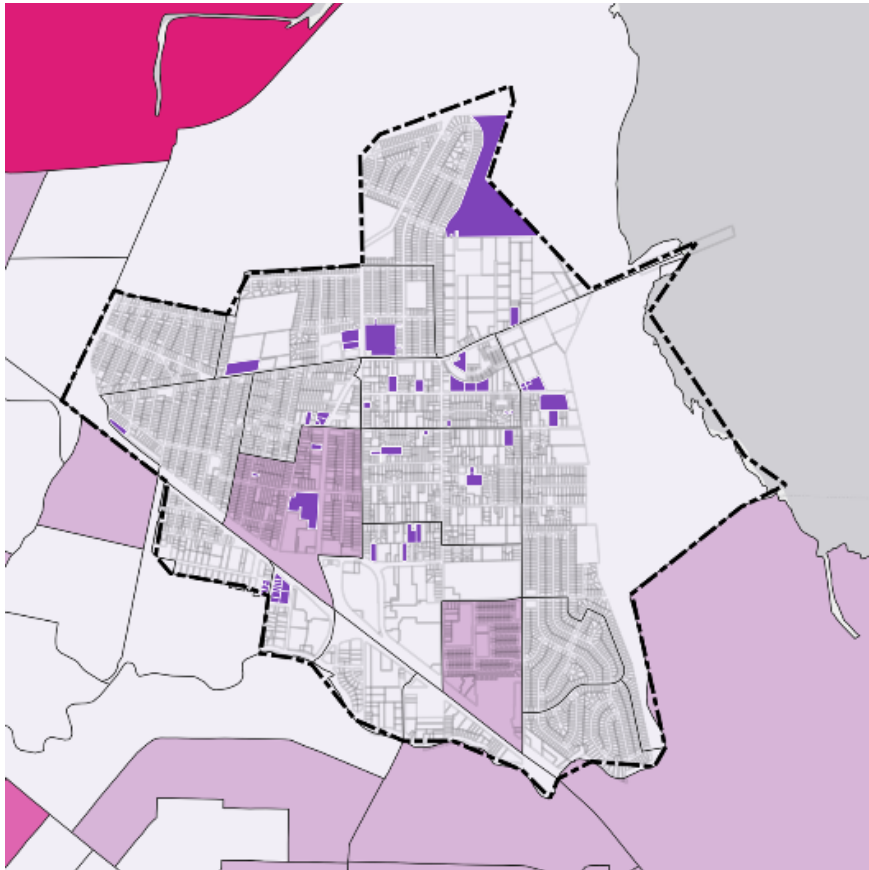









Map 5: Sites Inventory and Black/African American Population (2020)



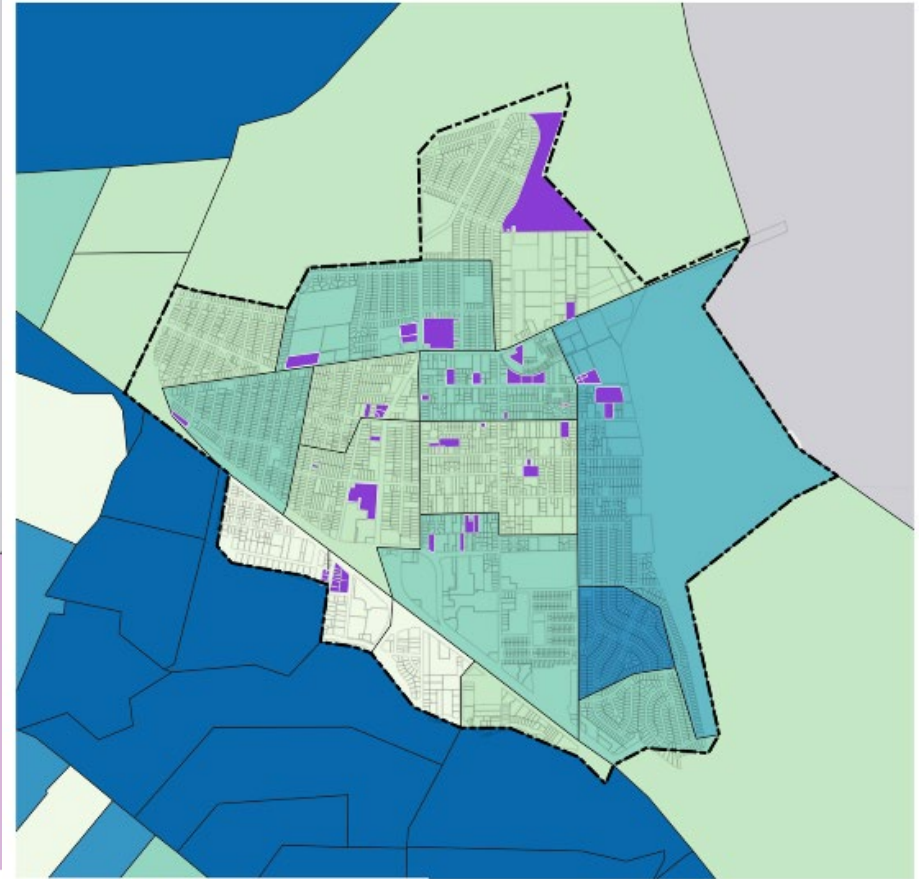
Source: ACS Table B19013, 2015-2019 5-Year Estimate.









Map 6: Sites Inventory and Asian/Pacific Islander Population (2020)



- East Palo Alto City Limits 
- East Palo Alto Housing Elements Sites Inventory 
- Asian Pacific Islander/Native Hawaiian Population
- Less than 20% 
- 20% - 40% 
- 40% - 60% 
- 60% - 80% 
- Greater than 80% 

Map 7: Sites Inventory and Median Household Income



- East Palo Alto City Limits 
- East Palo Alto Housing Element Sites Inventory 
- Median Household Income
- Less than \$50,000 
- \$50,000 - \$80,000 
- \$80,000 - \$110,000 
- \$110,000 - \$140,000 
- \$140,000 - \$170,000 
- Greater than \$170,000 

Source: ACS Table B19013, 2015-2019 5-Year Estimate.

Distribution of Lower, Moderate- and Above-Income Units in the Sites Inventory

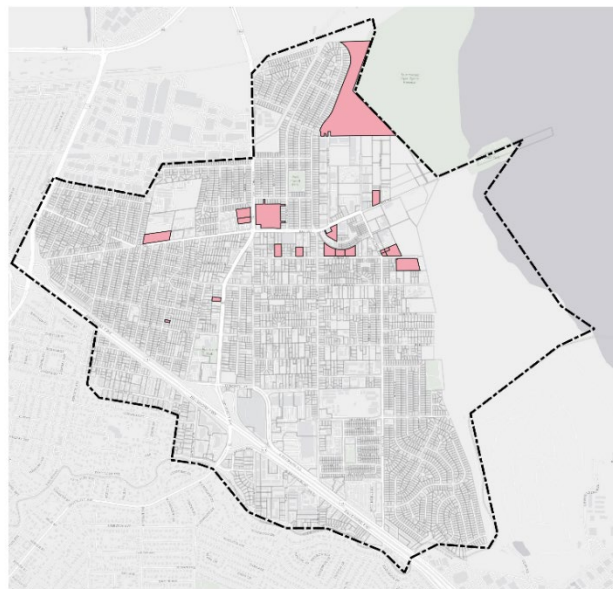
The following maps demonstrate where the future development of housing units is located, broken down by affordability levels.

Sites Inventory – Very Low-Income Units

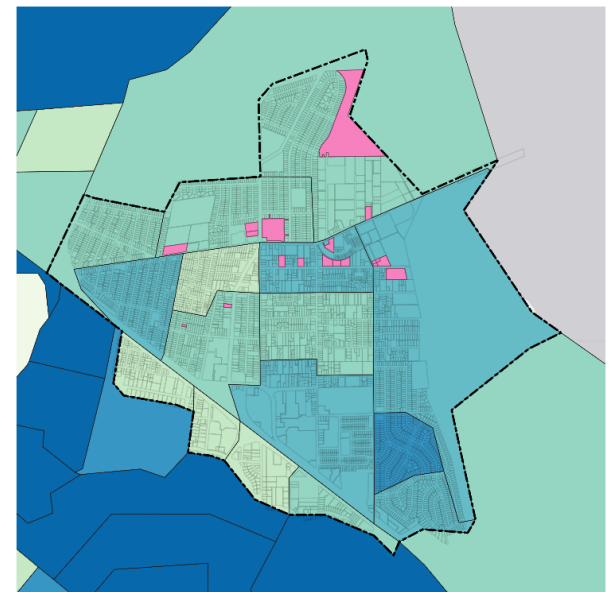
Very low-income units are primarily planned on the East side of Highway 101, where on average, there are fewer extremely low-income households. They are also primarily located in the Ravenswood Business District Specific Plan area (RBD) in close proximity to future job centers and in accordance with the City’s transit-oriented development plan. They are also located along transited streets such as Bay Road “Main Street,” University Avenue corridor, and Pulgas Avenue.

- 1804 Bay Road (10 units)
- 1923 Bay Rd. (25 units)
- 2277 University (20 units)
- 2415 University (61 units)
- 560 Bell St. (14 units)
- 791 Weeks (22 units)
- 851 Weeks (16 units)
- 965 Weeks Street (42 units)
- EPA Waterfront (52 units)
- Four Corners 1675 Bay Rd. (36 units)
- Harvest The Landing Housing Offsite 1103 Weeks (95 units)
- Lincoln St. (APN 063-186-270) (1 unit)
- Ravenswood Elementary School District Bay Rd. Site (26 units)
- South Of Weeks/Former Primary School Site (51 units)

Map 8: Distribution of Very Low-Income Units in Sites Inventory



East Palo Alto City Limits
Sites Inventory Very Low-Income Units



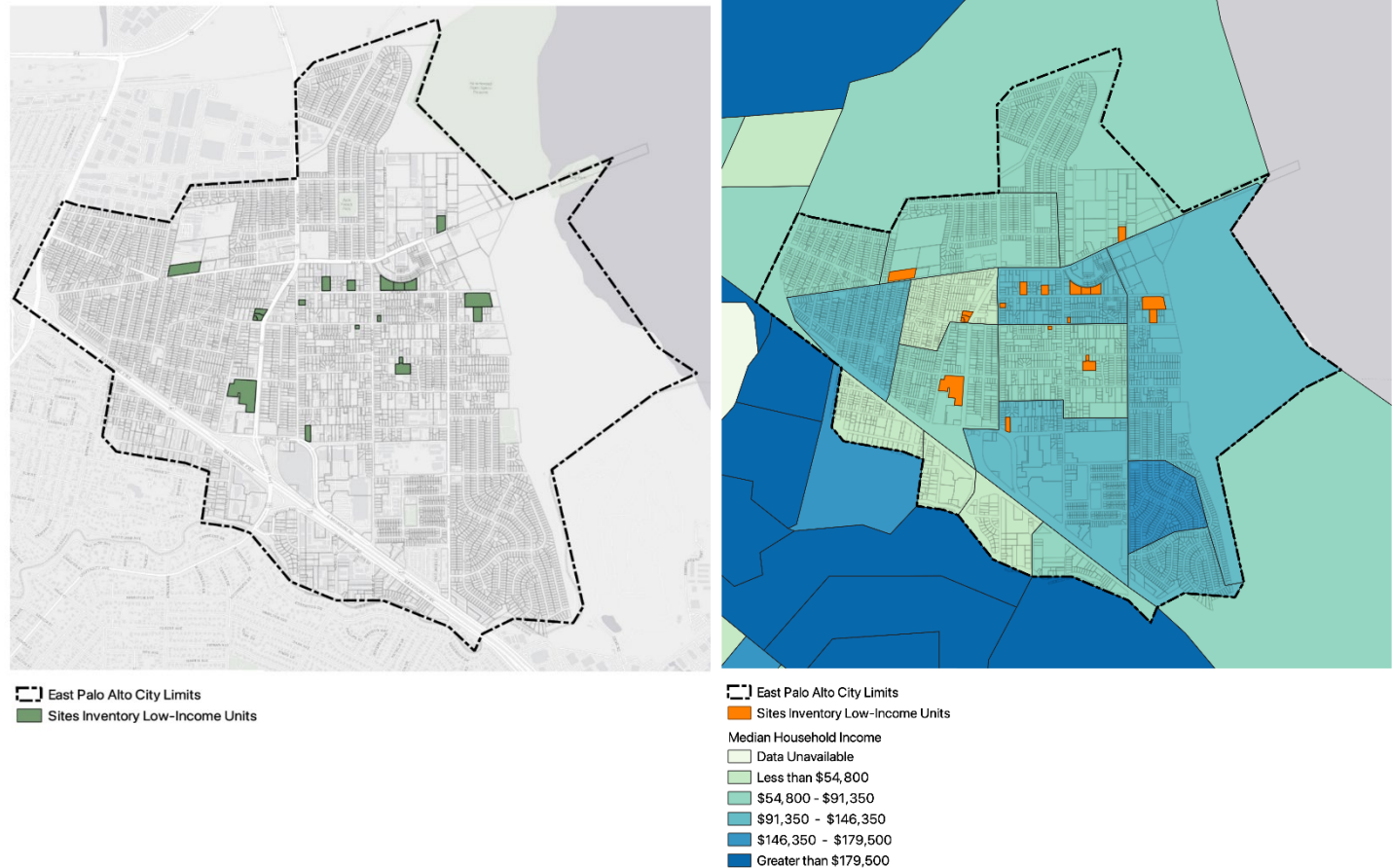
East Palo Alto City Limits
Sites Inventory Very Low-Income Units
Median Household Income
Data Unavailable
Less than \$54,800
\$54,800 - \$91,350
\$91,350 - \$146,350
\$146,350 - \$179,500
Greater than \$179,500

Sites Inventory – Low-Income Units

Low-income units are primarily planned on the East side of Highway 101, where on average, there are fewer extremely low-income households. They are planned along transited streets such as: Bay Road “Main Street,” University Avenue corridor, Weeks street, Pulgas Avenue, and East Bayshore Road.

- 1201 Runnymede (3 units)
- 1923 Bay Rd. (15 units)
- 2340 Cooley (1 unit)
- 560 Bell St. (8 units)
- 717 Donohoe (1 unit)
- 760 Weeks Street (1 unit)
- 791 Weeks (12 units)
- 851 Weeks (10 units)
- 965 Weeks Street (93 units)
- 990 Garden (1 unit)
- No Address/APN 063265300 (Runnymede/Clarke) (1 unit)
- Ravenswood Elementary School District Bay Rd. Site/APN 063090080 (26 units)
- South Of Weeks/Former Primary School Site (1200 Weeks St) (30 units)
- University Clarum Corner 2331 University (4 units)

Map 9: Distribution of Low-Income Units in Sites Inventory

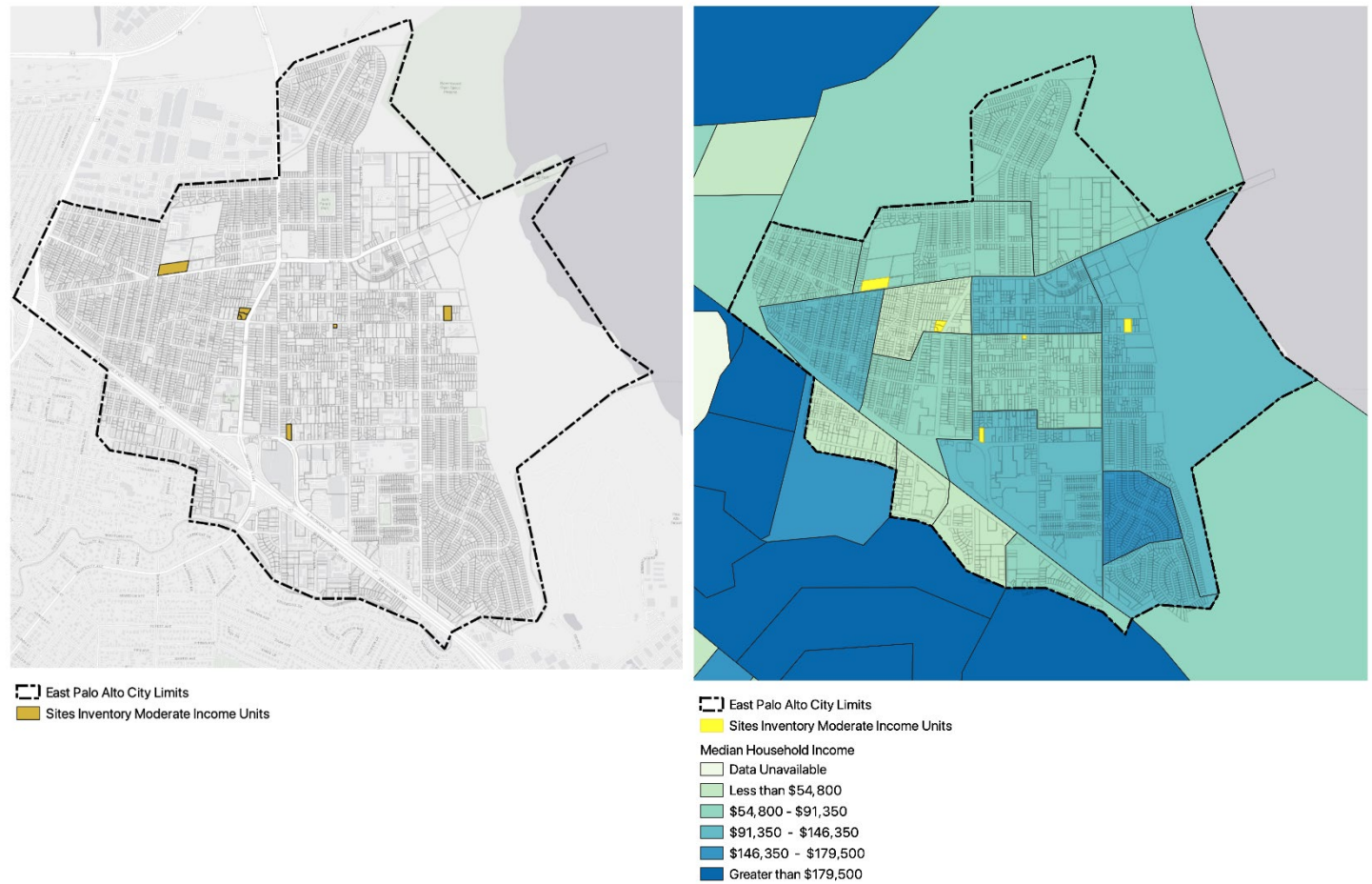


Sites Inventory Moderate Income Units

Moderate-income units are primarily planned on the East side of Highway 101, where on average, there are fewer extremely low-income households. They are planned along transited streets such as: Bay Road “Main Street,” University Avenue corridor, Pulgas Avenue, and East Bayshore Road.

- University Clarum Corner
2331 University (3 units)
- 1201 Runnymede (3 units)
- 760 Weeks Street (1 unit)
- 717 Donohoe (1 unit)
- Ravenswood Elementary School District Bay Rd. Site (26 units)

Map 10: Distribution of Moderate-Income Units in Sites Inventory

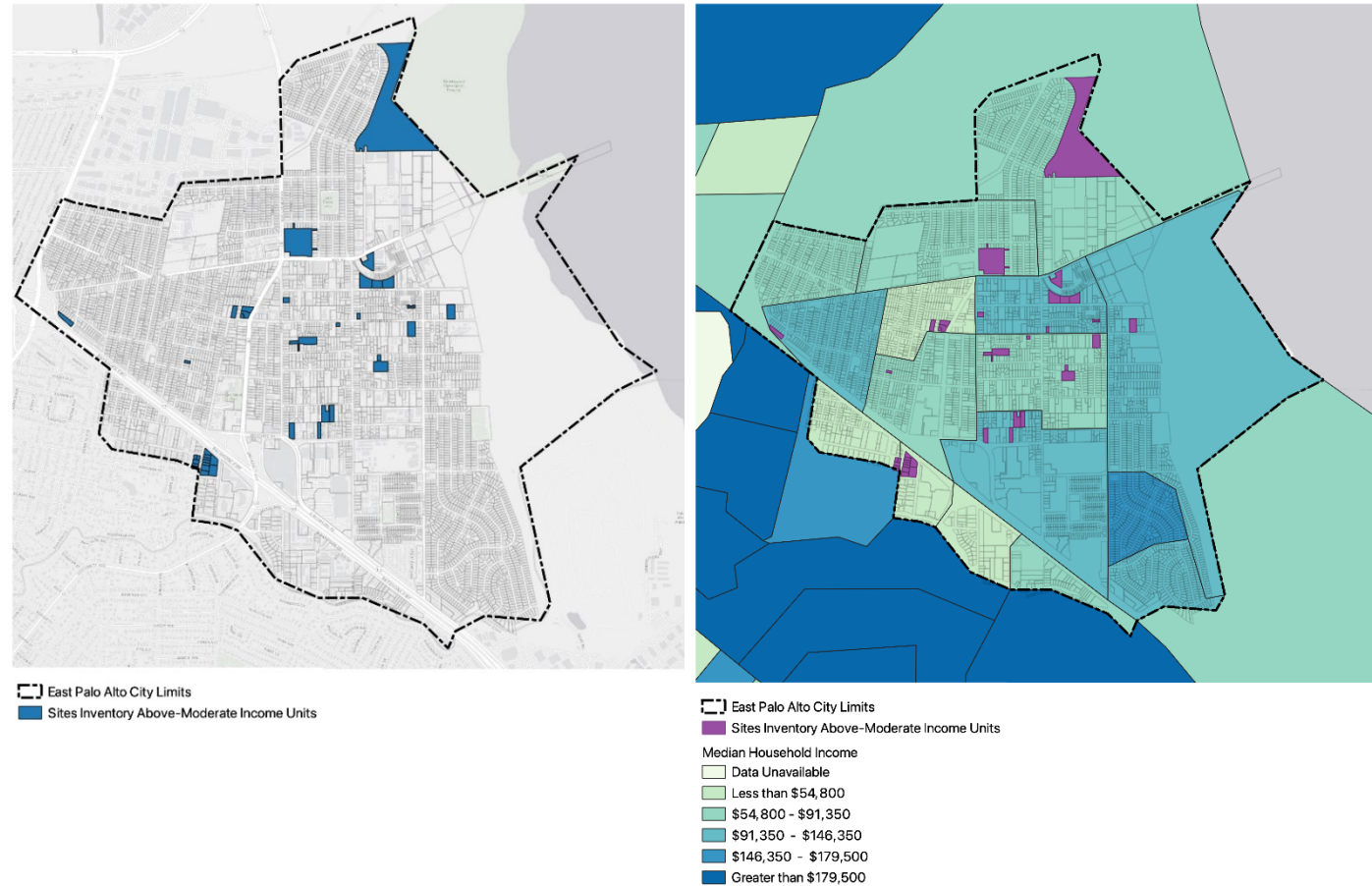


Sites Inventory Above-Moderate Income Units

Above moderate-income units are scattered along transit streets such as: Bay Road “Main Street,” University Avenue corridor, Pulgas Avenue, and West Bayshore Road. They are also concentrated in the RBD/4 Corners Specific Plan area.

- 965 Weeks Street (1 unit)
- 1804 Bay Road (65 units)
- University Clarum Corner 2331 University (26 units)
- 1201 Runnymede (26 units)
- 760 Weeks Street (8 units)
- 120-126 Maple Ln (4 units)
- No Address/APN 063265300 (Runnymede/ Clarke) (2 units)
- Lincoln St. (3 units)
- Woodland Park Communities Euclid Improvements (444 units)
- Four Corners 1675 Bay Rd. (144 units)
- 717 Donohoe (12 units)
- 990 Garden (6 units)
- 2340 Cooley (7 units)
- 547 Runnymede (7 units)
- 1062 Runnymede (6 units)
- 812 Green (5 units)
- 842 Green (4 units)
- 801 Donohoe (5 units)
- 755 Schembri Lane (17 units)
- 807 E. Bayshore (12 units)
- EPA Waterfront (208 units)

Map 11: Distribution of Above-Moderate-Income Units in Sites Inventory



5.10 SITES INVENTORY PROXIMITY TO AREAS

East Palo Alto is only 2.5 square miles and has limited variation between its census tracts. The following describes where the sites inventory units are distributed within the city.

- High-resourced areas:
 - 0.0% of residents in East Palo Alto live in neighborhoods identified as “Highest Resource” or “High Resource” areas by State-commissioned research. All the sites inventory is therefore within “Low Resource” or “High Segregation and Poverty” areas.
- High proficiency K-12 education institutions:
 - According to Figure III-1, a majority of the City has a TCAC Opportunity Area Education Score of less than 0.50. Most of the sites inventory is therefore in areas with less positive education outcomes. There is little the City can do to change these outcomes without broader, state and district policy changes affecting school choice.
- Low social vulnerability:
 - According to Figure III-15, a majority of the City has a higher Social Vulnerability Index. Most of the sites inventory is therefore in areas with high social vulnerability.
- Good jobs proximity:
 - East Palo Alto has more low-wage residents than low-wage jobs (where low-wage refers to jobs paying less than \$25,000). At the other end of the wage spectrum, the City has more high-wage residents than high-wage jobs (where high-wage refers to jobs paying more than \$75,000). Discussions are currently underway to ensure that the sites in the Ravenwood Business District Specific Plan provide mixed-use development that provides a job-housing balance addressing the community’s needs.
- Healthy places:
 - According to Figure III-11, a majority of the City has a Healthy Places Index less than 60%, which is lower than surrounding communities. Most of the sites inventory is therefore in areas with lower health.
- Flood hazards:
 - A large portion of East Palo Alto is within the flood zone. See Flood Zone map [here](#). Most sites inventory are therefore in high-flood risk areas. The largest contributors to 100-year storm flooding in East Palo Alto are spills from San Francisquito Creek and tidal inundation from San Francisco Bay. Learn about the City’s and San Francisquito Joint Powers Authority’s plans to add improved flood protection along the south and west sides of East Palo Alto and decrease flood risk in the 2014 Storm Drain Master Plan [here](#).

- Access to transportation:
 - East Palo Alto has approximately seven SamTrans bus routes: 81, 83, 280, 281, 296, 296O, and 397. The majority of sites inventory are located along major transit coordinators (i.e., University Avenue, Bay Road, Pulgas Avenue, East Bayshore, and West Bayshore). See bus routes [here](#).

- Water access:
 - Most of the City's water connections (about 80%) are served by the City of East Palo Alto water system operated by [Veolia](#), which supplies water from the San Francisco Public Utilities Commission ([SFPUC](#)). The remaining connections are served by either [Palo Alto Park Mutual Water Company](#) or [O'Connor Tract Co-Op Water Company](#). See the City's water service areas map [here](#).

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6 POLICIES AND PROGRAMS

This chapter incorporates themes and findings from several other sections of the Housing Element, including input from the community through various channels of community outreach; analysis of fair housing issues; review of housing needs data; review of governmental and non-governmental constraints; and evaluation of the current Housing Element.

The goals, policies, and programs in this chapter are intended to respond to these findings and constitute the actions that the City will take over the coming eight years to address the City's housing challenges and improve the overall state of housing in East Palo Alto.

This chapter builds upon the City's accomplishments since RHNA 5, outlined in the Review of the Prior Housing Element chapter, positioning the City to pursue policies and programs aimed at addressing the City's most challenging housing needs.

6.1 STRUCTURE OF RHNA 6 HOUSING ELEMENT WORKPLAN AND GUIDING PRINCIPLES

In this Housing Element Workplan, there are nine overarching goals. Each goal is organized into objectives, which are then further broken down into policies and programs in a workplan format, with an emphasis on the timeline, staffing, and other resources needed to accomplish each one.

Common themes from the public, which, along with the Affirmatively Furthering Fair Housing Analysis, formed the guiding principles of this Housing Element Workplan, include: *the need for more affordable housing, ensuring there is a jobs-housing balance, ensuring new jobs do not create displacement pressures on current residents, creating new units that have better habitability, and ensuring there is sufficient parking.*

6.2 AFFIRMATIVELY FURTHERING FAIR HOUSING CONSIDERATIONS FOR POLICIES AND PROGRAMS

Addressing the issue of fair housing, equity and access is a key goal for the City, and as such, an analysis of the City's efforts to affirmatively further fair housing is not only a stand-alone objective, but one that is incorporated throughout the Housing Element, including the policies and programs.

Identifying AFFH Issues

A County-wide AFFH survey was administered to capture residents' needs regarding affirmatively furthering fair housing, and found the following housing challenges (based on responses from 53 East Palo Alto residents):

- a) About 41% of respondents indicated they would like to move but can't afford anything that is available.
- b) About 35% of respondents said their house or apartment is too small for their family.
- c) About 20% of respondents said they are often late on rent payments and 16% indicated they can't keep up with utilities.
- d) 40% of respondents indicated their neighborhood does not have good sidewalks, walking areas, and/or lighting, and 25% indicated schools in their neighborhood are poor quality.
- e) 32% of respondents said they have experienced displacement in the past five years, common reasons for displacement included:
- f) Rent increased more than I could pay; and
- g) Landlord wanted to rent to someone else.
- h) 29% of respondents indicated they had been discriminated against when looking for housing.

The AFFH Appendix C3 compares survey responses with other jurisdictions in San Mateo County, allowing for a comparative analysis. These survey results align with what staff heard in past community engagement activities.

Fair Housing Issues and Possible Contributing Factors

The County-wide AFFH survey helped identify a few key fair housing issues in East Palo Alto. These key fair housing issues include:

- Cost burden for Hispanic/Latinx and Black/African American households
- Entire City is considered vulnerable to displacement
- Lack of sidewalks, good street lighting and walkability in some neighborhoods
- High rates of fair housing discrimination
- Applicants for mortgage face high rates of denial, highest for Black/African American and Hispanic/Latinx applicants
- Higher portion of children than rest of county attending lower-performing schools

An analysis of the City's history of segregation and discrimination helps answer what may be some contributing factors to these fair housing issues. Possible contributing factors include:

- Decades of discrimination in employment, education, and housing markets
- Race-blind policies still generate disparate outcomes
- Migration to East Palo Alto due to relatively more affordable rents and home prices; neighborhoods with highest performing schools have high housing prices, pushing families into areas with schools that have fewer resources

- Low-income residents seeking affordable housing more likely to work low wage jobs that do not support cost of living, resulting in cost burden and overcrowding
- K-12 achievement gaps impacting future employment opportunities
- Historically low private sector investment

Recommendations to Address Fair Housing Issues

The Housing Elements encourages examining specific policies and programs that may help address systemic challenges to furthering fair housing. The “Housing-specific policies enacted locally” section in the AFFH Chapter identifies the following policy and program ideas, which are incorporated into the RHNA 6 Goals, Objectives, Policies & Programs:

- Anti-Displacement Plan
- Rental registry
- Homebuyer assistance program
- Mortgage and rental assistance (beyond pandemic)
- Foreclosure assistance
- Living wage employment ordinances
- Housing counseling
- Acquisition and rehab programs
- Construction of 2–3-bedroom affordable housing units for larger families
- Exploring establishment of cooperatives/community ownership of housing;
- Standardized review metrics of housing developments

6.3 GOALS, POLICIES AND PROGRAMS SUMMARY

Table 6.1 summarizes the RHNA 6 Goals, Objectives, Policies & Programs. This is followed by a detailed overview of the implementation plan for each. The main RHNA 6 Goals include:

- Goal 1 Create more housing opportunities, and more housing that is affordable to East Palo Alto residents.
- Goal 2 Create homeownership opportunities for East Palo Alto residents and stability for existing homeowners.
- Goal 3 Promote stewardship and preservation of the City’s existing affordable housing stock.
- Goal 4 Prevent displacement of East Palo Alto residents.
- Goal 5 Apply environmental justice principles in planning for new housing development.
- Goal 6 Promote safe and healthy housing in East Palo Alto.

- Goal 7 Create more housing opportunities for special needs households, including large households, people at risk of or experiencing homelessness, and individuals with disabilities.
- Goal 8 Improve transparency and communication between the City and the public on housing issues.
- Goal 9 Build City capacity for long-term housing planning and implementation of a range of Housing programs and initiatives.

For an overview of how these goals compare to RHNA 5 goals, see Review of Prior Housing Element chapter.

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Table 6.1: Summary of RHNA 6 Goals, Objectives, and Policies & Programs

Goal 1 Create more housing opportunities, and more housing that is affordable to East Palo Alto residents.	
Take reasonable measures to reduce overall processing times for residential development applications while maintaining robust community outreach and engagement.	Policy: Develop objective development and design standards that simplify and improve approval certainty and timing.
Incentivize affordable housing development.	Policy: Evaluate the feasibility and utility of an affordable housing overlay zone to incentivize affordable housing beyond available incentives in the state Density Bonus law. Policy: Adopt by-right zoning for parcels in the Ravenswood/4 Corners Specific Plan area where there is a minimum of 20% lower-income units.
Encourage smaller-scale housing that is relatively more affordable, including duplexes/triplexes and market-rate accessory dwelling units (ADUs).	Policy: Develop a “next-phase” streamlining effort for ADUs and JADUs, SB 9 projects, and any future small-development, ministerial approval process that builds on lessons learned from the ADU Streamlining collaboration with EPACANDO and City Systems. Policy: Study feasibility and desirability of reducing fees or delaying payment of fees for small projects, e.g., two or fewer units. Program: Develop outreach materials targeting smaller developers aimed at informing future applicants and improving the quality of Planning and Building applications received. Policy or Program: Revisit feasibility of a preapproved ADU designs program or clearinghouse to facilitate streamlined review and reduce design costs of ADUs.
Incentivize production of deed-restricted ADUs to add to the City’s affordable housing stock.	Policy: Develop a formalized legalization process for unpermitted second units. Policy: Research all available public and private sources of rehabilitation/repair funding and strengthen partnership with organizations in this area, such as Habitat for Humanity.
Develop long-term, sustainable funding sources that are flexible and may be used for affordable housing production and preservation and to prevent displacement and homelessness.	Policy: Pursue a 2022 ballot measure to increase and expand the City’s existing Gross Receipts Tax on rental residential properties. Program: Develop a plan that lays out funding goals and priorities for the City’s affordable housing revenue sources for a finite period (1 year to 5 years). Collaboratively (Planning and Housing) pursue state grant funds wherever possible to support affordable housing and address homelessness in the City.

Take reasonable measures to reduce the cost of development for fully affordable housing developments.	Policy: Use the opportunity of the RBD Specific Plan Update to study feasibility and desirability of fee waivers or reductions or delayed fee payments for fully affordable projects. Policy: Incorporate parking reductions into the City’s new Transportation Demand Management Program.
Encourage housing on sites zoned for mixed use in the Ravenswood/4 Corners Specific Plan Area.	Policy: For sites within the RBD Specific Plan Area, study feasibility and effectiveness of an RBD-specific density bonus and relaxed zoning controls.
Leverage available public lands for affordable housing development where feasible and beneficial to the community.	Program: Study and determine feasibility for redevelopment of Senior Center at 560 Bell St. to include affordable housing. Program: Work with County of San Mateo to complete land swap and determine feasibility of the County developing affordable housing at 2277 University. Program: Work with Sequoia Elementary School District to facilitate the development of the district-owned parcel at 2450 Ralmar Ave. as affordable public school employee housing.
Build housing in areas zoned for exclusive retail use, where the market has made retail less feasible.	Policy: Study feasibility and desirability of Gateway 101 Retail Center as potential conversion to more mixed-use with additional housing.
Incentivize “missing middle” housing, or smaller-scale housing that is affordable to households at 80-120% of Area Median Income.	Policy: Review City zoning standards to ensure compatibility with SB 9 and make process improvements to encourage application of SB 9 on appropriately zoned parcels.
Goal 2 Create homeownership opportunities for East Palo Alto residents and stability for existing homeowners.	
Promote financial literacy as a means of encouraging homeownership and support first-time homebuyers.	Policy: Develop a City-led homebuyer support program or programs tailored to the needs of households in East Palo Alto.
Advocate for homebuyer and homeownership programs at the regional level.	Policy: Advocate for the homebuyer and homeownership programs at the regional level.
Goal 3 Promote stewardship and preservation of the City’s existing affordable housing stock.	
Ensure that the City’s deed-restricted affordable housing and Below Market-Rate (BMR) portfolio remain well-maintained and monitored.	Program: Continue working with EPACANDO and Bay Area Affordable Homeownership Alliance (BAAHA) on the existing BMR Program contract and draft Request for Proposals (RFP) for next phase of BMR Program management, including additional rental and for-sale inclusionary housing units.
Improve data on affordability of the City’s rental housing stock outside of the Rent Stabilized portfolio.	Program: Study feasibility of creating of a City rent registry.
Leverage County initiatives and affordable housing resources to increase public awareness of affordable housing opportunities in East Palo Alto.	Program: Work with the County of San Mateo to list all affordable housing projects and inclusionary units on Doorway, a new regional platform for searching and applying for affordable housing.
Goal 4 Prevent displacement of East Palo Alto residents.	

<p>Connect the creation of new jobs in the City from commercial development to the creation of new housing at the appropriate affordability levels.</p>	<p>Policy: As part of the RBD Specific Plan update, develop a new requirement to build new housing at specified levels of affordability based on a numerical linkage to office/R&D square footage in Ravenswood Business District (RBD).</p> <p>Program: Participate in countywide nexus study led by 21 Elements to update the existing Commercial Linkage Fee.</p>
<p>Promote the preservation of existing housing stock and rehabilitation of housing that is at-risk due to age, structural deficiencies, etc.</p>	<p>Policy: Develop a preservation strategy that addresses funding sources, identification of properties, and partnerships that can lead to preservation of affordable housing in East Palo Alto.</p> <p>Policy: Identify and maintain a list of at-risk and substandard buildings throughout the City.</p> <p>Policy: Study improvements to a City process for addressing code violations on residential properties, including, but not limited to, unpermitted second units.</p>
<p>Support housing stability of existing lower-income homeowners and enable the community's seniors to age in place.</p>	<p>Policy: Research all public sources and potential City-level initiatives to assist low-income homeowners in East Palo Alto with major repairs and rehab to address acute safety issues.</p> <p>Policy: Study models of foreclosure prevention at the local level in similarly sized cities, whether through local investment or leveraging outside funding.</p>
<p>Promote community/cooperative ownership of land and housing in East Palo Alto.</p>	<p>Program: Evaluate opportunities to support and/or leverage local community land trusts (CLTs) to create community ownership of new or preserved affordable housing, e.g., through scattered-site ADUs, small inclusionary projects, or preservation projects.</p>
<p>Prevent displacement due to high housing cost burden and barriers to housing, such as rental deposits.</p>	<p>Policy: Appropriate funds for direct emergency financial assistance to be administered by a qualified organization identified through a Request for Proposals (RFP) process.</p> <p>Policy: Consider developing a direct financial assistance program for first and last month's rent/deposit assistance.</p>
<p>Promote tenant education and create pathways to affordable rental and homeownership opportunities.</p>	<p>Policy: Release Request for Proposals (RFP) for anti-displacement and tenant education services and work with awarded organizations to report at regular intervals.</p> <p>Policy: Study and develop an Opportunity to Purchase Act policy that builds on prior research and City Council direction in 2021-22.</p>
<p>Implement an effective and fair housing compliant Local Preference Policy.</p>	<p>Policy: Complete guidelines on City's existing Local Preference Policy.</p>

Goal 5 Apply environmental justice principles in planning for new housing development.

Address water and sewer system constraints to housing production, to the extent they are within the City’s control, through targeted capital and governance improvements.	<p>Policy or Program: Establish and implement a plan to address the San Mateo County Local Agency Formation Commission (SMCLAFCo) Municipal Service Review and to resolve the delays to housing development caused by issues with the East Palo Alto Sanitary District.</p> <p>Program: Complete the Water System Master Plan and complete the first-phase capital improvements in the plan.</p>
Improve energy conservation and reduce the carbon footprint of residential buildings.	Program: Implement the East Palo Alto Reach Codes, which became effective in January 2021 and apply to all new construction.
Minimize new housing in highest-risk areas prone to flooding/sea level rise or due to environmental contamination.	<p>Program: Leverage community partnerships to utilize and maintain data and maps wherever possible to monitor areas subject to flooding and identify sites for future development and to comply with G.C. 65302.</p> <p>Program: Develop environmental “overlay” map with most up-to-date data to avoid housing in at-risk areas or with prescribed mitigation measures.</p>
Goal 6 Promote safe and healthy housing in East Palo Alto.	
Strengthen monitoring and enforcement of habitability issues.	Policy: Review the City’s ordinances and evaluate whether any changes or updates may be made to how the City addresses habitability complaints and concerns.
Incorporate amenities into multifamily housing that support households with children.	Policy: Study the most effective means of incentivizing or requiring childcare facilities in new affordable housing developments.
Improve earthquake readiness and resilience.	Program: Complete and implement recently updated Multi-Generational Local Hazard Mitigation Plan.
Goal 7 Create more housing opportunities for special needs households, including large households, people at risk of or experiencing homelessness, and individuals with disabilities.	
Incorporate special housing needs into City-supported future affordable housing developments.	Policy: For affordable housing projects located near high-quality transit and on City-owned land, with City subsidy, or where otherwise legally defensible, require developers of affordable housing to demonstrate how they will serve people with disabilities in the development.
Provide housing solutions for unhoused residents in East Palo Alto.	<p>Program: Complete the Master Temporary Use Permit for temporary housing program rollout to provide housing for individuals experiencing homelessness in the community.</p> <p>Program: Evaluate lessons learned and options for longer-term, holistic solutions to RVs parked in public right of way with the conclusion of the RV Safe Parking Program.</p> <p>Program: Research all available public funding sources to address homelessness and consider City investment of funds in homeless outreach and case management to supplement the countywide system.</p>
Reduce overcrowding and unsafe housing conditions related to housing affordability in East Palo Alto.	<p>Policy: Study feasibility of incentivizing deeply affordable housing units that serve larger household sizes, such as allowing additional density or other relaxed zoning controls.</p> <p>Policy: Encourage production of deed-restricted ADUs serving Extremely Low and Very Low-Income households as an Inclusionary Housing Alternative Compliance option.</p>

Goal 8 Improve transparency and communication between the City and the public on housing issues.	
Make the City website, social media, and newsletter a reliable source of housing information and make parallel efforts to reach residents through mailers and in-person meetings.	<p>Program: Improve and maintain the Housing website as a primary means of communicating the work of the Division.</p> <p>Policy: Create a budget for mailers and non-digital outreach on Housing workplan items at the start of each fiscal year.</p>
Incorporate language accessibility/language justice into City materials and meetings.	Policy: Provide translation of materials and interpretation of City Council, Planning Commission, Rent Stabilization, and other City meetings in alignment with City’s Language Policy.
Goal 9 Build City capacity for long-term housing planning and implementation of a range of Housing programs and initiatives.	
Efficiently use staff resources to run effective programs while simultaneously implementing the Housing Element Workplan and other workplans the Housing Division is responsible for.	Program: Join with other cities in San Mateo County to share housing staff to support longer-term housing initiatives and programs.
Work in close collaboration with the Planning Division to more efficiently achieve both divisions’ goals and workplan items.	Program: Collaboratively update the City’s Development Code, with an emphasis on known inconsistencies with the objectives of the City’s General Plan.

6.4 IMPLEMENTATION PLAN

Goal 1: Create more housing opportunities, and more housing that is affordable to East Palo Alto residents

Objective: Take reasonable measures to reduce overall processing times for residential development applications while maintaining robust community outreach and engagement.

Policy: Develop objective development and design standards that simplify and improve approval certainty and timing.

Timeframe:

- Starting Fall 2022 to end of 2023: engage consultant through ABAG Regional Early Action Planning Grant program to begin drafting standards. Conduct community outreach through 2023.
- Fall 2023: Planning Commission and City Council public hearings.
- First quarter 2024: Draft standards available.

Objective: Incentivize affordable housing development.

Policy: Evaluate the feasibility and utility of an affordable housing overlay zone to incentivize affordable housing beyond available incentives in the state Density Bonus law.

Timeframe:

- End of 2022/First quarter of 2023: Provide update to City Council on affordable housing overlay zones and seek direction for an overlay zone.
- Second quarter of 2023: Present to Planning Commission and City Council with recommendations on potential locations, key criteria, and other aspects of an overlay zone.
- End of 2024: If directed by City Council, complete overlay zone and incorporate into Development Code.

Resource implications: Utilize SB 2 funds that were allocated to a contract with Baird + Driskell Community Planning for planning technical assistance.

Policy: Adopt by-right zoning for parcels in the Ravenswood/4 Corners Specific Plan area where there is a minimum of 20% lower-income units.

Timeframe:

- This policy will be incorporated into the rezoning timeframe for the RBD Specific Plan area, which should be completed by end of 2023.

Objective: Encourage smaller-scale housing that is relatively more affordable, including duplexes/triplexes and market-rate accessory dwelling units (ADUs).

Policy: Develop a “next-phase” streamlining effort for ADUs and JADUs, SB 9 projects, and any future small-development, ministerial approval process that builds on lessons learned from the ADU Streamlining collaboration with EPACANDO and City Systems.

Timeframe:

- Second quarter 2023: Develop staff recommendations and release a Request for Proposals (RFP) for ADUs by mid-2023.
- End of 2023: Finalize website updates and materials for applicants on how to submit an SB 9 application.
- End of 2023: Work with ADU Working Group to develop guidance on soil testing and designing foundations for the most difficult soil conditions, a common barrier to ADU development.
- First quarter 2024: Complete SB 9 objective design and development standards (as part of overall objective design and development standards process).

Resource Implications: Review existing grant sources, e.g., LEAP and SB 2, for available funds. City has also set aside funds for ADU grants from the General Fund.

Policy: Study feasibility and desirability of reducing fees or delaying payment of fees for small projects, e.g., two or fewer units.

Timeframe:

- End of 2023: Survey other jurisdictions in San Mateo County and, if possible, the Bay Area, to determine whether there are

models for fee payment reductions or delays that the City Council may consider.

Resource Implications: This will take Planning, Housing, and Building staff time.

Program: Develop outreach materials targeting smaller developers aimed at informing future applicants and improving the quality of Planning and Building applications received.

Timeframe:

- End of 2023: Create handouts and other digital materials that focus on best practices to minimize delays and improve submittal quality. Feature this information specific to small developers prominently on City's Planning website, through a separate page.

Resource implications: Planning and Building staff time.

Policy or Program: Revisit feasibility of a preapproved ADU designs program or clearinghouse to facilitate streamlined review and reduce design costs of ADUs.

Timeframe:

- End of 2023: Work with ADU Working Group as the lead to develop recommendations for preapproved ADU designs.

Resource implications: ADU Working Group will take on this work with cooperation from Planning and Building staff as needed.

Objective: Incentivize production of deed-restricted ADUs to add to the City's affordable housing stock.

Policy: Develop a formalized legalization process for unpermitted second units.

Timeframe:

- Second quarter 2024: Survey surrounding jurisdictions with amnesty and/or legalization programs and make recommendations for an unpermitted second unit program.

Resource implications: Funds may be required for consultant costs. May be able to use SB 2 funds or REAP funds.

Policy: Research all available public and private sources of rehabilitation/repair funding and strengthen partnership with organizations in this area, such as Habitat for Humanity.

Timeframe (all ongoing):

- Staff research all funding opportunities on an annual basis.
- Pursue CalHOME in next available funding round to continue supporting low-income households to build deed-restricted affordable ADUs.
- Work with community partners in the ADU Working Group to pursue philanthropic funds.

Objective: Develop long-term, sustainable funding sources that are flexible and may be used for affordable housing production and preservation and to prevent displacement and homelessness.

Policy: Pursue a 2022 ballot measure to increase and expand the City's existing Gross Receipts Tax on rental residential properties.

Timeframe:

- End of 2022: if ballot measure is successful, work with staff to implement changes to Gross Receipts Tax.

Resource implications: The ballot measure is expected to increase revenue for affordable housing, but it will require staff coordination between Housing and Finance to ensure that taxes can be properly collected.

Program: Develop a plan that lays out funding goals and priorities for the City's affordable housing revenue sources for a finite period (1 year to 5 years).

Timeframe:

- End of 2023 and annually: Incorporate into the City Council Priority-Setting process completed at the start of each year. Create plan based on City Council-directed funding priorities for the coming year.

Program: Collaboratively (Planning and Housing) pursue state grant funds wherever possible to support affordable housing and address homelessness in the City.

Timeframe (ongoing):

- Pursue next round of Regional Early Action Planning grants, additional planning grants from HCD, next round of CalHOME grants, and research funding for homelessness.

Objective: Take reasonable measures to reduce the cost of development for fully affordable housing developments.

Policy: Use the opportunity of the RBD Specific Plan Update to study feasibility and desirability of fee waivers or reductions or delayed fee payments for fully affordable projects.

Timeframe:

- 2023/24: Study waiver or reduction of impact fees for fully affordable housing projects in the RBD area based on fiscal impact analyses performed for each of the major projects in RBD.

Resource implications: This may be combined with existing scope of for the RBD update process and/or ensuing implementation.

Policy: Incorporate parking reductions into the City’s new Transportation Demand Management Program.

Timeframe:

- End of 2024: Leverage existing consultant work on transportation and a potential Transportation Management Association (TMA) in the RBD area to establish a TDM program.

Objective: Encourage housing on sites zoned for mixed use in the Ravenswood/4 Corners Specific Plan Area.

Policy: For sites within the RBD Specific Plan Area, study feasibility and effectiveness of an RBD-specific density bonus and relaxed zoning controls.

Timeframe:

- End of 2023: Complete study of a by-right density bonus and higher floor area ratio for mixed-use projects with a minimum percentage of affordable units, or a similar policy, and make a recommendation for the RBD Specific Plan area.

Resource implications: This may be funded out of the Regional Early Action Planning grant for objective design and development standards, other City-funded contract associated with the RBD Update, or through the City's participation in 21 Elements.

Objective: Leverage available public lands for affordable housing development where feasible and beneficial to the community.

Program: Study and determine feasibility for redevelopment of Senior Center at 560 Bell St. to include affordable housing.

Timeframe:

- End of 2024: Engage consultant and commence feasibility study for redevelopment of Senior Center.
- Second quarter 2025: Provide recommendations to City Council on redevelopment of Senior Center.
- End of 2027: If directed by City Council, and if requirements of Surplus Lands Act (Government Code Section 54222 et. Seq.) are fulfilled, secure a developer for Senior Center site.

Resource implications: Consultant costs for feasibility study not yet appropriated. Likely General Fund.

Program: Work with County of San Mateo to complete land swap and determine feasibility of the County developing affordable housing at 2277 University.

Timeframe:

- First Quarter 2023: complete and execute Exchange Agreement with the County of San Mateo.
- By end of 2024, complete due diligence and environmental review, and make Surplus Lands Act findings pursuant to Government Code Section 54222(f) prior the exchange of properties.

Program: Work with Sequoia Elementary School District to facilitate the development of the district-owned parcel at 2450 Ralmar Ave. as affordable public school employee housing.

Timeframe:

- First quarter 2023: Determine in collaboration with the School District whether a rezoning of the parcel is necessary.
- The timeframe of this development will be largely driven by the School District, including the Surplus Land Act requirements (Government Code 54222has).

Resource implications: If rezoning of the parcel(s) is necessary, it is likely the City must seek additional funds to support this work.

Objective: Build housing in areas zoned for exclusive retail use, where the market has made retail less feasible.

Policy: Study feasibility and desirability of Gateway 101 Retail Center as potential conversion to more mixed-use with additional housing.

Timeframe:

- First quarter 2023: Seek City Council direction during priority-setting process.
- 2023-2024: If directed by City Council, engage a consultant to conduct a feasibility study of the Gateway 101 Retail Center for additional housing and to determine policy changes necessary to facilitate housing development. Engage retail center tenants and residents in this process.

Resource implications: There is currently no funding appropriated for this purpose. If the City Council determines that this is a priority, funds must be appropriated.

Objective: Incentivize “missing middle” housing, or smaller-scale housing that is affordable to households at 80-120% of Area Median Income.

Policy: Review City zoning standards to ensure compatibility with SB 9 and make process improvements to encourage application of SB 9 on appropriately-zoned parcels.

Timeframe:

- End of 2022: Fully implement process improvements for ministerial approvals, including templates for SB 9 and SB 35 projects.
- End of 2023: Complete review of Development Code to ensure there are no barriers to utilization of SB 9 and propose changes (or full ordinance adoption) as necessary.

Goal 2: Create homeownership opportunities for East Palo Alto residents and stability for existing homeowners.

Objective: Promote financial literacy as a means of encouraging homeownership and support first-time homebuyers.

Policy: Develop a City-led homebuyer support program or programs tailored to the needs of households in East Palo Alto.

Timeframe:

- By end of 2023: Staff research and report to City Council on the barriers to homebuying for households in East Palo Alto and effectiveness of federal, state, and local programs, with recommendation of either a City-led program or partnership with local organization. Determine how such a program should be funded, and whether a Request for Proposals (RFP) is needed.
- 2024- 2025: Study and determine how East Palo Alto residents can benefit from the California Dream for All down payment program for first-time homebuyers.
- First quarter 2025: Launch a City- or partner-led financial literacy, including credit counseling, and first-time homeowner

program that focuses on 1.) younger households seeking homeownership options and 2.) seniors looking to downsize.

Resource implications: Housing staff time with additional resources required for potential RFP.

Policy: Advocate for the homebuyer and homeownership programs at the regional level.

Timeframe:

- This is ongoing.

Resource implications: Housing staff time.

Goal 3: Promote stewardship and preservation of the City's existing affordable housing stock.

Objective: Ensure that the City's deed-restricted affordable housing and Below Market-Rate (BMR) portfolio remain well-maintained and monitored.

Program: Continue working with EPACANDO and BAAHA on the existing BMR Program contract and draft Request for Proposals (RFP) for next phase of BMR Program management, including additional rental and for-sale inclusionary housing units.

Timeframe:

- First quarter 2023: Report on progress made under existing BMR contract and seek City Council direction on future BMR administration.
- When directed, release RFP for future BMR administration.

Resource implications: Utilize available Affordable Housing funds.

Objective: Improve data on affordability of the City's rental housing stock outside of the Rent Stabilized portfolio.

Program: Study feasibility of creating a City rent registry.

Timeframe:

- End of 2024: Study models of rent registries in the Bay Area and report to City Council with recommendations on potential creation of a rent registry in East Palo Alto.

Objective: Leverage County initiatives and affordable housing resources to increase public awareness of affordable housing opportunities in East Palo Alto.

Program: Work with the County of San Mateo to list all affordable housing projects and inclusionary units on Doorway, a new regional platform for searching and applying for affordable housing, and finding affordable housing resources and information.

Timeframe:

- Staff will be available on an ongoing basis, subject to the County's timeline.

Goal 4: Prevent displacement of East Palo Alto residents.

Objective: Connect the creation of new jobs in the city from commercial development to the creation of new housing at the appropriate affordability levels.

Policy: As part of the RBD Specific Plan update, develop a new requirement to build new housing at specified levels of affordability based on a numerical linkage to office/R&D square footage in Ravenswood Business District (RBD).

Timeframe:

- First quarter 2023: Present to City Council the jobs-housing linkage requirement, together with the baseline requirements and community amenities that will apply to proposed projects in the RBD Specific Plan Area.

Resource implications: This is incorporated into the current scope of work performed by Raimi + Associates for the overall RBD Specific Plan Update.

Program: Participate in countywide nexus study led by 21 Elements to update the existing Commercial Linkage Fee.

Timeframe:

- End of 2022: Work with 21 Elements to determine scope and cost and report to City Council.

Resource implications: City Affordable Housing funds or General Fund. This multi-city effort should greatly reduce the cost of the study.

Objective: Promote the preservation of existing housing stock and rehabilitation of housing that is at-risk due to age, structural deficiencies, etc.

Policy: Develop a preservation strategy that addresses funding sources, identification of properties, and partnerships that can lead to preservation of affordable housing in East Palo Alto.

Timeframe:

- End of 2024: Work with Partnership for the Bay's Future (PBF) Policy Grant Fellow to research and develop recommendations for preservation strategies.

Resource implications: Policy Grant Fellow began working with the City in 2022 and is funded through mid-2024 through a grant from the Partnership for the Bay's Future.

Policy: Study improvements to a City process for addressing code violations on residential properties, including, but not limited to, unpermitted second units.

Timeframe:

- End of 2024: Study programs in other Bay Area jurisdictions for best practices.

Objective: Support housing stability of existing lower-income homeowners and enable the community's seniors to age in place.

Policy: Research all public sources and potential City-level initiatives to assist low-income homeowners in East Palo Alto with major repairs and rehab to address acute safety issues.

Timeframe:

- End of 2024: Staff report to City Council on funding sources and potential programs based on other Bay Area jurisdictions.

Policy: Study models of foreclosure prevention at the local level in similarly-sized cities, whether through local investment or leveraging outside funding.

Timeframe:

- End of 2023: Staff survey other jurisdictions and report to City Council on findings in conjunction with reporting on City efforts to support homeownership.

Objective: Promote community/cooperative ownership of land and housing in East Palo Alto.

Program: Evaluate opportunities to support and/or leverage local community land trusts (CLTs) to create community ownership of new or preserved affordable housing, e.g., through scattered-site ADUs, small inclusionary projects, or preservation projects.

Timeframe:

- End of 2024: Work with Partnership for the Bay’s Future Policy Grant Fellow to research and develop recommendations for community/cooperative ownership of land in conjunction with housing preservation strategies.

Resource implications: Policy Grant Fellow began working with the City in 2022 and is funded through mid-2024 through a grant from the Partnership for the Bay’s Future.

Objective: Prevent displacement due to high housing cost burden and barriers to housing, such as rental deposits.

Policy: Appropriate funds for direct emergency financial assistance to be administered by a qualified organization identified through a Request for Proposals (RFP) process.

Timeframe:

- End of 2022: Release RFP and, if qualified organizations respond, provide funding recommendations to City Council for this purpose.

- 2022-2024: Monitor direct financial assistance for duration of contract and report on the program to City Council at its conclusion in 2024.

Resource implications: Funds from the General Fund (“Measure O”) have already been appropriated for this RFP.

Policy: Consider developing a direct financial assistance program for first and last month’s rent/deposit assistance.

Timeframe:

- End of 2024: Provide recommendations to City Council on a potential direct financial assistance program for rental deposit assistance.

Objective: Promote tenant education and create pathways to affordable rental and homeownership opportunities.

Policy: Release Request for Proposals (RFP) for anti-displacement and tenant education services and work with awarded organizations to report at regular intervals.

Timeframe:

- End of 2022: Release RFP and provide funding recommendations to City Council for this purpose.
- 2022-2024: Monitor performance for the duration of the contract and report on the program to City Council at its conclusion in 2024.

Resource implications: Funds from the General Fund (“Measure O”) have already been appropriated for this RFP.

Policy: Study and develop an Opportunity to Purchase Act policy that builds on prior research and City Council direction in 2021-22.

Timeframe:

- End of 2022: Return to City Council with a revised Opportunity to Purchase Act policy.

- First quarter 2023: Begin implementation of Opportunity to Purchase Act policy and/or the policy that results from City Council direction.

Objective: Implement an effective and fair housing compliant Local Preference Policy.

Policy: Complete guidelines on City’s existing Local Preference Policy.

Timeframe:

- End of 2023: Complete guidelines on Local Preference Policy and post to website.

Goal 5: Apply environmental justice principles in planning for new housing development.

Objective: Address water and sewer system constraints to housing production, to the extent they are within the City’s control, through targeted capital and governance improvements.

Policy or Program: Establish and implement a plan to address the San Mateo County Local Agency Formation Commission (SMCLAFCo) Municipal Service Review and to resolve the delays to housing development caused by issues with the East Palo Alto Sanitary District.

Timeframe:

- End of 2022: Draft resolution with draft application to SMCLAFCo to initiate the process of establishing EPASD as a Subsidiary District of the City.
- December 2023: Complete process.

Resource implications: The City will incur some costs associated with this application, but the majority of costs will be borne by EPASD.

Program: Complete the Water System Master Plan and complete the first-phase capital improvements in the plan.

Timeframe:

- End of 2022: Complete Water System Master Plan.

- End of 2023: Complete construction of University Ave. and Cooley Ave. 12-in Water Transmission Main.
- End of 2023: Complete Pad D Standby Well construction.
- End of 2025: Purdue Ave. 16-inch transmission main, which includes installation of a new turnout connection to the SFPUC (San Francisco Public Utilities Commission) system to feed the Ravenswood Business District.

Resource implications: The Water System Master Plan is a 20-year capital improvement program to help guide future capital expenditures in the City. Funding for capital projects is outlined in the City's Capital Improvement Plan.

Objective: Improve energy conservation and reduce the carbon footprint of residential buildings.

Program: Implement the East Palo Alto Reach Codes, which became effective in January 2021 and apply to all new construction.

Timeframe: Ongoing

Program: Leverage community partnerships to utilize and maintain data and maps wherever possible to monitor areas subject to flooding and identify sites for future development and to comply with GC 65302.

Timeframe (ongoing):

- Update maps on an annual basis.

Objective: Minimize new housing in highest-risk areas prone to flooding/sea level rise or due to environmental contamination.

Program: Develop environmental “overlay” map with most up-to-date data to avoid housing in at-risk areas or with prescribed mitigation measures.

Timeframe:

- End of 2023: Housing, Planning, and Public Works staff work with regional partners to obtain data and create a map that can be featured on the City's website.

Goal 6: Promote safe and healthy housing in East Palo Alto.

Objective: Strengthen monitoring and enforcement of habitability issues.

Policy: Annually review the City’s habitability complaints and the Rent Stabilization Ordinance’s rules and regulations and evaluate whether any changes or updates may be made to how the City enforces habitability issues.

Timeframe: Ongoing

Objective: Incorporate amenities into multifamily housing that support households with children.

Policy: Study the most effective means of incentivizing or requiring childcare facilities in new affordable housing developments.

Timeframe:

- End of 2024: Meet with affordable housing developers, nonprofits, and foundations for feedback on how childcare is incorporated into new developments and make recommendations to City Council for future City-subsidized affordable housing developments or affordable housing in the RBD Specific Plan area.

Objective: Improve earthquake readiness and resilience.

Program: Complete and implement recently-updated Multi-Generational Local Hazard Mitigation Plan.

Timeframe: Ongoing.

Goal 7: Create more housing opportunities for special needs households, including large households, people at risk of or experiencing homelessness, and individuals with disabilities.

Objective: Incorporate special housing needs into City-supported future affordable housing developments.

Policy: For affordable housing projects located near high-quality transit and on City-owned land, with City subsidy, or where a development agreement is requested, require developers of affordable housing to demonstrate how they will serve people with disabilities in the development.

Timeframe:

- Upon the next appropriate affordable housing development:
 - Require a minimum percentage of Acutely Low-Income and Extremely Low-Income units with varying bedroom counts to serve the housing needs of special needs populations.
 - Require developers to affirmatively market accessible units to disability-serving organizations in San Mateo County (i.e., Golden Gate Regional Center, Housing Choices Coalition for Person with Developmental Disabilities, Center for Independence of Individuals with Disabilities, the Mental Health Alliance, and others).
 - Encourage developers to coordinate onsite supportive services funded by the Golden Gate Regional Center.
- By 2031, reach 40 new Extremely Low-Income (ELI) units for residents with developmental disabilities.

Objective: Provide housing solutions for unhoused residents in East Palo Alto.

Program: Complete the Master Temporary Use Permit (TUP) for temporary housing program rollout to provide housing for individuals experiencing homelessness in the community.

Timeframe:

- End of 2022: Create page on City website for potential applicants with contact information and supplemental TUP application.

- End of 2022: Reach out to faith communities in East Palo Alto to raise awareness of the Master TUP and encourage applications.

Resource implications: Housing and Planning staff time; an additional General Fund appropriation may be necessary to assist with plans and permitting costs if there is significant interest.

Program: Evaluate lessons learned and options for longer-term, holistic solutions to RVs parked in public right of way with the conclusion of the RV Safe Parking Program.

Timeframe:

- End of 2022: Continue monthly meetings with City staff, County of San Mateo, and LifeMoves and Project WeHOPE to assess options for RVs parked in the public right of way in the coming year, with a view towards concluding the RV Safe Parking Program.
- First quarter 2023: Work with Project WeHOPE to report on the successes and lessons learned from the RV Safe Parking Program from 2019-2023. Make recommendations to City Council.

Program: Research all available public funding sources to address homelessness and consider City investment of funds in homeless outreach and case management to supplement the countywide system.

Timeframe:

- Ongoing: research and report to City Council on funding opportunities that can support the City’s homelessness response.

Objective: Reduce overcrowding and unsafe housing conditions related to housing affordability in East Palo Alto.

Policy: Study household formation and make-up of overcrowded units in East Palo Alto to identify bedroom size needs.

Timeframe:

- End of 2023: Collect survey data or analyze existing data to identify whether East Palo Alto households consist of direct family, extended family, or other less common household formations to identify bedroom size needs.

Policy: Study feasibility of incentivizing deeply affordable housing units that serve larger household sizes, such as allowing additional density or other relaxed zoning controls.

Timeframe:

- End of 2023: Incorporate incentivizing larger affordable units into the Community Benefits Framework and broader analysis of the Ravenswood/4 Corners Specific Plan update process.

Policy: Encourage production of deed-restricted ADUs serving Extremely Low and Very Low-Income households as an Inclusionary Housing Alternative Compliance option.

Timeframe:

- End of 2024: On the City website, demonstrate examples of prior projects that have provided inclusionary ADUs and successfully leveraged incentive programs such as Density Bonus and SB 9.

Goal 8: Improve transparency and communication between the City and the public on housing issues.

Objective: Make the City website, social media, and newsletter a reliable source of housing information and make parallel efforts to reach residents through mailers and in-person meetings.

Program: Improve and maintain the Housing website as a primary means of communicating the work of the Division.

Timeframe: Ongoing

Policy: Create a budget for mailers and non-digital outreach on Housing workplan items at the start of each fiscal year.

Timeframe: Ongoing

- First quarter of each year: Review Housing budget for mailers/non-digital outreach.
- On a quarterly basis, review Housing website and make improvements as necessary.

Objective: Incorporate language accessibility/language justice into City materials and meetings.

Policy: Provide translation of materials and interpretation of City Council, Planning Commission, Rent Stabilization, and other City meetings in alignment with City's Language Policy.

Timeframe:

- Dependent upon timeframe of Citywide Language Policy adoption.

Goal 9: Build City capacity for long-term housing planning and implementation of a range of Housing programs and initiatives.

Objective: Efficiently use staff resources to run effective programs while simultaneously implementing the Housing Element Workplan and other workplans the Housing Division is responsible for.

Program: Join with other cities in San Mateo County to share the cost of shared housing staff to support inclusionary management and general housing work.

Timeframe:

- The program is aimed to launch in July 2023. Obtain City Council authorization to appropriate funds for the shared housing staff program and execute the relevant agreements with San Mateo County before the end of 2023.
- First quarter 2024: Begin first project with shared housing staff.

Objective: Work in close collaboration with the Planning Division to more efficiently achieve both divisions' goals and workplan items.

Program: Collaboratively update the City's Development Code, with an emphasis on known inconsistencies with the objectives of the City's General Plan.

Timeframe:

- End of 2023: Begin Development Code updates.
- End of 2025: Complete Development Code updates.

Resource implications: Funds available in existing contract with 21 Elements, but may require an additional appropriation by the City Council or other grant sources.

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7 REVIEW OF PRIOR HOUSING ELEMENT

State housing element law requires communities to reflect on the outcomes of the previous Housing Element's goals, objectives, policies, and programs. This evaluation helps ensure that the updated element for 2023-2031 builds on success, learns from lessons learned, and responds to the community's housing priorities.

7.1 ACCOMPLISHMENTS OF RHNA 5 HOUSING ELEMENT PERIOD

The following summary highlights key accomplishments and challenges from the previous Housing Element's planning period (2015 to 2022).

Adoption and Implementation of the City's 2018-2023 Affordable Housing Strategy. The Affordable Housing Strategy was adopted by the City Council in October 2018, a document with ten overarching affordable housing goals and comprehensive workplan comprised of 50 actions that complement and further the policies and programs of the 2015-2022 Housing Element.¹ Since the adoption of the Affordable Housing Strategy, the City has made major progress across all ten areas, with all but three actions completed or in progress. Highlights include:

- *Light Tree and 965 Weeks affordable housing developments:* the redevelopment of Light Tree will result in 91 net new affordable units and is under active construction, with the final phase of construction completed by end of 2023; 965 Weeks will result in 136 new affordable units on a City-owned parcel and is expected to begin construction in fall 2023.
- *Inclusionary Housing:* the City Council adopted the most recent Inclusionary Housing Ordinance in November 2019, establishing an inclusionary program for both rental and for-sale units. Since the Ordinance became effective, the City has processed several Inclusionary Housing applications-- often in conjunction with a Density Bonus, and two applications under SB 35—creating a significant pipeline of lower-income rental and moderate-income for-sale units.
- *Investments in Affordable Housing:* the City has made major investments in affordable housing in recent years, committing the \$10 million in Catalyst Housing Funds to the Light Tree and 965 Weeks affordable housing developments; \$714,000 in Housing Successor funds to 965 Weeks; and \$1.7 million of Measure HH and Transient Occupancy Tax funds as a local match for the Local Housing Trust Fund program to benefit 965 Weeks.
- *Leveraging State Funds for Affordable Housing:* the City was a successful co-applicant on two Affordable Housing and Sustainable Communities (AHSC) grants for the Light Tree and 965 Weeks

affordable housing developments. Housing and Planning staff have secured a (\$2 million) CalHOME, (\$160,000) SB 2, (\$150,000) Local Early Action Planning, and (\$70,000) Regional Early Action Planning (as a sub-allocation) grant over the last three years.

- *RV Safe Parking: this pilot program on a City-owned site at 1798 Bay Rd. in partnership with Project WeHOPE opened to the first RV households in May 2019; the program has continued with success through 2022, with over 35 individuals housed since the program's start.*
- *Accessory Dwelling Units: the City has partnered with local organizations to address unpermitted garage conversions and second units for several years and has most recently promoted ADUs through such efforts as: the ADU Streamlining contract, with EPACANDO and City Systems, funded by SB 2, the CalHOME ADU/JADU loan program, and monthly meetings of the ADU Working Group. Since new ADU laws became effective in 2020, the City has seen a more than doubling of ADU applications and permits. Work on legalization of second units continues as a cross-departmental City effort.*
- *Below Market-Rate Housing Administration: the City released an RFP for BMR Program Administration in 2018 to create a more efficient and cost-effective program. EPACANDO has administered the program since 2019, conducting annual monitoring, facilitating refinances and re-sales, and establishing ongoing contact with the owners of the City's 53 BMR for-sale units. By establishing a proper filing system, protocols and guidelines, and a point of contact for public inquiries, EPACANDO has vastly improved the administration of the City's portfolio and positioned the City well for an increase in units through the Inclusionary Housing Program.*
- *Homelessness Response: the City has consistently convened a group comprised of County of San Mateo Human Services Agency and Behavioral Health and Recovery Services staff, service providers LifeMoves and Project WeHOPE, and City staff from the Housing Division, Public Works, and Police Department since April 2021. The ongoing dialogue across agencies has created better coordination for housing individuals, monitoring and cleaning up encampments and RVs parked in the public right of way, and providing services to residents in East Palo Alto.*
- *Improved Processing for Streamlined Projects. The City has developed materials for developers, such as zoning clearance forms for ADUs, SB 35, and SB 9 projects, and made internal process improvements to adapt to the ever-changing landscape of state housing law. This has resulted in successful implementation of housing streamlining on mixed-use and residential projects, most of which combine multiple policies – Inclusionary Housing, Density Bonus, and SB 35 or SB 9, for example. In 2021, a total of 88 units from three multifamily residential projects were entitled or received SB 35 Zoning Clearance. Each of these three projects included an inclusionary housing component, for a total of 13 deed-restricted inclusionary units ranging from 35-120% AMI.*

- *Tenant Protections and Outreach.* In addition to ongoing implementation of the Rent Stabilization Ordinance which covers approximately 2,500 rental units citywide, the Rent Stabilization Program oversees the City’s various tenant protections, including just cause for eviction, tenant relocation, and others. During the COVID-19 pandemic, the Rent Stabilization Program oversaw an emergency financial assistance program in partnership with Samaritan House and funded local organizations Nuestra Casa, Youth United for Community Action, and Community Legal Services in East Palo Alto to assist local residents with accessing state rental assistance and prevent evictions due to pandemic-related rental hardships.

Updates and Re-Zoning Efforts to General and Specific Plan Areas. The City adopted the Vista 2035 General Plan in 2016, including upzoning in strategic areas and other major changes, such as mixed-use corridors along University Ave, with an emphasis on improving public health through active transportation choices, access to open space, and safe and affordable housing. The Ravenswood/4 Corners Specific Plan Area, the City’s only Priority Development Area, was established in 2013 and is currently undergoing a targeted update that began in 2021 and will significantly increase the number of housing units, including affordable housing units, located near job centers and transit.²

Preservation Efforts. The City received a Challenge Grant and a Breakthrough Grant (“Policy Grants”) from the San Francisco Foundation’s Partnership for the Bay’s Future (PBF), each of which provides a two-year midcareer fellow to pursue housing preservation policies. The City Council considered an Opportunity to Purchase Act ordinance, which is expected to return in a revised form in 2023, and the current fellow is researching cooperative housing models, such as community land trusts, to preserve affordable housing.

7.2 HOUSING ELEMENT PROGRESS

Appendix E provides a program-by-program review of the City’s progress in implementing the 2015-2023 Housing Element programs and objectives, and indication of the programs’ continued appropriateness.

7.3 PROGRESS TOWARDS LOWER-INCOME RHNA 5 TARGETS

To date, the City has made major progress on the very low-income RHNA, exceeding the target by 65 units. The City fell short of its low-income RHNA by only 19 units, with the largest deficit (196 units) in the above-moderate income category. Overall, the City has met 53% of its RHNA. By income category, the City has met 27% of its market rate housing target and 88% of its affordable housing target.

Table 7.3 shows the City’s RHNA 5 targets and progress from 2015 to today:

Table 7.3: RHNA 5 Progress, 2015-Present									
Income Level	2015	2016	2017	2018	2019	2020	2021	Totals	RHNA Deficit
Extremely Low (0%-30% AMI)	16					26	8	50	n/a
Very Low (31%-49% AMI)					4	68	7	79	-65
Low (50%-80% AMI)	24				2	3	6	35	19
Moderate (81%-120% AMI)	1	5		1	2	2	6	17	66
Above Moderate (> 120% AMI)	50	2	5	3	1	4	5	70	196
Total	91	7	5	4	9	103	32	251	216

While the above Table 7.3.B illustrates shortfalls in the City’s RHNA 5 targets, it does not show the number of units in the City’s pipeline. There are several major project applications currently under review that, together with several smaller developments, will add over 1,000 units to the City’s housing stock. This includes projects such as the Woodland Park Communities Euclid Improvements, a 605-unit redevelopment of a complex that currently contains 160 rent-stabilized units, for a net increase of 444 units; the EPA Waterfront proposal, a mixed-use project that would add 260 units, and the Harvest: The Landing off-site affordable housing proposal, which would add 95 lower-income units. It should be noted that all housing development in East Palo Alto was delayed due to the Water Moratorium in place from 2016 to 2018. Even with the moratorium no longer in effect, developers have faced further delays due to issues with the East Palo Alto Sanitary District. City Council has been working with the East Palo Alto Sanitary District to express concerns about delays and work toward a solution.

7.4 ONGOING CHALLENGES TO MEETING THE CITY’S HOUSING NEEDS

Infrastructure. The chief impediment to further housing development in East Palo Alto remains infrastructure-related. Pipeline projects are experiencing significant delay as the City and developers of affected projects work with the East Palo Alto Sanitary District to find a feasible solution to the system’s capacity. In addition, while the City has largely met its water supply needs, water distribution with the current network of pipelines remains a challenge.

In addition, the City must balance environmental preservation with the utility and feasibility of building out transportation. This is particularly the case in the Ravenswood Business District (RBD)/4 Corners Specific Plan Area, the area of the City where concentrated commercial space and jobs growth, dense housing, and upgrades to transportation infrastructure are planned. Even with these improvements, the City lacks a rail connection.

These issues and the steps the City is taking to ameliorate them are detailed further in the Governmental Constraints analysis in the Housing Constraints chapter, and policies and programs addressing infrastructure are included in the Policies and Programs chapter.

Staffing resources. With limitations on City staff resources, the City is constrained in the actions it can take to counter strong market forces, which continue to push housing prices higher, threaten to displace residents, and fail to produce the types of housing needed most in the community.

Displacement pressures. Residents of East Palo Alto continue to face displacement pressures as housing prices rise in the region and within the city. Data show that, the median income within East Palo Alto is less than half that of the County of San Mateo median, making rents and home sales prices now further out of reach for many households. Overcrowding and substandard housing conditions are prevalent and are a direct result of the housing cost burden many residents face. As additional market-rate housing is proposed for East Palo Alto, it is important that the City pursue ambitious preservation efforts, explore new anti-displacement policies, and prioritize affordable housing as part of the City's growth, especially in the RBD/4 Corners Specific Plan Area.

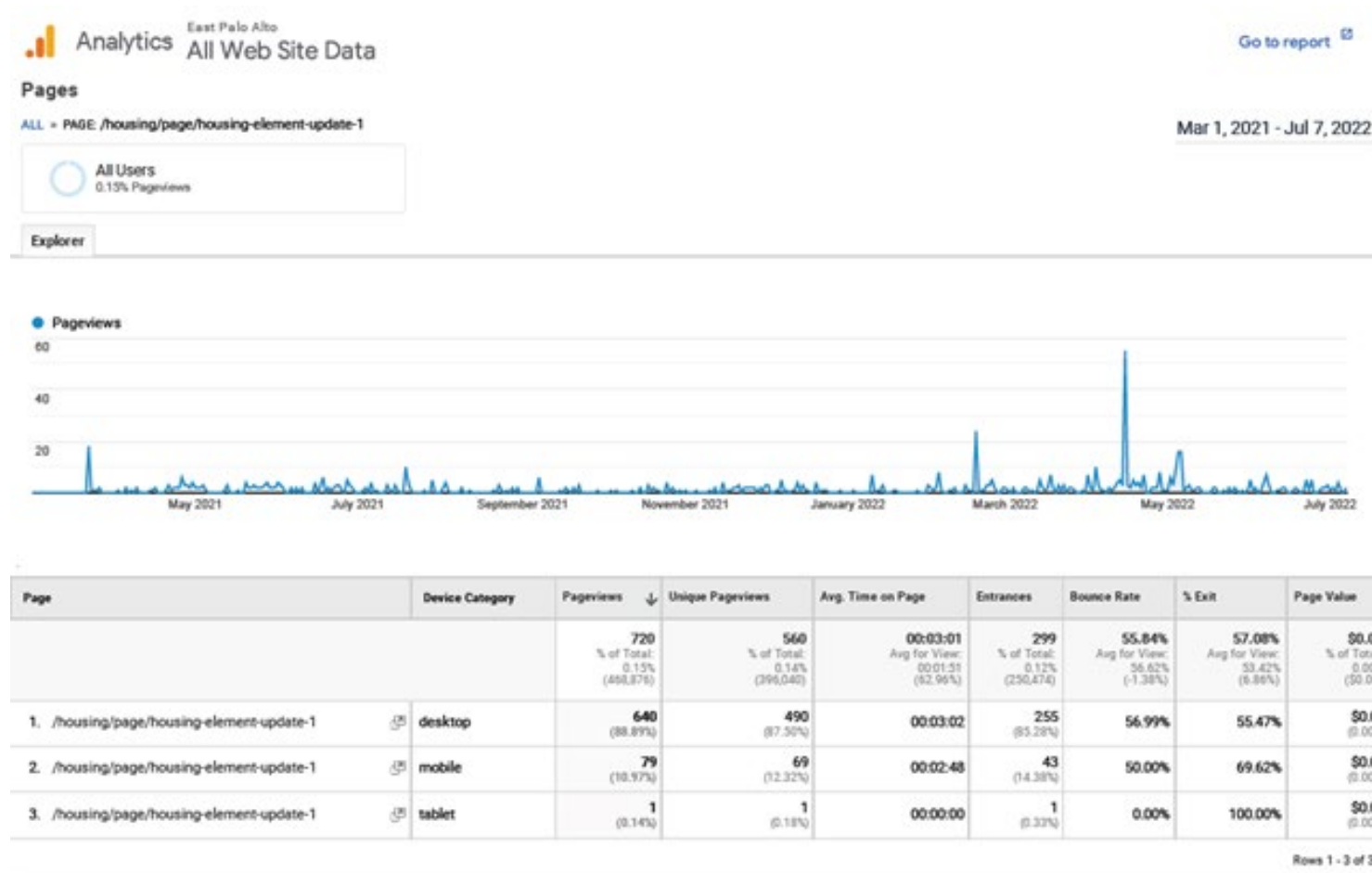
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APPENDIX A. PUBLIC OUTREACH AND PARTICIPATION

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APPENDIX A1 WEBPAGE PERFORMANCE

The following is a report of the City’s Housing Element Webpage analytics from its launch date of March 22, 2021, to July 7, 2022. As shown, the webpage had 640 desktop views, 79 mobile views, and 1 tablet view. The average time a resident spent on the page was 3 minutes. This is 0.15% of the total views the City of East Palo Alto website received in the same timeframe.




APPENDIX A2 SOCIAL MEDIA PERFORMANCE

The City promoted events and surveys on the [City's Facebook page](#), which has a total of 3.1K followers as of July 2022, in both English and Spanish (with an option to translate into other languages available through Facebook's translation system).


Data analytics on Facebook post performance is only available for 90 days, between the dates of April 8, 2022, to July 7, 2022. "Post Reach" provides the number of people who saw any of the posts at least once (and does not include multiple views by the same people), while "Engagement" provides the number of times people engaged with the posts through reactions, comments shares, views and clicks.

In summary:


Our "Help us balance East Palo Alto's potential future housing development" post on June 3, 2022, reached 494 people, and engaged 33 people.

	<p>Help us balance East Palo Alto's potential future housing development! ¡Ayúdanos a equilibrar el desarrollo potencial de nuevas viviendas en East Palo Alto! -...</p> <p>Fri, Jun 3</p>	<p>Post Reach 494</p>	<p>Engagement 33</p>
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Our "We're updating East Palo Alto's housing plan, and we want you to be part of the conversation" post on May 4, 2022, promoting the May 5, 2022, Community Meeting reached 3386 people and engaged 149 people.

	<p>We're updating East Palo Alto's housing plan, and we want you to be part of the conversation. We're holding a community meeting to gather your input and create a community-driven...</p> <p>Wed, May 4</p>	<p>Post Reach 3386</p>	<p>Engagement 149</p>
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Our "Join us on May 5th at 6pm!" post on May 3, 2022, promoting the May 5, 2022, Community Meeting reached 1284 people and engaged 79 people.

	<p>Join us on May 5th at 6pm! To register and learn more, visit: www.tinyurl.com/EPAHousingElement3.</p> <p>Tue, May 3</p>	<p>Post Reach 1284</p>	<p>Engagement 79</p>
---	---	-----------------------------------	---------------------------------


Our "Join us in-person on Thursday, May 5th at 6pm for a community meeting" post on April 28, 2022, promoting the May 5, 2022, Community Meeting reached 662 people and engaged 39.

	Join us in-person on Thursday, May 5th at 6pm for a community meeting. Please register for the meeting details. REGISTER: www.tinyurl.com/EPAHousingElement3 -- Asista una reunión...	Post Reach	Engagement
	Thu, Apr 28	662	39

Our “Join the joint City Council and Planning Commission Study Session on the Housing Element Update tonight at 6pm!” post promoting a public meeting held on April 26, 2022, reached 354 people and engaged 5 people.

	Join the joint City Council and Planning Commission Study Session on the Housing Element Update tonight at 6pm! Visit www.eastpaloalto.iqm2.com/Citizens and click the April 26...	Post Reach	Engagement
	Tue, Apr 26	354	5

Our “On Tuesday, July 19th, City Council will be discussing the Housing Element Update” post promoting a public meeting held on July 19, 2022, reached 683 people and engaged 24 people.

	On Tuesday, July 19th, City Council will be discussing the Housing Element Update, among other things. El martes 19 de julio, el Consejo Municipal discutirá la Actualización del...	Post Reach	Engagement
	Fri, Jul 15	683	24

Data analytics on Event Page performance show a lower success rate in reaching people via event pages compared to posts.

Our May 5, 2022, Community Meeting event page reached 87 people and received 10 responses.

	THU, MAY 5 Housing Element Update Community Meeting San Francisco Bay · Menlo Park, CA	--	87	10
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Our February 24, 2022, Community Meeting event page reached 205 people and received 5 responses.

	THU, FEB 24 Housing Element Update	--	205	5
---	---------------------------------------	----	-----	---

The following is our highest-performing social media post, demonstrating that short text, strong visuals, and direct links performed better:

City of East Palo Alto - Government ✓
 Published by Mailchimp · June 3 · 🌐

Help us balance East Palo Alto's potential future housing development!
 ¡Ayúdanos a equilibrar el desarrollo potencial de nuevas viviendas en East Palo Alto!
 - https://mailchi.mp/d51d3340b121/epa_balancing_act
 --

LINKS/ENLACES:
 Balancing Act: <https://eastpaloalto.abalancingact.com/EPA-balancing-act>
 Policies & Programs Survey (English): <http://www.tinyurl.com/HousingElementSurvey>
 Encuesta sobre Políticas y Programas (español): <http://www.tinyurl.com/HousingElementEncuesta>
 Jamboard: <http://www.tinyurl.com/HousingElementJamboard>

EAST PALO ALTO HOUSING ELEMENT UPDATE

We need your feedback on our City's housing plan! ¡Necesitamos sus comentarios sobre el plan de vivienda de la Ciudad!

We're updating East Palo Alto's housing plan, and we want you to be part of the conversation!

Please fill out the following surveys:

- East Palo Alto Balancing Act**
www.eastpaloalto.abalancingact.com/EPA-balancing-act
 Provide your input on where new housing development should be prioritized, and the appropriate density of new housing development in specific areas.
- Policies and Programs Survey**
www.tinyurl.com/HousingElementSurvey (English)
 Let us know how we are doing with our housing policies and programs, which policies we should keep, and which new policies we should prioritize for the next 8 years.
- Jamboard**
www.tinyurl.com/HousingElementJamboard
 Share your ideas on additional policies and programs to prioritize, what types of housing you want to see, what environmental considerations we should have when zoning for new housing, and more.

More information: The Housing Element is a chapter in the City's General Plan that is updated every 8 years to plan for new housing and lay out the goals, policies and programs to meet the community's housing needs. Your participation will help shape our City's planning documents to ensure our process is as inclusive and community driven as possible.

Estamos actualizando el plan de vivienda de East Palo Alto y queremos que usted forme parte de la conversación.

Por favor complete las siguientes encuestas:

- East Palo Alto Balancing Act**
www.eastpaloalto.abalancingact.com/EPA-balancing-act
 Proporcione su opinión sobre dónde se debería de priorizar el desarrollo de viviendas nuevas y qué es la densidad adecuada de este desarrollo.
- Encuesta sobre Políticas y Programas**
www.tinyurl.com/HousingElementEncuesta (español)
 Queremos saber cómo nos va con nuestras políticas y programas de vivienda, qué políticas debemos mantener y qué nuevas políticas debemos priorizar durante los próximos 8 años.
- Jamboard**
www.tinyurl.com/HousingElementJamboard
 Comparta sus ideas sobre qué políticas y programas adicionales deberíamos priorizar, qué tipos de viviendas le gustaría ver, qué consideraciones medioambientales deberíamos tener al zonificar para nuevas viviendas y más.

Más información: El Elemento de Vivienda es una sección del Plan General de la Ciudad que se actualiza cada 8 años para planificar el desarrollo de nuevas viviendas y establece las metas, pólizas y programas para satisfacer las necesidades de vivienda de la comunidad. Su participación ayudará a dar forma a los documentos de planificación de nuestra Ciudad para garantizar que nuestro proceso sea lo más inclusivo y comunitario posible.

Learn more at the City's Housing Element Update page at www.cityofepa.org/housing.



Aprenda más en la página de la Actualización del Elemento de Vivienda en www.cityofepa.org/housing.

A3 EMAIL ALERTS PERFORMANCE

The City of East Palo Alto sent email alerts to community members subscribed to the Housing Element Update email alerts (15 subscribers until February 2022 and 100+ subscribers after May 2022), and to 500+ community members subscribed to the Ravenwood Business District/Four Corners Specific Plan email list interested in the Housing Element Update process. The email alerts averaged a 57% open rate and a 9% click rate.



July 19, 2021, Community Meeting Alert:

July, 2021 (2)


 Reminder: Housing Element Community Meeting Monday, July 19 Regular - City of East Palo Alto Sent Wed, July 14th, 2021 6:11 PM to 12 recipients by you	Sent	66.7% Opens	8.3% Clicks
 Housing Element Community Meeting, July 19 at 6pm Regular - City of East Palo Alto Sent Thu, July 8th, 2021 1:25 PM to 12 recipients by you	Sent	75.0% Opens	25.0% Clicks


February 24, 2022, Community Meeting Alert:

February, 2022 (2)

 Housing Element Update email to RBD List Regular - City of East Palo Alto Tags: RBD Sent Fri, February 18th 6:33 PM to 551 recipients by you	Sent	38.3% Opens	5.3% Clicks
 East Palo Alto Housing Element Update February 24 at 6pm // Actualización del Elemento de Vivienda el 24 de febrero a las 6pm Regular - City of East Palo Alto Tags: Housing Element Sent Thu, February 3rd 3:32 PM to 15 recipients by you	Sent	53.3% Opens	20.0% Clicks

April 28, 2022, Joint Planning Commission and City Council Study Session Alert:


	Housing Element Survey & Study Session - RBD List Regular - City of East Palo Alto Tags: RBD Sent Tue, April 12th 5:23 PM to 493 recipients by you	Sent	49.2% Opens	3.9% Clicks
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	Housing Element Survey & Study Session Regular - City of East Palo Alto Tags: Housing Element Sent Tue, April 12th 5:08 PM to 15 recipients by you	Sent	71.4% Opens	0.0% Clicks
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May 5, 2022, Community Meeting Alert:

April, 2022 (5)

	Social Post From May 5 Housing Element Community Meeting Social Post - Facebook Published Thu, April 28th 10:56 AM	Published	276 Reach	278 Impressions
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	May 5 Housing Element Community Meeting - RBD List Regular - City of East Palo Alto Tags: RBD Sent Thu, April 28th 11:02 AM to 487 recipients by you	Sent	47.1% Opens	3.3% Clicks
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	May 5 Housing Element Community Meeting Regular - City of East Palo Alto Tags: Housing Element Sent Thu, April 28th 10:56 AM to 15 recipients by you	Sent	71.4% Opens	21.4% Clicks
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Balancing Act Survey Alert:

June, 2022 (4)

 **Social Post From Balancing Act - Housing Element List** Published **402** **405** **4**
Social Post - Facebook
Published Fri, June 3rd 3:05 PM
Reach Impressions Engagements


 **Balancing Act - Housing Element List** Sent **64.3%** **7.1%**
Regular - City of East Palo Alto
Tags: Housing Element
Sent Fri, June 3rd 3:05 PM to 15 recipients by you
Opens Clicks


 **Balancing Act - RBD List** Sent **45.3%** **4.5%**
Regular - City of East Palo Alto
Tags: RBD
Sent Fri, June 3rd 3:15 PM to 486 recipients by you
Opens Clicks


 **Balancing Act - Community Meetings List** Sent **57.5%** **13.7%**
Regular - City of East Palo Alto
Tags: Housing Element Community Meetings
Sent Fri, June 3rd 6:18 PM to 78 recipients by you
Opens Clicks

July 19, 2022, City Council Meeting Alert:

July, 2022 (3)

 **Social Post From Housing Element Update - July 19th City Council Meeting** Published **335** **339** **7**
Social Post - Facebook
Published Fri, July 15th 8:04 PM
Reach Impressions Engagements

 **Housing Element Update - July 19th City Council Meeting - RBD List** Sent **46.8%** **2.6%**
Regular - City of East Palo Alto
Tags: RBD
Sent Fri, July 15th 8:11 PM to 485 recipients by you
Opens Clicks

 **Housing Element Update - July 19th City Council Meeting** Sent **56.3%** **6.3%**
Regular - City of East Palo Alto
Tags: Housing Element
Sent Fri, July 15th 8:04 PM to 100 recipients by you
Opens Clicks

Sample Email Alert - Campaign Preview



Community Meeting Housing Element Update

We're holding an in-person community meeting to gather your input on the City of East Palo Alto's housing plan.

WHEN: Thursday, May 5, 2022 from 6:00-8:00 PM
WHERE: Cooley Landing (at the end of Bay Road) or Zoom
REGISTER: www.tinyurl.com/EPAHousingElement3

If you can't join us in-person you can watch the meeting as a webinar online. Spanish, Tongan, and Samoan interpretation will be available. We will also have free food and childcare. Note that COVID-19 safety precautions will be taken. Please register for the meeting details.

There are other ways to also engage:

- [Find this survey](#) on Housing Element policies and programs. We want to hear your thoughts on how we are doing with our housing policies and programs, which policies we should keep, and which new policies we should consider to prioritize for the next 8 years!
- [Visit Jamboard](#) to share your ideas about the following: what types of housing do you want to see, what locations/sites do you want to see explored, what environmental issues bring you the most concern, and what environmental considerations should we have when zoning for new housing.
- Watch the recent joint City Council and Planning Commission Study Session on the Housing Element Update [here](#).
- Visit the [Housing Element Update](#) webpage.

What is the Housing Element?

The Housing Element is a chapter in the City's General Plan that is updated every 8 years to plan for new housing and lays out the goals, policies and programs to meet the community's housing needs. Every California city and county adopts a Housing

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The Housing Element is a chapter in the City's General Plan that is updated every 8 years to plan for new housing and lays out the goals, policies and programs to meet the community's housing needs. Every California city and county adopts a Housing Element!

Why is my participation in the Housing Element Update important?

Your participation in the Housing Element, Safety Element, and Environmental Justice Element updates will help shape our City's planning documents and determine the goals, policies and programs that will shape our community's future. Your participation helps us ensure our process is as inclusive and community driven as possible.

What if I can't make it?

Stay up-to-date and explore our Housing Element page at www.cityofepa.org/housing. You can also submit your comments to housing@cityofepa.org, using "Housing Element Update" in the subject line.

Find Out More

Forward this Email

Reunión Comunitaria

Actualización del Elemento de Vivienda

La Ciudad tendrá una reunión comunitaria en persona para obtener su opinión sobre el plan de vivienda de la Ciudad de East Palo Alto.

CUÁNDO: Jueves, 5 de mayo del 2022 de las 6:00-8:00 PM
DÓNDE: Cooley Landing (al final de Bay Road) o Zoom
REGÍSTRESE: www.tinyurl.com/EPAHousingElement3

Si no puede asistir en persona puede mirar la reunión como un seminario en línea. Habrá interpretación al español, tongano y samoano. También habrá comida gratis y cuidado de niños. Tenga en cuenta que tomaremos precauciones de salud para evitar el contagio de COVID-19. Por favor regístrese para los detalles de la junta.

Hay otras maneras de también involucrarse:

- [Complete esta encuesta](#) sobre las políticas y los programas del Elemento de Vivienda. ¡Queremos escuchar sus opiniones de cómo nos va con nuestras políticas y programas de vivienda, qué políticas debemos mantener y qué nuevas políticas debemos considerar para priorizar durante los próximos 8 años!
- [Visite Jamboard](#) para compartir sus ideas sobre lo siguiente: qué tipos de viviendas le gustaría ver, qué ubicaciones/sites le gustaría ver explorados, qué problemas medioambientales le preocupan más y qué consideraciones medioambientales deberíamos tener al zonificar para nuevas viviendas.
- Mire la Sesión Especial reciente con el Concejo Municipal y la Comisión de Planificación sobre el Elemento de Vivienda [aquí](#).
- Visite la página sobre la [Actualización del Elemento de Vivienda](#).

¿Qué es el Elemento Vivienda?

El Elemento de Vivienda es un capítulo del Plan General de la Ciudad que se actualiza cada 8 años para planificar el desarrollo de nuevas viviendas y establece las metas, pólizas y programas para satisfacer las necesidades de vivienda de la comunidad. ¡Todas las ciudades y condados de California adoptan un Elemento de Vivienda!

¿Por qué es importante mi participación en la Actualización del Elemento de Vivienda?

Su participación en las actualizaciones del Elemento de Vivienda, Elemento de Seguridad y Elemento de Justicia Ambiental ayudará a dar forma a los documentos de planificación de nuestra Ciudad y a determinar las metas, políticas y programas que darán forma al futuro de nuestra comunidad. Su participación nos ayuda a garantizar que nuestro proceso sea lo más inclusivo y comunitario posible.

¿Qué pasa si no puedo participar?

Manténgase actualizado/a visitando nuestra página de Elemento de Vivienda en www.cityofepa.org/housing. También puede enviar sus comentarios a housing@cityofepa.org, utilizando "Elemento de Vivienda" en la línea de asunto.

Más información

Sample Email Alert - Plain Text Preview

Community meeting on Thursday, May 5 at 6pm.
Reunión comunitaria el jueves, 5 de mayo a las 6pm.
Register | Regístrate | Lesisita (<https://us06web.zoom.us/j/92111111111>)

We're holding an in-person community meeting to gather your input on the City of East Pal' Alto's housing plan.

WHEN: Thursday, May 5, 2022, from 6:00-8:00 PM
WHERE: Cooley Landing (at the end of Bay Road) or Zoom
REGISTER: www.tinyurl.com/EPAHousingElement3

If you can't join us in-person you can watch the meeting as a webinar online. Spanish, Tongan, and Samoan interpretation will be available. We will also have free food and childcare. Note that COVID-19 safety precautions will be taken. Please register for the meeting details.

There are other ways to also engage:

* Fill out this [survey](https://tinyurl.com/HousingElementSurvey) on Housing Element policies and programs. We want to hear your thoughts on how we are doing with our housing policies and programs, which policies we should keep, and which new policies we should consider to prioritize for the next 8 years!

* Visit [Jamboard](https://tinyurl.com/HousingElementJamboard) to share your ideas about the following: what types of housing do you want to see, what locations/sites do you want to see explored, what environmental issues bring you the most concern, and what environmental considerations should we have when zoning for new housing.

* Watch the recent joint City Council and Planning Commission Study Session on the Housing Element Update [here](http://eastpaaloalto.iqm2.com/Citizens/SplitView.aspx?Mode=Video&MeetingID=1808&MinutesID=1529&Format=Minutes&MediaFileFormat=mpeg4).

* Visit the Housing Element Update (<https://www.ci.east-palo-alto.ca.us/housing/page/housing-element-update-community-meeting-0>) webpage.

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Your participation in the Housing Element, Safety Element, and Environmental Justice Element updates will help shape our City's planning documents and determine the goals, policies and programs that will shape our community's future. Your participation helps us ensure our process is as inclusive and community driven as possible.

What if I can't make it?

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La Ciudad tendrá una reunión comunitaria en persona para obtener su opinión sobre el plan de vivienda de la Ciudad de East Palo Alto.

CUÁNDO: Jueves, 5 de mayo del 2022 de las 6:00-8:00 PM
DÓNDE: Cooley Landing (al final de Bay Road) o Zoom
REGÍSTRESE: www.tinyurl.com/EPAHousingElement3

Si no puede asistir en persona puede mirar la reunión como un seminario en línea. Habrá interpretación al español, tongano y samoano. También habrá comida gratis y cuidado de niños. Tenga en cuenta que tomaremos precauciones de salud para evitar el contagio de COVID-19. Por favor regístrese para los detalles de la junta.

Hay otras maneras de también involucrarse:

* Complete esta [encuesta](https://tinyurl.com/HousingElementEncuesta) sobre las políticas y los programas del Elemento de Vivienda. ¡Queremos escuchar sus opiniones de cómo nos va con nuestras políticas y programas de vivienda, qué políticas debemos mantener y qué nuevas políticas debemos considerar para priorizar durante los próximos 8 años!

* Visite [Jamboard](https://tinyurl.com/HousingElementJamboard) para compartir sus ideas sobre lo siguiente: qué tipos de viviendas le gustaría ver, qué ubicaciones/sitios le gustaría ver explorados, qué problemas medioambientales le preocupan más y qué consideraciones medioambientales deberíamos tener al zonificar para nuevas viviendas.

* Mire la Sesión Especial reciente con el Concejo Municipal y la Comisión de Planificación sobre el Elemento de Vivienda [aquí](http://eastpaaloalto.iqm2.com/Citizens/SplitView.aspx?Mode=Video&MeetingID=1808&MinuteSID=1529&Format=Minutes&MediaFileFormat=mpeg4).

* Visite la página sobre la Actualización del Elemento de Vivienda (<https://www.ci.east-palo-alto.ca.us/housing/page/housing-element-update-community-meeting-0>).

¿Qué es el Elemento Vivienda?

El Elemento de Vivienda es un capítulo del Plan General de la Ciudad que se actualiza cada 8 años para planificar el desarrollo de nuevas viviendas y establece las metas, pólizas y programas para satisfacer las necesidades de vivienda de la comunidad. ¡Todas las ciudades y condados de California adoptan un Elemento de Vivienda!

¿Por qué es importante mi participación en la Actualización del Elemento de Vivienda?

Su participación en las actualizaciones del Elemento de Vivienda, Elemento de Seguridad y Elemento de Justicia Ambiental ayudará a dar forma a los documentos de planificación de nuestra Ciudad y a determinar las metas, políticas y programas que darán forma al futuro de nuestra comunidad. Su participación nos ayuda a garantizar que nuestro proceso sea lo más inclusivo y comunitario posible.

¿Qué pasa si no puedo participar?

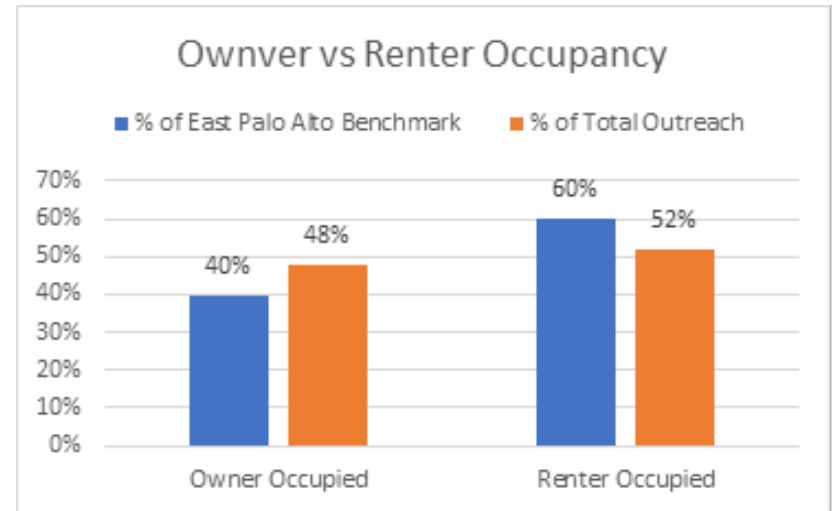
Manténgase actualizado/a visitando nuestra página de Elemento de Vivienda en www.cityofepa.org/housing. También puede enviar sus comentarios a housing@cityofepa.org, utilizando "Elemento de Vivienda" en la línea de asunto. Más información (<https://www.cityofepa.org/housing/page/housing-element-update-1>)

A4 COMMUNITY MEETINGS REPORT

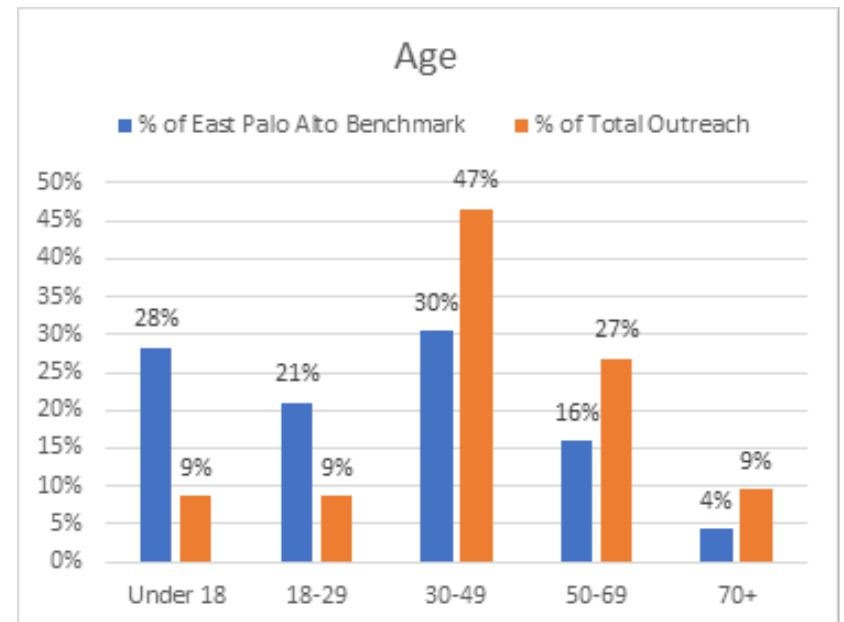
The following is a summary of community meeting participation in the East Palo Alto community meetings and surveys, and how that compares to 2020 census demographics data.

Demographics Summary

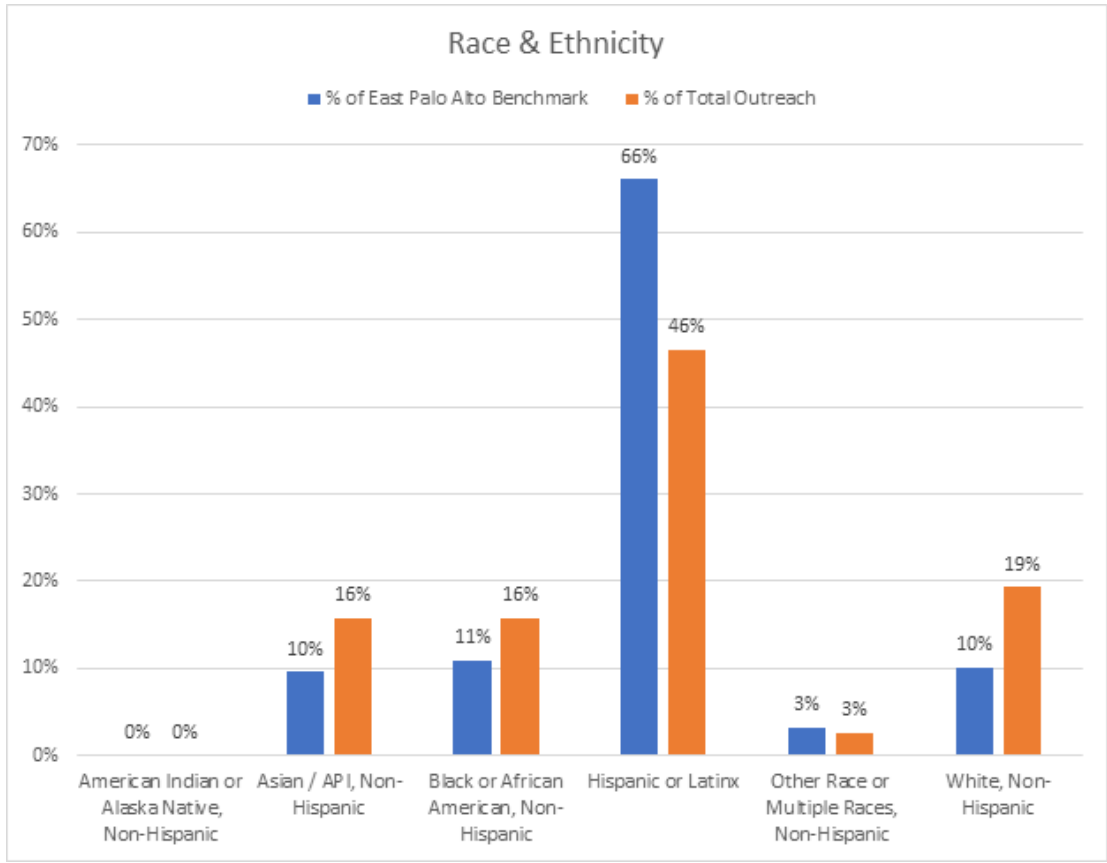
Owner vs Renter Occupancy: Approximately 48% of community members that engaged in the Housing Element Update process were homeowners, and 52% were renters. This compares to a 40:60 ratio of owners vs. renters in the City



Age: A majority of community members that engaged in the Housing Element Update process were between 30-49 years old; the second-largest engaged group were 50–69-year-olds. The City has a larger young population of 18 years or under, and a smaller older population of 70+ years.



Race & Ethnicity: Approximately 46% of community members that engaged in the Housing Element Update process were Hispanic/Latinx, 19% were non-Hispanic White, 16% were Black/African American, and 16% were Asian/Pacific Islander. The largest East Palo Alto population is Hispanic/Latinx at 66%.



Demographic Breakdown by Community Meeting

Community Meeting #1 – July 19, 2021

No registrant or participant data is available.

Community Meeting #2 - February 24, 2022

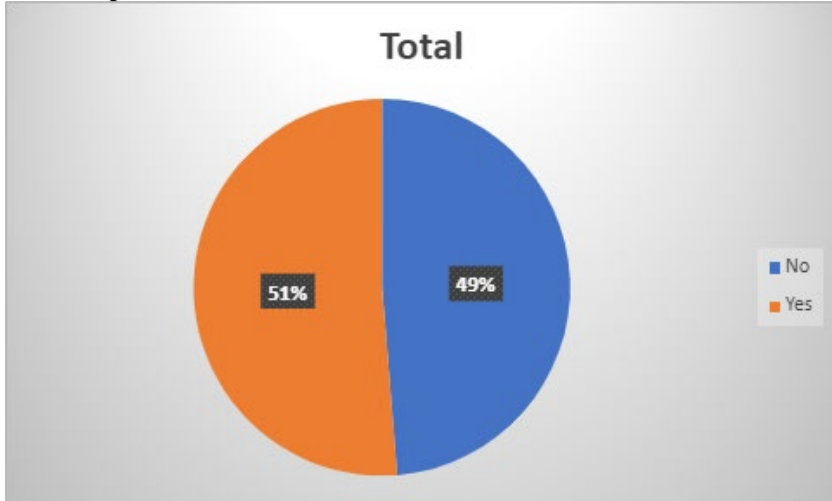
Registration & Participation Report

Registration

Time	Participated	Race/Ethnicity	Housing Situation	Neighborhood	Primary Language	Age
1/28/2022 19:41	No	Unknown	Unknown	Unknown	Unknown	Unknown
1/28/2022 21:53	Yes	Black/African American	Tenant (single-family/duplex)	The Gardens	English	40 – 59
1/28/2022 23:30	No	Unknown	Unknown	Unknown	Unknown	Unknown
1/29/2022 8:49	Yes	Unknown	Unknown	Unknown	Unknown	Unknown
1/29/2022 10:16	No	Unknown	Unknown	Unknown	Unknown	Unknown
1/31/2022 17:20	Yes	Other	Live but not work in EPA	Not applicable	English	25 – 29
2/3/2022 12:36	Yes	Unknown	Unknown	Unknown	Unknown	Unknown
2/3/2022 14:01	Yes	White/European	Landlord	Weeks Area	English	60+
2/5/2022 6:48	No	Unknown	Unknown	Unknown	Unknown	Unknown
2/5/2022 13:07	No	Unknown	Unknown	Unknown	Unknown	Unknown
2/5/2022 15:59	Yes	Asian	Unknown	Unknown	Unknown	Unknown
2/8/2022 11:29	No	White/European	Tenant (multi-family)	Midtown	English	30 – 39
2/9/2022 17:27	Yes	Asian	Work but not live in EPA	Not applicable	English	30 – 39
2/16/2022 8:51	Yes	Black/African American	Homeowner	The Westside	English	60+
2/16/2022 14:51	No	Hispanic/Latinx	Other	Not applicable	English	40 – 59
2/17/2022 15:08	No	Black/African American	Landlord	The Village	English	60+
2/18/2022 16:03	No	Asian	Homeowner	The Gardens	Other	40 – 59
2/18/2022 16:28	No	Unknown	Unknown	Unknown	Unknown	Unknown
2/18/2022 16:48	No	Hispanic/Latinx	Tenant (single-family/duplex)	The Westside	English	40 – 59
2/18/2022 17:15	Yes	Black/African American	Homeowner	The Gardens	English	Unknown
2/18/2022 18:26	Yes	Unknown	Unknown	Unknown	Unknown	Unknown
2/18/2022 19:59	Yes	White/European	Homeowner with tenants	Midtown	English	60+
2/18/2022 22:33	No	Black/African American	Live but not work in EPA	The Westside	English	60+
2/18/2022 23:23	No	Hispanic/Latinx	Tenant (single-family/duplex)	Unknown	Español	30 – 39
2/19/2022 6:33	No	White/European	Unknown	Unknown	English	Unknown
2/19/2022 6:59	No	Unknown	Unknown	Unknown	Unknown	Unknown
2/20/2022 7:41	No	White/European	Homeowner	The Westside	English	60+
2/20/2022 20:23	No	Hispanic/Latinx	Tenant (multi-family)	The Westside	Español	40 – 59
2/21/2022 9:09	No	Unknown	Unknown	Unknown	Unknown	Unknown
2/21/2022 9:27	Yes	White/European	Live but not work in EPA	Not applicable	English	60+
2/21/2022 11:18	No	Other	Tenant (multi-family)	The Westside	English	60+
2/21/2022 14:07	Yes	White/European	Other	Not applicable	English	60+
2/24/2022 8:35	Yes	White/European	Other	Not applicable	English	Unknown
2/24/2022 9:57	Yes	Hispanic/Latinx	Tenant (multi-family)	The Westside	English	25 – 29
2/24/2022 11:00	Yes	Unknown	Unknown	Unknown	Unknown	Unknown
2/24/2022 17:09	Yes	Hispanic/Latinx	Homeowner	The Gardens	English	40 – 59
2/24/2022 17:56	Yes	Unknown	Unknown	Unknown	Unknown	Unknown
2/24/2022 17:59	Yes	Unknown	Unknown	Unknown	Unknown	Unknown
2/24/2022 18:01	Yes	Asian	Tenant (multi-family)	Not applicable	English	18 – 24

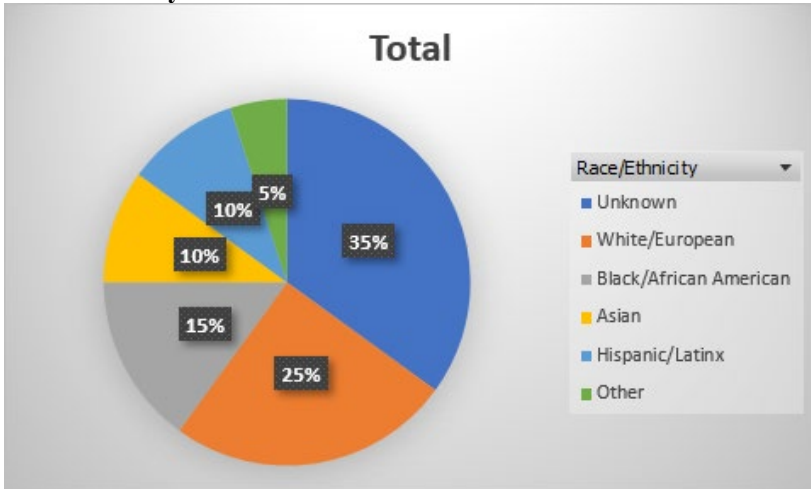
Participant Demographics

Participation Rate:



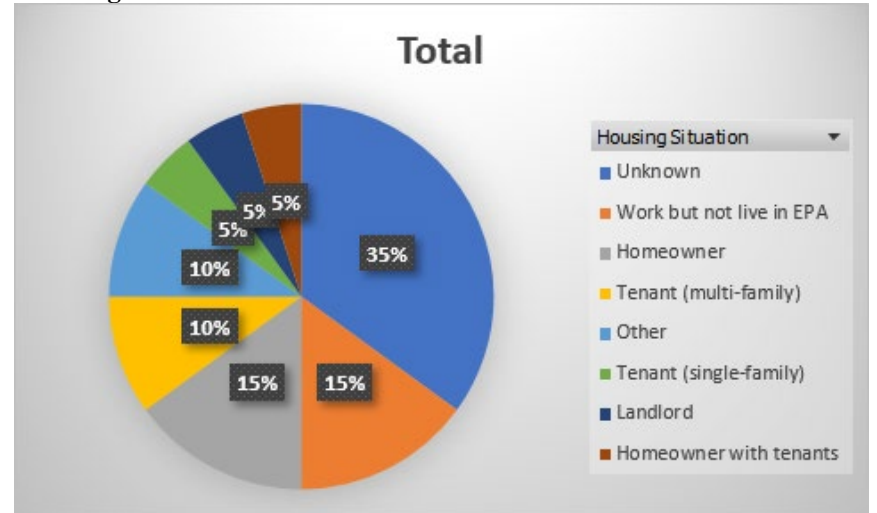
Out of the 39 registrants, 20 people total (51%) participated.

Race/Ethnicity:



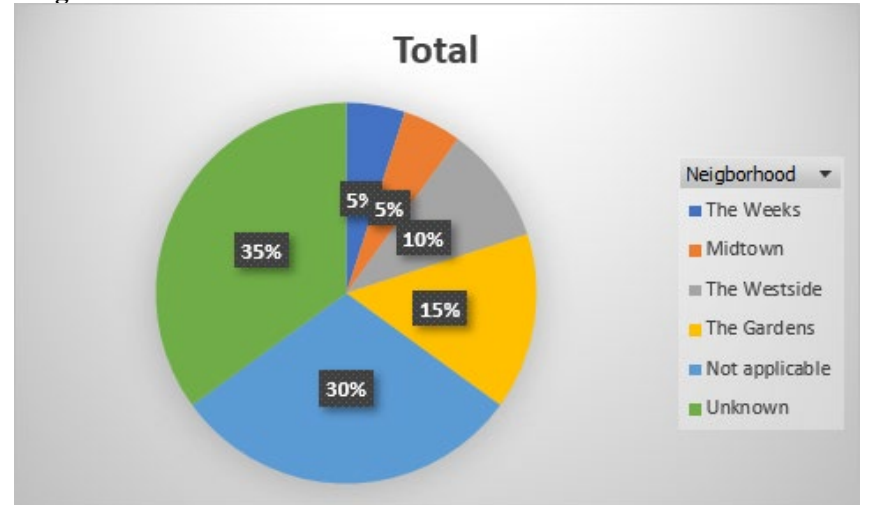
A larger share of participants was White/European and Black/African American.

Housing Situation:



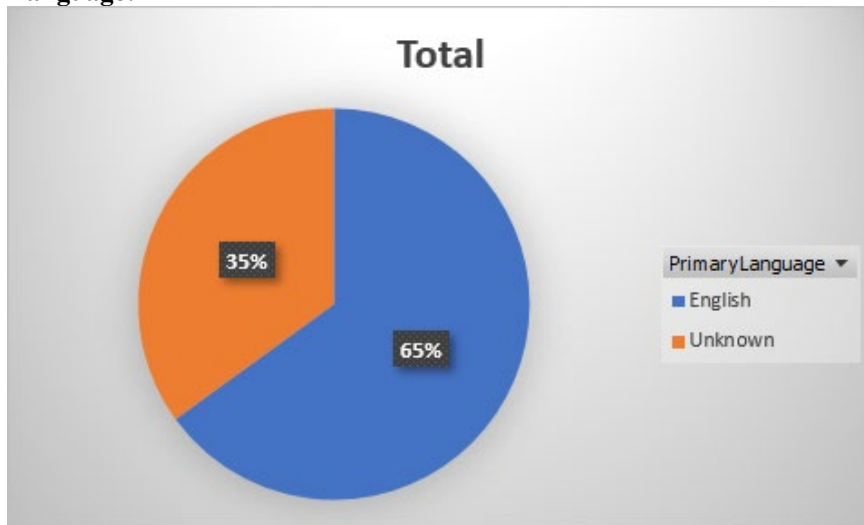
A larger share of homeowners participated compared to tenants.

Neighborhood:



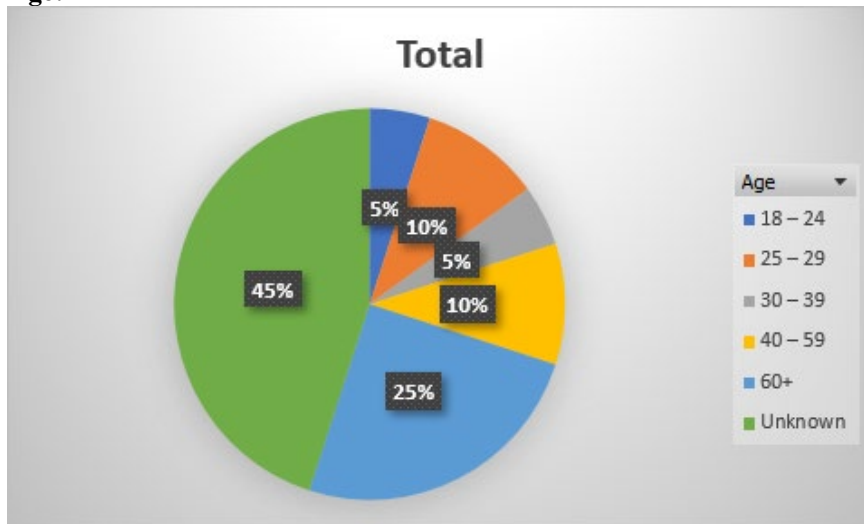
A larger share of participants indicated they live in The Gardens neighborhood, compared to other neighborhoods.

Language:



A majority of participants were English-speaking.

Age:



A larger share of participants were 60 years and older compared to other age groups.

Community Meeting #3 – May 5, 2022

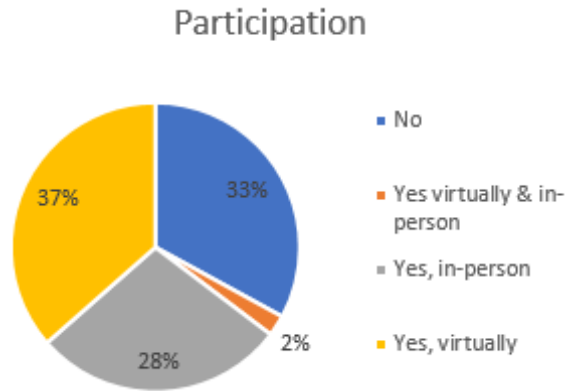
Registration & Participation Report

Registration							Language	
Time	Participated	Race/Ethnicity	Housing Situation	Neighborhood	Age	Interpretation	Used Shuttle	
4/28/2022 9:25	Yes, virtually	American Indian/Alaska Native	Unknown	Unknown		English		
4/28/2022 9:30	Yes, virtually	Black/African American	Work but not live in EPA	The Village	30 – 39	English		
	Yes virtually &							
5/3/2022 13:20	in-person	Hispanic/Latinx	Tenant (multi-family)	Unknown	40 – 59	Español	Yes	
5/3/2022 14:47	Yes, virtually	Black/African American	Homeowner	The Gardens	60+	English		
5/3/2022 15:07	Yes, virtually	Hispanic/Latinx	Tenant (multi-family)	Unknown	30 – 39	English		
5/3/2022 15:56	Yes, virtually	Hispanic/Latinx	Tenant (single-family/duplex)	Unknown	40 – 59	Español		
5/3/2022 19:13	Yes, virtually	Black/African American	Homeowner	Not applicable	60+	English		
5/4/2022 1:40	Yes, virtually	Hispanic/Latinx	Other	Unknown	30 – 39	Español		
5/4/2022 12:20	Yes, virtually	Hispanic/Latinx	Tenant (multi-family)	The Westside	40 – 59	Español		
5/4/2022 15:00	Yes, virtually	Hispanic/Latinx	Work but not live in EPA	Not applicable	30 – 39	English		
5/4/2022 15:57	Yes, virtually	Native Hawaiian/Pacific Islander	Single family home landlord	Midtown	40 – 59	English		
5/5/2022 7:19	Yes, virtually	Unknown	Unknown	Unknown		English		
	Yes virtually &							
5/5/2022 9:07	in-person	Native Hawaiian/Pacific Islander	Homeowner	Not applicable	40 – 59	Tongan		
5/5/2022 10:29	Yes, virtually	Asian	Work but not live in EPA	Not applicable	30 – 39	English		
5/5/2022 16:42	Yes, virtually	Black/African American	Homeowner	The Gardens	60+	English		
5/5/2022 17:36	Yes, virtually	Asian	Landlord	Not applicable	60+	English		
5/5/2022 17:41	Yes, virtually	Asian	Single family home landlord	Not applicable	40 – 59	English		
5/5/2022 17:42	Yes, virtually	Unknown	Unknown	Unknown		English		
5/5/2022 17:49	Yes, virtually	Unknown	Unknown	Unknown		English		
5/5/2022 17:49	Yes, virtually	Hispanic/Latinx	Homeowner	Unknown	40 – 59	English		
5/5/2022 17:57	Yes, virtually	Black/African American	Work but not live in EPA	Unknown	30 – 39	English		
5/5/2022 17:59	Yes, virtually	White/European	Homeowner	Unknown	40 – 59	English		
5/5/2022 17:59	Yes, virtually	Asian	Homeowner	Unknown	30 – 39	English		
5/5/2022 17:59	Yes, virtually	Asian	Work but not live in EPA	Not applicable	40 – 59	English		
5/5/2022 18:05	Yes, virtually	White/European	Work but not live in EPA	Not applicable	40 – 59	English		
5/5/2022 18:05	Yes, virtually	Asian	Homeowner	The Gardens	40 – 59	English		
5/5/2022 18:05	Yes, virtually	Asian	Homeowner	Unknown	30 – 39	English		
5/5/2022 18:21	Yes, virtually	Hispanic/Latinx	Tenant (multi-family)	The Westside	30 – 39	English		
5/5/2022 18:31	Yes, virtually	Hispanic/Latinx	Other	The Gardens	40 – 59	English		
5/5/2022 18:32	Yes, virtually		Unknown	Unknown		English		
5/5/2022 18:52	Yes, virtually	Hispanic/Latinx	Landlord	Unknown	40 – 59	English		
5/5/2022 19:12	Yes, virtually	Native Hawaiian/Pacific Islander	Tenant (multi-family)	The Westside	30 – 39	English		
5/5/2022 19:40	Yes, virtually	White/European	Homeowner	Midtown	40 – 59	English		
4/28/2022 9:34	Yes, in-person	Asian	Homeowner	Not applicable	25 – 29	English		
5/2/2022 17:12	Yes, in-person	Hispanic/Latinx	Tenant (multi-family)	The Westside	40 – 59	English	Yes	
5/3/2022 21:00	Yes, in-person	Black/African American	Unknown	Unknown	60+	English		
5/4/2022 19:48	Yes, in-person	Black/African American	Tenant (multi-family)	The Westside	40 – 59	English		
5/5/2022 8:51	Yes, in-person	White/European	Homeowner	Not applicable	60+	English		
5/5/2022 16:46	Yes, in-person	Asian, Hispanic/Latinx Hispanic/Latinx, Native	Tenant (multi-family)	The Westside	25 – 29	English		
5/5/2022 16:49	Yes, in-person	Hawaiian/Pacific Islander	Other	Midtown	18 – 24	English		
5/5/2022 16:54	Yes, in-person	Native Hawaiian/Pacific Islander	Work but not live in EPA	The Westside	18 – 24	English		

4/28/2022 9:29 No	Black/African American	Tenant (single-family/duplex)	The Village	30 – 39	English	
4/28/2022 10:48 No	Black/African American	Tenant (multi-family)	The Westside	40 – 59	English	
4/28/2022 15:07 No	Other	Other	Not applicable	60+	English	
4/29/2022 19:10 No	Hispanic/Latinx	Tenant (multi-family)	Unknown	40 – 59	Español	
4/30/2022 11:10 No	Unknown	Unknown	Unknown	40 – 59	English	
4/30/2022 11:48 No	Hispanic/Latinx	Landlord	Not applicable	40 – 59	English	
5/1/2022 19:02 No	Hispanic/Latinx	Tenant (single-family/duplex)	Unknown	40 – 59	English	Yes
5/3/2022 8:28 No	Unknown	Work but not live in EPA	Unknown		English	
5/3/2022 14:22 No	Black/African American	Homeowner	Midtown	60+	English	
5/3/2022 14:52 No	Hispanic/Latinx	Tenant (single-family/duplex)	Unknown	25 – 29	English	
5/3/2022 14:57 No	Hispanic/Latinx	Tenant (single-family/duplex)	The Gardens	30 – 39	English	
5/3/2022 20:24 No	Black/African American	Homeowner	The Gardens	60+	English	
5/3/2022 21:02 No	Hispanic/Latinx	Tenant (multi-family)	The Village	40 – 59	English	
5/3/2022 22:55 No	Black/African American	Tenant (single-family/duplex)	The Gardens	40 – 59	English	Yes
5/4/2022 7:31 No	Hispanic/Latinx	Tenant (ADU)	The Westside	30 – 39	Español	Yes
5/4/2022 9:52 No	Black/African American	Homeowner	The Gardens	40 – 59	English	
5/4/2022 11:07 No	Black/African American	Other	Unknown	40 – 59	English	
5/4/2022 11:29 No	Hispanic/Latinx	Tenant (multi-family)	The Westside	25 – 29	English	Yes
5/4/2022 14:47 No	Hispanic/Latinx	Other	Midtown	30 – 39	English	
5/4/2022 19:00 No	Hispanic/Latinx	Single family home landlord	The Gardens	40 – 59	Español	
5/4/2022 22:52 No	Hispanic/Latinx	Unknown	Unknown	30 – 39	Español	
5/5/2022 10:39 No	Hispanic/Latinx	Other	Midtown	40 – 59	Español	
5/5/2022 12:54 No	White/European	Homeowner	Unknown	30 – 39	English	
5/5/2022 16:40 No	Hispanic/Latinx	Tenant (multi-family)	The Westside	18 – 24	English	
5/5/2022 16:53 No	Hispanic/Latinx	Tenant (single-family/duplex)	Midtown	18 – 24	English	
5/5/2022 18:36 No	White/European	Homeowner	The Gardens	30 – 39	English	
5/5/2022 18:42 No	Unknown	Unknown	Unknown	40 – 59	Español	
5/5/2022 19:04 No	Hispanic/Latinx	Tenant (single-family/duplex)	Unknown	60+	English	Yes
5/5/2022 18:00 Yes, in-person	Hispanic/Latinx	Tenant	Unknown	18-29	English	Yes
5/5/2022 18:00 Yes, in-person	White/European	Homeowner	Unknown	50-69	English	
5/5/2022 18:00 Yes, in-person	White/European	Homeowner	Unknown	30-49	English	
5/5/2022 18:00 Yes, in-person	Native Hawaiian/Pacific Islander	Unknown	Unknown	30-49	English	
5/5/2022 18:00 Yes, in-person	Asian, Hispanic/Latinx	Unknown	Unknown	50-69	English	
5/5/2022 18:00 Yes, in-person	Asian, Hispanic/Latinx	Unknown	Unknown	50-69	English	
5/5/2022 18:00 Yes, in-person	Hispanic/Latinx	Tenant	The Westside	30-49	Español	
5/5/2022 18:00 Yes, in-person	Hispanic/Latinx	Tenant	The Westside	30-49	Español	
5/5/2022 18:00 Yes, in-person	Hispanic/Latinx	Tenant	The Westside	30-49	English	
5/5/2022 18:00 Yes, in-person	Black/African American	Tenant	Unknown	70+	English	
5/5/2022 18:00 Yes, in-person	Black/African American	Unknown	Unknown	50-69	English	
5/5/2022 18:00 Yes, in-person	White/European	Unknown	Unknown	30-49	English	
5/5/2022 18:00 Yes, in-person	Black/African American	Unknown	The Westside	50-69	English	
5/5/2022 18:00 Yes, in-person	Hispanic/Latinx	Unknown	Unknown	30-49	English	
5/5/2022 18:00 Yes, in-person	Hispanic/Latinx	Unknown	Unknown	30-49	English	
5/5/2022 18:00 Yes, in-person	Black/African American	Unknown	Unknown	50-69	English	

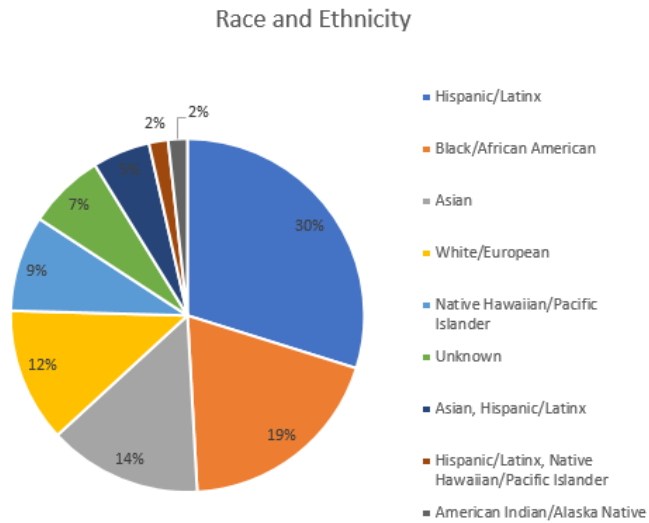
Participant Demographics

Participation Rate:



Of the 85 registrants, 67% participated (24 participated in-person, 31 participated virtually, and 2 participated both in-person and virtually).

Race/Ethnicity:



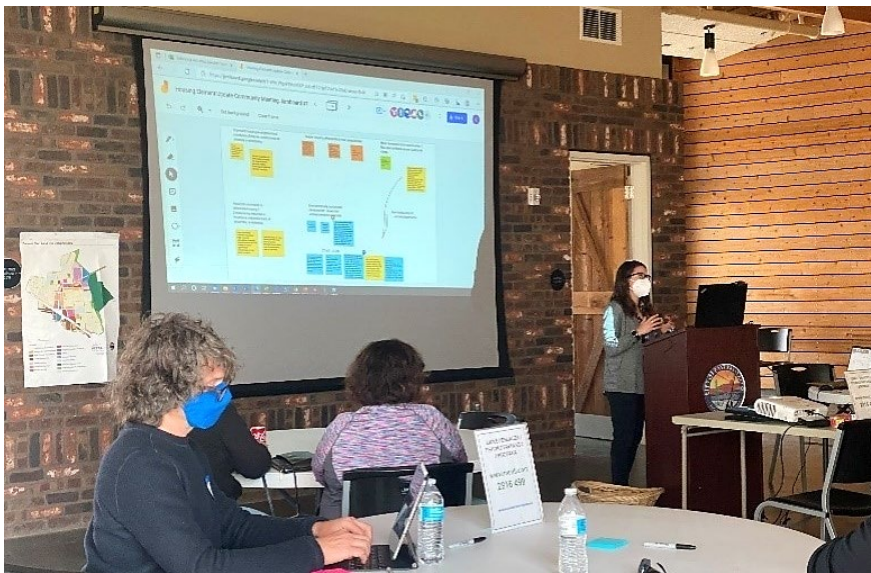
Photos from May 5, 2022, Hybrid (In-Person and Virtual) Community Meeting



Housing Element Community Meeting #3 (English & Spanish)

NOT YET RATED

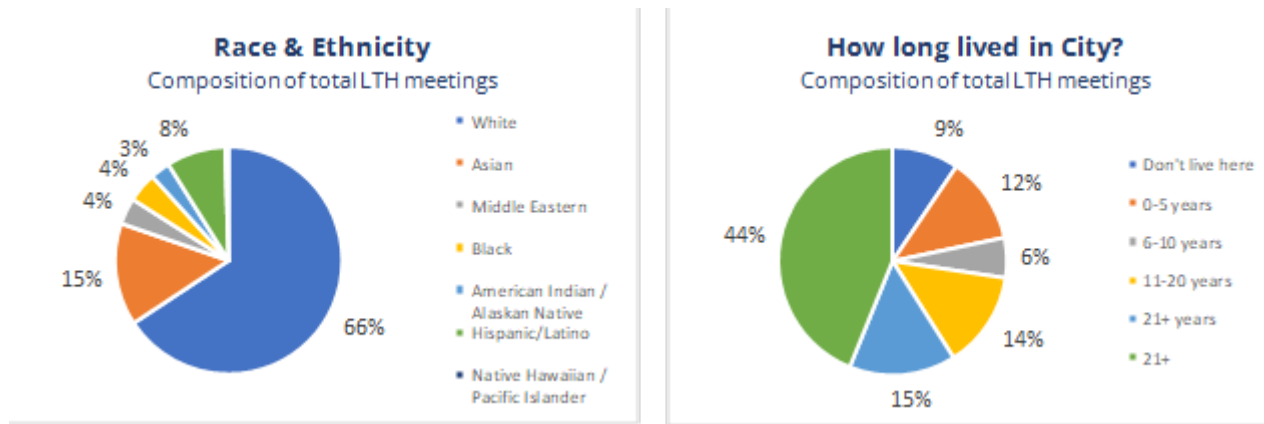
5 months ago | More



A5 COUNTYWIDE MEETING SUMMARY

A series of countywide meetings about the Housing Element update were held from March to May 2021. Each meeting provided community members with an introduction the Housing Element update, why it matters, information on the Let’s Talk Housing outreach effort and countywide trends. Breakout room discussions with individual cities and towns followed.

Who We Heard From



In total 1,024 registered for the series and 264 registered for the All About RHNA meeting. Of those who registered for the series, the majority identified as White (66%) or Asian (15%) and were 50 years or older; nearly half were 50 to 69 years old and almost a fifth were over 70. Almost half had lived over 21 years in their homes, and three-fourths owned their own homes.

East Palo Alto was part of the May 30th introductory meeting, along with Burlingame, Hillsborough, Millbrae and San Mateo City. Due to technical difficulties, a second meeting was held on May 6th. One person who lives in East Palo Alto registered as a participant. She was a renter who had lived in the City between 0 and 5 years. Demographically, she was a White woman between the ages of 50 and 69. This is not an appropriate sample of the participants, however, because between 10 and 15 people participated in the breakout room.

What We Heard

Main Meeting

People were asked to share a word in the chat describing housing now at the beginning of the meeting, and the housing they envisioned in their communities ten years from now.



Breakout Session

There was a lively discussion with approximately 10-15 people in attendance. There was a feeling that East Palo Alto was doing a lot, with one participant saying, “It seems like EPA is the most ambitious City on the peninsula,” but that a lot is not enough. The primary concern heard from the group was the lack of affordable housing. This applied to both housing for extremely low-income households as well as moderate income/ownership opportunities. There was support for tiny homes and looking at employers to do more.

Post Event Survey

The post-event survey reflected the variety of opinions present on issues ranging from a desire to preserve communities as they are, to an appeal for more and diverse housing everywhere in the county. Despite the technical difficulties, community members responded that they valued the space and the information provided within it and looked forward to spaces where more meaningful and engaged discussion could take place.

A6 SURVEYS REPORT

Whiteboard Survey

Results

Input on July 19, 2021, Community Meeting

Housing Element Community Meeting

What does affordable mean? Que significa accesible? +

Affordable meaning everyone low/middle income are able to purchase a home. + 0	Safe, quality housing that can be accessed by people of all income levels without fear of rent burden. + 1	Looking at varying income levels, ESPECIALLY for college students returning home and want to rent an apartment. + 0
Attainable + 0	Attainable + 0	Our diversity + 0
I hope that all of the major races that make up epa get to stay here and live in stable conditions not in rvs down the street. + 0	viviendas para todos, viviendas al alcance de las personas con bajos ingresos. + 0	

What are the housing needs? Cual son las necesidades de vivienda? +

Affordable and good quality housing that is attainable. + 0	Increase of accessible affordable housing for people with intellectual and developmental disabilities who need coordinated services to live independently in the community as well as housing that is affordable to. + 0	Housing should also be available for those who have been displaced. + 0
Housing needs to be made available to those who are earning more than \$50K per year. + 0		

What is the City doing well? Que esta haciendo bien la ciudad? +

Well motivated staff that recognizes the importance of housing for EPA. + 0	muchas gracias por la interpretacion. + 0	The city prioritizes housing for extremely low income families. + 0
--	--	--

What do you love about your community? Que es lo que amas de tu comunidad? +

It is home for so many. + 0	One of the most diverse communities in San Mateo County. + 0	somos una ciudad multicultural y unida. + 0
The fact that people have long term roots in the community. There is a strong active element to the community. EPA cares about each other. + 0		

What does the City need to do better? Que necesita hacer la ciudad mejor? +

How does UC Berkeley's Displacement Study IMPACT EPA council's goals around lessening displacement? + 0	Partner with Housing Authority to increase availability of housing affordable to people on fixed incomes such as SSI which is well below ELI limits. + 0	Workforce housing + 0
housing where families can live, grow and be able to pass on to the next. + 0	City needs to provide housing for higher low income families and housing for single individuals. + 0	

What do you envision for East Palo Alto housing over the next 5-10 years? / Que imagina para las viviendas de East Palo Alto durante los próximos 5 a 10 años? +

I envision that those who have been displaced can find a path back. + 0	I envision a jobs-housing balance in EPA. + 0	In RE development and overlay zones that encourage density. + 0
Una casa para Victor + 0	Reasoning SFH to allow for apartments. + 0	A place where those who graduated from college and grew up here can live here again. + 0
Increase of affordable, accessible housing. + 0	que todos los que estamos aqui sigamos en nuestra ciudad. + 0	

Note: Clearer version of sticky note responses is unavailable.

Jamboard Survey

Results

Slide 1 – Input from May 5, 2022 – July 7, 2022

Improved housing & neighborhood conditions | Mejores condiciones de vivienda y vecindarios

More mixed-use development to improve access to amenities

Coordinate any re-zoning with a better traffic/mobility plan than currently on-hand. One that incorporates creative mobility solutions, traffic calming measures, and regional integration. (09) that's badly

Create regulations AND enforcement for slumlords to provide better housing conditions to their tenants.

Reduced constraints to affordable housing | Limitaciones reducidas e incentivos mejorados para el desarrollo de viviendas

More housing overall is needed, high density affordable housing. Most families will be happy to be in apartment complexes, if the price is right.

Get blockers to new development and housing, like EPASD's hefty fees and bureaucracy, out of the way.

Build multi-level, mixed-use structures along Bay Rd (RBD) that include first-floor retail and 2nd-5th floor apartments. Make EPA a walkable, diverse, affordable city!

When looking for new housing sites, factor in the value of increasing density around existing social infrastructure - like parks. (1)

Housing within the RBD is not the housing element's 'get out of jail free card.' Very dangerous trap and huge missed opportunity that will have irreversible socioeconomic repercussions. (02)

Limit the concentration of affordable housing in single developments - it's 'settling' for an unjust solution to a problem of injustice. (03)

Vet proposed policies by vetting them through all facets of the housing ecosystem to ensure the intention of the policies can withstand the complexity of the system. (04)

Create zones or policy inroads to support new housing models that respond to EPA's specific needs - but we cannot account for now. (05)

Coordinate housing element to reflect and support East Palo Alto's rich cultural diversity. The housing element should reflect how we live and how we want to live, not tell us how we need to conform or sacrifice our way of

Prioritize, enable, and support existing homeowners in developing their own properties. Make it possible for current residents who helped EPA become what it is today participate in shaping what it will become in the future.

Discourage sloppy subdivision of large lots into opportunistic capital grabs populated by rubber-stamped suburban homes. Look at some of the cities who have become champions of good design and talk

Deeper housing affordability | más asequibilidad

Increase accessible affordable housing for people with intellectual and developmental disabilities who need coordinated services to live in the community

Viviendas para todos, viviendas al alcance de las personas de bajos ingresos

More multifamily rentals

Environmentally sustainable development | Desarrollo ambientalmente sostenible

Flooding concerns

Reduce vehicle miles traveled

I am concerned about the air, water and ground pollution in East Palo Alto due to the rise in Asthma and skin conditions of the residents. Concerned that we have not taken a good enough look at the old and leaking pipes in EPA

Mixed-income / high density communities, makes a lot of sense. Apartments on top, business, retail and services at the bottom.

It's important to make biking/walking/taking the bus an easy choice, a car should not always be needed.

OTHER | OTRO

What are we doing about our neighbors who treat RHNA as a toothless suggestion, letting EPA pick up the slack?

Child free housing

Thank you - this was really a wonderful opportunity.

More homeownership opportunities | Más oportunidades de ser dueños de casas

Housing where families can live and grow

Small condos which make sense to both the developers to make, and the potential homeowners to buy, should be seen as priority. SFH, even with lots of incentives, most likely out of reach for low-income

Anti-displacement | Antidesplazamiento

Pass OPA - spend summer and fall educating EPA residents on community land trusts and housing cooperatives; engage with communities in San Jose, Berkeley, and DC on their OPA experiences.

This right here! >>>>

Engage in robust, grassroots outreach that brings forth voices from different neighborhoods. Hold neighborhood meetings that culminate in all-city meetings to educate one another on EPA neighborhoods, their

All the housing assistance needs more money, and money is collected via taxes for the most part. Hence, increase the tax base is required.

Slide 2 - Input from February 24, 2022 – July 7, 2022

What types of housing do you want to see? | ¿Qué tipos de vivienda le gustaría ver?

- Units for single people and seniors. 1 bedroom or studios
- Housing for middle level incomes
- I want to see more single family housing that people can buy and pass along to the next generation.
- Housing with supportive services for those with needs. Group homes used to be more present in our city.
- More mixed-use housing near transit, and more mixed-density neighborhoods (single-family and multi-family together)
- Agreed, community gardens and food access are important. Even places like patches of earth by sidewalks can be used to grow food. Food sharing too.
- School district sites developed
- Along Bayshore road north of University Avenue
- Transit-oriented sites increases accessibility for people with developmental and other disabilities as well as other special needs populations that are transit dependent
- More deeply affordable units (Extremely and Acutely Low Income) that meets the needs of people on fixed incomes
- Multifamily Rental affordable housing for more families
- Financial Assistance, for example CalHFA Equity Builder Loan First Time Buyers couple with City of East Palo Alto source of funds generate from new project development.
- Single-family neighborhoods in high-opportunity areas
- I hope that most of the new housing will allow residents to grow some of their own food in their yard or a nearby garden.
- Higher density housing in locations safer from environmental factors. The number of people impacted do not necessarily make sense to me about single family housing, especially considering environmental factors.
- More mixed-used development to increase accessibility to community resources
- SMART - Sustainable, Mixed-use, Affordable, Resilient, Transit-oriented housing
- More affordable units for families (2+ bedrooms)
- Duplexes and/or cottages
- Ownership units!
- mixed income developments (EL to Middle)

What environmental issues bring you the most concern? | ¿Qué problemas ambientales le da más preocupación?

- Parking and pollution
- Flooding
- Flooding, rising temperatures, fire
- Air quality esp. with recent wildfires!
- Sea level rise, stormwater flooding, urban heat island affect, air/water pollution

What locations/sites do you want to see explored? | ¿Qué lugares/sitios quiere ver explorados?

- Transit-oriented sites increases accessibility for people with developmental and other disabilities as well as other special needs populations that are transit dependent
- Single-family neighborhoods in high-opportunity areas
- I hope that most of the new housing will allow residents to grow some of their own food in their yard or a nearby garden.

What environmental considerations should we have when zoning for new housing? | ¿Qué consideraciones ambientales deberíamos de abordar cuando hacemos nuevas zonas para viviendas?

- Reducing Vehicle Miles Travelled
- Building away from the flood zones, incorporating nature-based green infrastructure, urban greening
- Elevated buildings and also lower density around the bay front.. densed units should be build more inward, not focused too much along the bay front
- Ready for solar power to get off the grid, or put our solar power into the grid and get a rebate for selling electricity
- Make sure it is not a super site. Less risk of flood and consider fire mitigation.
- Don't sacrifice green spaces and trees. We need them for a healthy and sustainable life. Choose eco-friendly options when possible, like solar panels, energy-efficient way of building.

Survey Themes

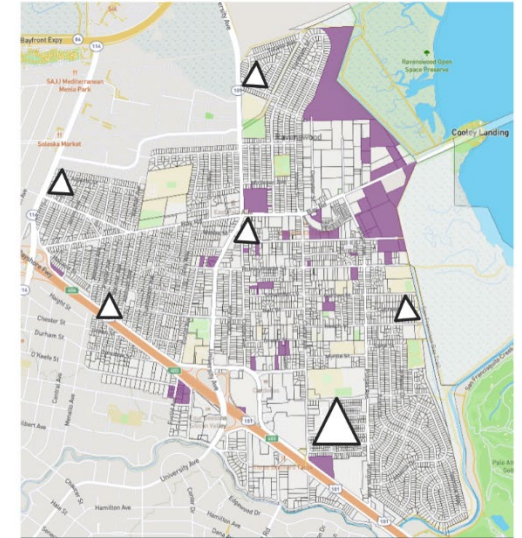
- Improved housing & neighborhood conditions
- Deeper housing affordability
- More homeownership opportunities
- Reduced constraints to affordable housing
- Environmentally sustainable development
- Anti-displacement

Slide 3 - Input from February 24, 2022 – July 7, 2022



Please add sticky notes or shapes on this map where you'd like to see new housing development

Favor de añadir notas adhesivas o figuras en este mapa en lugares donde le gustaría ver viviendas nuevas.

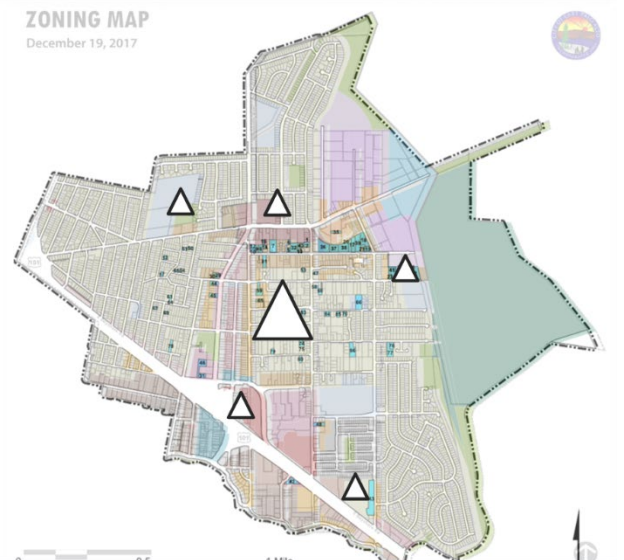


Slide 4 - Input from February 24, 2022 – July 7, 2022



Please add sticky notes on this map where you'd like to see new housing development

Favor de añadir notas adhesivas en este mapa en lugares donde le gustaría ver viviendas nuevas.

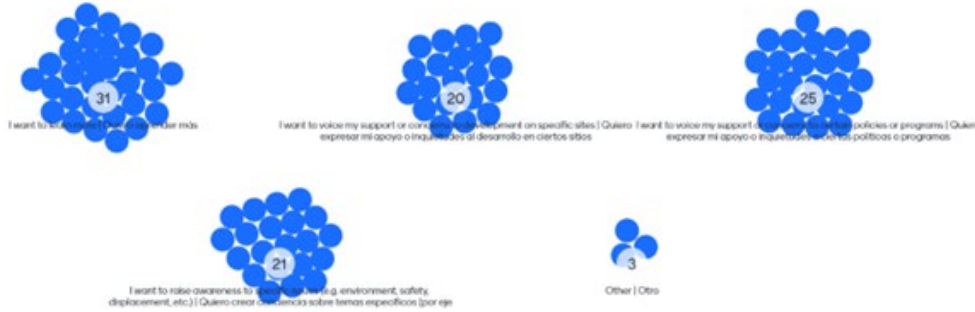


May 5, 2022, Community Meeting In-Person Survey Results
 Online and In-Person Interactive Activity

Go to www.menti.com and use the code 28 16 49 9

What brings you here tonight? | ¿Qué le trajo aquí hoy?

Mentimeter



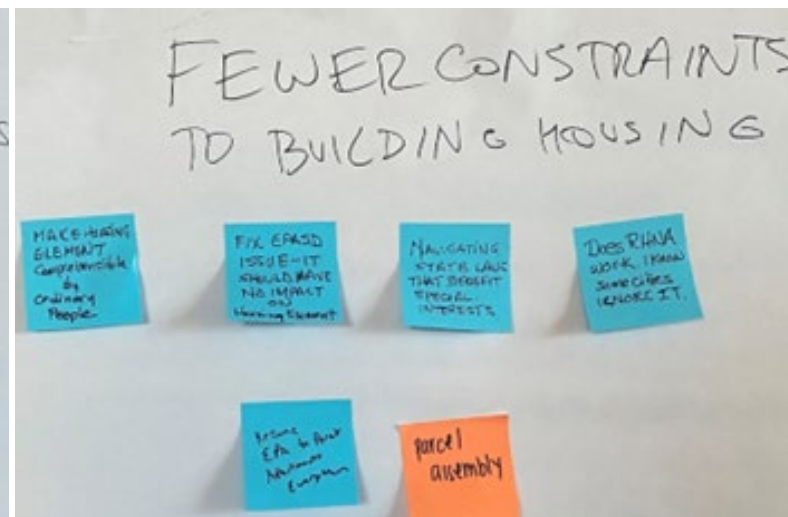
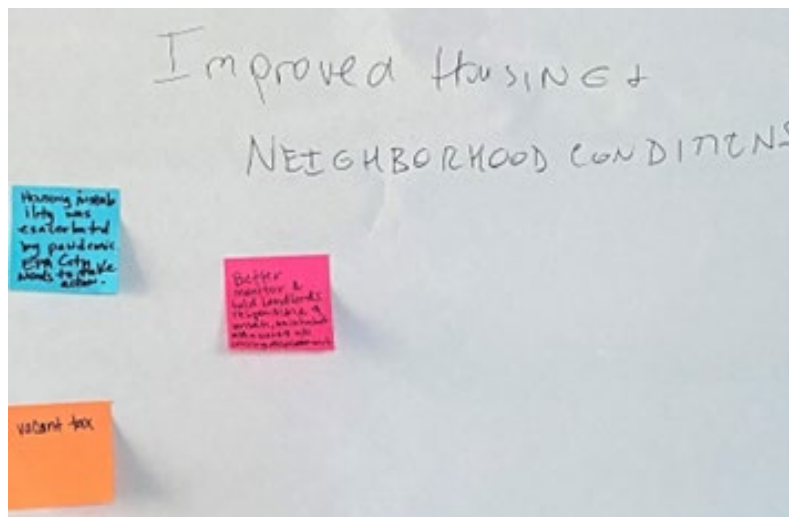
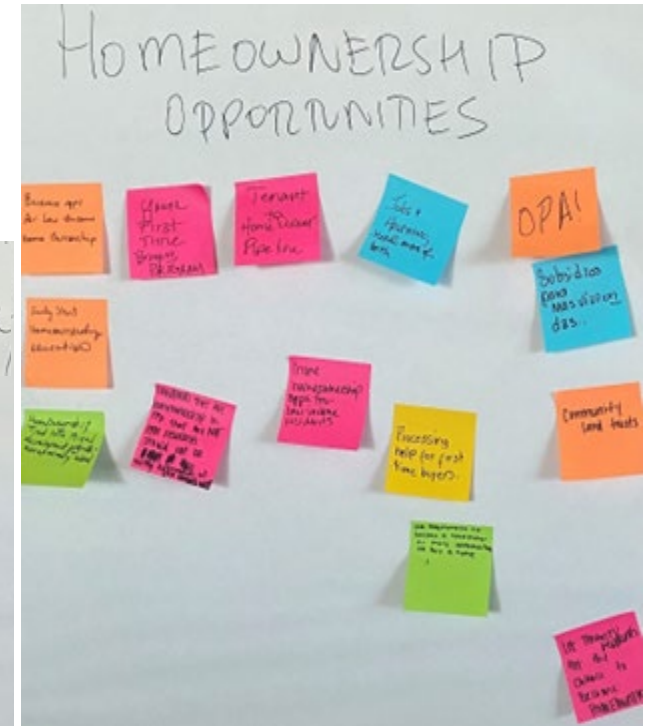
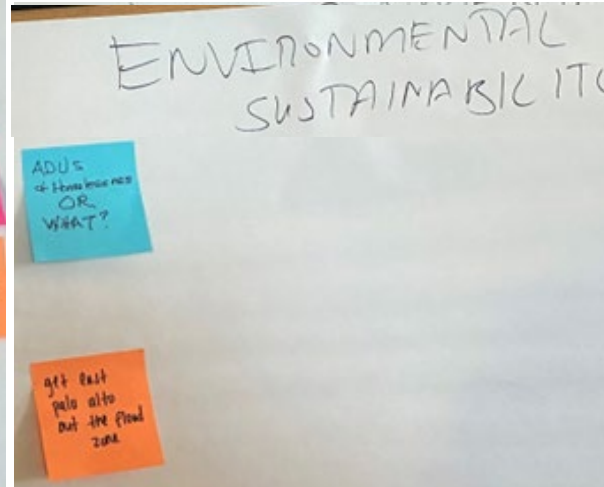
Go to www.menti.com and use the code 28 16 49 9

Rank Housing Policies and Programs | Cree un Orden de Importancia para las Políticas y Programas de Viviendas

Mentimeter



In-Person Post-It Activity



Policies and Programs Survey

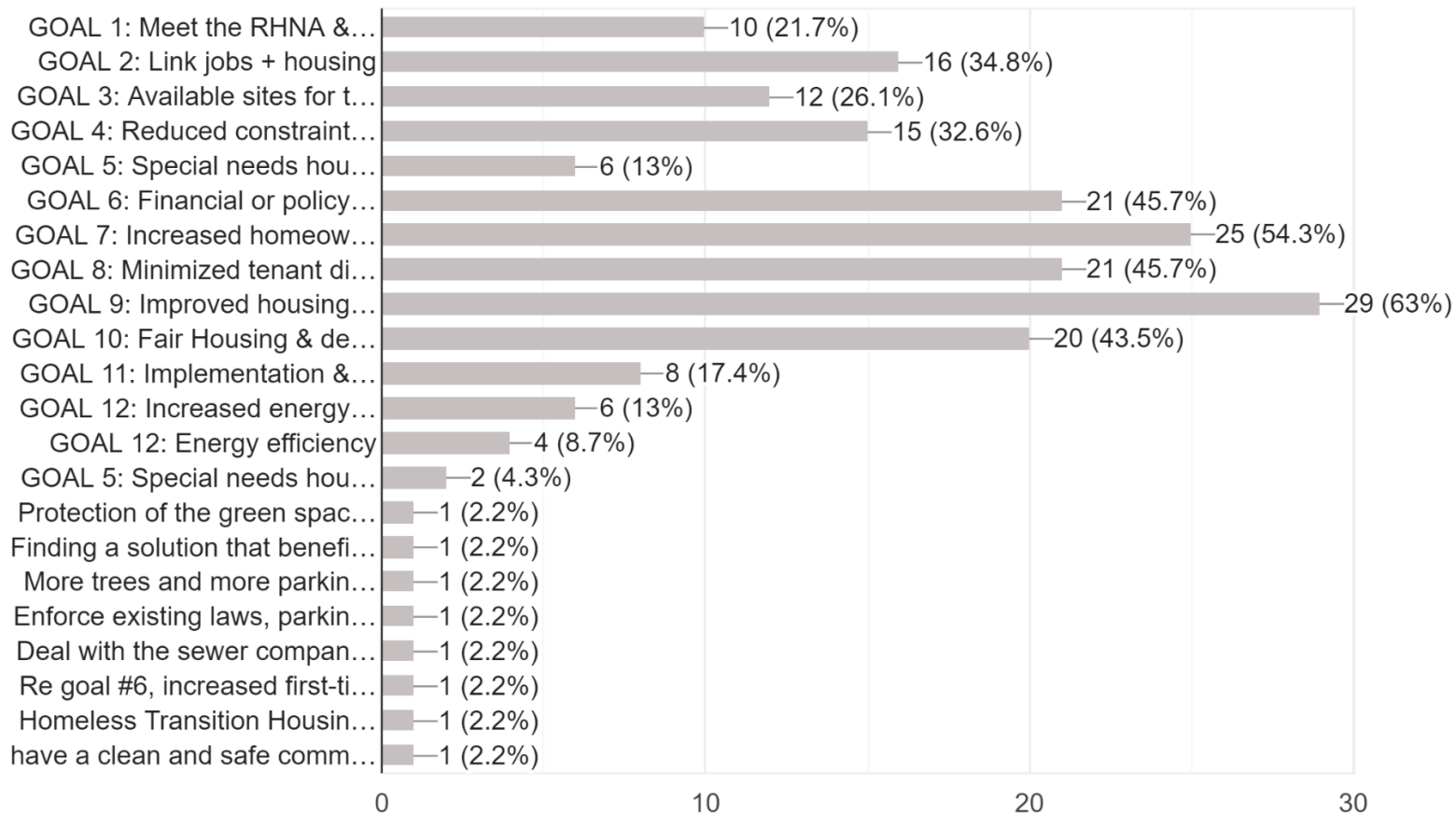
Survey Results

1. Which of the following goals is most important to you?

- GOAL 1: Meet the RHNA & produce all housing types
- GOAL 2: Link jobs + housing
- GOAL 3: Available sites for the development of housing
- GOAL 4: Reduced constraints & enhanced incentives for housing development
- GOAL 5: Special needs housing
- GOAL 6: Financial or policy assistance to low-income households
- GOAL 7: Increased homeownership opportunities
- GOAL 8: Minimized tenant displacement
- GOAL 9: Improved housing & neighborhood conditions
- GOAL 10: Fair Housing & decent, safe living environments for all
- GOAL 11: Implementation & use of housing policies
- GOAL 12: Energy efficiency
- OTHER (written responses):
 - *Protection of the green space and wildlife habitat especially on the West Side*
 - *Finding a solution that benefits both tenants and homeowners*
 - *More trees and more parking spaces*
 - *Enforce existing laws, parking on sidewalks, speeding and reckless driving, animal control, noise violations, fireworks, housing code enforcement etc...*
 - *Deal with the sewer company issues that have prevented housing or that will make low income folks pay for new sewer lines. Crazy!*
 - *Re goal #6, increased first-time homeownership opportunities specifically for low-income, long-time residents and young people through policies like TOPA/COPA and more.*
 - *Homeless Transition Housing plus integrated social services*
 - *Have a clean and safe community where the law is enforce*

Which of the following goals is most important to you?

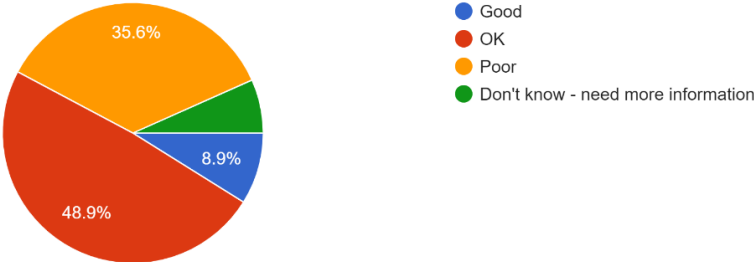
46 responses



Goal 1: Sufficient numbers and varieties of housing units (houses, townhomes, condominiums, and apartments) needed to: meet the State’s mandate to replace affordable units/bedrooms demolished due to Redevelopment Agency action; address the City’s Regional Housing Needs Determination; and facilitate housing development for all incomes segments within East Palo Alto, including extremely low-, very low-, low-, moderate-, and above-moderate income housing.

Overall, how would you rate the City’s performance on this goal?

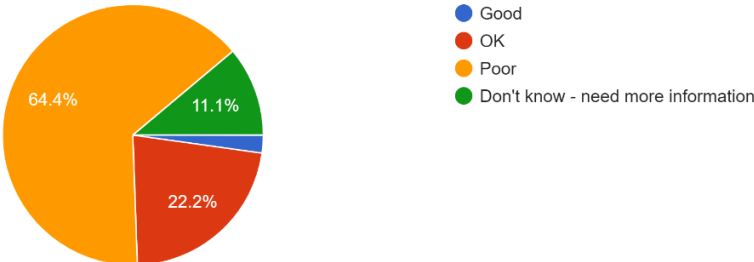
45 responses



GOAL 2: Balanced development that links housing to jobs.

Overall, how would you rate the City’s performance on this goal?

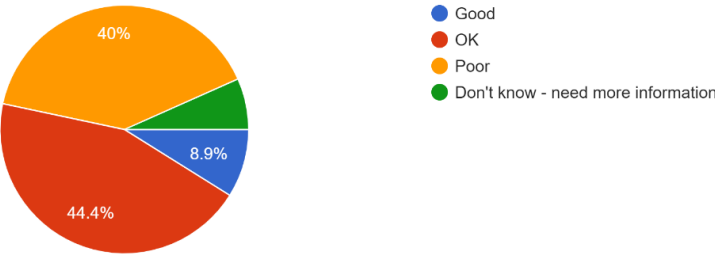
45 responses



GOAL 3: Available residential sites for the development of a range of housing types.

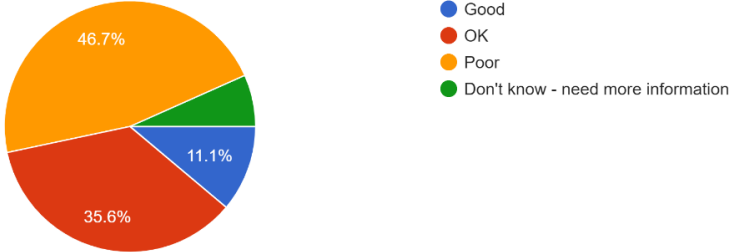
Overall, how would you rate the City’s performance on this goal?

45 responses



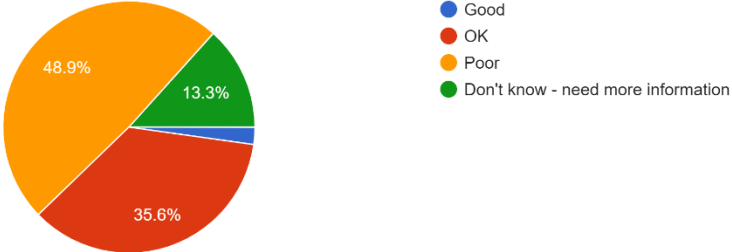
GOAL 4: Reduced constraints and enhanced incentives for housing development within the City, particularly in regard to affordable housing.

Overall, how would you rate the City's performance on this goal?
45 responses



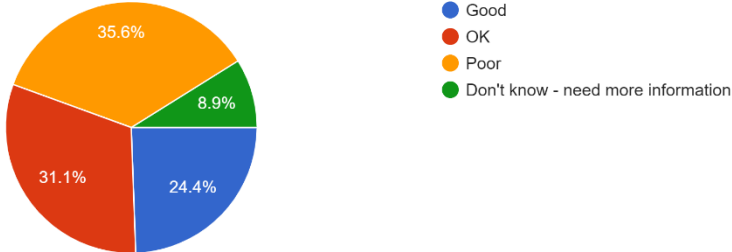
GOAL 5: Adequate housing for special needs groups in the City, including seniors, physically challenged, HIV positive or living with AIDS, homeless, at-risk youth (leaving the foster care system), small and large families, veterans, farm workers, people with developmental disabilities, and female headed households.

Overall, how would you rate the City's performance on this goal?
45 responses



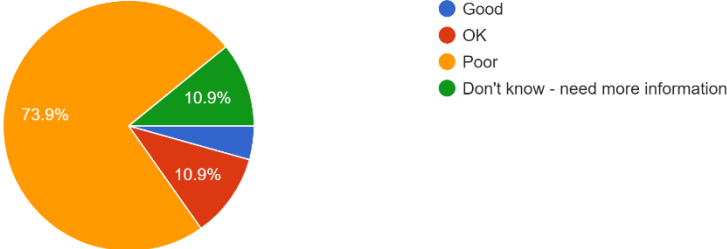
GOAL 6: Financial and policy assistance for low- and moderate-income households to ease housing cost burden and overcrowding.

Overall, how would you rate the City's performance on this goal?
45 responses



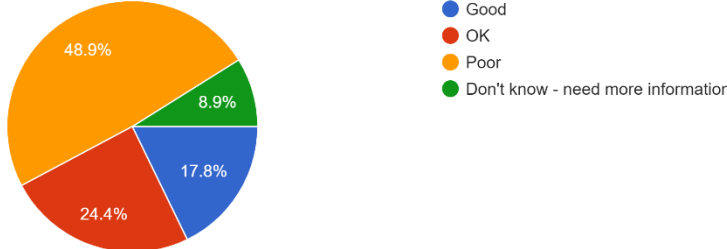
GOAL 7: Increased homeownership opportunities for income-qualified households (focused on existing residents and workers in East Palo Alto).

Overall, how would you rate the City's performance on this goal?
46 responses



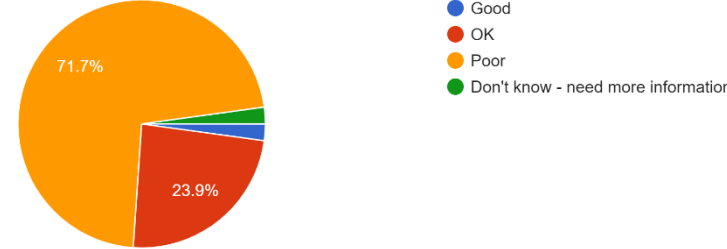
GOAL 8: Minimized Displacement of Renter.

Overall, how would you rate the City's performance on this goal?
45 responses



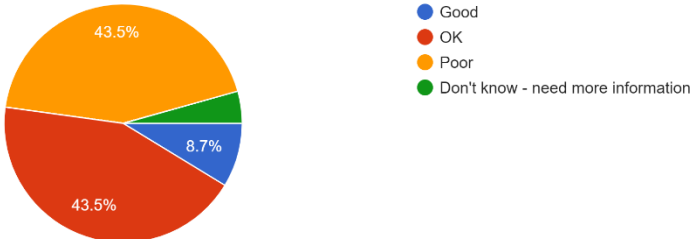
GOAL 9: Improved Housing and Neighborhood Conditions in East Palo Alto.

Overall, how would you rate the City's performance on this goal?
46 responses



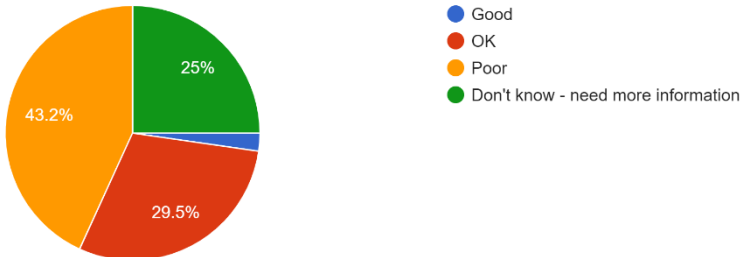
GOAL 10: Decent, safe living environments for City residents regardless of age, gender, race, color, ancestry, national origin, familial status, marital status, sexual preference, religion, disability, language, or any other arbitrary factor.

Overall, how would you rate the City's performance on this goal?
46 responses



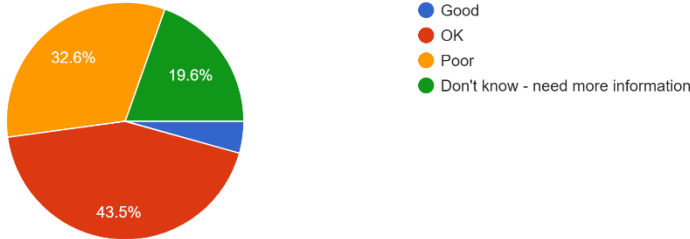
GOAL 11: Implemented housing policies and broad participation in associated programs.

Overall, how would you rate the City's performance on this goal?
44 responses



GOAL 12: Increased energy efficiency in existing and new housing development, in part as a means of reducing housing cost.

Overall, how would you rate the City's performance on this goal?
46 responses



Balancing Act Survey

Balancing Act Page Preview



City of East Palo Alto Balancing Act

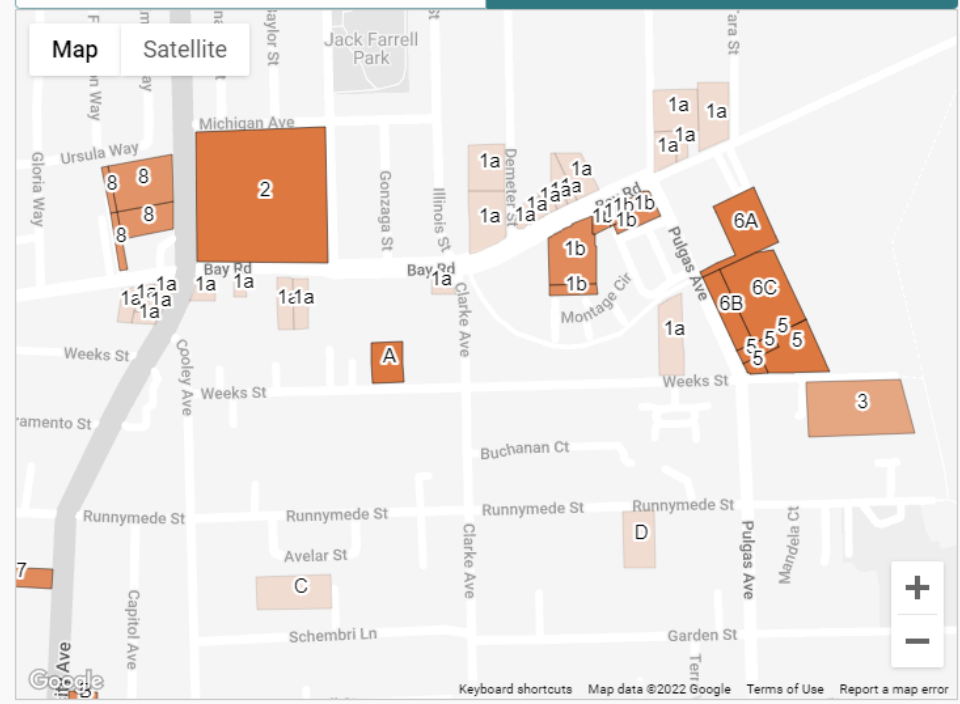
Help

You do not have a housing plan.



View Total Units

Density Allocation



Sample Survey Questions

You do not have a housing plan.

1,078 housing units

View Total Units

Density Allocation

Density Allocation

Ravenswood Business District Potential Redevelopment >

Sites: 0 housing units ⓘ

Ravenswood Business District Potential Housing Development: >

0 housing units ⓘ

Pulgas East Potential Housing Development: >

0 housing units ⓘ

Public Sites: >

0 housing units

Bay Road Corridor: >

0 housing units

University Corridor: >

0 housing units

Weeks Neighborhood: >

0 housing units

Mid-Town/Palo Alto Park Neighborhood: >

0 housing units

Total 0 housing units

Submit

Density Allocation

Ravenswood Business District Potential Redevelopment ▾

Sites: 0 housing units ⓘ

1a - RBD Zoned for Housing: 0 housing units ⓘ

How many housing units should be built on these RBD sites zoned for housing?

- No housing units
- Lower density ⓘ
- Higher density ⓘ

0 housing units
0 housing units
0 housing units

Share
Comment

1b - RBD Zoned for Housing: 65 dwelling units per acre ⓘ

How many housing units should be built on these RBD sites zoned for housing?

- No housing units
- Lower density ⓘ
- Higher density ⓘ

0 housing units
0 housing units
0 housing units

Share
Comment

2 - Four Corners: 86 dwelling units per acre ⓘ

How many housing units should be built on this Four Corners site zoned for housing?

- No housing units
- Lower density ⓘ
- Higher density ⓘ

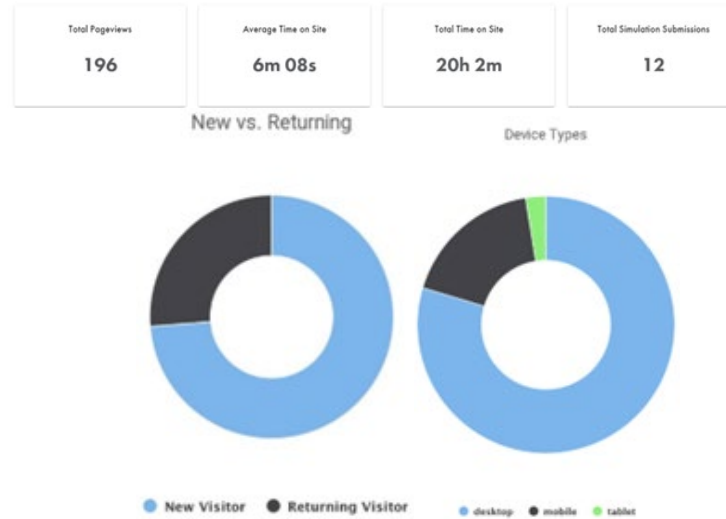
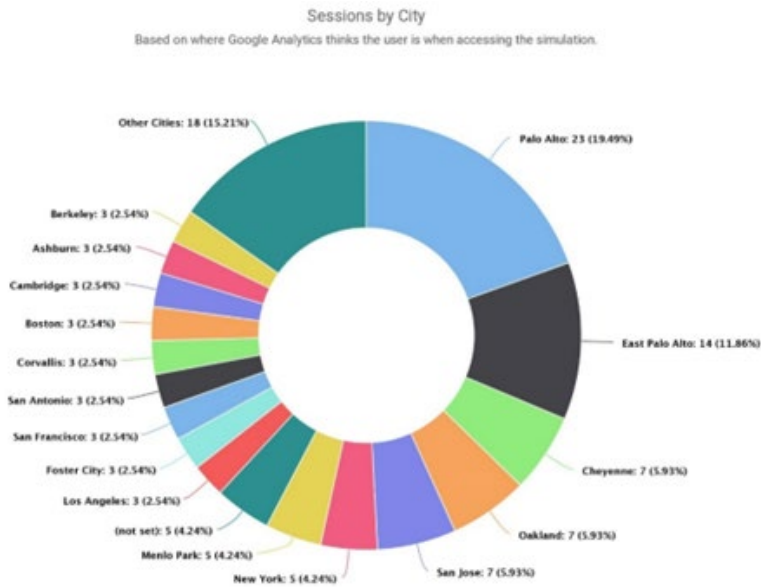
0 housing units
0 housing units
0 housing units

Share
Comment

Performance Analytics

The City of East Palo Alto received the second-highest engagement compared to other California cities participating in this simulation tool, with 12 unique respondents total.

Extensive outreach via the City’s website, City newsletters, direct email communications, social media, and in-person flyer distribution helped us receive 196 page views for a total of 20 hours of site use; despite these efforts, the response rate was only 6%. This outcome illustrates the challenges of engaging residents through tools that require technological knowledge.



Balancing Act Survey Respondent Demographics

Resident	Age	Race/ Ethnicity	Neighborhood	Housing Situation
1	Ye-	40 - 59	Other	Tenant (single-family/duplex)
2	Ye-	30 - 39	Asian	Homeowner
3	Ye-	40 - 59	White/European	Homeowner
4	Ye-	40 - 59	White/European	Homeowner
5	No	60+	White/European	Work in EPA but live elsewhere
6	Yes	60+	White/European	Single family home landlord
7	Yes	60+	White/European	Homeowner
8	N-	40 - 59	White/European	Work in EPA but live elsewhere
9	Yes	Unknown	Unknown	Homeowner
10	Ye-	40 - 59	Other	Tenant (single-family/duplex)
11	Ye-	30 - 39	Hispanic/Latinx	Tenant (single-family/duplex)
12	Ye-	40 - 59	Hispanic/Latinx	Other

Balancing Act Survey Results

The following table summarizes the Balancing Act survey results:

East Palo Alto Balancing Act Sites Inventory Survey Results				
	Respondents Choosing “Higher Density”	Respondents Choosing “Lower Density”	Respondents Choosing “No housing”	Average Unit Count Selected
1a - RBD Zoned for Housing	75%	25%	0%	592
1b - RBD Zoned for Housing	50%	50%	0%	127
2 - Four Corners	67%	25%	8%	397
3 - South of Weeks	42%	25%	25%	80
4 - EPA Waterfront	25%	33%	42%	152
5 - Harvest Affordable Housing Proposal	42%	0%	17%	73
6A - Pulgas East Site 1	42%	17%	42%	57
6B - Pulgas East Site 2	42%	17%	42%	53
6C - Pulgas East Site 3	58%	25%	17%	123
7 - City of East Palo Alto	50%	8%	42%	13
8 - San Mateo County Government Center	17%	17%	67%	39
9 - Ravenswood School District	42%	25%	33%	104
A - Weeks Street	50%	33%	17%	37
B - University Avenue	83%	0%	17%	11
C - Schembri Lane	33%	42%	25%	7
D - Runnymede Street	33%	33%	33%	6
E - Green Street 1	33%	42%	25%	6
F - Green Street 2	33%	42%	25%	4
G - Donohoe Street	50%	25%	25%	7
H - East Bayshore	58%	17%	25%	8

The Balancing Act survey results demonstrate there is more appetite for housing. Most residents supported higher density housing on the Ravenswood/Four Corners Specific Area Plan sites. A majority (50% or more) also supported higher density on the following sites:

- a. Pulgas Street East Site 3 (APN 63240310)
- b. East Bayshore site (807 East Bayshore)
- c. Weeks Street site (851 Weeks Street)
- d. Donohoe Street site (801 Donohoe Street)
- e. City of East Palo Alto site (2277 University Avenue)

An overwhelming majority supported higher density along University Avenue, and a large majority (67%) did not support housing on the San Mateo County Government Center site at 2415 University Ave., where the East Palo Alto City Hall is currently located.

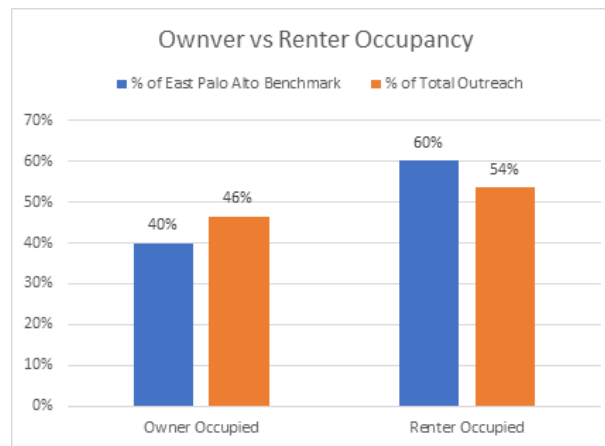
Intercept Survey

Survey Results

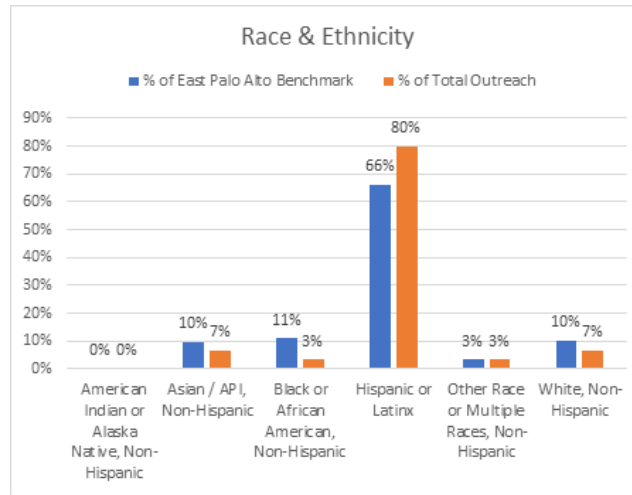
On June 18, 2022, and June 15, 2022, we spoke with 30 East Palo Alto residents in-person at East Palo Alto Community Farmer’s Markets and received further input on housing density and future housing development. Of the 30 residents we engaged, 53% indicated they wanted to see higher-density housing, 20% indicated they wanted to see lower-density housing, and 24% indicated they would visit the City website to learn more. Residents also expressed their thoughts and opinions on the proposed sites inventory, and common input included the need for more affordable housing, ensuring there is a jobs-housing balance, ensuring new jobs do not create displacement pressures on current residents, creating new units that have better habitability, and ensuring there is enough parking.

Respondent Demographics

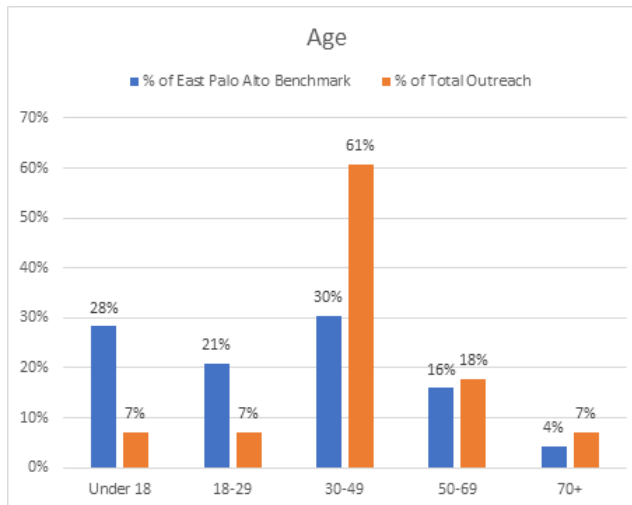
Of the 30 respondents, approximately 13 were homeowners, 15 were tenants, and 2 were young people under the age of 18 and living with their parents.



The majority of respondents (80%) were monolingual Spanish-speakers.



The majority of respondents were women between the ages of 30-49.



A7 - EQUITY ADVISORY GROUP INPUT

Following a series of Housing Element presentations by San Mateo County jurisdictions to the Equity Advisory Group (EAG), some members of the EAG followed up to 21 Element jurisdictions with a collaborative letter to send all their Housing Element feedback summarized in one letter. The following is the letter in its entirety:

To the 21 Elements team and all San Mateo County jurisdictions,

The Equity Advisory Group exists to help San Mateo County jurisdictions implement policies that promote fair housing choice and access to opportunity for members of historically marginalized groups. We are a group of service providers and housing activists, convened to inform equitable policy making in housing elements. Thank you to the 21 Elements team for promoting the EAG and thank you to the City staff that are giving us this opportunity to share our perspectives.

With this letter, the EAG proposes specific policies San Mateo County jurisdictions can implement to promote equity through their housing elements. These policies were selected by EAG members because of their proven track record for promoting equity goals, primarily the production of affordable homes and protection of renters. As service providers and advocates, we take a broad approach to housing equity. To us, equity means that everyone in a community, regardless of background, has access to safe, stable, affordable housing.

However, housing equity does not stop at a jurisdiction's borders. True equity means that no one is excluded from a community because of lack of access to housing. "Lack of access" can come in many forms, whether that be physical inaccessibility, language barriers, distance from community resources, or prohibitive cost. In order to ensure that no one is excluded from a community, jurisdictions must affirmatively promote fair housing for all by regularly changing regulations to facilitate a wider range of housing types.

In practice, equity can be controversial, because increasing equity sometimes requires changes to status quo policies. We see this process as an opportunity for jurisdictions to commit to implementing new policies with the support of the state of California behind you.

Policy Recommendations

Guidance from HCD on how to affirmatively further fair housing states that jurisdictions must promote fair housing choice and access to opportunity in their goals, policies, and programs. HCD defines fair housing choice as encompassing:

- **Actual choice**, meaning the existence of realistic housing options
- **Protected choice**, meaning housing that can be accessed without discrimination; and
- **Enabled choice**, meaning realistic access to sufficient information regarding options so that any choice is informed.

Jurisdictions cannot meet the requirement to promote fair housing choice and access to opportunity without first completing a thorough and meaningful assessment of the housing needs of residents, including factors which may limit fair housing choice as well as both governmental and non-governmental constraints to housing production. Jurisdictions should complete all relevant analyses before formulating their policies and programs. As such, appropriate policies and programs for each jurisdiction will vary based on the needs of your specific community.

Below are a list of general policies which the EAG would recommend as a minimum to Affirmatively Furthering Fair Housing in your jurisdiction. Programs to implement these policies, as defined by HCD, must include concrete steps, timelines, and measurable outcomes.

Policy	Description	How does it AFFH?
Just cause eviction, relocation benefits, and first right of return	Tenant protections beyond state law. (Ex: Oakland Just Cause for Eviction Ordinance; Redwood City Relocation Assistance Program, LAHD Rent Stabilization Ordinance)	Implemented in tandem, this set of policies can protect lower-income tenants living in NOAH who are evicted through no fault of their own, providing them the resources to relocate or the option to first right of return.
Prioritize City affordable housing funds, City-owned land, and land dedicated to affordable housing for projects which include more units at deeper levels of affordability or for special needs populations at greatest risk of homelessness or displacement.	Scoring guidelines for RFPs for these City resources should give greater preference for projects which include more units at deeper levels of affordability or target special needs populations.	In 2021, the SMC HSA Center on Homelessness reported that 96% of Homeless Outreach and Shelter Clients were extremely low income. Jurisdictions cannot begin to address the needs of the unhoused and other at-risk populations without addressing the lack of deeply affordable housing.
Expand local funding sources for development of affordable housing	Can include policies such as commercial linkage fees, vacancy taxes, transfer tax, etc. (Ex: San Jose Measure E)	Most affordable housing projects require a source of gap funding in order to be financially feasible, especially if they are targeting deeper levels of affordability. Local investment in these projects can also make them more competitive for state and federal funding.

Rent stabilization	Tenant protections beyond state law. (Ex: Oakland Rent Adjustment Program, LAHD Rent Stabilization Ordinance)	Stagnant wages for the lowest income residents have not kept pace with rising housing costs, becoming one of the largest contributors to our current housing crisis. Local rent control with greater protections beyond state law will help to keep more lower income renters stably housed.
Fee exemptions for 100% affordable housing projects		According to the 21 Elements Fee Survey, jurisdictions charge fees ranging from \$6,824-\$167,210 per

		unit in multifamily housing. These additional fees can make many affordable housing projects, which rely on public subsidy, infeasible. Waiving or lowering fees for 100% affordable housing projects can promote the production of more affordable housing across a spectrum of income levels.
Allow exceptions to development standards for 100% affordable housing projects	Can include but is not limited to reduced/waived parking requirements, Minimum lot sizes, widths, setbacks, etc (Ex: Half Moon Bay)	Many projects utilize State Density Bonus Law (SDBL) to increase financial feasibility of projects through incentives and concessions. Local exceptions to development standards for 100% affordable housing projects increases feasibility above and beyond what would be enabled through SDBL.
Implement inclusive design standards	Implement design standards beyond state and federal law to increase cross-disability access to housing (Refer to The Kelsey's Housing Design Standards for Inclusion and Accessibility)	While landlords are required to approve reasonable accommodations requested by persons with disabilities, often the burden of financing physical modifications of a unit falls upon the tenant, many of whom cannot afford these expensive renovations. Inclusive design can significantly reduce requests for reasonable accommodations and lower overall costs of modifying units. Inclusive design also supports cross-disability access.

Increase language accessibility	Require affirmative marketing of units to non-English speakers, make multilingual applications available, and perform active outreach to newly arrived immigrants and refugees.	Language can create one of the highest barriers to access for affordable housing. Affirmative marketing to non-English speakers will ensure all members of our communities can access the resources available to them, regardless of country of origin.
Promote fair housing information to residents	Provide residents with information about renter protections and monetary relief available to victims of unlawful housing practices. Post information in easily	Renters are often unaware of the protection and resources afforded them under California state law. Jurisdictions can help promote fair housing by proactively ensuring that renters are aware of their rights.
	available locations on jurisdiction websites and send regular mailers to renters within the community.	
Analyze past racially discriminatory policies and report data regarding ongoing impacts	<ol style="list-style-type: none"> 1. Conduct a systematic review of the preliminary title report and eradicate any language of racially restrictive covenants. 2. Provide information re: location and ratio of renters and owners and their correlation with the patterns of racial and ethnic segregation in San Mateo County. 3. Provide information re: demographics and environmental health – identify disparities in access to environmentally healthy neighborhoods. 	Jurisdictions are most likely to reduce the racial homeownership gap if they actively identify the ways in which past racially restrictive regulations and current barriers to affordable housing create our socioeconomic disparity in home ownership. Home ownership is one of the most powerful vehicles for multigenerational economic security. Employing a health-equity lens throughout planning and re-zoning efforts will further fair housing policy goals.
Affordable housing overlay for nonprofits and religious institutions	Create a housing overlay allowing at least the local mullin density (20 or 30 du/ac) on all nonprofit- or religious institution-owned land throughout the entirety of jurisdiction. Relax design standards and zoning regulations for projects with 20% extremely low income, 30% very low	Jurisdictions promote equity when they allow affordable, multi-family housing in new areas. Nonprofits and religious institutions have strong incentives to promote affordable housing development. By facilitating affordable housing on land owned by religious institutions, regardless of local zoning, jurisdictions can help those institutions accomplish their missions of

	income, or 50% low income units.	providing for the needy while also affirmatively furthering fair housing in new areas.
Accessible housing near transit	Reduce parking minimums for developments within 0.5 miles of transit. Eliminate parking minimums entirely for developments within 0.5 miles of transit that serve residents with disabilities and low-, very low-, or extremely low-income households.	Parking minimums raise the price of housing and de facto subsidize car ownership. Especially when located near transit, these policies impose a significant burden on housing. In the cases of low-income households, which can typically afford no or limited car ownership, and the disabled, these policies become entirely superfluous.

The Equity Advisory Group recommends that every jurisdiction in San Mateo County implement these proposals to the best of their abilities. Implementing these policies will demonstrate your community's commitment to affirmatively furthering fair housing for all.

Thank you for your consideration, Kalisha Webster
Senior Housing Advocate, Housing Choices

Hyun-mi Kim
Housing Advocacy Director, Puente de la Costa Sur

Jeremy Levine
Policy Manager, Housing Leadership Council

Signed on behalf of the 21 Elements Equity Advisory Group

A8 PUBLIC REVIEW PERIOD

Table A8 summarizes the comments received during the public review period between August 29, 2022 and October 3, 2022, and how they are addressed in the Housing Element.

Table A8: Comments During Public Review Period			
Date	From	Summary	How It Is Addressed
9/29/2022	Victoria Wong, MidPen Housing	Asks for clarifying language regarding City capital improvements and water line upgrades that will benefit the 965 Weeks development project.	Clarifying language was added.
9/29/2022	Melissa Borgesi, Midpeninsula Regional Open Space District	Comments on development in the Ravenwood Business District/4 Corners Specific Plan. Asks for additional park and open space requirements within RBD/4 Corners Specific Plan, because new housing in the area can exasperate demand in visitation. Recommends several active transportation options when integration parking reduction.	City is still reviewing potential densities.
9/30/2022	Corinne I. Calfee, Opterra Law Inc. representing Sand Hill Property Company	Highlights importance of entitled and highly probable projects getting entitled and built. Comments on probability of two major development projects. Comments on processing times being longer, and need for streamlining.	City is prioritizing streamlining development.
9/30/2022	Keith Diggs, YIMBY Law	Commends City for doubling lower-income allocations. Offers support if state law does not offer right of return support for displaced residents. Water is more important than design review. Also, need for shorter process times for new apartments.	City is prioritizing streamlining development. City also recently adopted Master Water Plan (in October 2022). More discussion around water was added.
9/30/2022	Jeanne Yu, resident	Comments on programs and policies recommended for non-profits to own, acquire, and build property and land. Asks that nonprofits not interfere with home selling process.	City is still studying program, no decision has been made.

9/30/2022	Kevin Keating, 14 year resident	Comments on density and zoning. Asks for re-evaluation of lots zoned higher density or urban residential near single family neighborhoods. Asks that higher density be along major thoroughfares (University Ave/Bay Road), close to transit and major arteries.	Housing opportunity sites take into consideration transit concerns.
9/30/2022	Moana Kofutua, Youth United for Community Action	Asks for Spanish and Tongan translation and simplification of the Housing Element documents. Wants clarity on why many affordable housing developments have not shown promise for community members.	City Language Access Plan is under way. City is prioritizing development of extremely and very low-income units in alignment with community needs.
9/30/2022	Julian Sierra, Youth United for Community Action	Suggests breaking down abbreviations, translation in Spanish and Tongan, and simplification of wording. Asked for more details on water sources. Asks for more City staffing. Recommends community forum to actively dismiss misinformation.	City Language Access Plan is under way. Abbreviations were broken down. Water sources details were added. City staffing is mentioned.
9/30/2022	Dani Montes, Youth United for Community Action	Recommends focusing on incentivizing building affordable ADU's.	Plan for ADU streamlining and incentives is in Policies and Programs.
9/30/2022	Hailey Romero, Youth United for Community Action	Comments on need for better marketing of affordable housing units. Comments that the average housing income in East Palo Alto is lower than the moderate and above moderate incomes. Comments on project delays generally.	Program for improved dissemination of information is in the City's housing plan.. City is prioritizing streamlining development.
9/30/2022	Estefani Ruiz, Youth United for Community Action	Comments on need for translation of City fliers and notices.	City Language Access Plan is under way.
9/30/2022	Jalayah Minor, Youth United for Community Action	Comments on need for quality education, and prioritizing ADUs.	Plan for ADU streamlining is in Policies and Programs.
9/30/2022	Ingrid Ruiz, Youth United	Questions how moderate and above moderate housing will benefit the community if the majority of East Palo Alto	City is planning for moderate and above moderate housing

	for Community Action	residents are low-income. Comments on need for more affordable housing. Asks for accountability in carrying out Housing Element.	to comply with RHNA 6 requirements.
9/30/2022	Ivan Valencia, Youth United for Community Action	Comments on need for better quality education, and addressing displacement and gentrification. Suggests simplifying Housing Element language.	Plan to address displacement and gentrification is in Policies and Programs. Abbreviations were broken down for greater access.
9/30/2022	Xenia Hernandez, Youth United for Community Action	Comments on translation need for Spanish and Tongan speakers to make the Housing Element more inclusive.	City Language Access Plan is under way.
9/30/2022	Fernando Medrano, Youth United for Community Action	Comments on need to advertise new low income housing (for LightTree apartments and Weeks).	Program for improved dissemination of information is in the City's housing plan.
9/30/2022	Filiberto Zaragoza, Youth United for Community Action	Comments on need for lower income units, rather than moderate and above moderate units because East Palo Alto is a low income community. Comments on need for programs that support families in becoming homeowners.	City is planning for moderate and above moderate housing to comply with RHNA 6 requirements. Program for homeownership opportunities is in the City's housing plan.
10/3/2022	Harvey McKeon, NorCal Carpenters Union 217	Comments on Four Corners and the Ravenwood Business District Specific Plan Area. Asks that the City's CEQA analyze the impacts resulting from construction-related employment and the environmental impacts on the Project's construction workers.	Environmental review of RBD/4 Corners Specific Plan Area is underway.

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APPENDIX B HOUSING NEEDS DATA

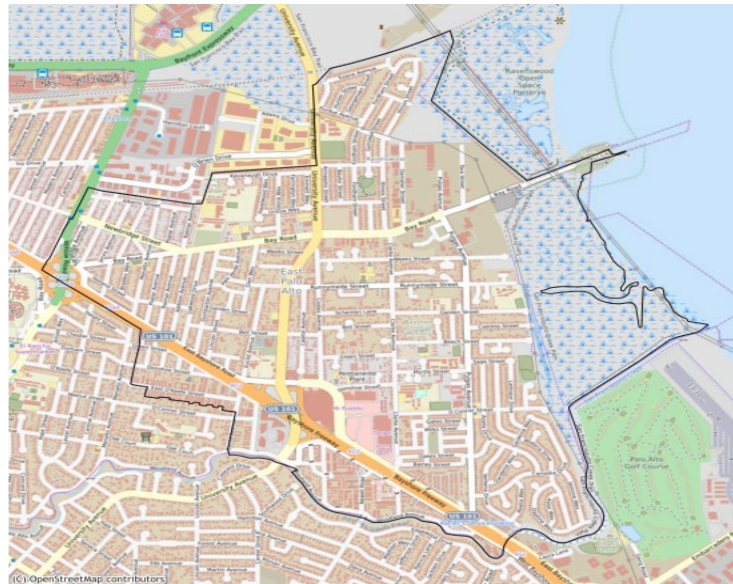
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APPENDIX B1 EAST PALO ALTO HOUSING NEEDS DATA REPORT

HOUSING NEEDS DATA REPORT: EAST PALO ALTO

ABAG/MTC Staff and Baird + Driskell Community Planning

2021-04-02



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1 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 our growth and housing challenges. Required by the state, the Housing Element identifies what the existing housing conditions and community needs are, reiterates goals, and creates a plan for more housing. The Housing Element is an integral part of the General Plan, which guides the policies of East Palo Alto.

2 SUMMARY OF KEY FACTS

- **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 East Palo Alto increased by 4.4% from 2000 to 2020, which is below the growth rate of the Bay Area.
- **Age** - In 2019, East Palo Alto's youth population under the age of 18 was 8,381 and senior population 65 and older was 2,033. These age groups represent 28.3% and 6.9%, respectively, of East Palo Alto's population.
- **Race/Ethnicity** - In 2020, 10.1% of East Palo Alto's population was White while 10.9% was African American, 9.6% was Asian, and 66.1% was Latinx. People of color in East Palo Alto comprise a proportion above the overall proportion in the Bay Area as a whole.⁴⁷
- **Employment** - East Palo Alto residents most commonly work in the *Health & Educational Services* industry. From January 2010 to January 2021, the unemployment rate in East Palo Alto decreased by 5.4 percentage points. Since 2010, the number of jobs located in the jurisdiction increased by 470 (13.2%). Additionally, the jobs-household ratio in East Palo Alto has increased from 0.37 in 2002 to 0.57 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 East Palo Alto increased, 1.3% 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 East Palo Alto residents to live and thrive in the community.
 - **Ownership** The largest proportion of homes had a value in the range of \$750k-\$1M in 2019. Home prices increased by 160.0% from 2010 to 2020.
 - **Rental Prices** - The typical contract rent for an apartment in East Palo Alto was \$1,630 in 2019. Rental prices increased by 65.7% from 2009 to 2019. To rent a typical apartment without cost burden, a household would need to make \$65,560 per year.⁴⁸
- **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, 54.1% of homes in East Palo Alto were single family detached, 4.1% were single family attached, 3.4% were small multifamily (2-4 units), and 36.6% were medium or large multifamily (5+ units). Between 2010 and 2020, the number of single-family units increased more than multi-family units. Generally, in East Palo Alto, the

⁴⁷ 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.

⁴⁸ 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.

- **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 East Palo Alto, 28.8% of households spend 30%-50% of their income on housing, while 25.2% of households are severely cost burdened and use the majority of their income for housing.
- **Displacement/Gentrification** - According to research from The University of California, Berkeley, 64.7% of households in East Palo Alto live in neighborhoods that are susceptible to or experiencing displacement, and 0.0% live in areas at risk of or undergoing gentrification. 0.0% of households in East Palo Alto live in neighborhoods where low-income households are likely excluded due to prohibitive housing costs. Although the data show no risk of gentrification, anecdotally, the City has heard about the gentrification pressures residents are facing. There are various ways to address displacement including protection, preservation, and production policies.
- **Neighborhood** - 0.0% of residents in East Palo Alto live in neighborhoods identified as “Highest Resource” or “High Resource” areas by State-commissioned research, while 100.0% of residents live in areas identified by this research as “Low Resource” or “High Segregation and Poverty” areas. These neighborhood designations are based on a range of indicators covering areas such as education, poverty, proximity to jobs and economic opportunities, low pollution levels, and other factors.⁴⁹ These neighborhood designations hinder the City’s ability to access Low Income Housing Tax Credits (LIHTC) and other state resources for affordable housing developments that target funding to high-resource areas.
- **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 East Palo Alto, 6.4% of residents have a disability of any kind and may require accessible housing. Additionally, 27.5% of East Palo Alto households are larger households with five or more people, who likely need larger housing units with two bedrooms or more.⁵⁰ 20.6% of households are female-headed families, which are often at greater risk of housing insecurity.

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

⁴⁹ 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.

⁵⁰ The assumption for larger (2+) bedroom size came from public input and the Affirmatively Furthering Fair Housing Survey, where respondents indicated not having enough space for all members of their household.

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.

Additionally, there may be instances where there is no data available for a jurisdiction for particular data point, or where a value is 0 and the automatically generated text cannot perform a calculation. In these cases, the automatically generated text is “NODATA.” Staff should reword these sentences before using them in the context of the Housing Element or other documents.

Note on Figures

Any figure that does not specify geography in the figure name represents data for East Palo Alto.

3 LOOKING TO THE FUTURE: REGIONAL HOUSING NEEDS

3.1 Regional Housing Needs Determination

The Plan Bay Area 2050⁵¹ Final Blueprint forecasts that the nine-county Bay Area will add 1.4 million new households between 2015 and 2050. For the eight-year time frame covered by this Housing Element Update, 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.⁵² This calculation, known as the Regional Housing Needs Determination (RHND), is based on population projections produced by the California Department of Finance as well as adjustments that incorporate the region's existing housing need. The adjustments result from recent legislation requiring HCD to apply additional adjustment factors to the baseline growth projection from California Department of Finance, in order for the regions to get closer to healthy housing markets. To this end, adjustments focus on the region's vacancy rate, level of overcrowding and the share of cost burdened households, and seek to bring the region more in line with comparable ones.⁵³ 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.

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 or RHNA - the share of the RHND assigned to each jurisdiction by the Association of Bay Area Governments (ABAG). State Housing Element Law requires ABAG to develop a methodology that calculates the number of housing units assigned to each city and county and distributes each jurisdiction's housing unit allocation among four affordability levels. For this RHNA cycle, the RHND increased by 135%, from 187,990 to 441,776. For more information on the RHNA process this cycle, see ABAG's website: <https://abag.ca.gov/our-work/housing/rhna-regional-housing-needs-allocation>

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

In January 2021, ABAG adopted a Draft RHNA Methodology, which is currently being reviewed by HCD. For East Palo Alto, the proposed RHNA to be planned for this cycle is 829 units, a slated increase from the last cycle. **Please note that the previously stated figures are merely illustrative, as ABAG has yet to issue Final RHNA allocations. The Final RHNA allocations that local jurisdictions will use for**

⁵¹ 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

⁵² HCD divides the RHND into the following four income categories:

Very Low-income: 0-50% of Area Median Income

Low-income: 50-80% of Area Median Income

Moderate-income: 80-120% of Area Median Income

Above Moderate-income: 120% or more of Area Median Income

⁵³ 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)

their Housing Elements will be released at the end of 2021. The potential allocation that East Palo Alto would receive from the Draft RHNA Methodology is broken down by income category as follows:

Table 1: Illustrative Regional Housing Needs Allocation from Draft Methodology

Income Group	East Palo Alto Units	San Mateo County Units	Bay Area Units	East Palo Alto Percent	San Mateo County Percent	Bay Area Percent
Very Low Income (<50% of AMI)	165	12196	114442	19.9%	25.6%	25.9%
Low Income (50%-80% of AMI)	95	7023	65892	11.5%	14.7%	14.9%
Moderate Income (80%-120% of AMI)	159	7937	72712	19.2%	16.6%	16.5%
Above Moderate Income (>120% of AMI)	410	20531	188130	49.5%	43.1%	42.6%
Total	829	47687	441176	100.0%	100.0%	100.0%

Source: Association of Bay Area Governments Methodology and tentative numbers were approved by ABAG's Executive board on January 21, 2021 (Resolution No. 02-2021). The numbers were submitted for review to California Housing and Community Development in February 2021, after which an appeals process will take place during the Summer and Fall of 2021. THESE NUMBERS SHOULD BE CONSIDERED PRELIMINARY AND SUBJECT TO CHANGE PER HCD REVIEW

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, except for a dip during the Great Recession. Many cities in the region have experienced significant growth in jobs and population. While these trends have led to a corresponding increase in demand for housing across the region, the regional production of housing has largely not kept pace with job and population growth. Since 2000, East Palo Alto's population has increased by 4.4%; this rate is below that of the region as a whole, at 14.8%. In East Palo Alto, roughly 10.6% of its population moved during the past year, a number 2.8 percentage points smaller than the regional rate of 13.4%.

Table 2: Population Growth Trends

Geography	1990	1995	2000	2005	2010	2015	2020
East Palo Alto	23451	24710	29506	32080	28155	30236	30794
San Mateo County	649623	685354	707163	719844	718451	761748	773244
Bay Area	6020147	6381961	6784348	7073912	7150739	7595694	7790537

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.

In 2020, the population of East Palo Alto was estimated to be 30,794 (see Table 2). From 1990 to 2000, the population increased by 25.8%, while it decreased by 4.6% during the first decade of the 2000s. In the most recent decade, the population increased by 9.4%. The population of East Palo Alto makes up 4.0% of San Mateo County.⁵⁴

⁵⁴ To compare the rate of growth across various geographic scales, Figure 1 shows population for the jurisdiction, county, and region indexed to the population in the year 1990. This means that the data points represent the population growth (i.e. percent change) in each of these geographies relative to their populations in 1990.

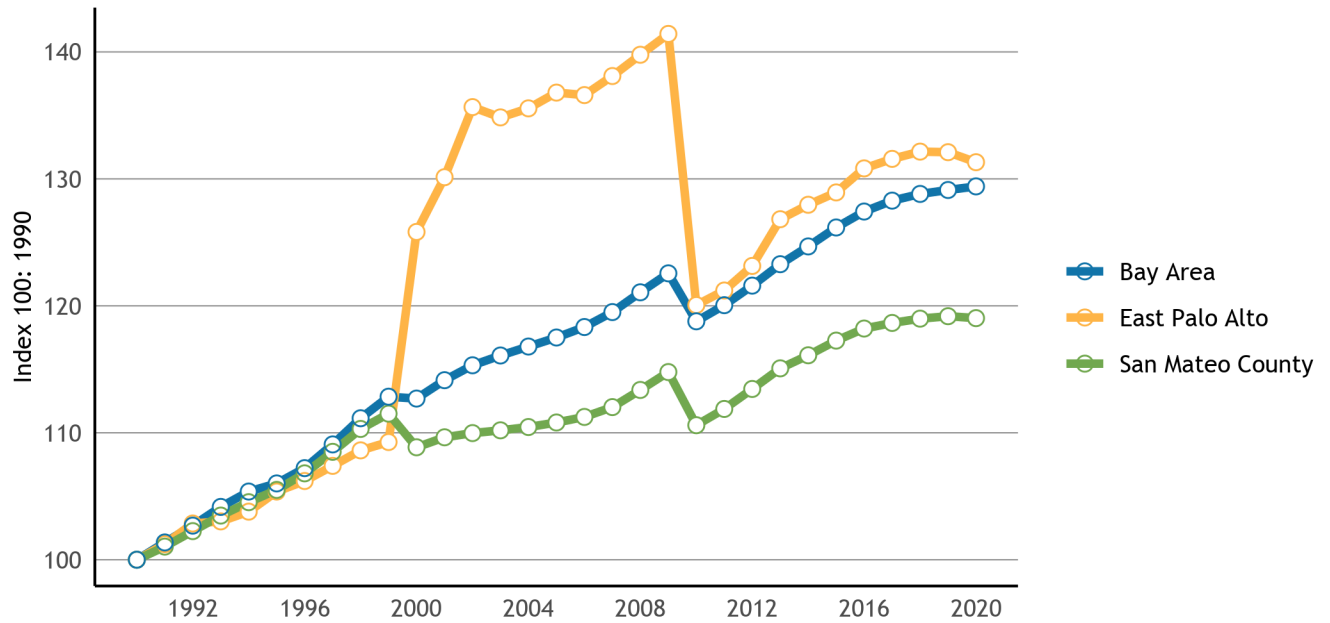


Figure 1: Population Growth Trends

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. For some jurisdictions, a break may appear at the end of each decade (1999, 2009) as estimates are compared to census counts. 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.

4.2 Age

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

In East Palo Alto, the median age in 2000 was 25.8; by 2019, this figure had increased, landing at around 30 years. More specifically, the population of those under 14 has decreased since 2010, while the 65-and-over population has increased (see Figure 2).

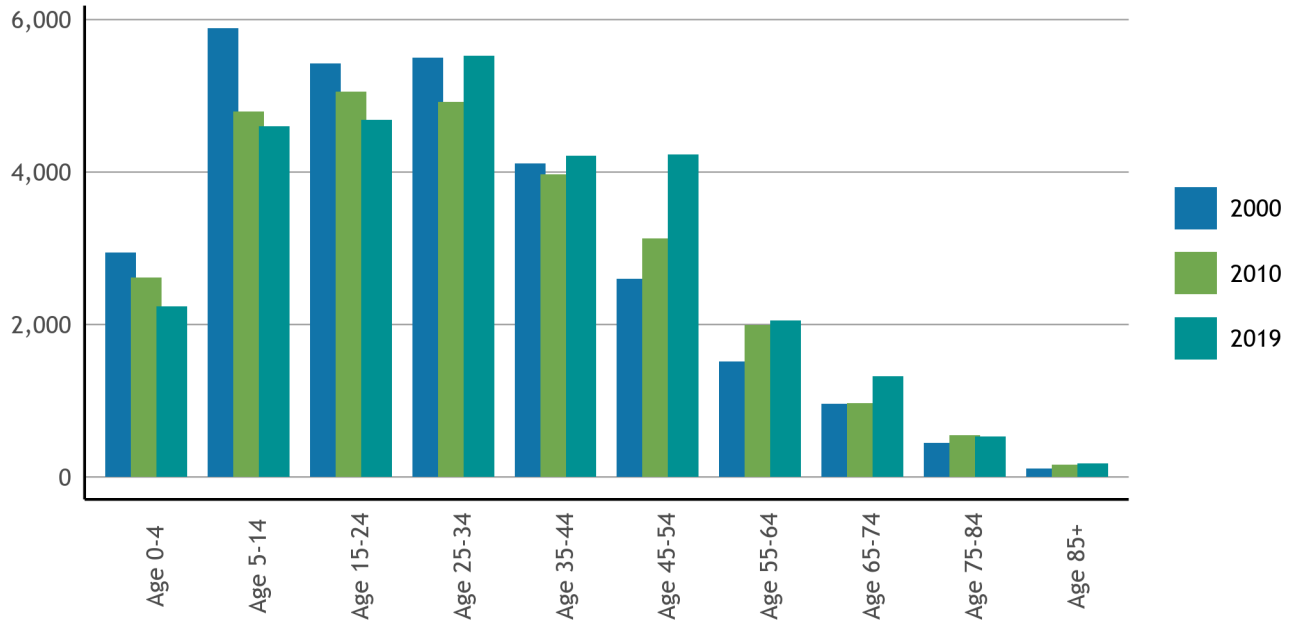


Figure 2: Population by Age, 2000-2019

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 senior and youth population by race can add an additional layer of understanding, as families and seniors of color are even more likely to experience challenges finding affordable housing. People of color⁵⁵ make up 68.2% of seniors and 65.9% of youth under 18 (see Figure 3).

⁵⁵ Here, we count all non-white racial groups

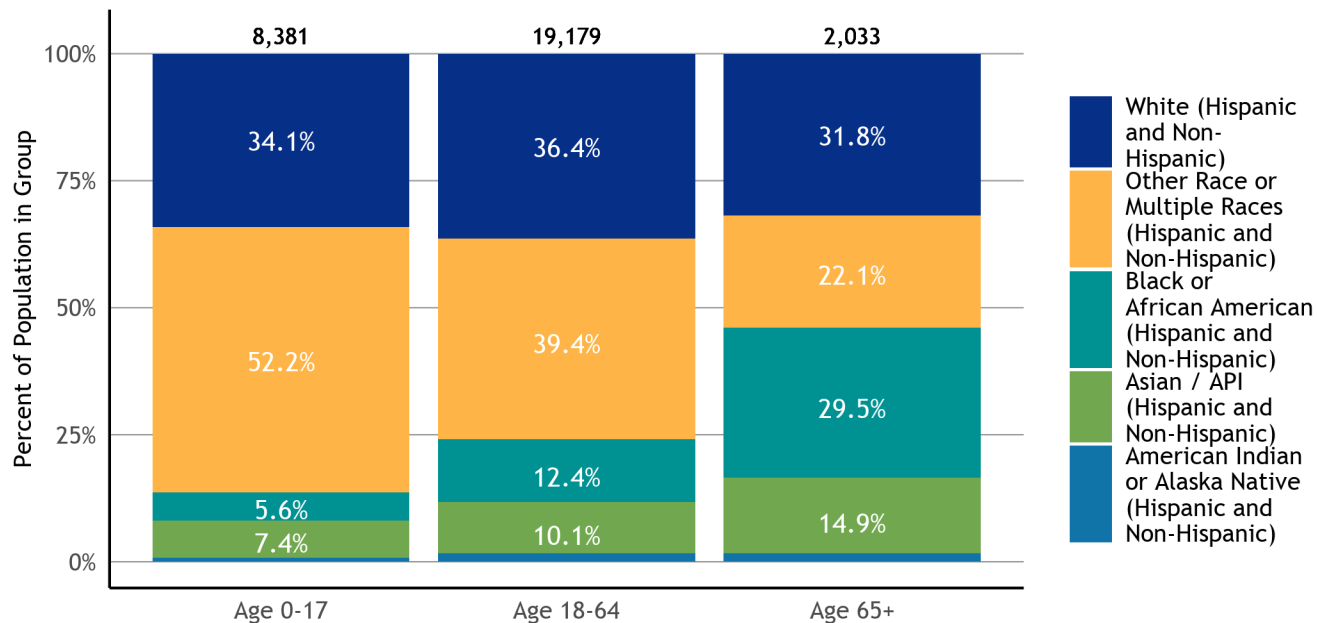


Figure 3: Senior and Youth Population by Race

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 has occurred over time and continues to impact communities of color today⁵⁶. Since 2000, the percentage of residents in East Palo Alto identifying as White has increased - and by the same token the percentage of residents of all *other* races and ethnicities has *decreased* - by 3.4 percentage points, with the 2019 population standing at 2,991 (see Figure 4). In absolute terms, the *Hispanic or Latinx* population increased the most while the *Black or African American, Non-Hispanic* population decreased the most.

⁵⁶ 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.

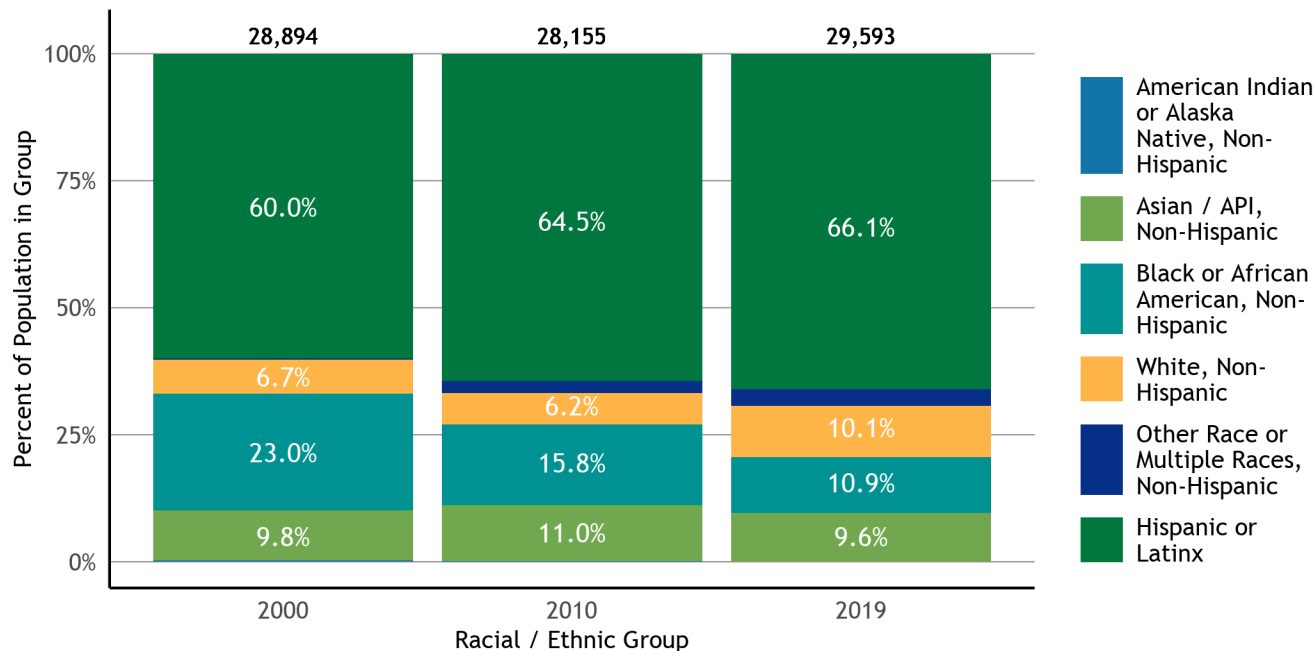


Figure 4: Population by Race, 2000-2019

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

4.4.1 Balance of Jobs and Workers

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

One measure of this is the relationship between *workers* and *jobs*. A city with a surplus of workers “exports” workers to other parts of the region, while a city with a surplus of jobs must conversely “import” them. Between 2002 and 2018, the number of jobs in East Palo Alto increased by 46.9% (see Figure 5).

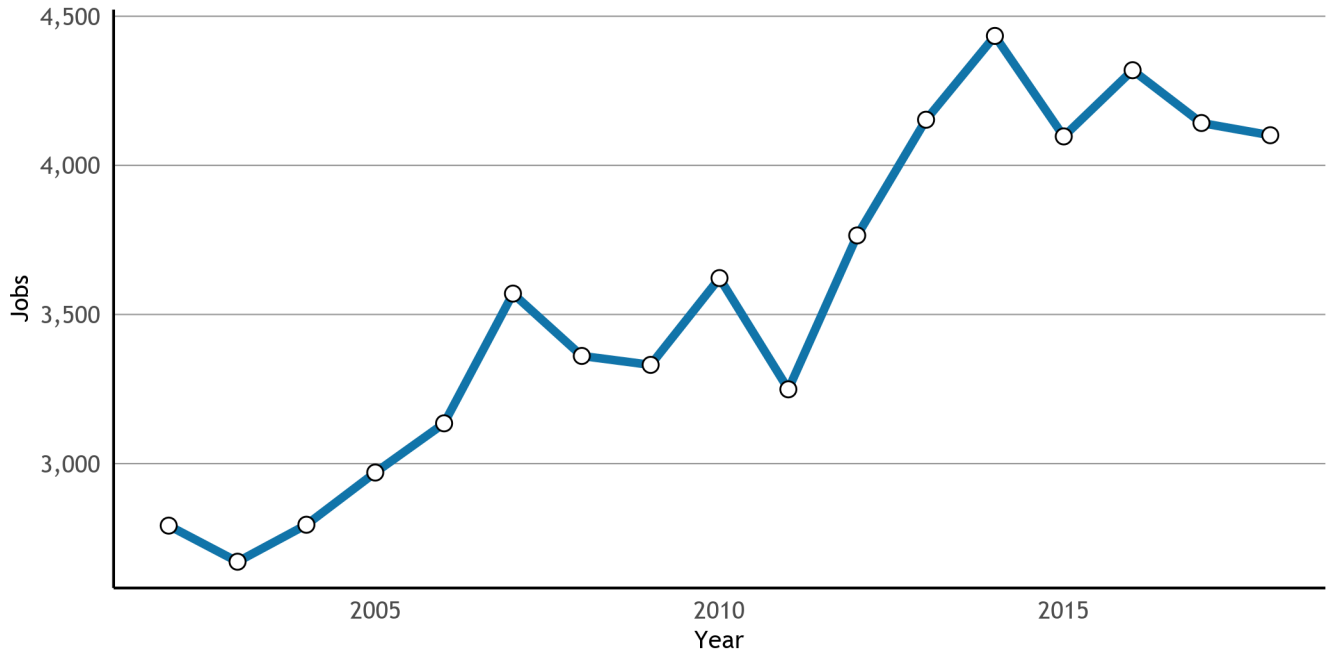


Figure 5: Jobs in a Jurisdiction

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.

There are 15,101 employed residents, and 5,225 jobs⁵⁷ in East Palo Alto - the ratio of jobs to resident workers is 0.35; East Palo Alto is a *net exporter of workers*.

Figure 6 shows the balance when comparing jobs to workers, broken down by different wage groups, offering additional insight into local dynamics. A community may offer employment for relatively low-income workers but have relatively few housing options for those workers - or conversely, it may house residents who are low wage workers but offer few employment opportunities for them. Such relationships may cast extra light on potentially pent-up demand for housing in particular price categories. A relative *surplus* of jobs relative to residents in a given wage category suggests the need to import those workers, while conversely, surpluses of workers in a wage group relative to jobs means the community will export those workers to other jurisdictions. Such flows are not inherently bad, though over time, sub-regional imbalances may appear. East Palo Alto has more low-wage *residents* than low-wage *jobs* (where low-wage refers to jobs paying less than \$25,000). At the other end of the wage spectrum, the city has more high-wage *residents* than high-wage *jobs* (where high-wage refers to jobs paying more than \$75,000) (see Figure 6).⁵⁸

⁵⁷ 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.

⁵⁸ The source table is top-coded at \$75,000, precluding more fine grained analysis at the higher end of the wage spectrum.

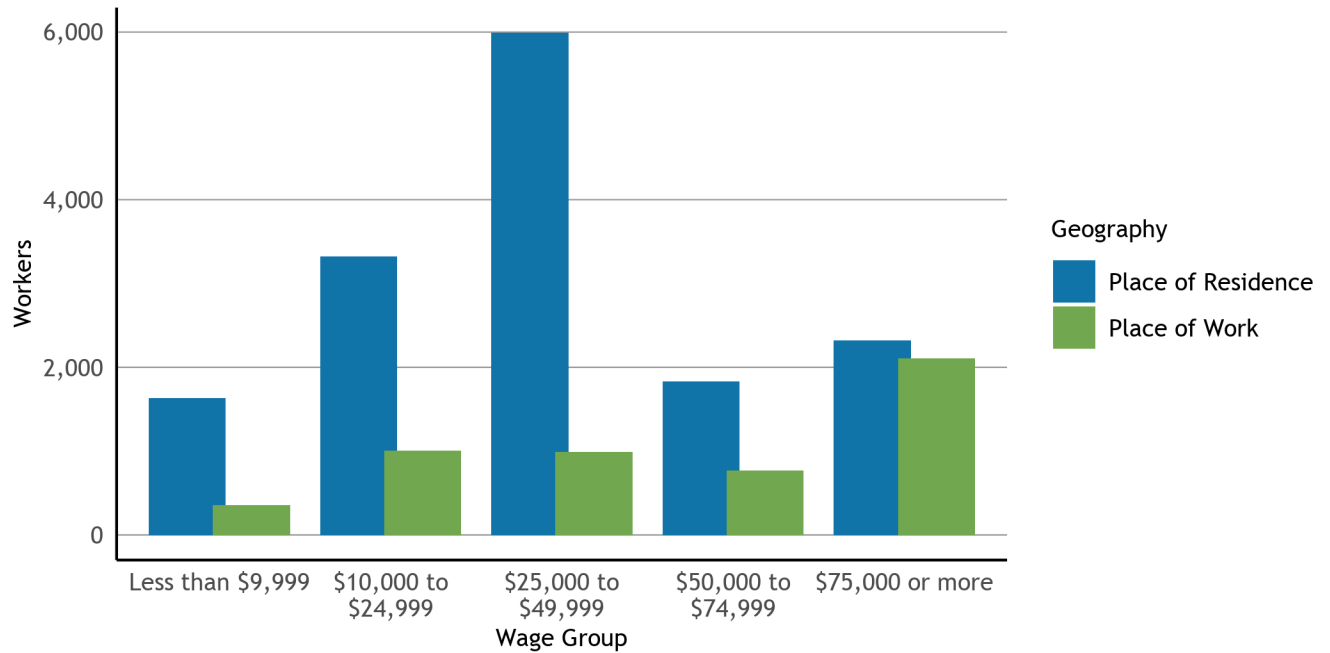


Figure 6: Workers by Earnings, by Jurisdiction as Place of Work and Place of Residence

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 in a wage group as it has resident workers - in principle, a balance. Values above 1 indicate a jurisdiction will need to import workers for jobs in a given wage group. At the regional scale, this ratio is 1.04 jobs for each worker, implying a modest import of workers from outside the region (see Figure 7).

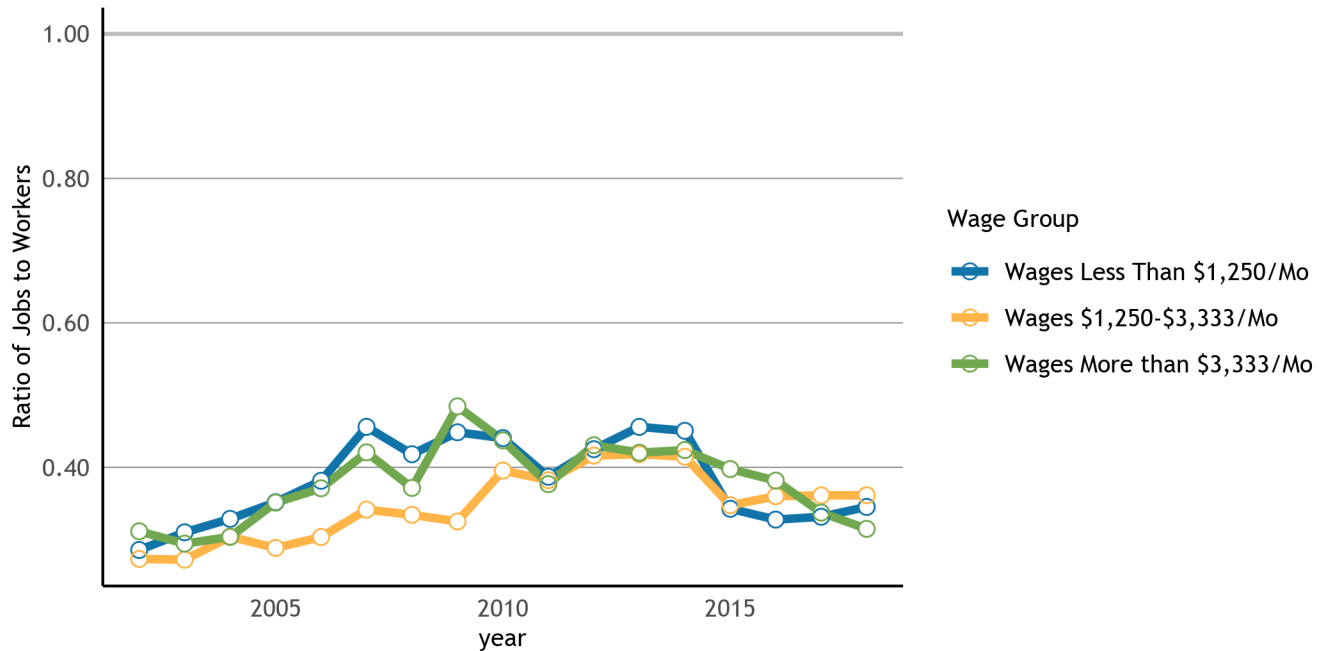


Figure 7: Jobs-Worker Ratios, By Wage Group

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 Data Packet Workbook, Table POPEMP-14.

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

If there are more jobs than employed residents, it means a city is relatively jobs-rich, typically also with a high jobs to household ratio. Thus bringing housing into the measure, the *jobs-household ratio* in East Palo Alto has increased from 0.37 in 2002, to 0.57 jobs per household in 2018 (see Figure 8).

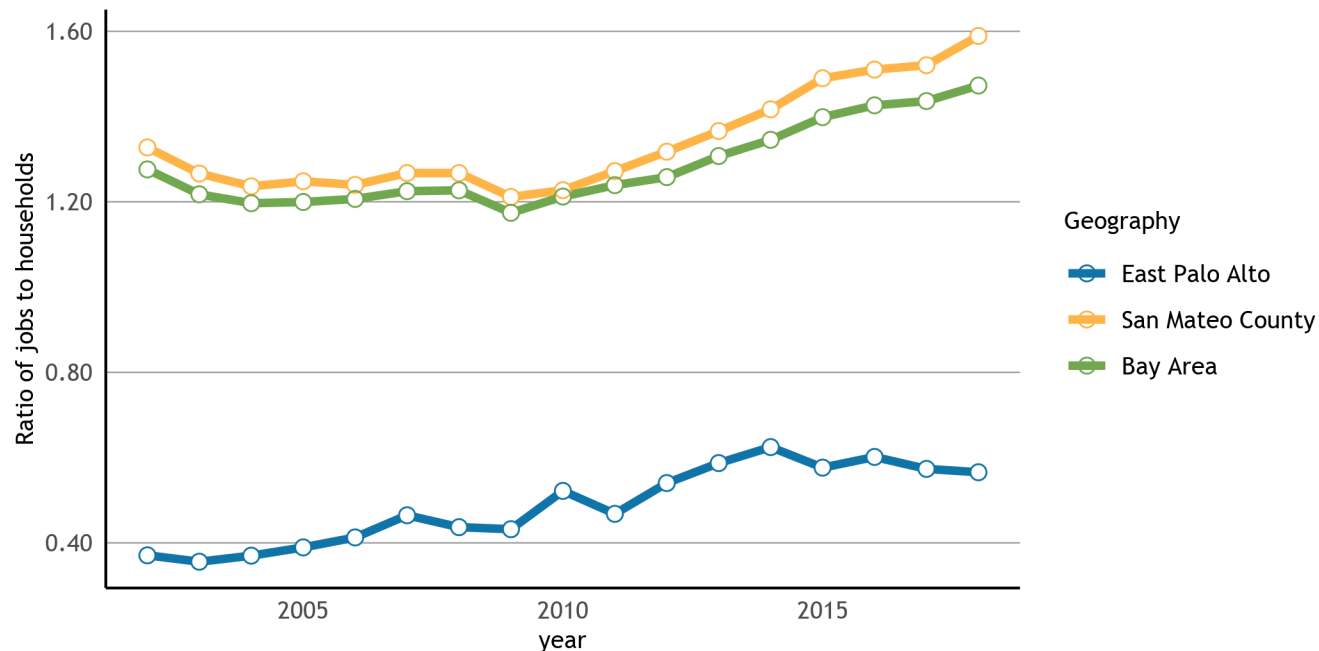


Figure 8: Jobs-Household Ratio

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 POPEMP-13.

4.4.2 Sector Composition

In terms of sectoral composition, the largest industry in which East Palo Alto residents work is *Health & Educational Services*, and the largest sector in which San Mateo residents work is *Health & Educational Services* (see Figure 9). For the Bay Area as a whole, the *Health & Educational Services* industry employs the most workers.

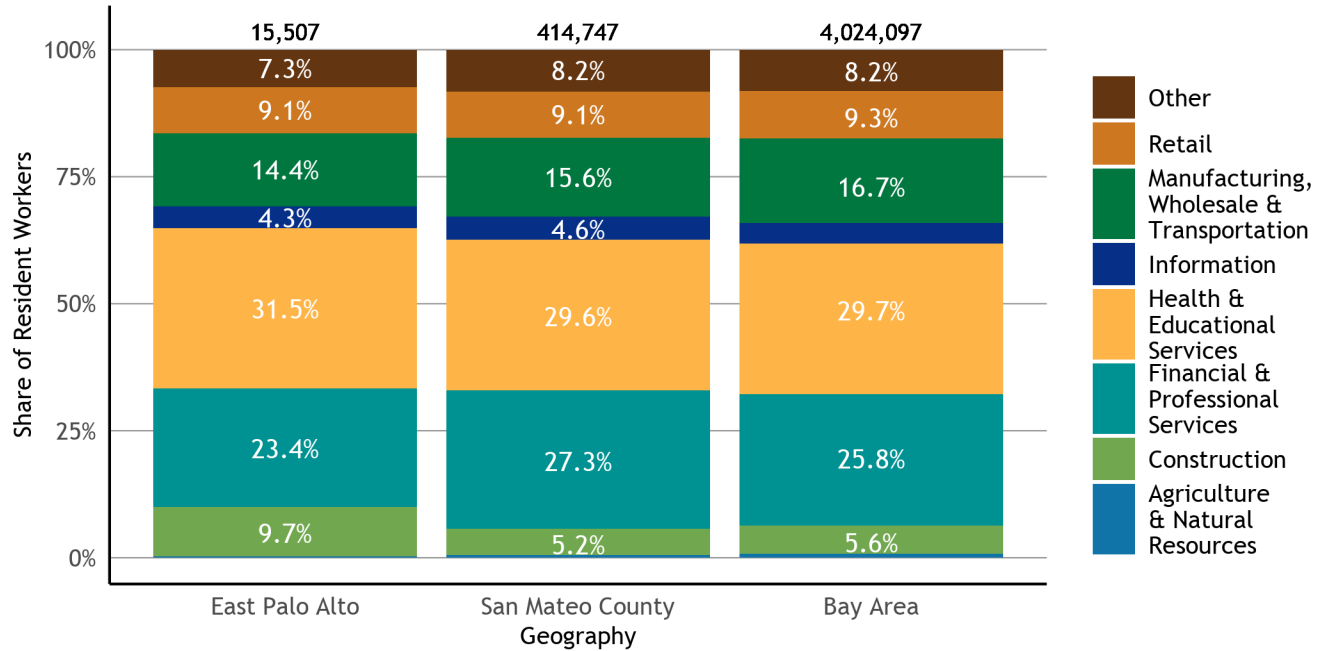


Figure 9: Resident Employment by Industry

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.

4.4.3 Unemployment

In East Palo Alto, there was a 5.4 percentage point decrease in the unemployment rate between January 2010 and January 2021. Jurisdictions through the region experienced a sharp rise in unemployment in 2020 due to impacts related to the COVID-19 pandemic, though with a general improvement and recovery in the later months of 2020.

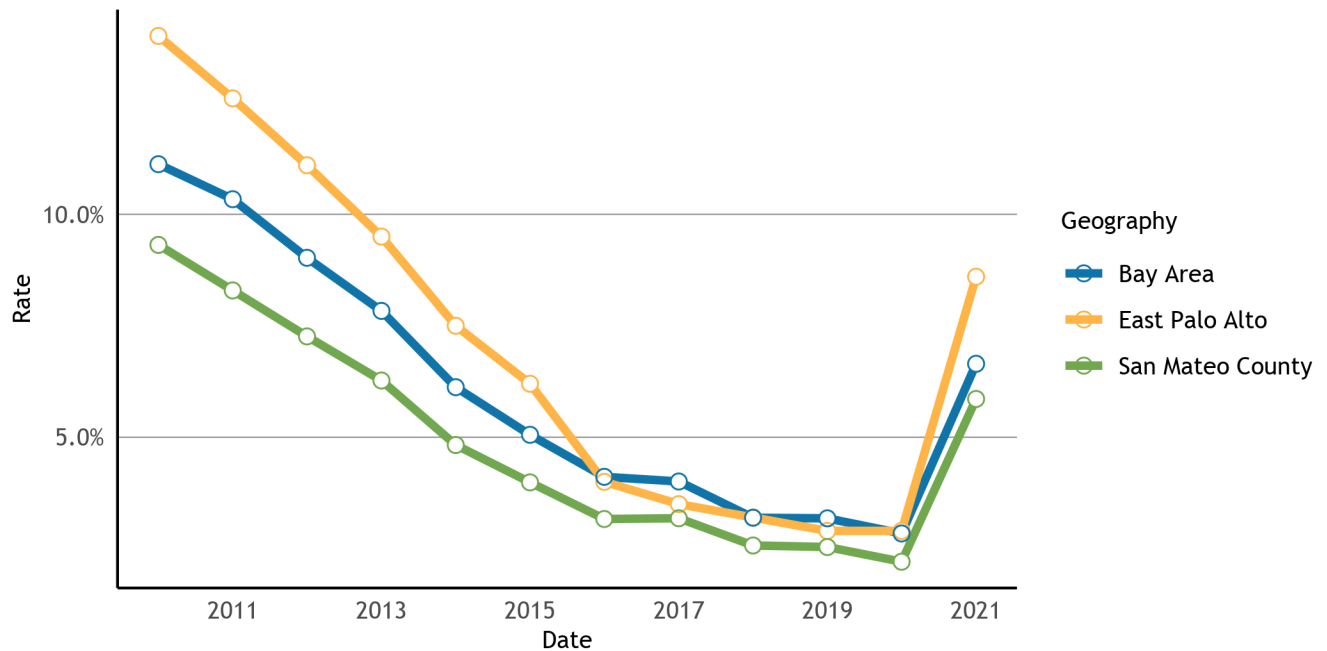


Figure 10: Unemployment Rate

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 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 state⁵⁹.

In East Palo Alto, 17.4% of households make more than 100% of the Area Median Income (AMI)⁶⁰, compared to 25.5% making less than 30% of AMI, which is considered extremely low-income (see Figure 11).

⁵⁹ Bohn, S. et al. 2020. Income Inequality and Economic Opportunity in California. *Public Policy Institute of California*.

⁶⁰ 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

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.

Note on Estimating the Projected Number of Extremely Low-Income Households

Local jurisdictions are required to provide an estimate for their projected extremely low-income households 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. For more information, visit HCD's Building Blocks page on Extremely Low-Income Housing Needs.

This document does not contain the required data point of projected extremely low-income households, as Bay Area jurisdictions have not yet received their final RHNA numbers. Once East Palo Alto receives its 6th Cycle RHNA, staff can estimate the projected extremely low-income households using one of the following three methodologies:

Option A: *Assume that 59.8% of East Palo Alto's very low-income RHNA is for extremely low-income households.*

According to HCD's Regional Housing Need Determination for the Bay Area, 15.5% of the region's housing need is for 0-30% AMI households while 25.9% is for 0-50% AMI households. Therefore, extremely low-income housing need represents 59.8% of the region's very low-income housing need, as 15.5 divided by 25.9 is 59.8%. This option aligns with HCD's guidance to use U.S. Census data to calculate the percentage of very low-income RHNA that qualifies for extremely low-income households, as HCD uses U.S. Census data to calculate the Regional Housing Need Determination.

Option B: *Assume that 50.0% of East Palo Alto's very low-income RHNA is for extremely low-income households.*

According to the data shown below (Figure 11), 3,837 of East Palo Alto's households are 0-50% AMI while 1,918 are extremely low-income. Therefore, extremely low-income households represent 50.0% of households who are 0-50% AMI, as 1,918 divided by 3,837 is 50.0%. This option aligns with HCD's guidance to use U.S. Census data to calculate the percentage of very low-income RHNA that qualifies for extremely low-income households, as the information in Figure 11 represents a tabulation of Census Bureau Data.

Option C: *Assume that 50% of East Palo Alto's very low-income RHNA is for extremely low-income households.*

HCD's guidance notes that instead of using U.S. Census data to calculate the percentage of very low-income RHNA that qualifies for extremely low-income households, local jurisdictions can presume that 50% of their RHNA for very low-income households qualifies for extremely low-income households.

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.

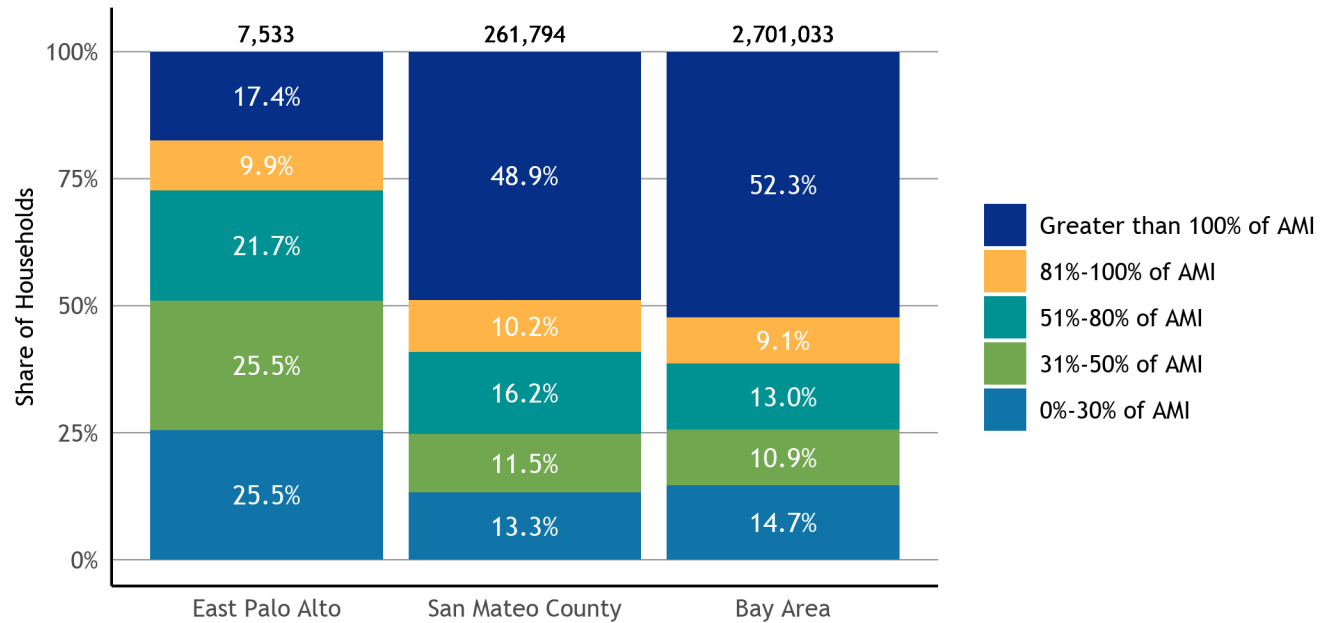


Figure 11: Households by Household Income Level

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.

Throughout the region, there are disparities between the incomes of homeowners and renters. Typically, the number of low-income renters greatly outpaces the amount of housing available that is affordable for these households.

In East Palo Alto, the largest proportion of renters falls in the *0%-30% of AMI* income group, while the largest proportion of homeowners are found in the *Greater than 100% of AMI* group (see Figure 12).

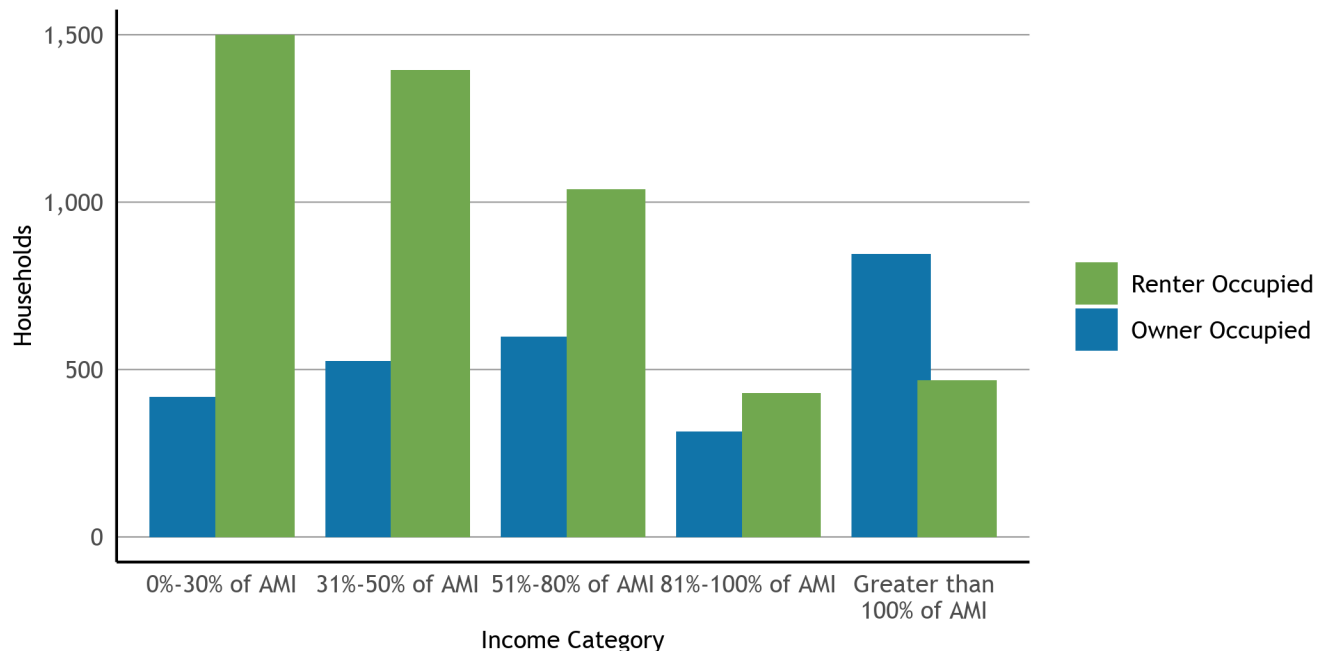


Figure 12: Household Income Level by Tenure

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 as a result of federal and local housing policies that have historically excluded them from the same opportunities extended to White residents.⁶¹ These economic disparities also leave communities of color at higher risk for housing insecurity, displacement or homelessness. In East Palo Alto, American Indian or Alaska Native (Hispanic and Non-Hispanic) residents experience the highest rates of poverty, followed by Other Race or Multiple Races (Hispanic and Non-Hispanic) residents (see Figure 13).

⁶¹ Moore, E., Montojo, N. and Mauri, N., 2019. Roots, Race & Place: A History of Racially Exclusionary Housing the San Francisco Bay Area. *Hass Institute*.

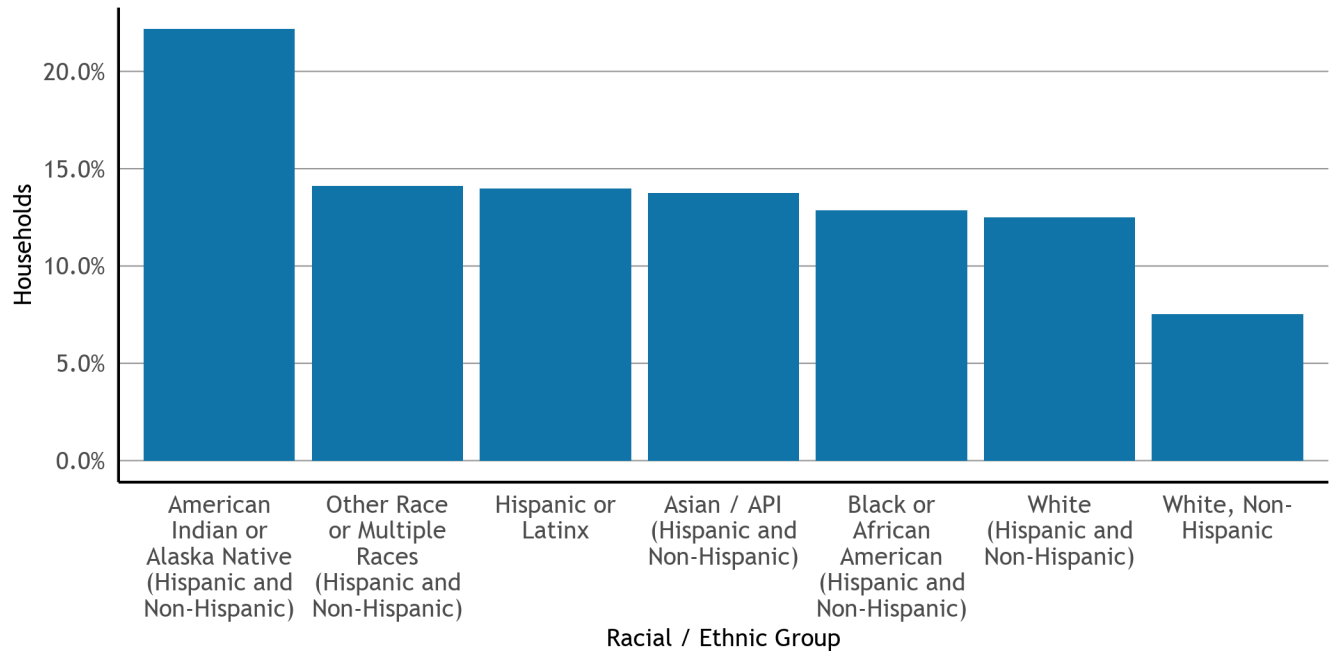


Figure 13: Poverty Status by Race

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.

4.6 Tenure

The number of residents who own their homes compared to those who rent their homes can help identify the level of housing insecurity - ability for individuals to stay in their homes - in a city and region. Generally, renters may be displaced more quickly if prices increase. In East Palo Alto there are a total of 7,724 housing units, and more residents rent than own their homes: 60.2% versus 39.8% (see Figure 14). By comparison, 39.8% of households in San Mateo County are renters, while 44% of Bay Area households rent their homes.

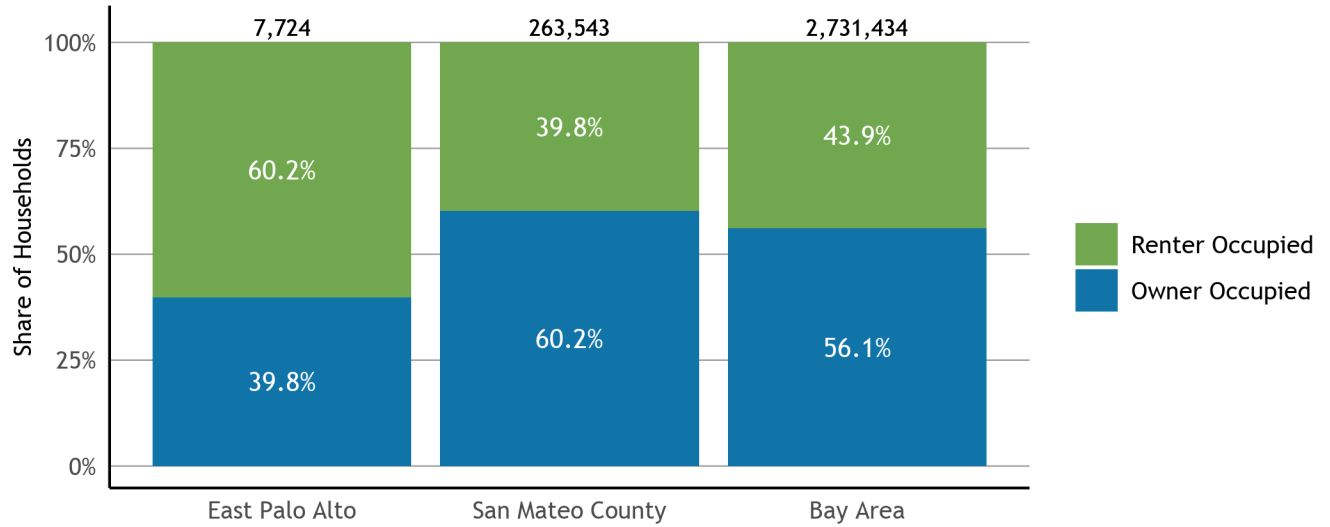


Figure 14: Housing Tenure

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 policy are still evident across Bay Area communities.⁶²

In East Palo Alto, 60.2% of Black households owned their homes, while homeownership rates were 60.0% for Asian households, 27.7% for Latinx households, and 31.9% for White households. Notably, recent changes to state law require local jurisdictions to examine these dynamics and other fair housing issues when updating their Housing Elements.

⁶² 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.

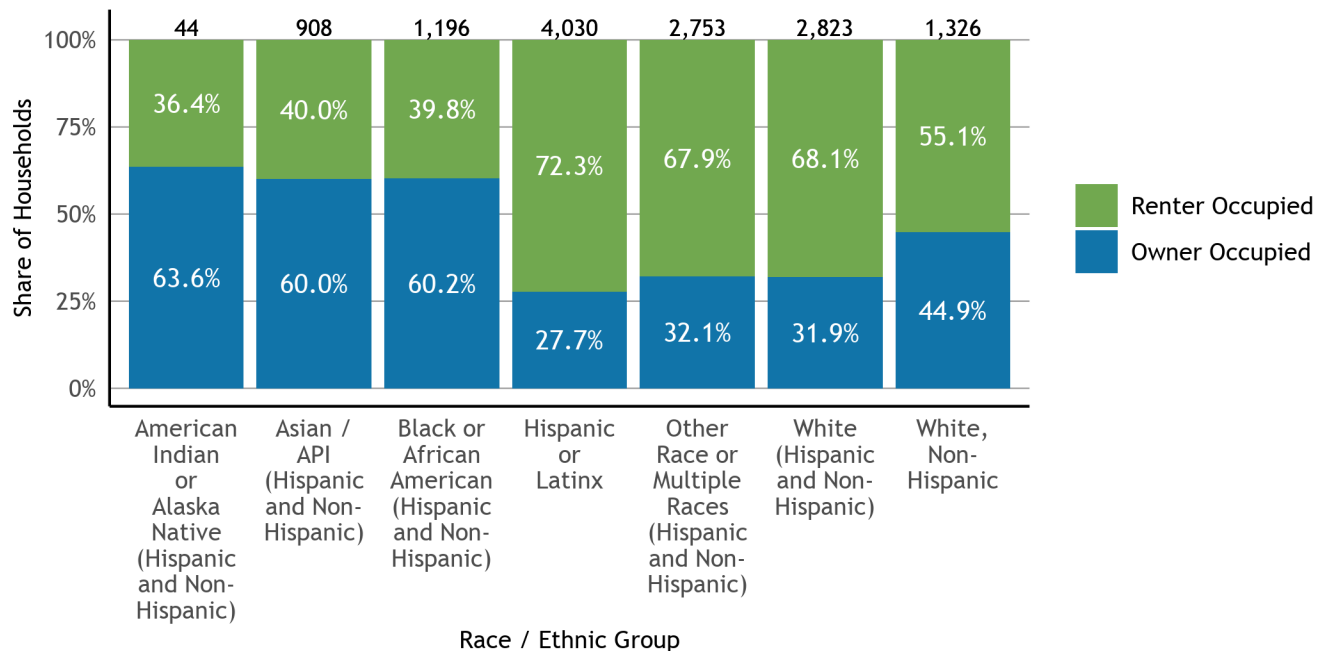


Figure 15: Housing Tenure by Race of Householder

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.

The age of residents who rent or own their home can also signal the housing challenges a community is experiencing. Younger households tend to rent and may struggle to buy a first home in the Bay Area due to high housing costs. At the same time, senior homeowners seeking to downsize may have limited options in an expensive housing market.

In East Palo Alto, 74.3% of householders between the ages of 25 and 44 are renters, while 26.4% of householders over 65 are (see Figure 16).

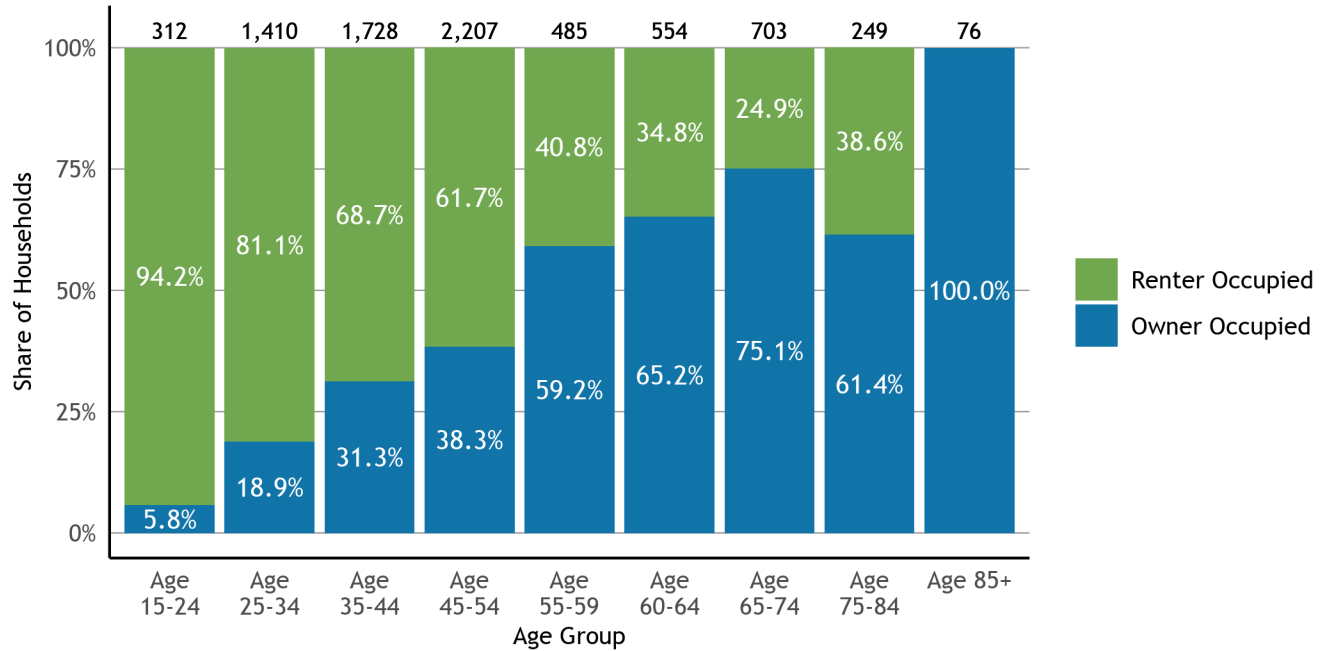


Figure 16: Housing Tenure by Age

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.

In many cities, homeownership rates for households in single-family homes are substantially higher than the rates for households in multi-family housing. In East Palo Alto, 63.6% of households in detached single-family homes are homeowners, while 6.0% of households in multi-family housing are homeowners (see Figure 17).

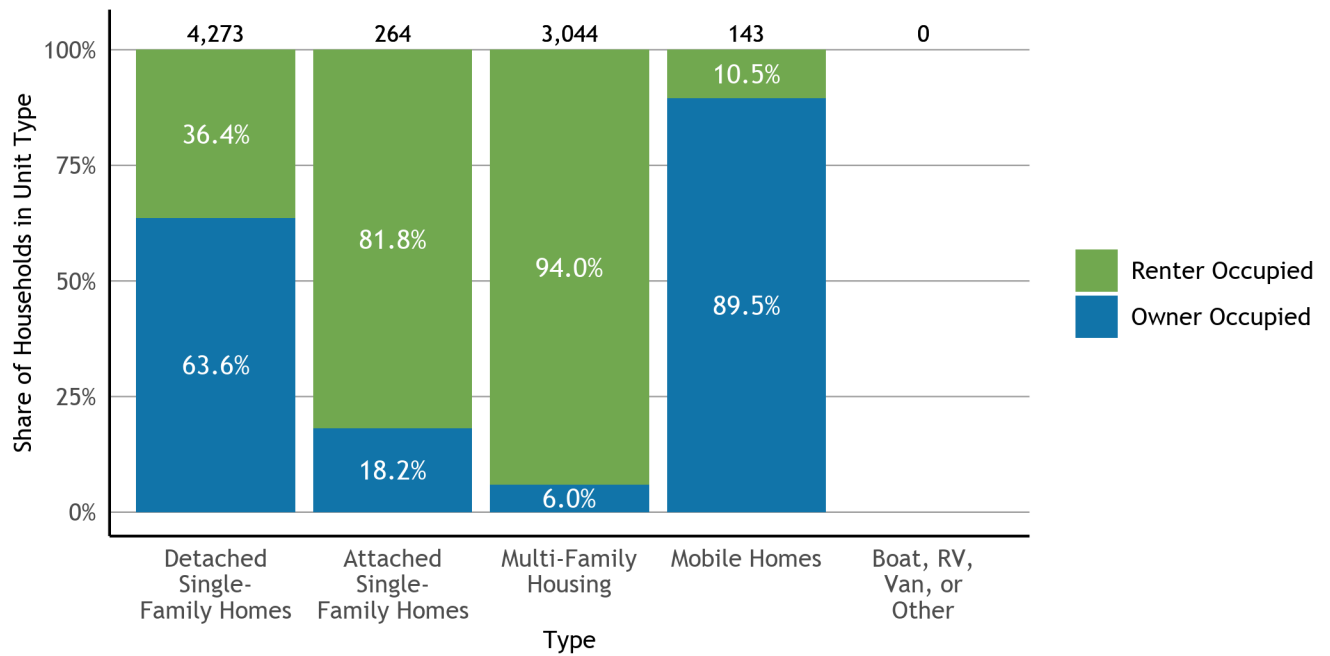


Figure 17: Housing Tenure by Housing Type

Universe: Occupied housing units

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25032

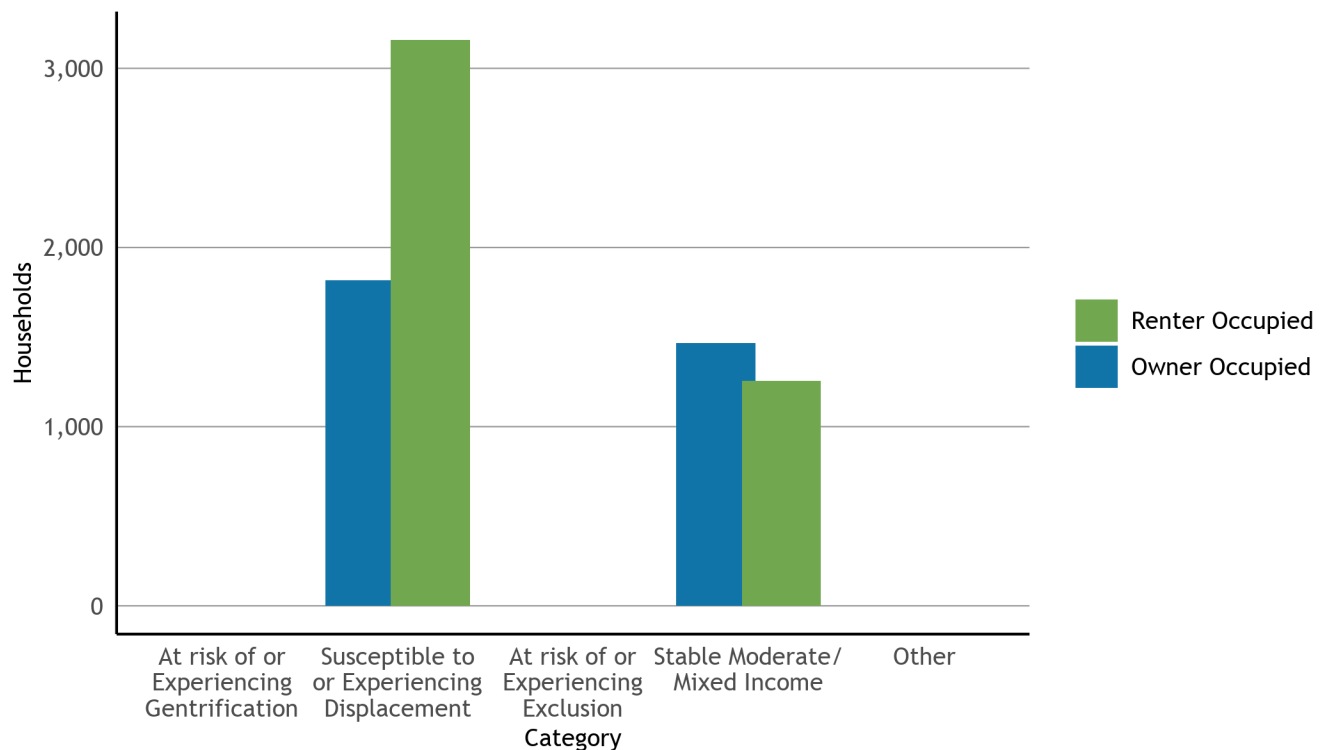
For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-22.

4.7 Displacement

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

The University of California, Berkeley has mapped all neighborhoods in the Bay area, identifying their risk for gentrification. They find that in East Palo Alto, 64.7% of households live in neighborhoods that are susceptible to or experiencing displacement and 0.0% live in neighborhoods at risk of or undergoing gentrification.

Equally important, some neighborhoods in the Bay Area do not have housing appropriate for a broad section of the workforce. UC Berkeley estimates that 0.0% of households in East Palo Alto live in neighborhoods where low-income households are likely to be excluded due to prohibitive housing costs.⁶³



⁶³ More information about this gentrification and displacement data is available at the Urban Displacement Project's webpage: <https://www.urbandisplacement.org/>. Specifically, one can learn more about the different gentrification/displacement typologies shown in Figure 18 at this link: https://www.urbandisplacement.org/sites/default/files/typology_sheet_2018_0.png. Additionally, one can view maps that show which typologies correspond to which parts of a jurisdiction here: <https://www.urbandisplacement.org/san-francisco/sf-bay-area-gentrification-and-displacement>

Figure 18: 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 consisted of single-family homes and larger multi-unit buildings. However, some households are increasingly interested in “missing middle housing” - including duplexes, triplexes, townhomes, cottage clusters and accessory dwelling units (ADUs). These housing types may open up more options across incomes and tenure, from young households seeking homeownership options to seniors looking to downsize and age-in-place.

The housing stock of East Palo Alto in 2020 was made up of 54.1% single family detached homes, 4.1% single family attached homes, 3.4% multifamily homes with 2 to 4 units, 36.6% multifamily homes with 5 or more units, and 1.9% mobile homes (see Figure 19). In East Palo Alto, the housing type that experienced the most growth between 2010 and 2020 was *Single-Family Home: Detached*.

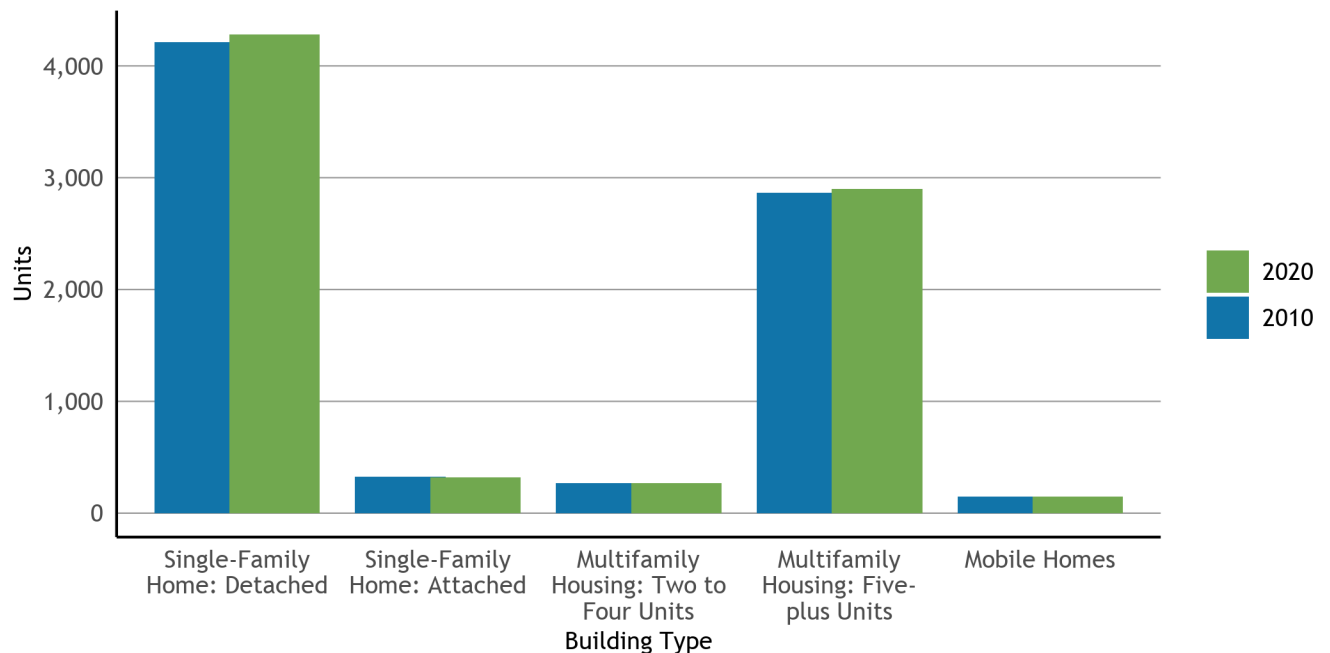


Figure 19: Housing Type Trends

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.

Production has not kept up with housing demand for several decades in the Bay Area, as the total number of units built and available has not yet come close to meeting the population and job growth experienced throughout the region. In East Palo Alto, the largest proportion of the housing stock was built 1940 to 1959, with 3,262 units constructed during this period (see Figure 20). Since 2010, 1.5% of the current housing stock was built, which is 128 units.

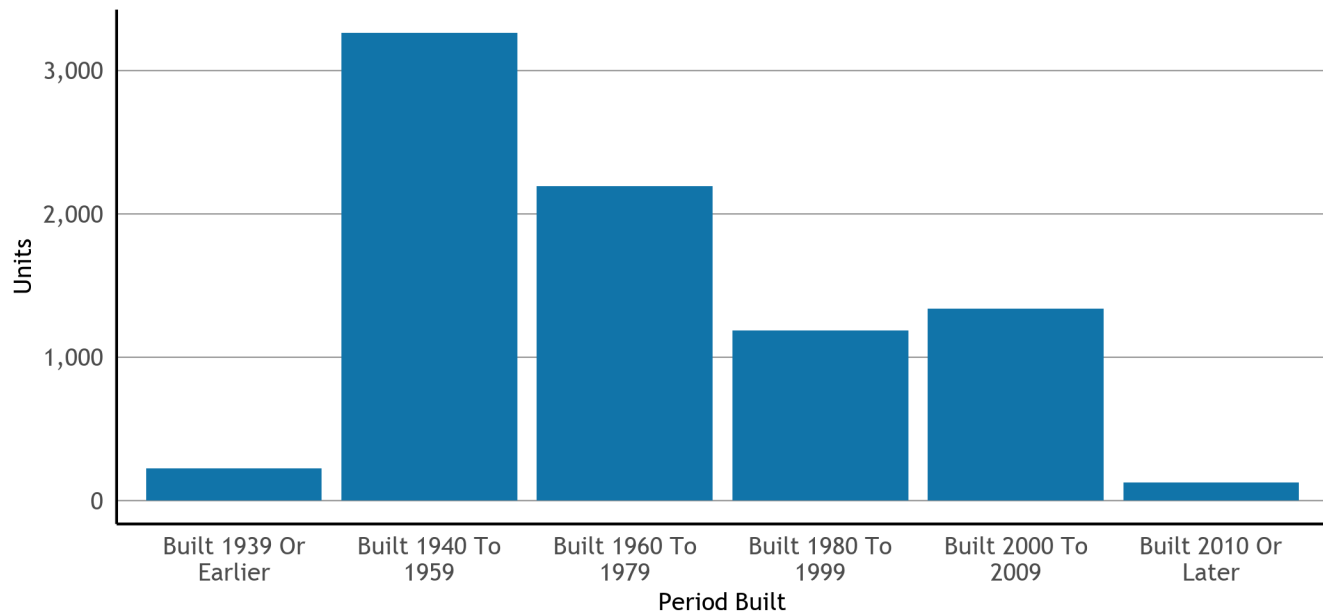


Figure 20: Housing Units by Year Structure Built

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 make up 7.4% of the overall housing stock in East Palo Alto. The rental vacancy stands at 8.5%, while the ownership vacancy rate is 2.4%. Of the vacant units, the most common type of vacancy is *For Rent* (see Figure 21).⁶⁴

Throughout the Bay Area, vacancies make up 2.6% of the total housing units, with homes listed for rent; units used for *recreational or occasional use*, and units not otherwise classified (*other vacant*) making up the majority of vacancies. The Census Bureau classifies a unit as vacant if no one is occupying it when census interviewers are conducting the American Community Survey or Decennial Census. Vacant units classified as “for recreational or occasional use” are those that are held for short-term periods of use throughout the year. Accordingly, vacation rentals and short-term rentals like Airbnb are likely to fall in this category. The Census Bureau classifies units as “other vacant” if they are vacant due to foreclosure, personal/family reasons, legal proceedings, repairs/renovations, abandonment, preparation for being rented or sold, or vacant for an extended absence for reasons such as a work assignment, military duty, or incarceration.⁶⁵ 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 likely to represent a large portion of the “other vacant” category. Additionally, the need for seismic retrofitting

⁶⁴ The vacancy rates by tenure is for a smaller universe than the total vacancy rate first reported, which in principle includes the full stock (7.4%). 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*.

⁶⁵ 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>.

in older housing stock could also influence the proportion of “other vacant” units in some jurisdictions.⁶⁶

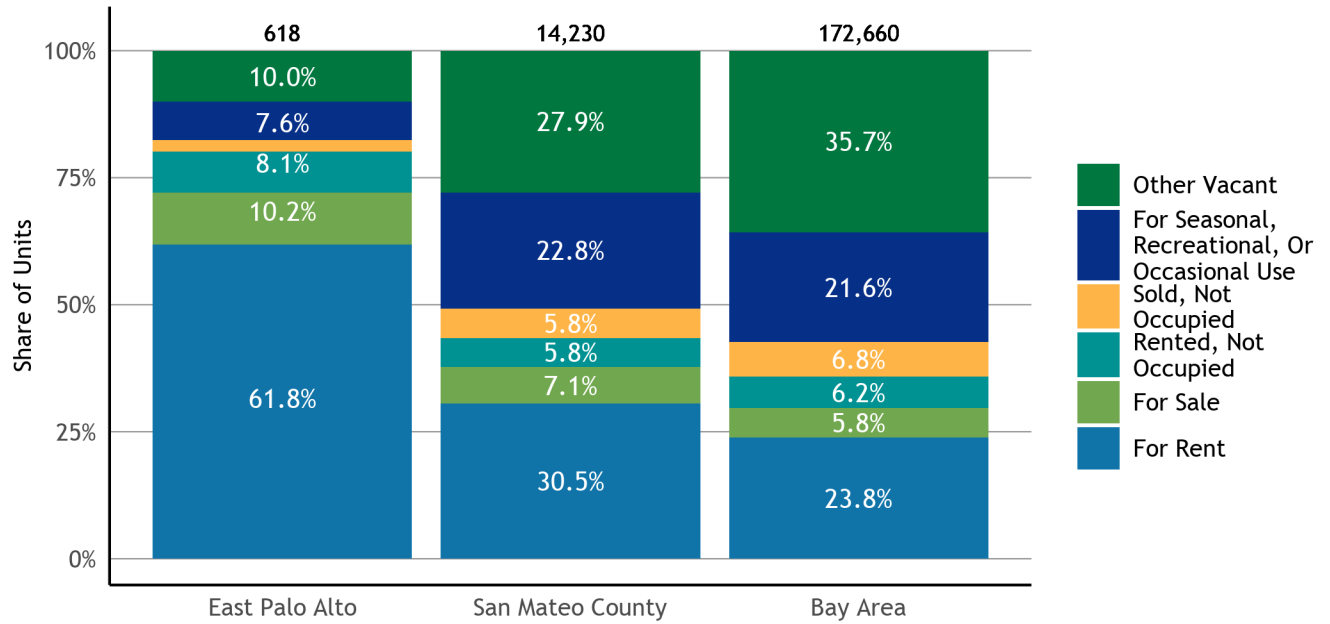


Figure 21: Vacant Units by Type

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.

Between 2015 and 2019, 95 housing units were issued permits in East Palo Alto. 6.3% of permits issued in East Palo Alto were for above moderate-income housing, 36.8% were for moderate-income housing, and 56.8% were for low- or very low-income housing (see Table 3).

Table 3: Housing Permitting

Income Group	value
Moderate Income Permits	35
Low Income Permits	34
Very Low Income Permits	20
Above Moderate Income Permits	6

⁶⁶ 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.

Universe: Housing permits issued between 2015 and 2019

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)

This table is included in the Data Packet Workbook as Table HSG-11.

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. Additionally, it is typically faster and less expensive to preserve currently affordable units that are at risk of converting to market-rate than it is to build new affordable housing.

The data in the table below comes from the California Housing Partnership’s Preservation Database, 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. 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 data table. There are 466 assisted units in East Palo Alto in the Preservation Database. Of these units, 0.0% are at *High Risk* or *Very High Risk* of conversion.⁶⁷

Note on At-Risk Assisted Housing Developments

HCD requires that Housing Elements list the assisted housing developments at risk of converting to market-rate uses. For more information on the specific properties that are at Moderate Risk, High Risk, or Very High Risk of conversion, local jurisdiction staff should contact Danielle Mazzella, Preservation & Data Manager at the California Housing Partnership, at dmazzella@chpc.net.

Table 4: Assisted Units at Risk of Conversion

Income	East Palo Alto	San Mateo County	Bay Area
Low	466	4656	110177
Moderate	0	191	3375

⁶⁷ 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.

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.

Income	East Palo Alto	San Mateo County	Bay Area
High	0	359	1854
Very High	0	58	1053
Total Assisted Units in Database	466	5264	116459

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. 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. 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.

Source: California Housing Partnership, Preservation Database (2020)

This table is included in the Data Packet Workbook as Table RISK-01.

5.3 Substandard Housing

Housing costs in the region are among the highest in the country, which could result in households, particularly renters, needing to live in substandard conditions in order to afford housing. Generally, there is limited data on the extent of substandard housing issues in a community. However, the Census Bureau data included in the graph below gives a sense of some of the substandard conditions that may be present in East Palo Alto. For example, 2.0% of renters in East Palo Alto reported lacking a kitchen and 1.6% of renters lack plumbing, compared to 0.0% of owners who lack a kitchen and 1.5% of owners who lack plumbing.

Note on Substandard Housing

HCD requires Housing Elements to estimate the number of units in need of rehabilitation and replacement. As a data source for housing units in need of rehabilitation and replacement is not available for all jurisdictions in the region, ABAG was not able to provide this required data point in this document. To produce an estimate of housing needs in need of rehabilitation and replacement, staff can supplement the data below on substandard housing issues with additional local information from code enforcement, recent windshield surveys of properties, building department data, knowledgeable builders/developers in the community, or nonprofit housing developers or organizations. For more information, visit HCD's Building Blocks page on Housing Stock Characteristics.

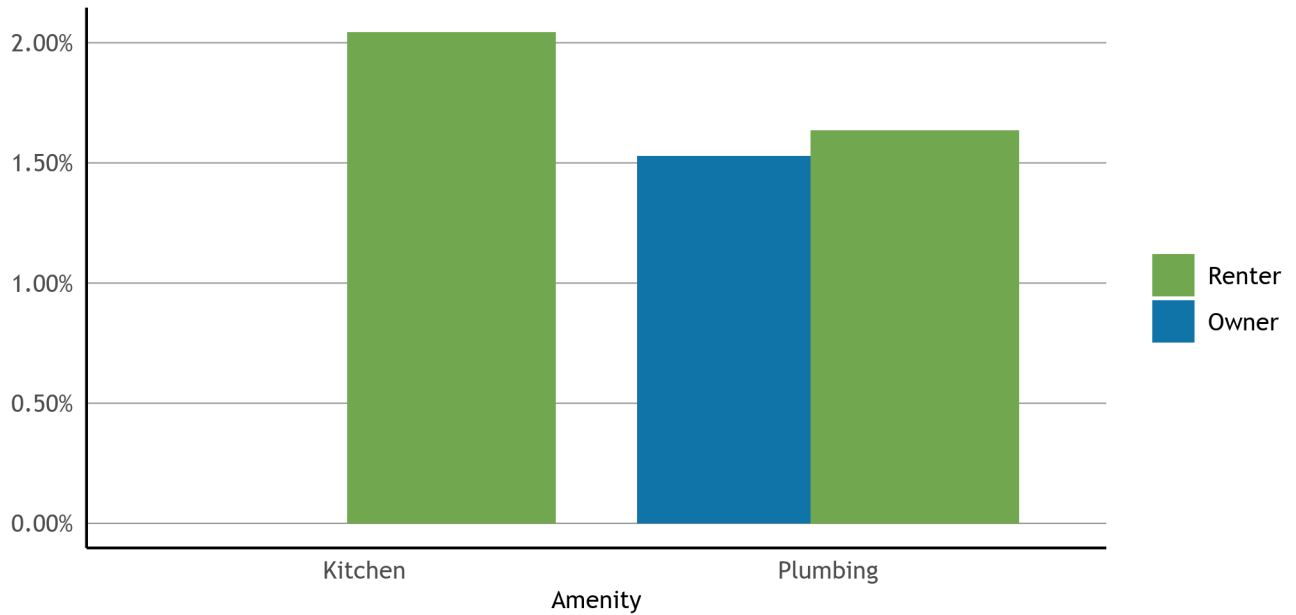


Figure 22: Substandard Housing Issues

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.

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 Bay Area, the costs of housing have long been among the highest in the nation. The typical home value in East Palo Alto was estimated at \$936,680 by December of 2020, per data from Zillow. The largest proportion of homes were valued between \$750k-\$1M (see Figure 23). By comparison, the typical home value is \$1,418,330 in San Mateo County and \$1,077,230 the Bay Area, with the largest share of units valued \$1m-\$1.5m (county) and \$500k-\$750k (region).

The region’s home values have increased steadily since 2000, besides a decrease during the Great Recession. The rise in home prices has been especially steep since 2012, with the median home value in the Bay Area nearly doubling during this time. Since 2001, the typical home value has increased 151.0% in East Palo Alto from \$373,130 to \$936,680. This change is above the change in San Mateo County, and above the change for the region (see Figure 24).

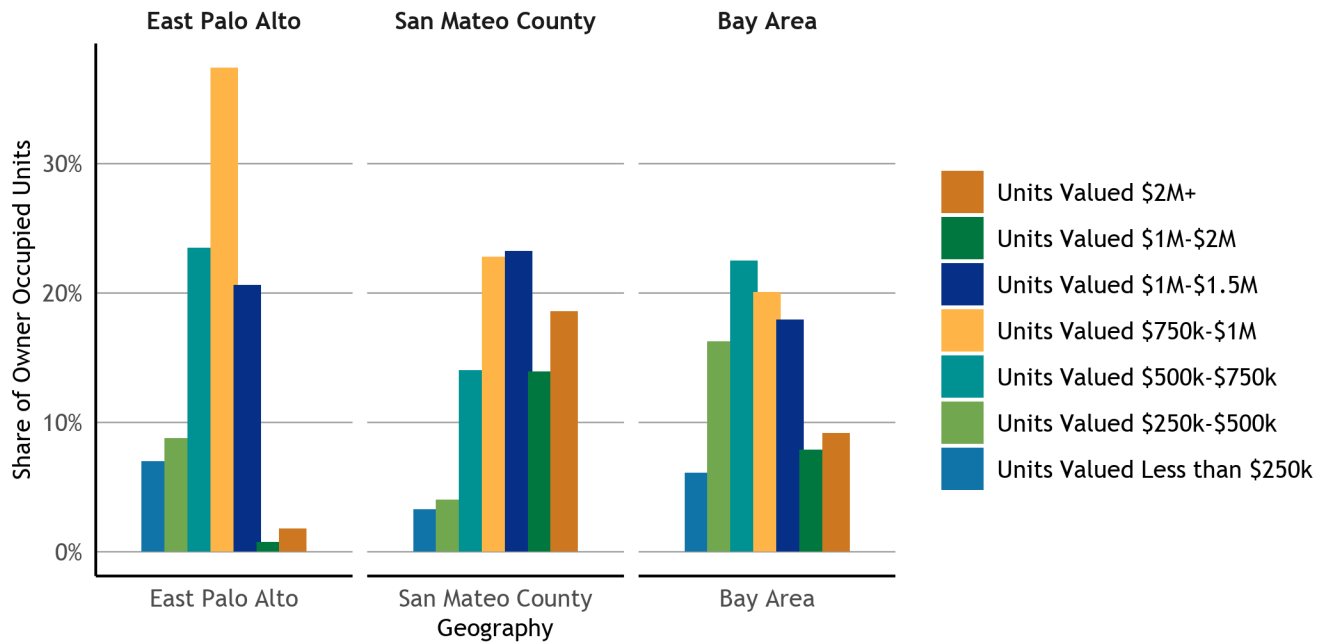


Figure 23: Home Values of Owner-Occupied Units

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.

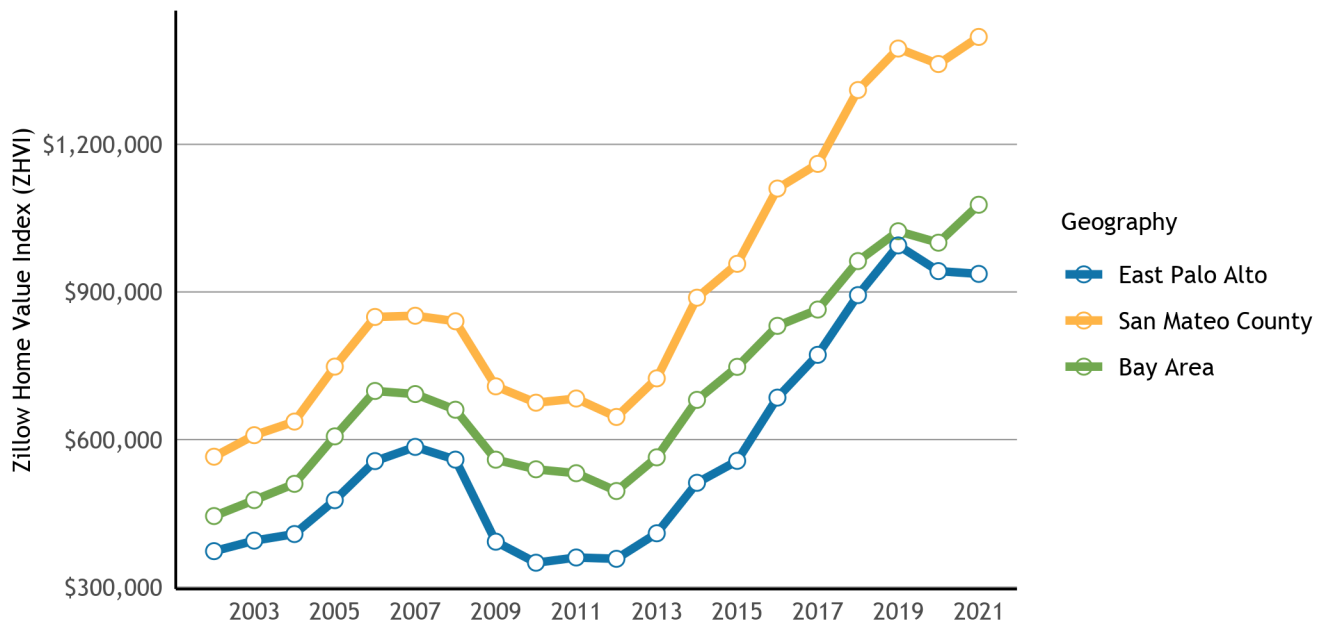


Figure 24: Zillow Home Value Index (ZHVI)

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)
 For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-08.

Similar to home values, rents have also increased dramatically across the Bay Area in recent years. Many renters have been priced out, evicted or displaced, particularly communities of color. Residents finding themselves in one of these situations may have had to choose between commuting long distances to their jobs and schools or moving out of the region, and sometimes, out of the state.

In East Palo Alto, the largest proportion of rental units rented in the *Rent \$1500-\$2000* category, totaling 30.7%, followed by 25.6% of units renting in the *Rent \$1000-\$1500* category (see Figure 25). Looking beyond the city, the largest share of units is in the *\$3000 or more* category (county) compared to the *\$1500-\$2000* category for the region as a whole.

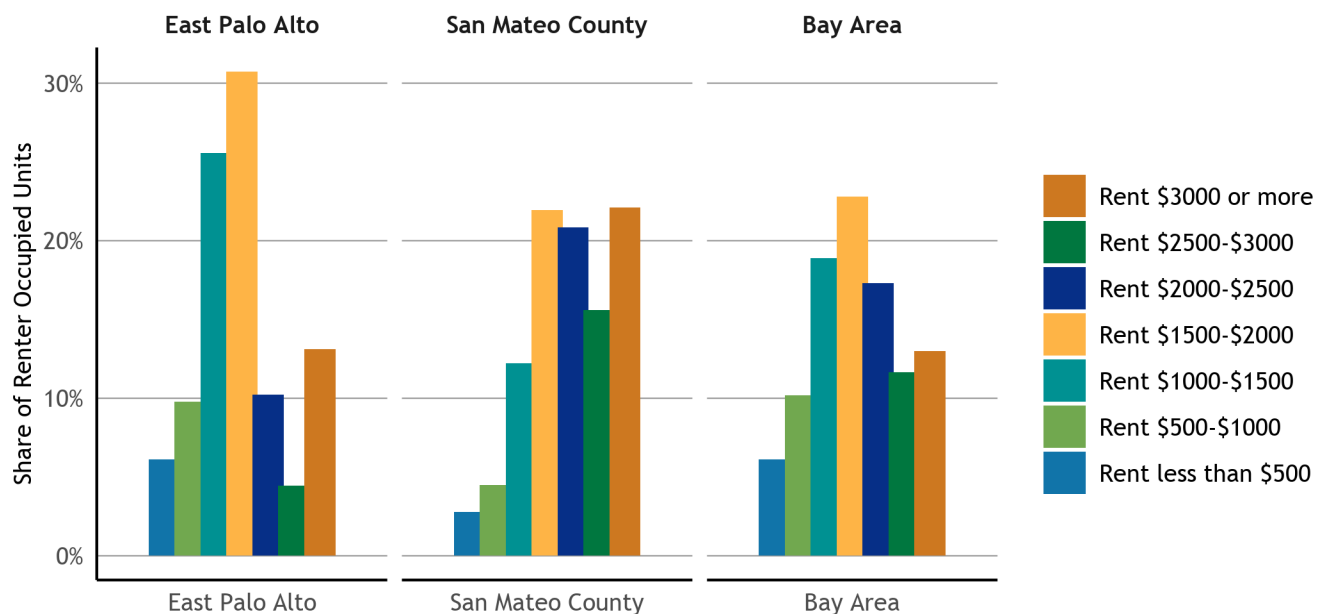


Figure 25: Contract Rents for Renter-Occupied Units

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.

Since 2009, the median rent has increased by 65.7% in East Palo Alto, from \$1,210 to \$1,630 per month (see Figure 26). In San Mateo County, the median rent has increased 41.1%, from \$1,560 to \$2,200. The median rent in the region has increased significantly during this time from \$1,200 to \$1,850, a 54% increase.⁶⁸

⁶⁸ While the data on home values shown in Figure 24 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.

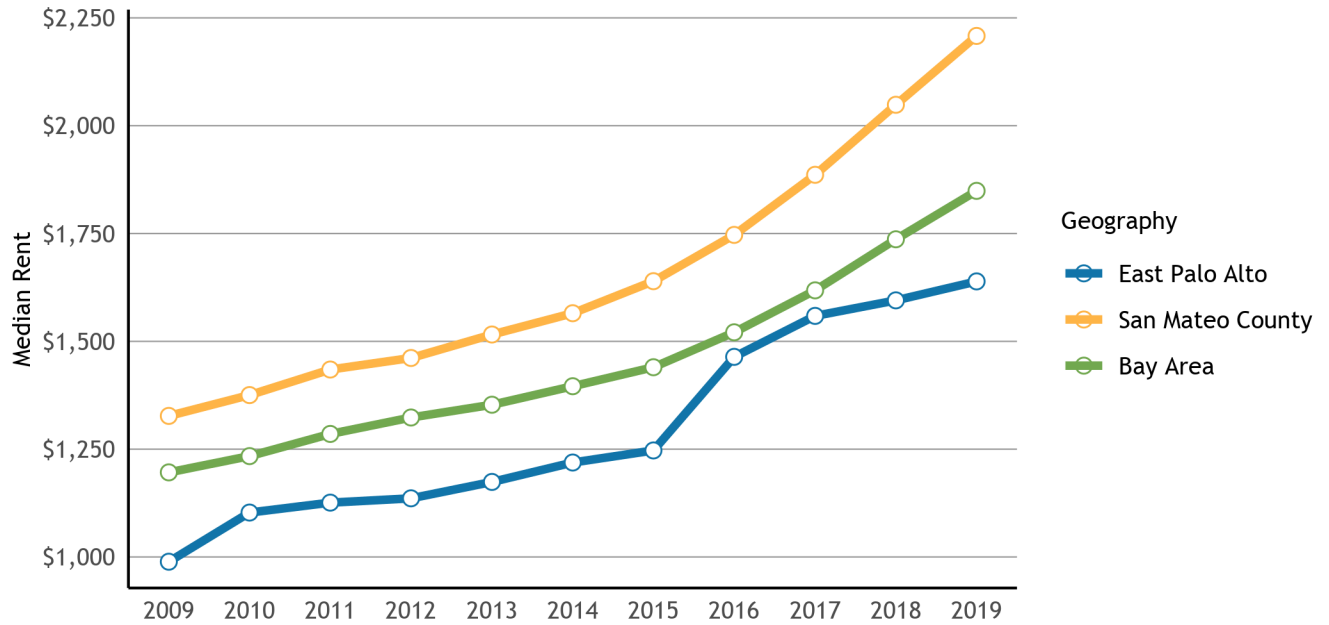


Figure 26: Median Contract Rent

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 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 income on housing puts low-income households at higher risk of displacement, eviction, or homelessness.

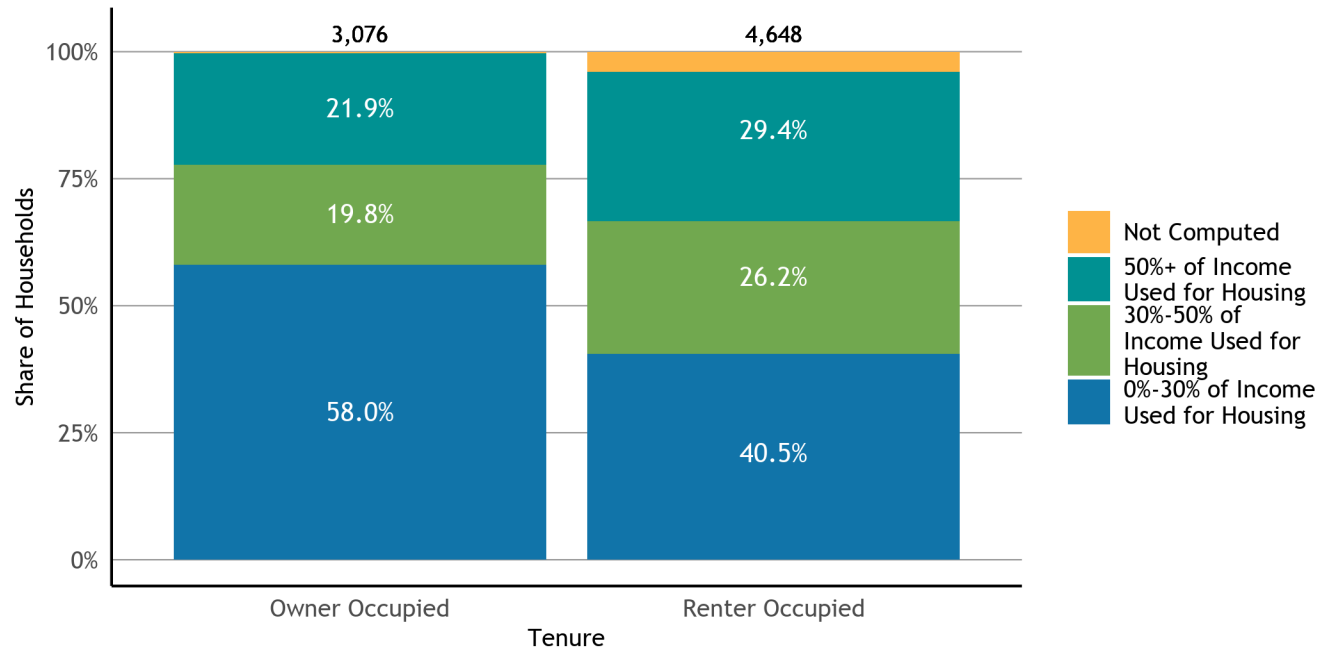


Figure 27: Cost Burden by Tenure

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.

Renters are often more cost-burdened than owners. While the housing market has resulted in home prices increasing dramatically, homeowners often have mortgages with fixed rates, whereas renters are more likely to be impacted by market increases. When looking at the cost burden across tenure in East Palo Alto, 26.2% of renters spend 30% to 50% of their income on housing compared to 19.8% of those that own (see Figure 27). Additionally, 29.4% of renters spend 50% or more of their income on housing, while 21.9% of owners are severely cost-burdened.

In East Palo Alto, 25.2% of households spend 50% or more of their income on housing, while 28.8% spend 30% to 50%. However, these rates vary greatly across income categories (see Figure 28). For example, 67.5% of East Palo Alto households making less than 30% of AMI spend the majority of their income on housing. For East Palo Alto residents making more than 100% of AMI, just 0.0% are severely cost-burdened, and 93.2% of those making more than 100% of AMI spend less than 30% of their income on housing.

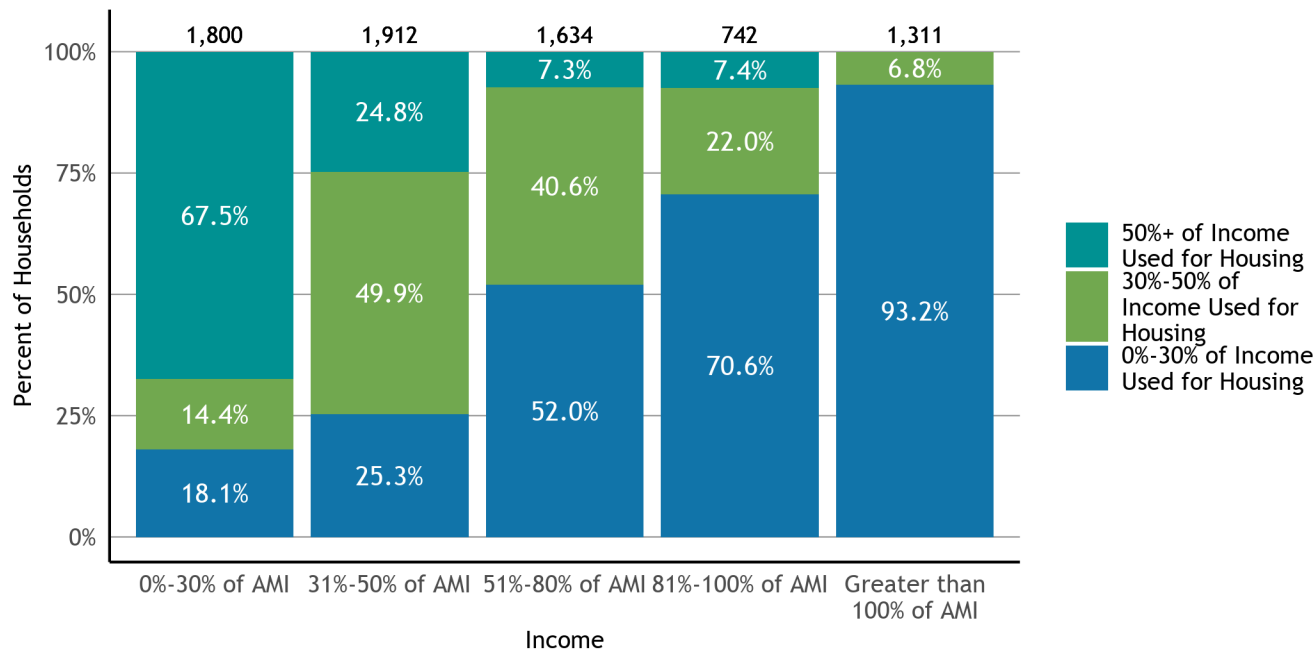


Figure 28: Cost Burden by Income Level

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.

Currently, people of color are more likely to experience poverty and financial instability as a result of federal and local housing policies that have historically excluded them from the same opportunities extended to White residents. As a result, they often pay a greater percentage of their income on housing, and in turn, are at a greater risk of housing insecurity.

Other Race or Multiple Races, Non-Hispanic residents are the most cost burdened with 42.2% spending 30% to 50% of their income on housing, and *Hispanic or Latinx* residents are the most severely cost burdened with 29.6% spending more than 50% of their income on housing (see Figure 29).

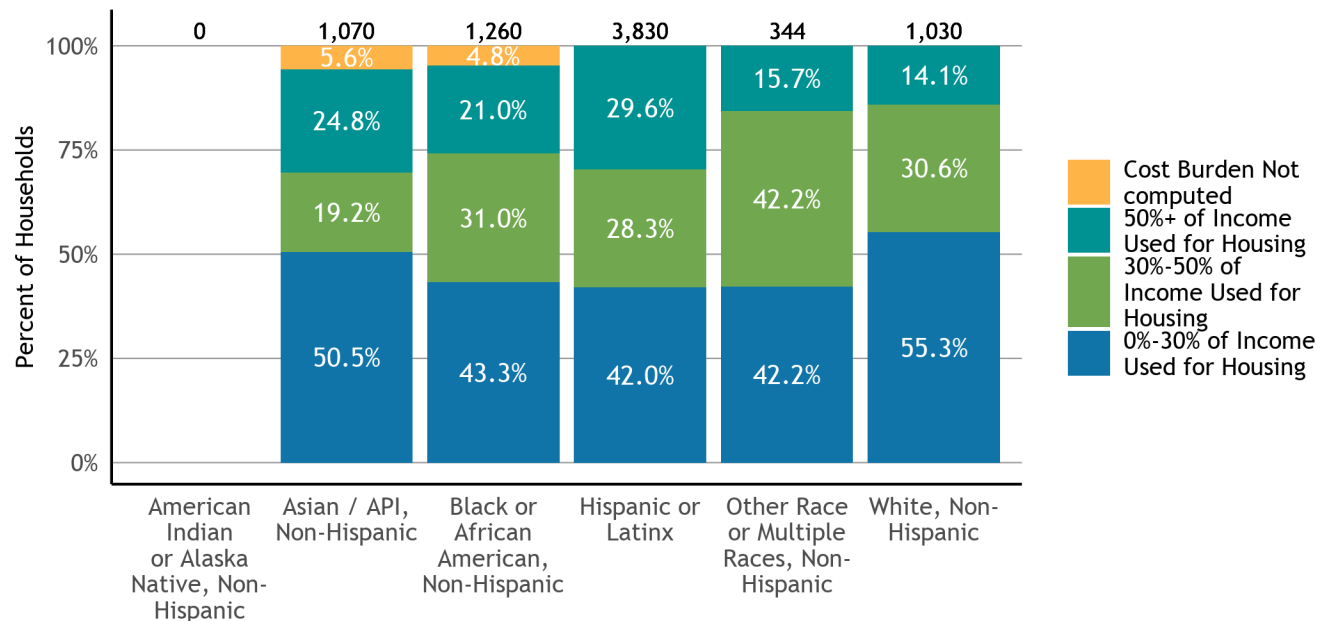


Figure 29: Cost Burden by Race

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.

Large family households often have special housing needs due to a lack of adequately sized affordable housing available. The higher costs required for homes with multiple bedrooms can result in larger families experiencing a disproportionate cost burden than the rest of the population and can increase the risk of housing insecurity.

In East Palo Alto, 29.0% of large family households experience a cost burden of 30%-50%, while 24.8% of households spend more than half of their income on housing. Some 28.7% of all other households have a cost burden of 30%-50%, with 25.3% of households spending more than 50% of their income on housing (see Figure 30).

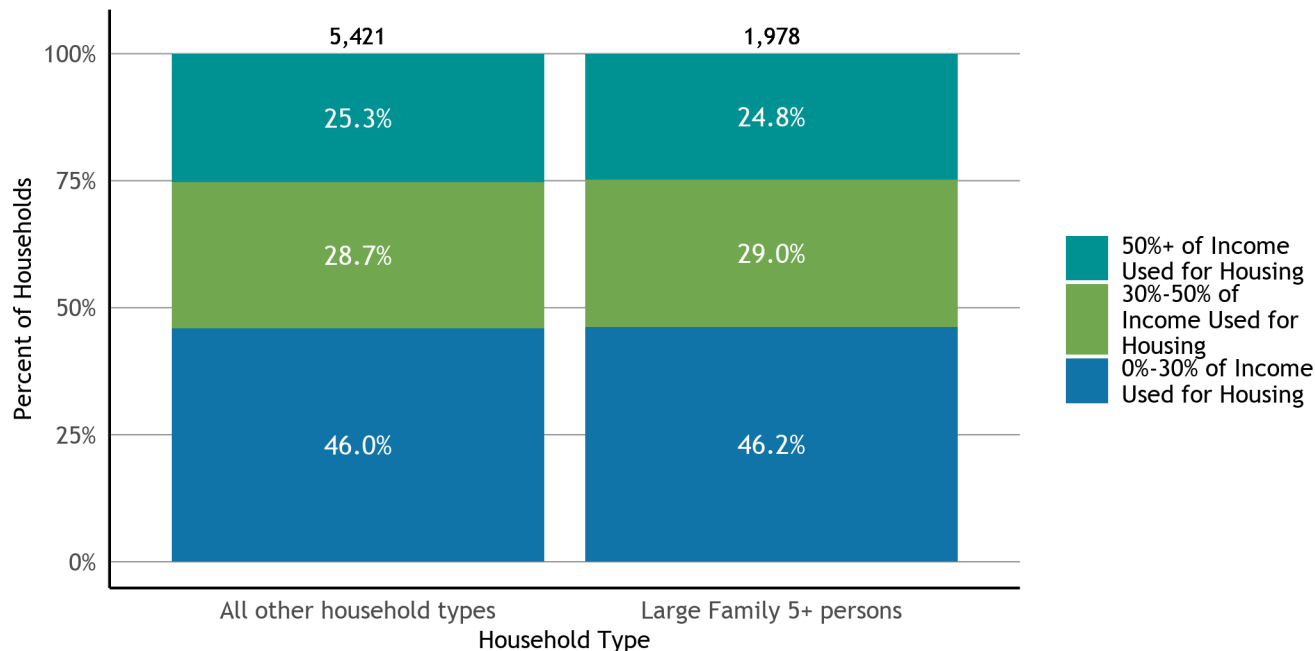


Figure 30: Cost Burden by Household Size

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, putting further stress on the local rental market or forcing residents out of the community they call home. Understanding how seniors might be cost-burdened is of particular importance due to their special housing needs, particularly for low-income seniors. 55.8% of seniors making less than 30% of AMI are spending the majority of their income on housing. For seniors making more than 100% of AMI, 84.7% are not cost-burdened and spend less than 30% of their income on housing (see Figure 31).

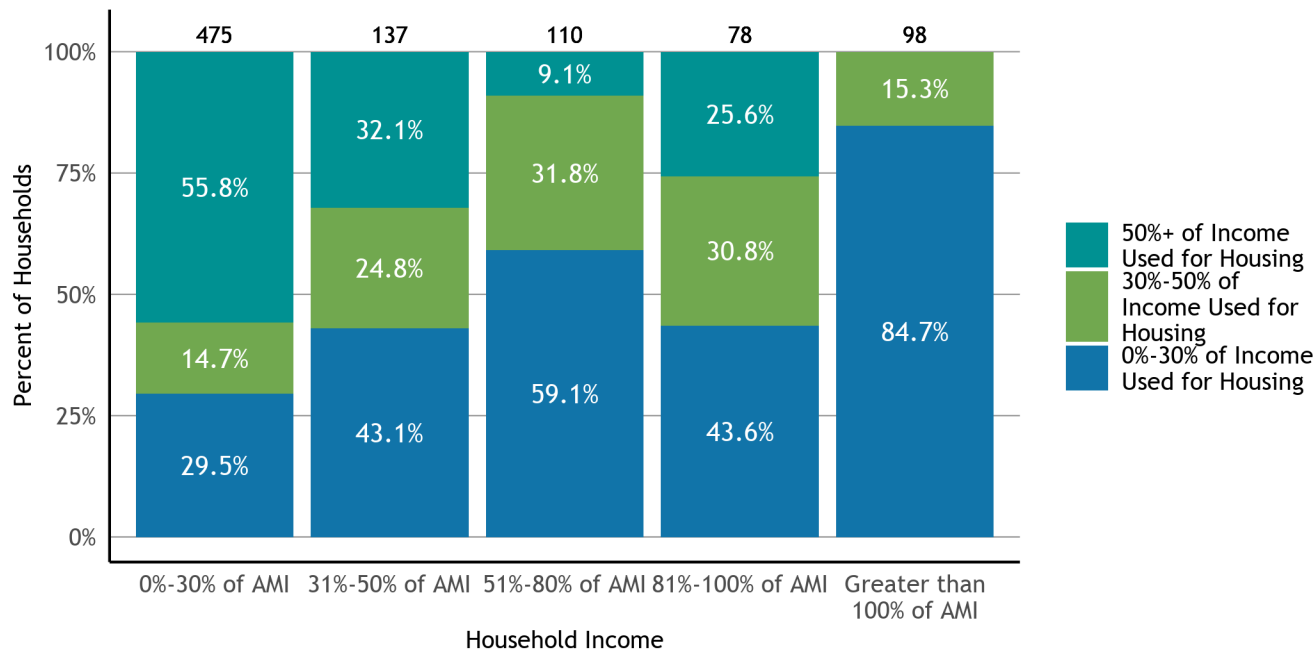


Figure 31: Cost-Burdened Senior Households by Income Level

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.

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 that are renting, with multiple households sharing a unit to make it possible to stay in their communities. In East Palo Alto, 17.5% of households that rent are severely overcrowded (more than 1.5 occupants per room), compared to 3.2% of households that own (see Figure 32). In East Palo Alto, 18.3% of renters experience moderate overcrowding (1 to 1.5 occupants per room), compared to 7.9% for those own.

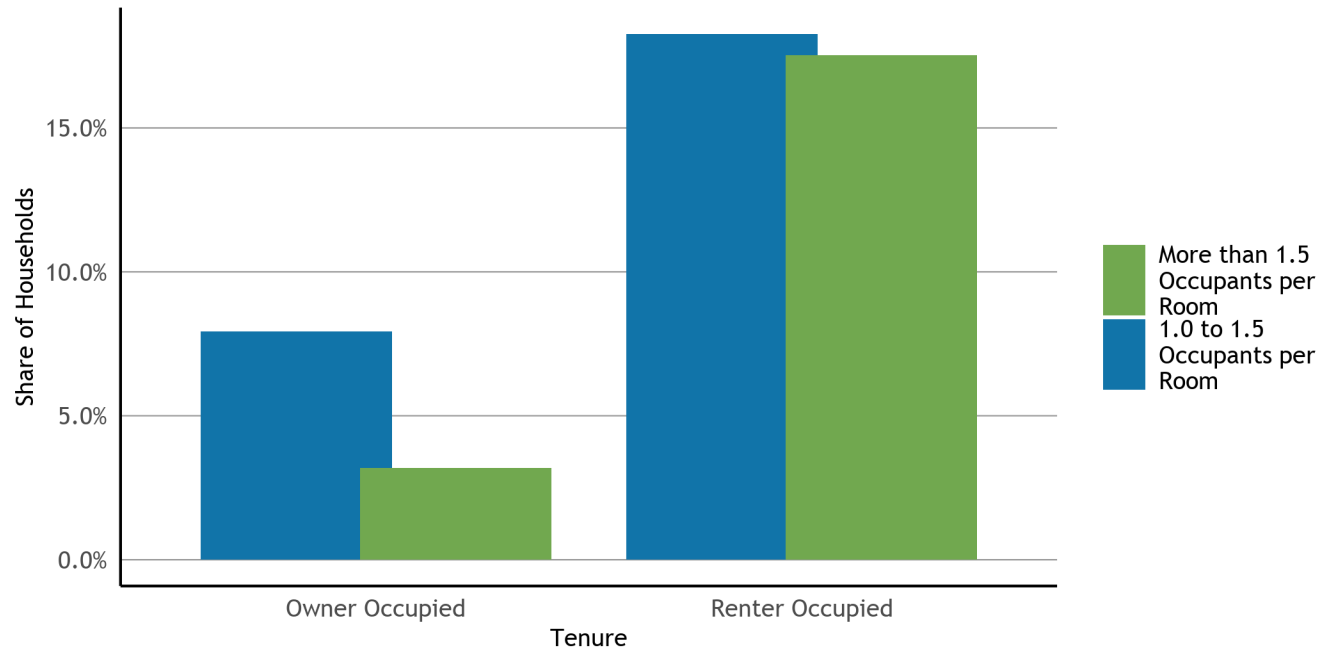


Figure 32: Overcrowding by Tenure and Severity

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. 8.6% of very low-income households (below 50% AMI) experience severe overcrowding, while 7.9% of households above 100% experience this level of overcrowding (see Figure 33).

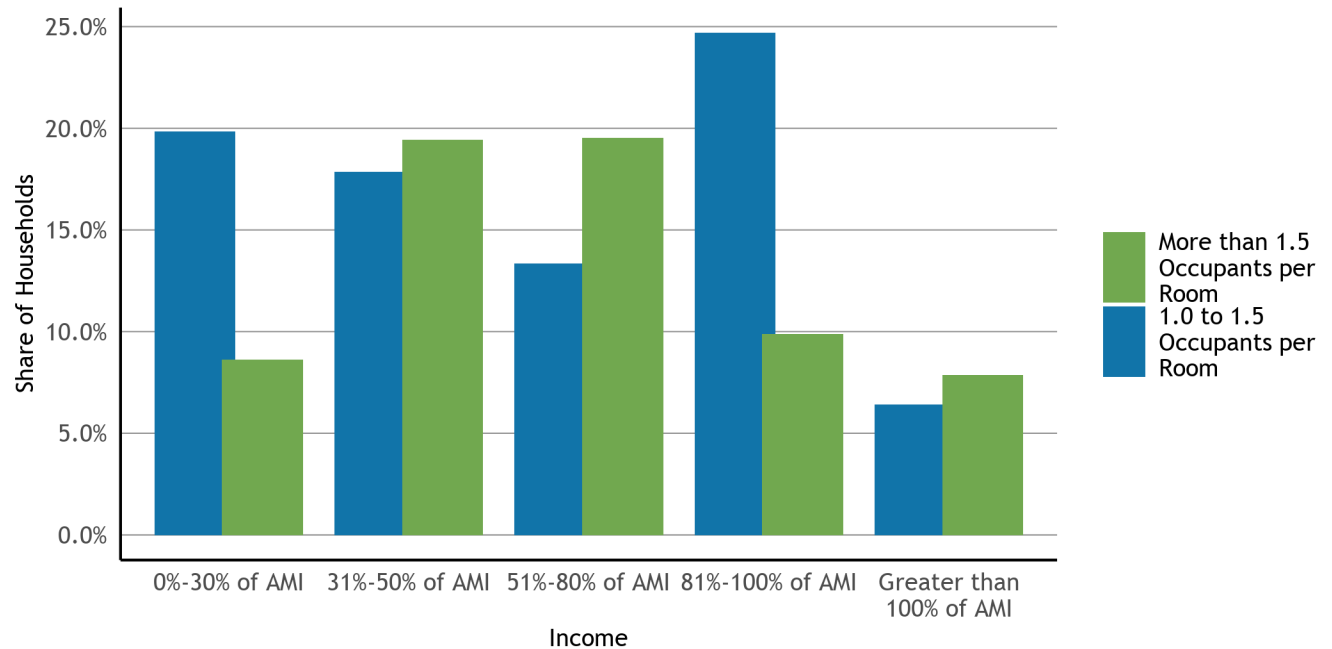


Figure 33: Overcrowding by Income Level and Severity

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 similar to how they are more likely to experience poverty, financial instability, and housing insecurity. People of color tend to experience overcrowding at higher rates than White residents. In East Palo Alto, the racial group with the largest overcrowding rate is *Hispanic or Latinx* (see Figure 34)

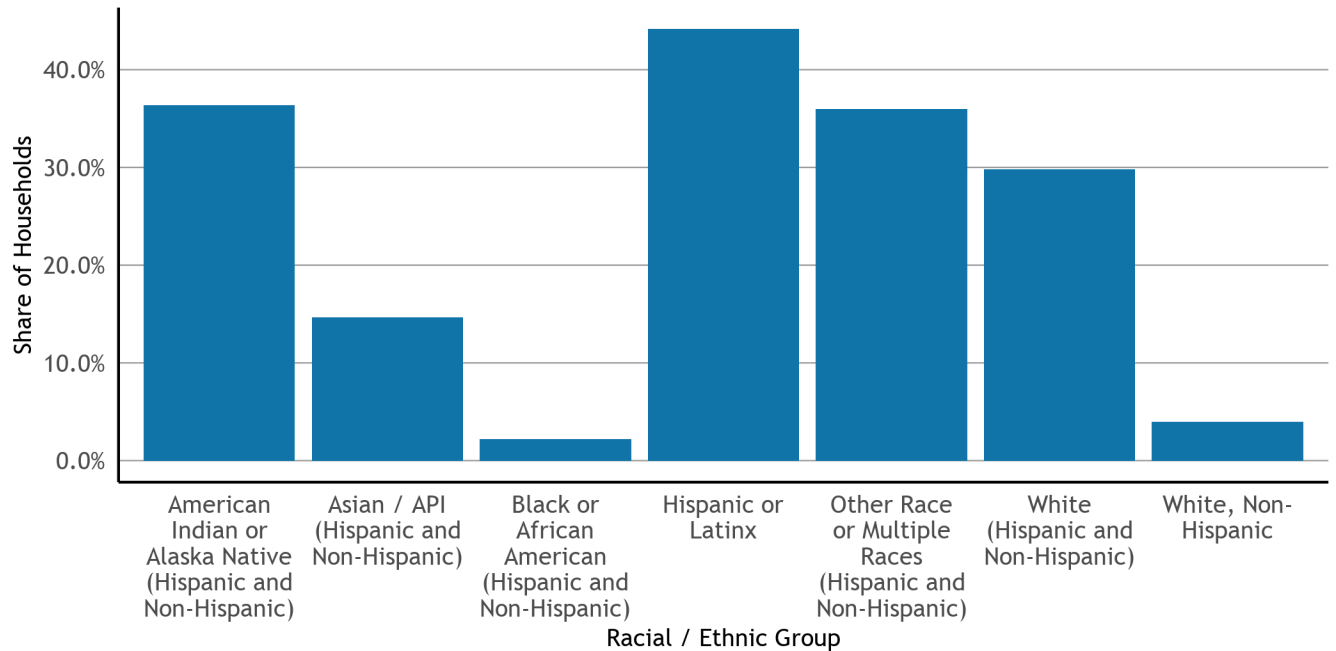


Figure 34: Overcrowding by Race

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 who rent could end up living in overcrowded conditions. In East Palo Alto, for large households with 5 or more persons, most units (63.3%) are renter occupied (see Figure 35). In 2017, 48.3% of large households were very low-income, earning less than 50% of the area median income (AMI).

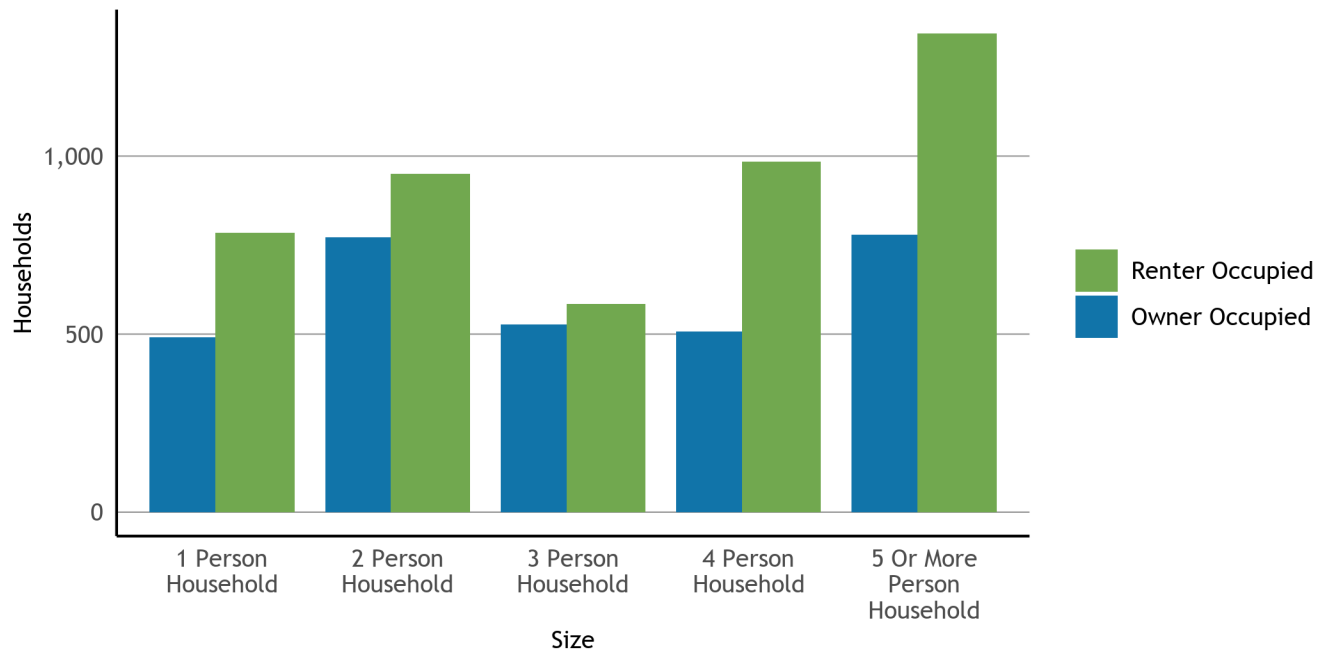


Figure 35: Household Size by Tenure

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.

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 3 or more bedrooms, of which there are 3,678 units in East Palo Alto. Among these large units with 3 or more bedrooms, 32.3% are owner-occupied and 67.7% are renter occupied (see Figure 36).

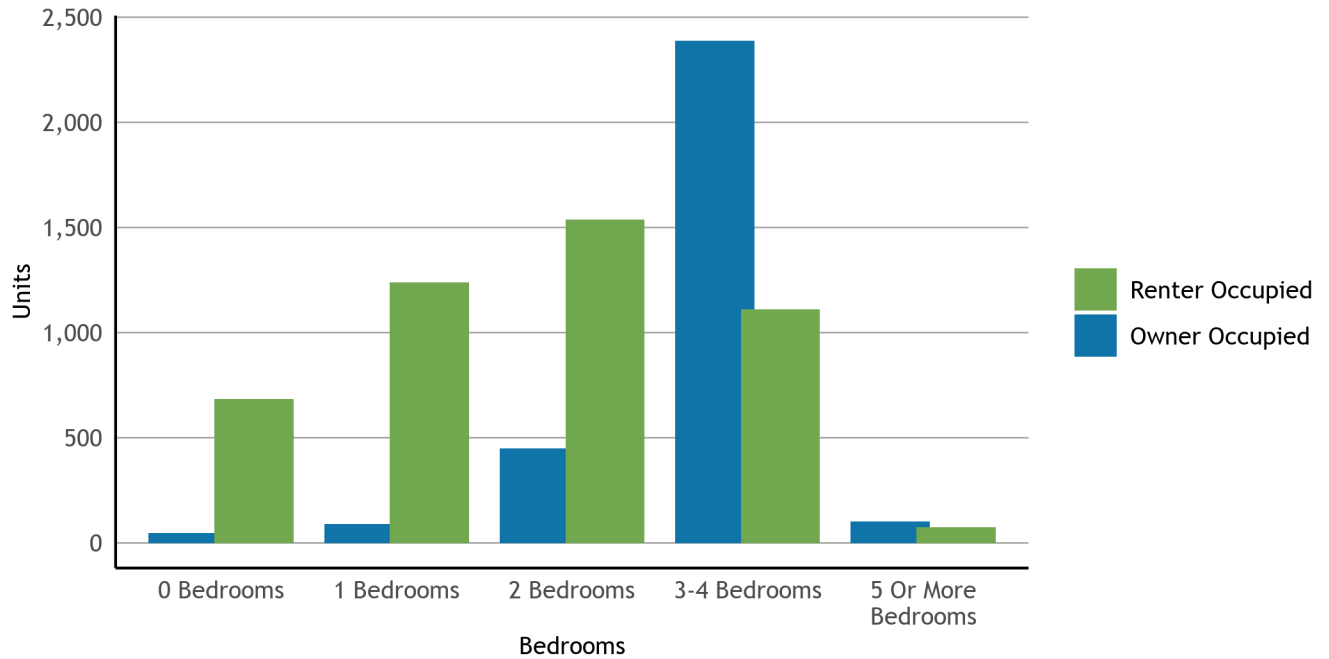


Figure 36: Housing Units by Number of Bedrooms

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.

6.2 Female-Headed Households

Households headed by one person are often at greater risk of housing insecurity, particularly female-headed households, who may be supporting children or a family with only one income. In East Palo Alto, the largest proportion of households is *Married-couple Family Households* at 48.1% of total, while *Female-Headed Households* make up 20.6% of all households.

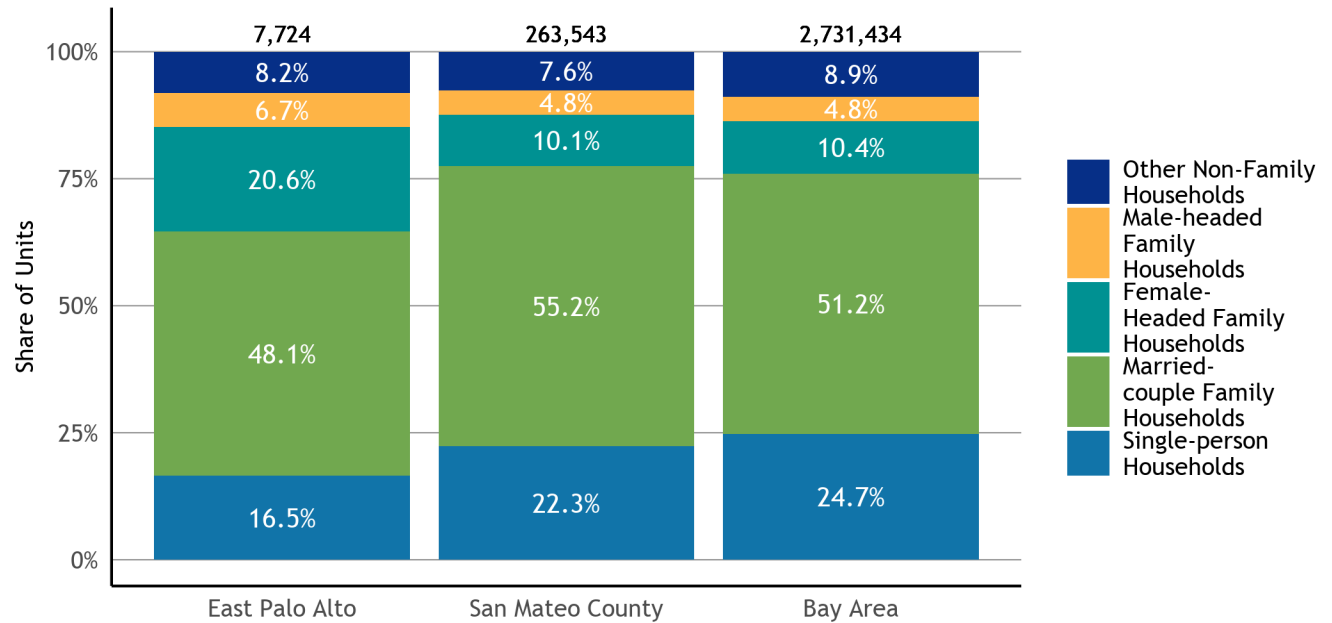


Figure 37: Household Type

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 particular housing challenges, with pervasive gender inequality resulting in lower wages for women. Moreover, the added need for childcare can make finding a home that is affordable more challenging.

In East Palo Alto, 30.9% of female-headed households with children fall below the Federal Poverty Line, while 1.0% of female-headed households *without* children live in poverty (see Figure 38).

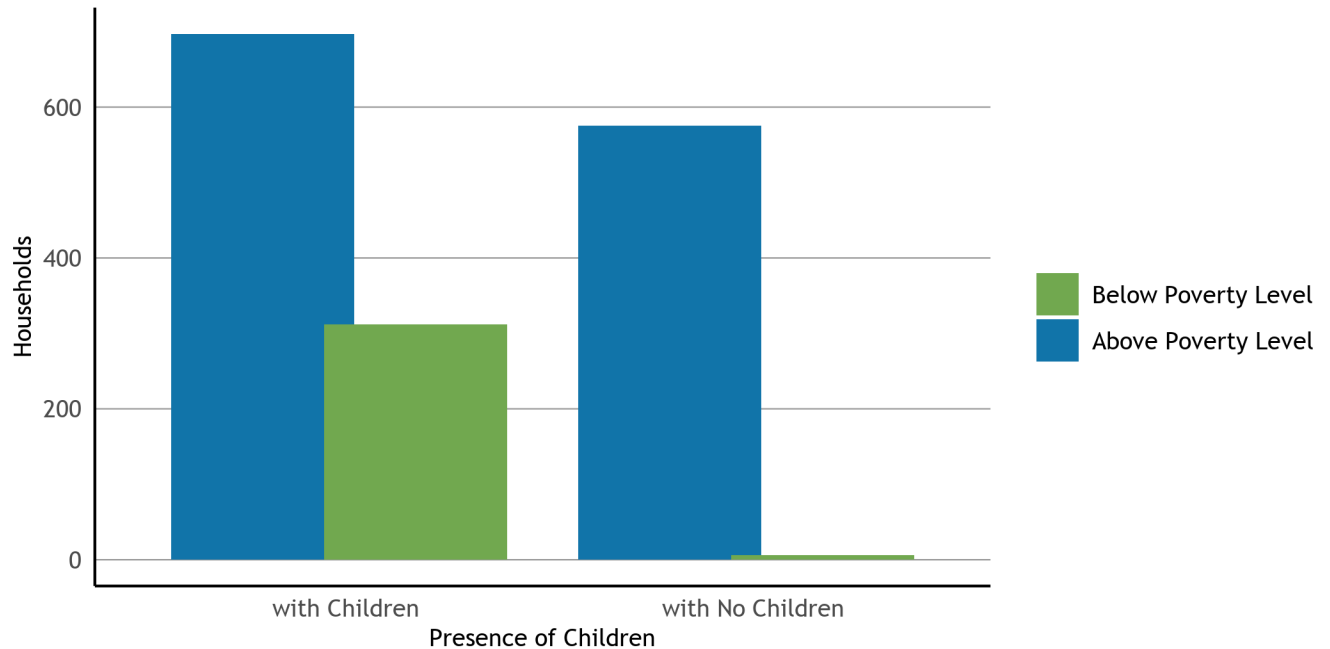


Figure 38: Female-Headed Households by Poverty Status

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.

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/or reduced mobility.

Seniors who rent may be at even greater risk for housing challenges than those who own, due to income differences between these groups. The largest proportion of senior households who rent make 0%-30% of AMI, while the largest proportion of senior households who are homeowners falls in the income group 0%-30% of AMI (see Figure 39).

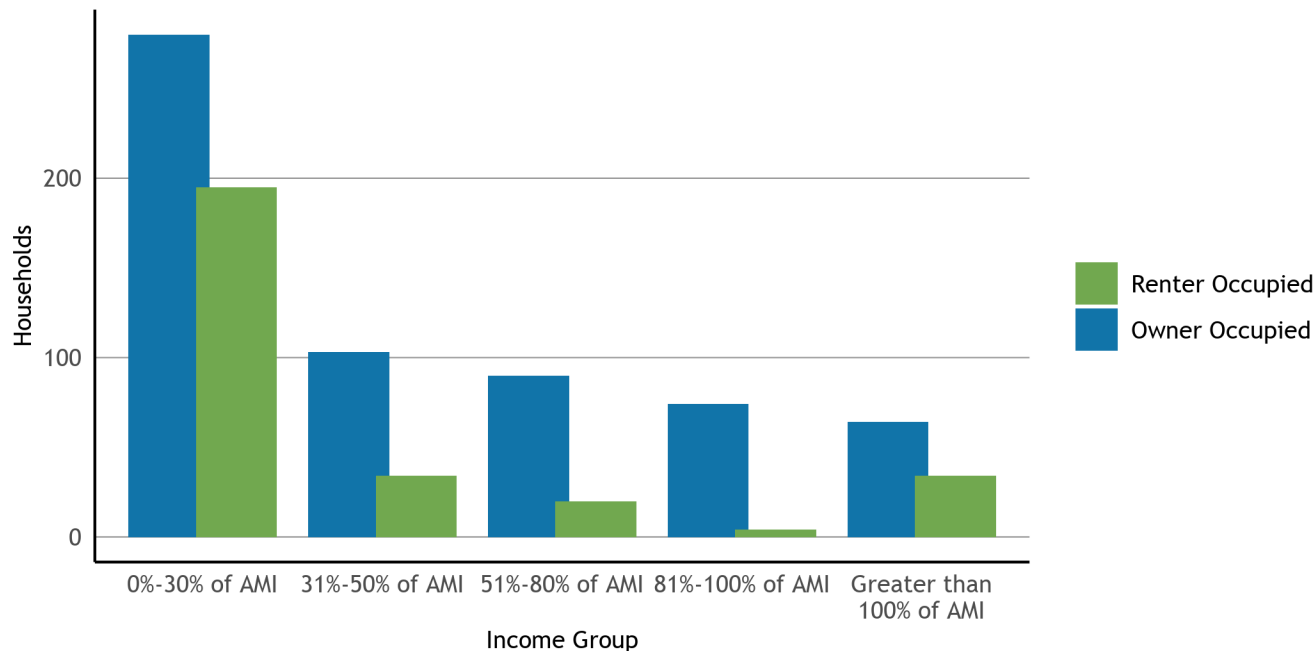


Figure 39: Senior Households by Income and Tenure

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.

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 are in need of 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, the need typically outweighs what is available, 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 40 shows the rates at which different disabilities are present among residents of East Palo Alto. Overall, 6.4% of people in East Palo Alto have a disability of any kind.⁶⁹

⁶⁹ 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.

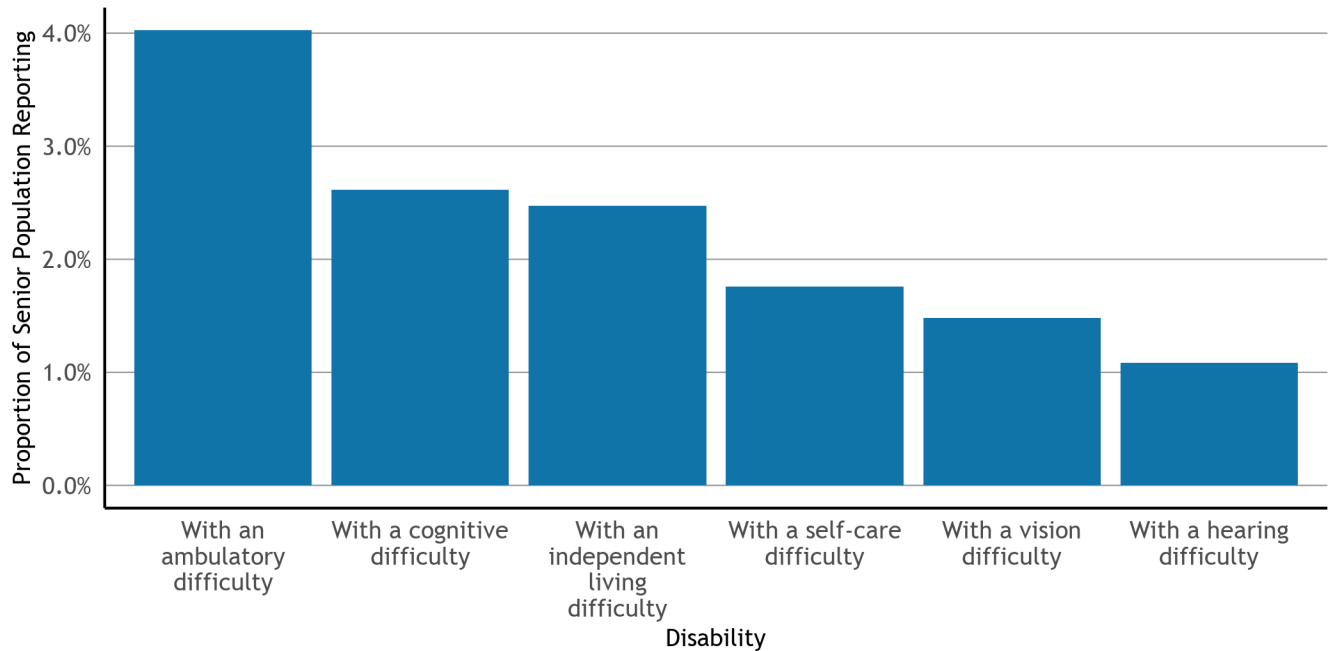


Figure 40: Disability by Type

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.

State law also requires Housing Elements to examine the housing needs of people with developmental disabilities. Developmental disabilities are defined as severe, chronic, and attributed to a mental or physical impairment that begins before a person turns 18 years old. This can include Down’s Syndrome, autism, epilepsy, cerebral palsy, and mild to severe mental retardation. Some people with developmental disabilities are unable to work, rely on Supplemental Security Income, and live with family members. In addition to their specific housing needs, they are at increased risk of housing insecurity after an aging parent or family member is no longer able to care for them.⁷⁰

In East Palo Alto, of the population with a developmental disability, children under the age of 18 make up 50.0%, while adults account for 50.0%.

⁷⁰ For more information or data on developmental disabilities in your jurisdiction, contact the Golden Gate Regional Center for Marin, San Francisco and San Mateo Counties; the North Bay Regional Center for Napa, Solano and Sonoma Counties; the Regional Center for the East Bay for Alameda and Contra Costa Counties; or the San Andreas Regional Center for Santa Clara County.

Table 5: Population with Developmental Disabilities by Age

Age Group	value
Age 18+	93
Age Under 18	93

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 crosswalked 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.

The most common living arrangement for individuals with disabilities in East Palo Alto is the home of parent /family /guardian.

Table 6: Population with Developmental Disabilities by Residence

Residence Type	value
Home of Parent /Family /Guardian	173
Independent /Supported Living	13
Other	0
Foster /Family Home	0
Intermediate Care Facility	0
Community Care Facility	0

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 crosswalked 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.

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. 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 41).

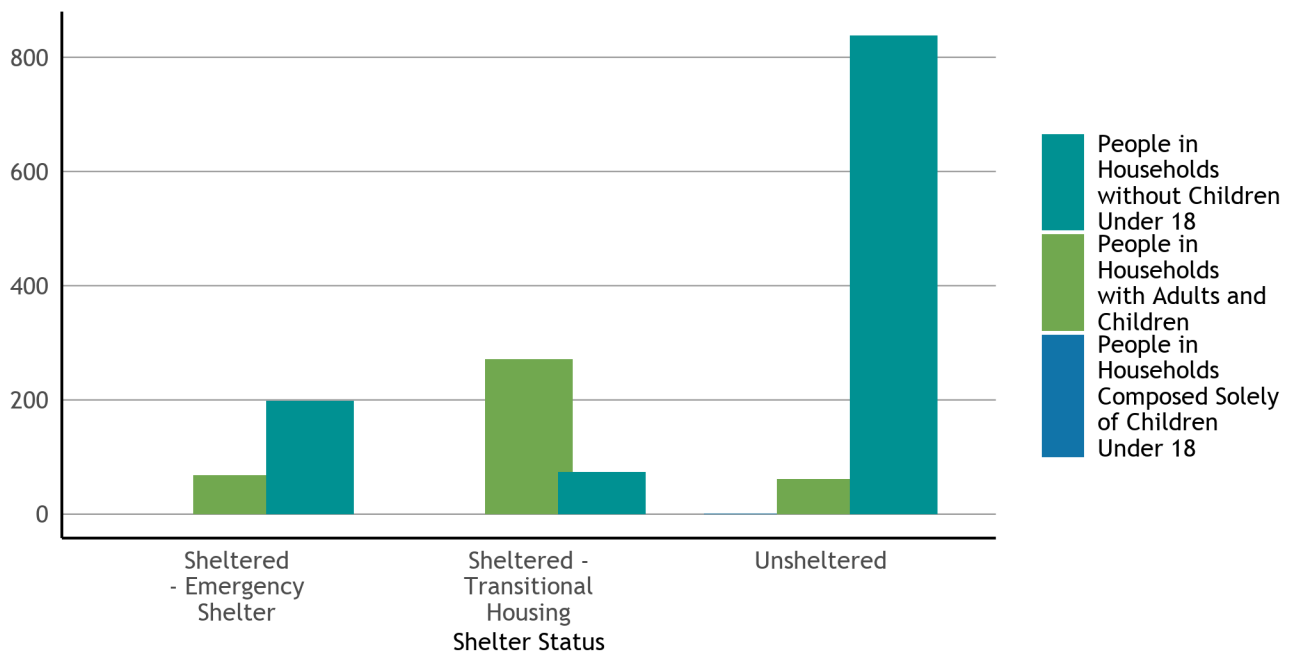


Figure 41: Homelessness by Household Type and Shelter Status, San Mateo County

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 HOMELS-01.

People of color are more likely to experience poverty and financial instability as a result of federal and local housing policies that have historically excluded them from the same opportunities extended to White residents. Consequently, people of color are often disproportionately impacted by homelessness, particularly Black residents of the Bay Area. In San Mateo County, White (Hispanic and Non-Hispanic) residents represent the largest proportion of residents experiencing homelessness and account for 66.6% of the homeless population, while making up 50.6% of the overall population (see Figure 42).

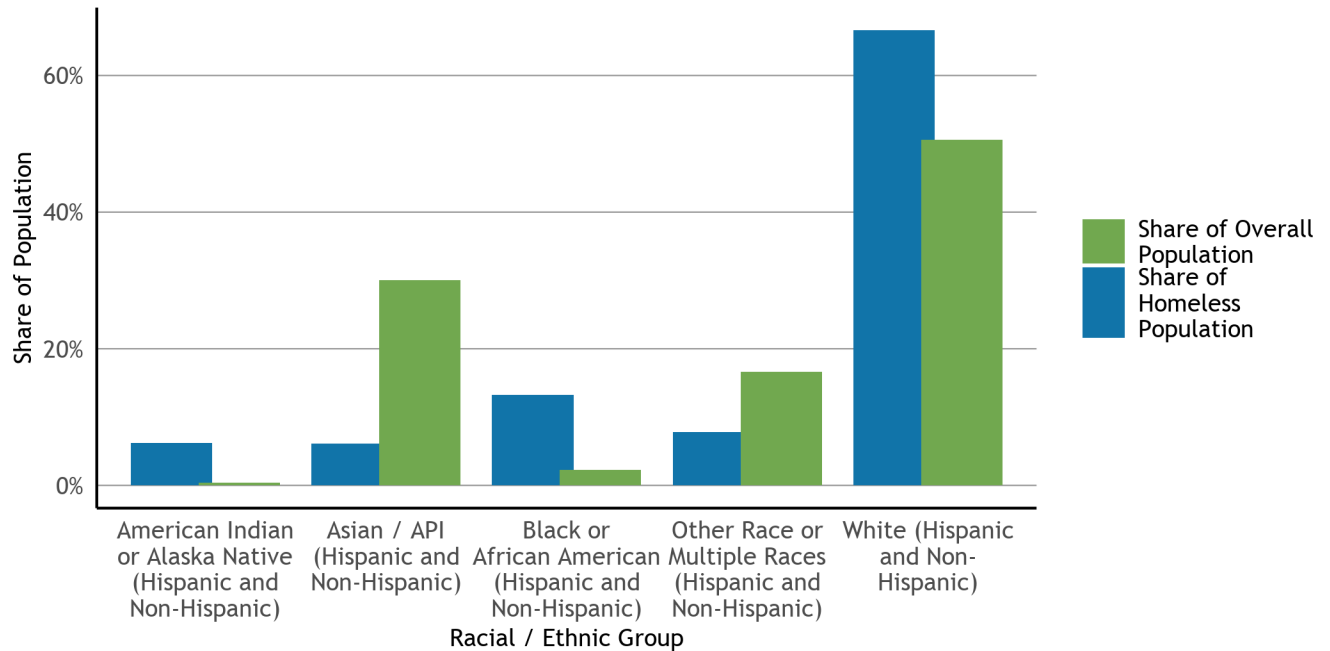


Figure 42: Racial Group Share of General and Homeless Populations, San Mateo County

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 HOMELS-02.

In San Mateo, Latinx residents represent 38.1% of the population experiencing homelessness, while Latinx residents comprise 24.7% of the general population (see Figure 43).

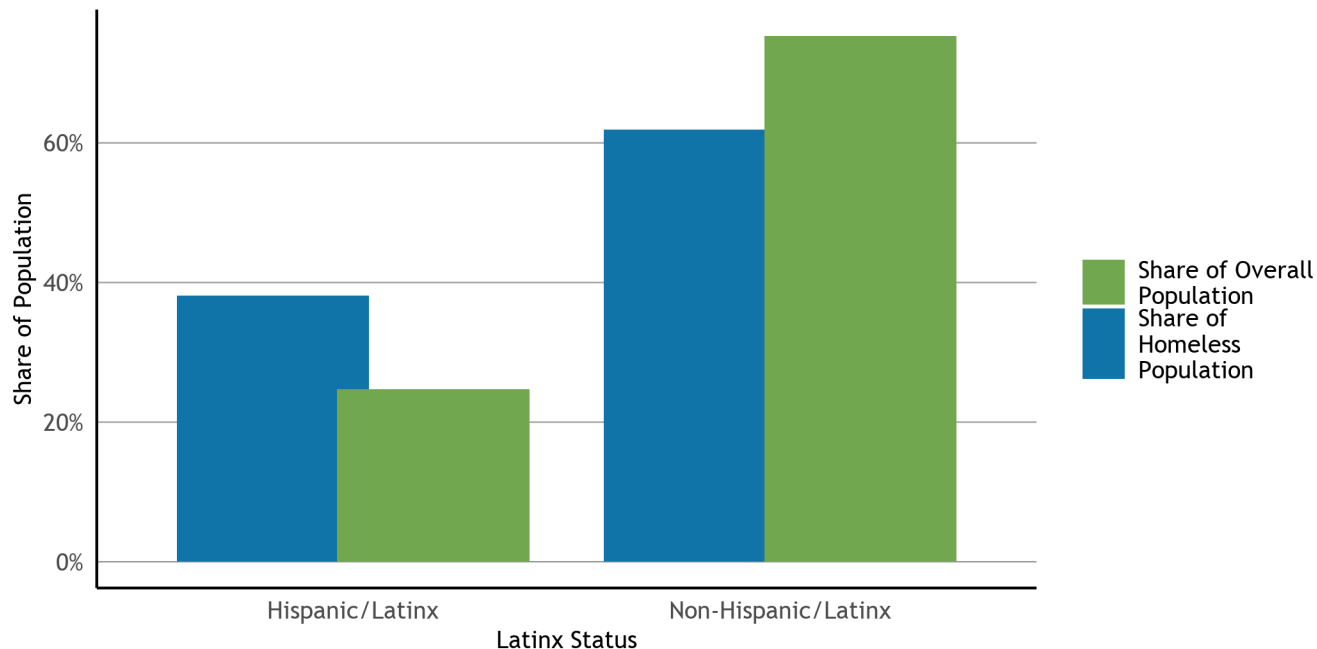


Figure 43: Latinx Share of General and Homeless Populations, San Mateo County

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 HOMELS-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 12). Of those, some 62.0% are unsheltered, further adding to the challenge of handling the issue.

Note on Homelessness Data

Notably all the data on homelessness provided above is for the entire county. This data comes from the Department of Housing and Urban Development’s (HUD) Point in Time count, which is the most comprehensive publicly available data source on people experiencing homelessness. HUD only provides this data at the county-level and not for specific jurisdictions. However, Housing Element law requires local jurisdictions to estimate or count of the daily average number of people lacking shelter. Therefore, staff will need to supplement the data in this document with additional local data on the number of people experiencing homelessness. If staff do not have estimates of people experiencing homelessness in their jurisdiction readily available, HCD recommends contacting local service providers such as continuum-of-care providers, local homeless shelter and service providers, food

programs, operators of transitional housing programs, local drug and alcohol program service providers, and county mental health and social service departments.⁷¹

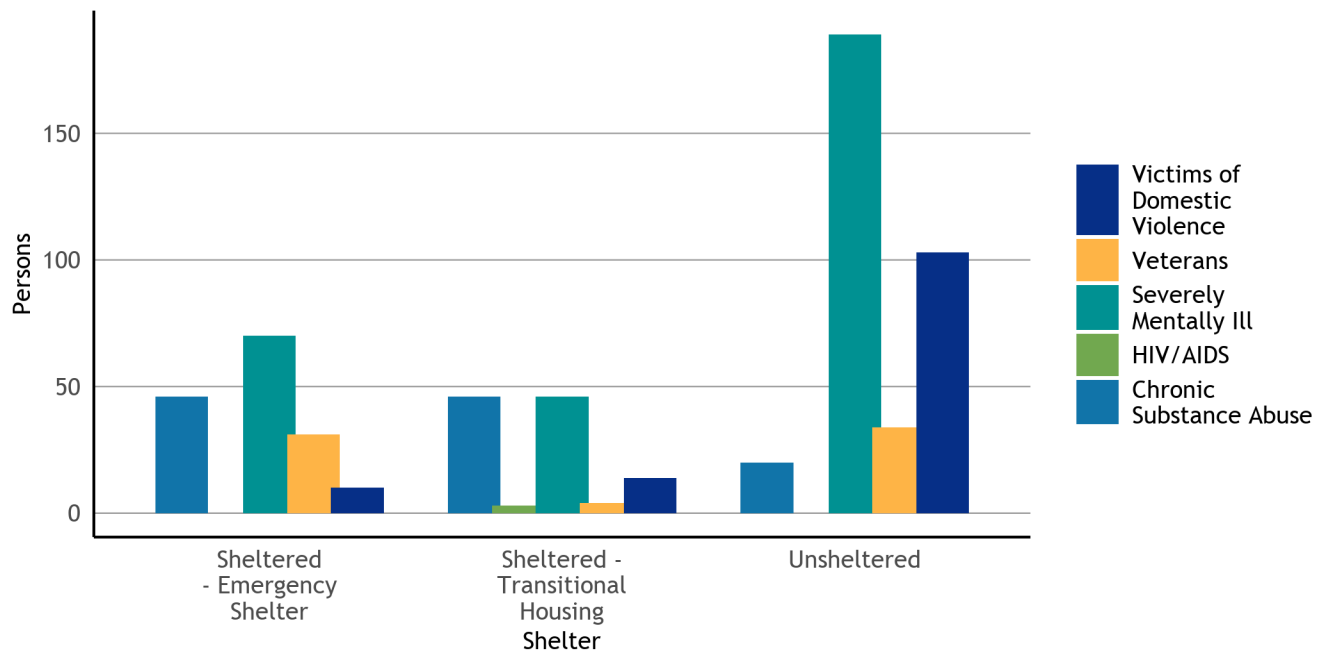


Figure 44: Characteristics for the Population Experiencing Homelessness, San Mateo County

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.

In East Palo Alto, the student population experiencing homelessness totaled 524 during the 2019-20 school year and decreased by 31.7% since the 2016-17 school year. By comparison, San Mateo County has seen a 37.5% decrease in the population of students experiencing homelessness since the 2016-17 school year, and the Bay Area population of students experiencing homelessness decreased by 8.5%. During the 2019-2020 school year, there were still some 13,718 students experiencing homelessness throughout the region, adding undue burdens on learning and thriving, with the potential for longer term negative effects.

The number of students in East Palo Alto experiencing homelessness in 2019 represents 43.9% of the San Mateo County total and 3.8% of the Bay Area total.

⁷¹ For more information, see HCD's Building Blocks webpage for People Experiencing Homelessness: <https://www.hcd.ca.gov/community-development/building-blocks/housing-needs/people-experiencing-homelessness.shtml>

Table 7: Students in Local Public Schools Experiencing Homelessness

Academic Year	East Palo Alto	San Mateo County	Bay Area
2016-17	767	1910	14990
2017-18	441	1337	15142
2018-19	946	1934	15427
2019-20	524	1194	13718

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.

6.6 Farmworkers

Across the state, housing for farmworkers has been recognized as an important and unique concern. Farmworkers generally receive wages that are considerably lower than other jobs and may have temporary housing needs. Finding decent and affordable housing can be challenging, particularly in the current housing market.

In East Palo Alto, 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 8: Migrant Worker Student Population

Academic Year	East Palo Alto	San Mateo County	Bay Area
2016-17	58	657	4630
2017-18	0	418	4607
2018-19	0	307	4075

Academic Year	East Palo Alto	San Mateo County	Bay Area
2019-20	0	282	3976

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)

This table is included in the Data Packet Workbook as 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 decreased, totaling 343 in 2017 (see Figure 45).

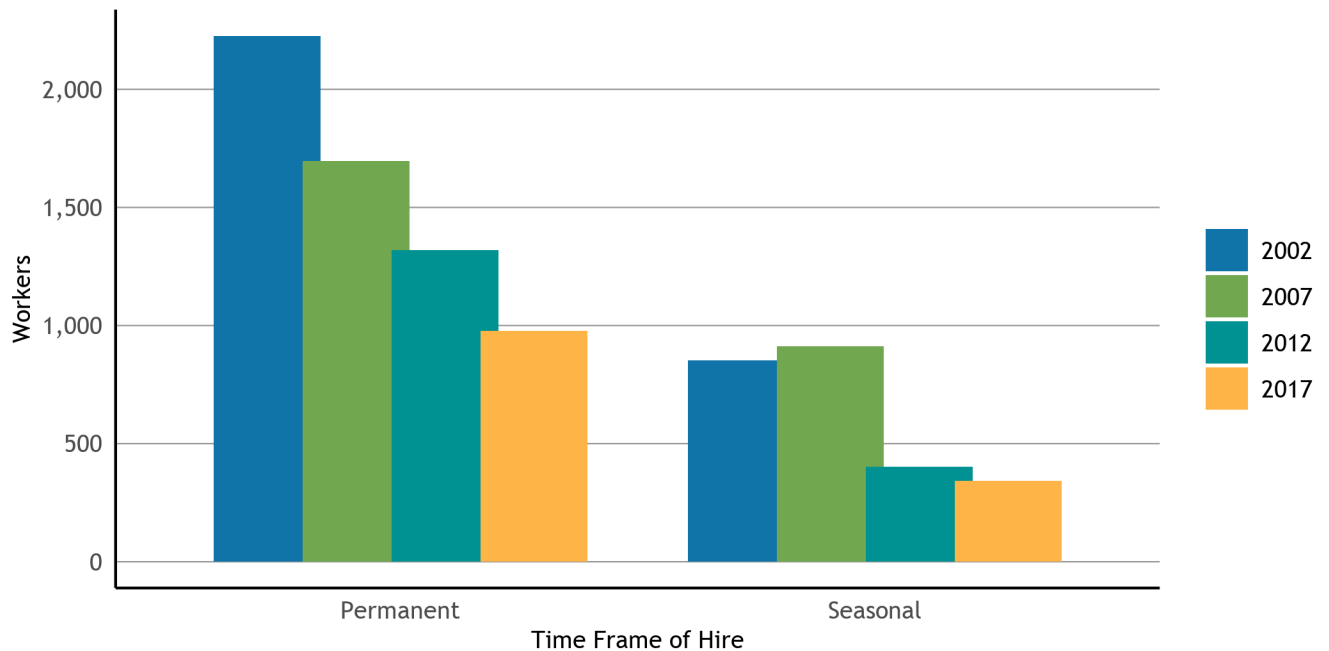


Figure 45: Farm Operations and Farm Labor by County, San Mateo County

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 United States, which means that many languages are spoken throughout the Bay Area. Since learning a new language is universally challenging, it is not uncommon for residents who have immigrated to the United States to have limited English proficiency. This limit can lead to additional disparities if there is a disruption in housing, such as an eviction, because residents might not be aware of their rights or they might be

way to engage due to immigration status concerns. In East Palo Alto, 13.8% of residents 5 years and older identify as speaking English not well or not at all, which is above the proportion for San Mateo County. Throughout the region the proportion of residents 5 years and older with limited English proficiency is 8%.

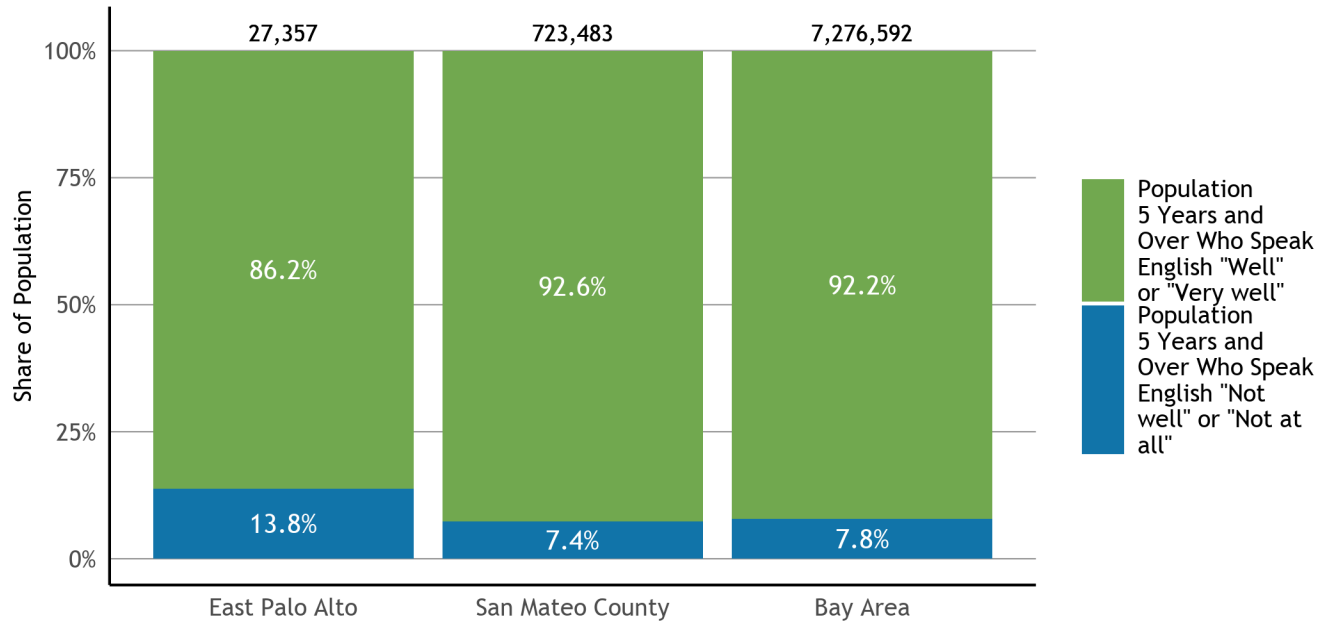


Figure 46: Population with Limited English Proficiency

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.

APPENDIX B2 SAN MATEO COUNTY HOUSING NEEDS DATA

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INTRODUCTION



People

- By 2026, one out of five residents will be 65 or over
- San Mateo County's population is becoming more diverse



Housing

- The number of households will continue to grow
- Housing prices and rents will continue to increase



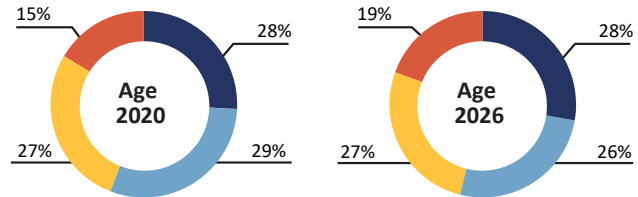
Jobs

- The number of jobs will continue to grow
- Although the median income is high, many jobs pay low wages

PEOPLE

By 2026, one out of five residents will be 65 or over

■ Under 25 ■ 25-44 ■ 45-64 ■ 65+



San Mateo County makes up 10 percent of the total Bay Area population, which is the fifth largest metropolitan area in the country. The number of people living here has steadily grown over the past few decades. **In 2020, our population was estimated to be 773,244, an increase of 19 percent since 1990.**¹ That trend is expected to continue—despite the impact of the pandemic—because jobs continue to be added.

People are also living longer, with those 65 and over expected to make up nearly 20 percent of the population by 2026. Equally important is the fact that Millennials recently surpassed the Baby Boomers as our largest generation. As Millennials enter their 40s, they will continue to shape countywide housing needs. By 2026, people 25-44 and 45-64 will make up more than 50 percent of the population.²

What does this mean for housing needs?

Both seniors and Millennials have shown a preference



for more walkable, mixed-use neighborhoods that are close to work, schools, parks, and amenities. The majority of seniors prefer to stay in their homes and communities, known as *aging-in-place*. Yet many live on fixed incomes and may have mobility issues as they age, which require supportive services.

Simultaneously, Millennials are less likely to own homes and have less savings than previous generations; they are more likely to live alone and delay marriage; and as they start families, may be in greater need of support when purchasing their first home. Coupled with increasing housing prices, it is more difficult for younger generations to rent or purchase a home than it was for current residents.

We must address how to support our seniors as they get older so they can stay in their homes and communities, and make sure young people, new families, and our workers can find housing they can afford that meets their needs.

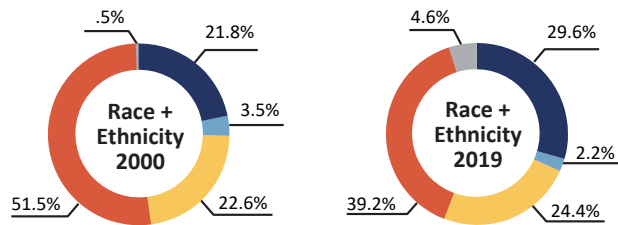


¹ U.S. Census, American Community Survey
² Clarittas Population Facts 2021

Our population is becoming more diverse

■ Asian ■ Latinx ■ Other*
■ Black ■ White

*Due to small percentage, Other is grouped as American Indian, Alaska Native, "Other" or Multiple Races



San Mateo County is a very diverse place to live, even when compared to the State of California. Countywide, more than one-third of the population is foreign-born and almost half speaks a language other than English at home. By contrast, a quarter of all Californians are foreign-born and less than a quarter speak a language other than English at home. Over 120 identified languages are spoken in San Mateo County, with top languages including Spanish (17 percent), Chinese (8 percent) and Tagalog (6 percent).

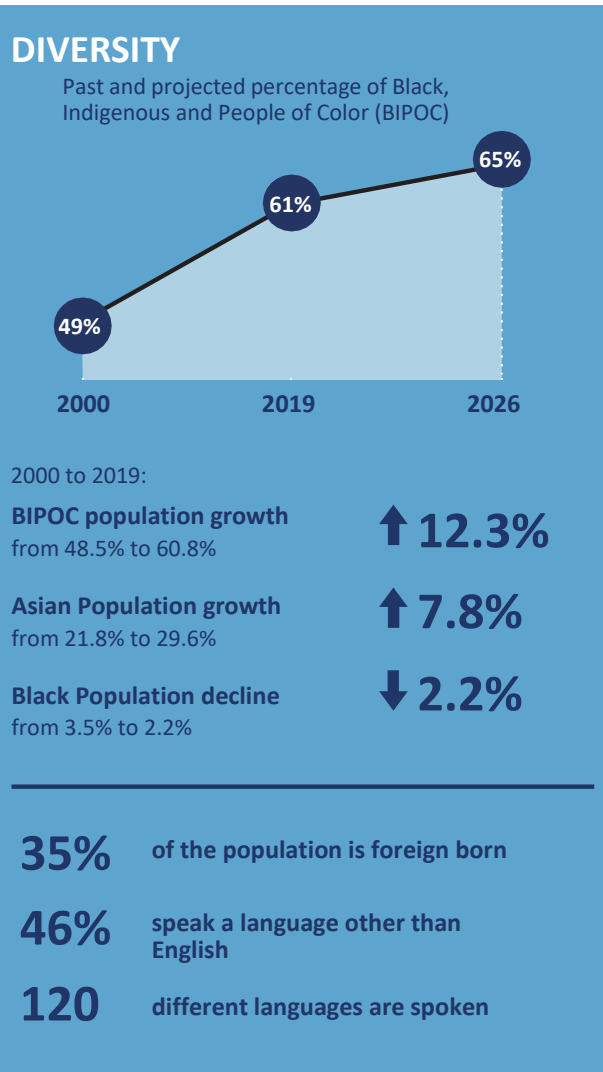
Our population has become increasingly more diverse over time. **In 2000, more than half of people identified as White, which fell to 39 percent in 2019, and is expected to decrease further to 35 percent by 2026.** However, while the Asian and Latinx populations increased during that time, but the Black population decreased by almost half, from 3.5 to 2.2 percent.¹

What does this mean for housing needs?

When planning for housing, we need to consider a variety of housing needs—like larger homes for multi-generational families or those with more children—and how to create opportunities for everyone to access quality, affordable housing near schools, transit, jobs, and services.

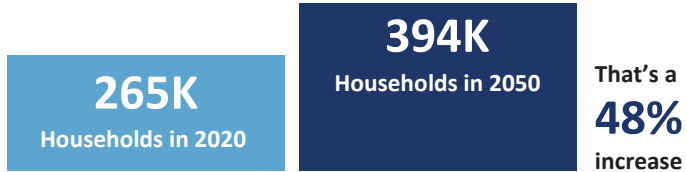
Past exclusionary practices have prevented people of color from purchasing homes, living in certain neighborhoods, and building wealth over time. As a result, they are more likely to experience poverty, housing insecurity, displacement, and homelessness. And while many of our communities are very diverse, we are still contending with segregation and a lack of equitable opportunities. To help prevent displacement due to gentrification and to create a future where it is possible for everyone to find the housing they need, it will be important to plan for a variety of housing types and affordability options in all neighborhoods.

¹ U.S. Census, American Community Survey



HOUSEHOLDS + HOUSING

The number of households will continue to grow



Over the past 30 years, new home construction has not kept up with the number of jobs added to the economy. This has led to a housing shortage.

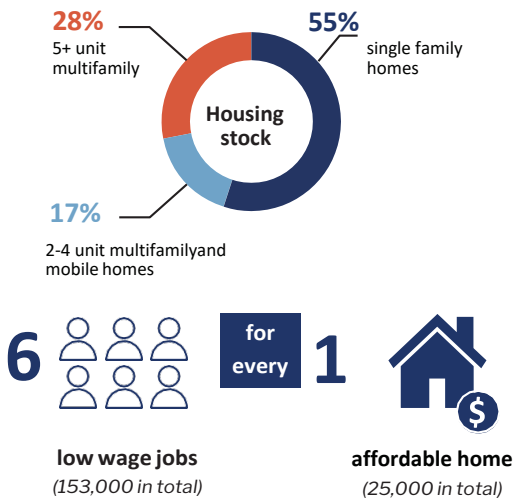
In 2020, there were 265,000 households in San Mateo County. By 2050 we expect that to increase by almost 50 percent, to 394,000.¹ This growing demand will continue to put pressure on home prices and rents. Given that nearly 75 percent of our housing was built before 1980, there will also be a need to upgrade older homes. While upgrades will be essential to make sure housing is of high quality and safe to residents, redevelopment or repair can sometimes result in a loss of affordable housing, especially in older multifamily or apartment buildings.

For every six low-wage jobs (\$20/hour) there is one home in the county that is affordable to such a worker (monthly rent of \$1,500).²

What does this mean for housing needs?

Along with planning for more housing, we also need to consider how to best support the development of low and moderate income housing options while preserving existing affordable homes. This includes transitional and supportive housing options for the unhoused and universal design to meet accessibility and mobility needs.

Although the majority of housing produced in the past few decades has been single-family homes or larger multifamily buildings, some households have become increasingly interested in “missing middle” housing—smaller homes that include duplexes, triplexes, townhomes, cottage clusters, garden apartments, and accessory dwelling units (ADUs). These smaller homes may provide more options to a diversity of community members across income, age, and household size.



68%
of households are families



76%
of existing housing was built before 1980



17%
of households spend half or more of their income on housing



5,264
existing affordable units are at risk of being converted to market rate

¹ Plan Bay Area 2050 [Projected Growth Pattern](#), U.S. Census, American Community Survey
² Association of Bay Area Governments [Jobs Housing Fit](#)

Housing rent and prices continue to increase

2009 to 2020

\$1.56K

\$2.2K
per month

Median rent increased 41%

\$675K

\$1.4M

Home values more than doubled

The Bay Area is a great place to live, but throughout the region and county there just isn't enough housing for all income levels, which has caused costs to go up. Home prices and rents have been steadily increasing the past two decades, but in recent years the jump has been dramatic. **Since 2009, median rent increased 41 percent to \$2,200, and median home values have more than doubled to \$1,445,000.**¹

Overall, many residents are paying too much for housing, while many others have been priced out entirely. If a household spends more than 30 percent of its monthly income on housing, it is considered *cost-burdened*. If it spends more than 50 percent, it is considered *severely cost-burdened*. Renters are usually more cost-burdened than homeowners. While home prices have increased dramatically, homeowners often benefit from mortgages at fixed rates, whereas renters are subject to ups and downs of the market.

In San Mateo County, 17 percent of households spend half or more of their income on housing, while 19 percent spend between a one-third to half. However, these rates vary greatly across income and race. Of those who are *extremely low income*—making 30 percent or less of the area median income (AMI)—88 percent spend more than half of their income on housing. Latino renters and Black homeowners are disproportionately cost burdened and severely cost-

burdened. Given that people in this situation have a small amount of income to start with, spending more than half what they make on housing leaves them with very little to meet other costs, such as food and healthcare. Very low-income households paying more than 50 percent of their income on rent are often at a greater risk of homelessness.²

As a result, more people are living in overcrowded or unsafe living conditions. They are also making the

tough choice to move further away and commute long distances to work or school, which has created more traffic. Since low income residents and communities of color are the most cost burdened, they are at the highest risk for eviction, displacement, and homelessness.

What does this mean for housing needs?

Although there are complex supply, demand, and economic factors impacting costs, not having enough housing across all incomes has meant rent and prices are just higher. Programs and policies that can support more housing across all income levels, particularly very low, low, and moderate income, are essential, as are more safe, affordable housing options to address homelessness.

¹ San Mateo County Association of Realtors, Zillow
² U.S. Census, American Community Survey

RENTER SNAPSHOT



54% are under 44 years old

76% are people of color and at a higher risk of being displaced



1 in 3 renters...

spend **50%** of income on rent

live in overcrowded households –

89% of these renters are BIPOC

Latinx are the most cost burdened

31% spend more than half and

18% spend a third to half of their income on rent

JOBS

The number of jobs will continue to grow



The Bay Area and San Mateo County have had very strong economies for decades. While some communities have more jobs and some have less, we have all been impacted by the imbalance of job growth and housing.

Since 2010, we have added over 100,000 jobs but only 10,000 homes.¹ At the same time, our population is growing naturally, meaning more people are living longer while our children are growing up and moving out into homes of their own. All of this impacts housing demand and contributes to the rising cost of homes. We need more housing to create a better balance.

In 2020, there were 416,700 jobs, and by 2050 we expect that to increase 22 percent to 507,000.² While some jobs pay very well, wages for many others haven't kept up with how costly it is to live here.

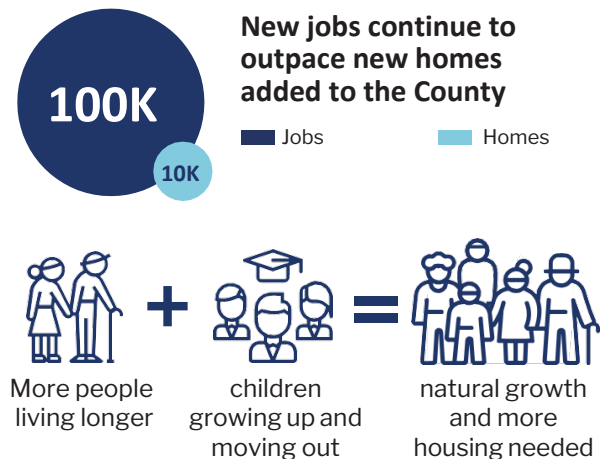


What does this mean for housing needs?

As we plan for housing, we need to consider the needs of our workforce—folks who are a part of our communities but often end their day by commuting long distances to a place they can afford. Many have been displaced in recent decades or years, as housing rent and prices soared along with a job-generating economy. The lack of workforce housing affects us all, with teachers, fire fighters, health care professionals, food service providers, and many essential workers being excluded from the communities they contribute to every day. The long-term sustainability of our communities depends on our ability to create more affordable and equitable housing options.

NEW JOBS TO NEW HOUSING

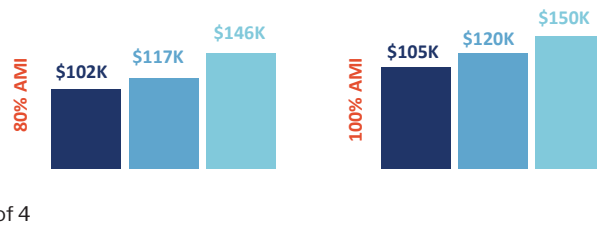
2010 - 2020



¹ U.S. Census American Community Survey, State of CA Employment Development Dept (EDD)
² Plan Bay Area 2050 [Projected Growth Pattern](#)

Our median income is high, but the wage gap continues to grow

2021 Household Income:



■ Household of 1 ■ Household of 2 ■ Household of 4

To be considered low or moderate income in the Bay Area means a very different thing than in most parts of the country. The *income or wage gap*—the difference between the highest and lowest wages—is large in our region. Affordable housing here can mean that your favorite hairstylist, your child’s principal, or the friendly medical assistant at your doctor’s office can qualify for—and often needs—below market rate or subsidized affordable housing so they can live close to their work.

The starting point for this calculation is the *Area Median Income (AMI)*—the middle spot between the lowest and highest incomes earned in San Mateo County. Simply put, half of households make more, and half of households make less. Moderate income is 80 to 120 percent of the AMI, low income is 50 to 80 percent AMI, and very low income is 30 to 50 percent AMI. Below 30 percent AMI is considered extremely low income. The rule of thumb is households should expect to pay about a third of their income on housing.

In San Mateo County, the AMI is \$104,700 for a single person, \$119,700 for a household of two and \$149,600 for a family of four. When we talk about affordable housing, we mean housing that is moderately priced for low or moderate income residents so that new families and the workforce can live in our communities. Affordable housing programs are generally for those who earn 80 percent or below the AMI, which is \$102,450 for a single person, \$117,100 for a household of two, and \$146,350 a year for a household of four.¹

What does this mean for housing needs?

Given the price of land in San Mateo County and what it costs to build new housing, creating affordable housing is extremely challenging—and often impossible without some form of subsidy. Sometimes this is in the form of donated land from a local government or school district. Sometimes this is in the form of incentives to

INCOME LEVELS + WAGES

Extremely Low Income 30% AMI	Grocery Store Clerk or Barista \$29K/Yr or \$15/Hr 83% of income spent on housing*
Very Low Income 50% AMI	Hair Stylist or Administrative Assistant \$38K/Yr or \$20/Hr 63% of income spent on housing*
Low Income 80% AMI	Medical Assistant or Preschool Teacher \$52K/Yr or \$27/Hr 46% of income spent on housing* School Administrator or Social Worker \$86K/Yr or \$45/Hr 28% of income spent on housing*

*income spent on housing based on 2k per month/studio or 1 bedroom

¹ State of CA Dept of Housing and Community Development (HCD)

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APPENDIX C: AFFIRMATIVELY FURTHERING FAIR HOUSING

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APPENDIX C1 AFFH DATA REPORT

SECTION I. Fair Housing Enforcement and Outreach Capacity

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

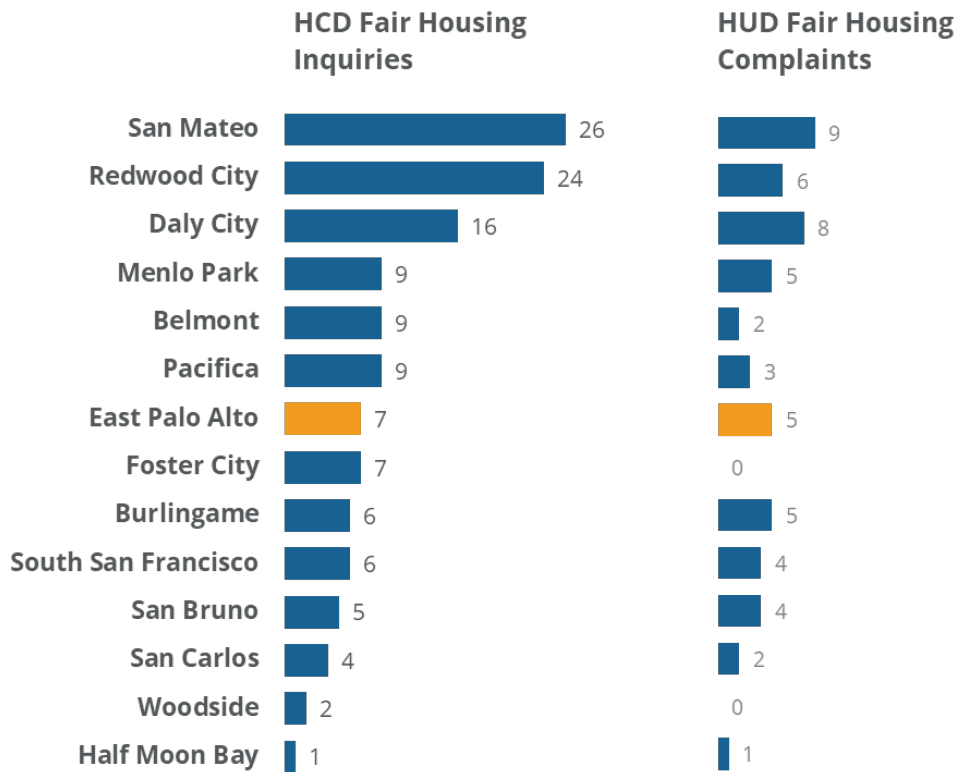
Source: Organization Websites

**Figure I-2.
Fair Housing
Complaints
Filed with HUD
by Basis, San
Mateo County,
2017-2021**

Source:
HUD.

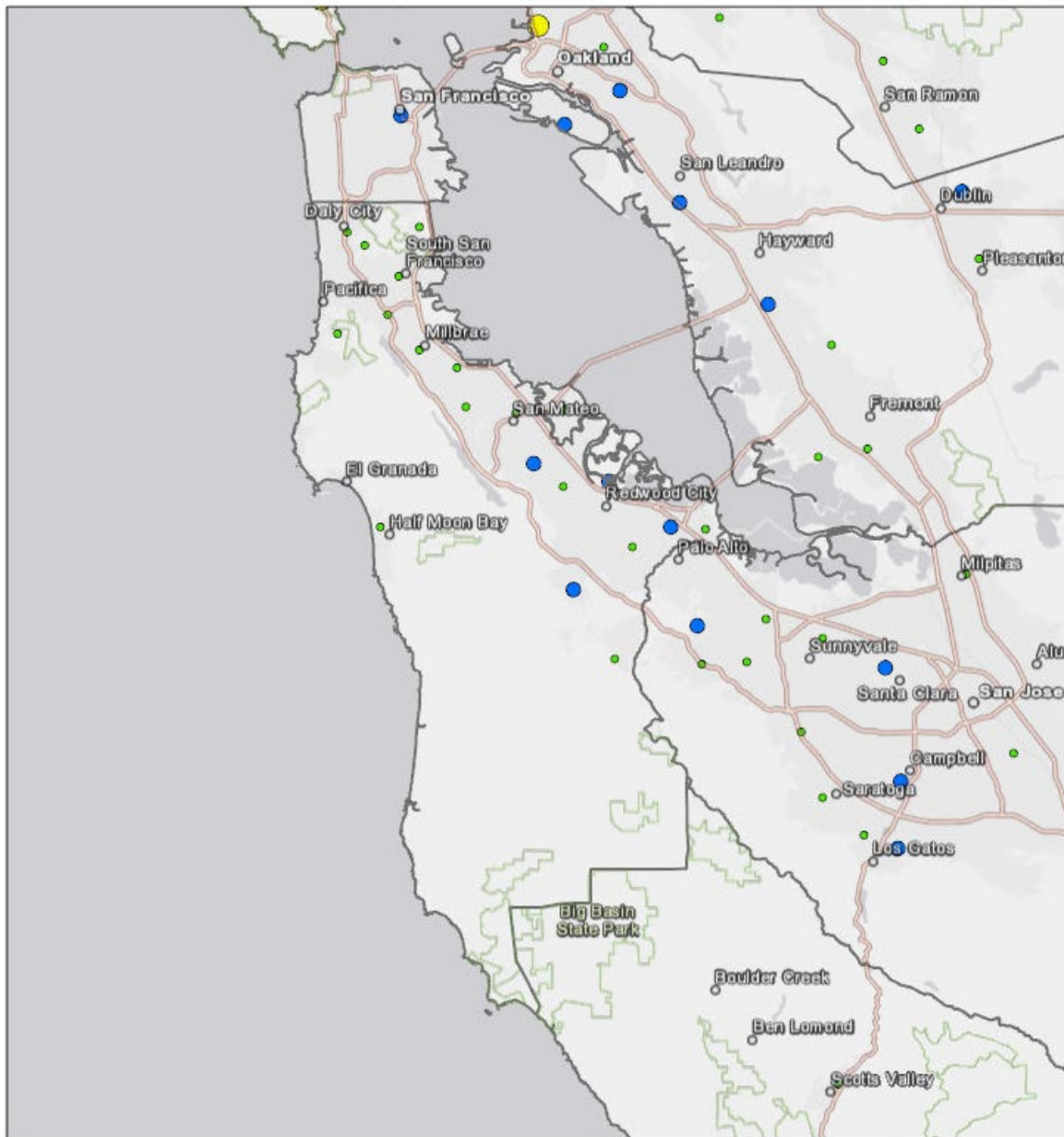
	2017	2018	2019	2020	2021	2017-2021 Total	
						Cases	% of Total
Disability	8	9	3	9	3	32	56%
Race	3	5	2	1		11	19%
Familial Status	4	3			1	8	14%
National Origin	2				1	3	5%
Religion		1		1		2	4%
Sex					1	1	2%
Total cases	17	18	5	11	6	57	100%

**Figure I-3.
HCD Fair Housing Inquiries (2013- 2021) and HUD Fair Housing Complaints (2017- 2021)**



Source: Organization Websites.

Figure I-4.
FHEO Inquiries by City to HUD, San Mateo County, 2013-2021

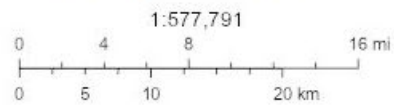


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County Boundaries

(R) FHEO Inquiries by City (HUD, 2013-2021)

- < .25 Inquiries
- < .5 Inquiries
- < 1 Inquiry



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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

CA HCD

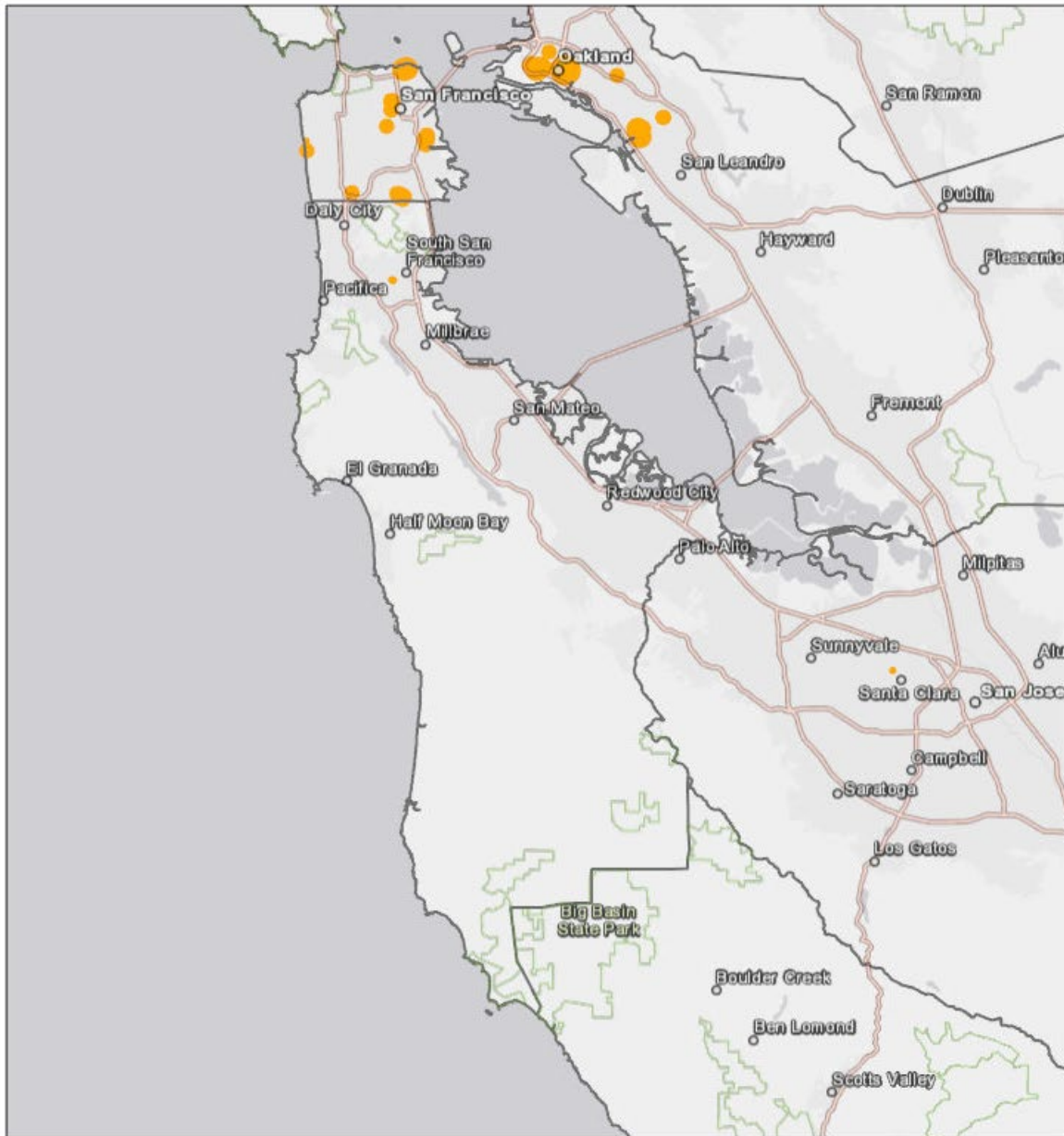
Source: California Department of Housing and Community Development AFFH Data Viewer

**Figure I-5.
HCD Fair Housing Inquiries by Bias, January 2013-March 2021**

Jurisdiction	Disability	Race	Familial Status	National Origin	Religion	Sex	Color	Total
Atherton	0	0	0	0	0	0	0	0
Belmont	2	0	1	0	0	0	0	9
Brisbane	0	0	0	0	0	0	0	0
Burlingame	3	0	2	0	0	0	0	6
Colma	0	0	0	0	0	0	0	0
Daly City	1	2	1	3	0	0	0	17
East Palo Alto	1	1	0	0	0	0	0	7
Foster City	4	0	0	0	0	0	0	7
Half Moon Bay	0	0	0	0	0	0	0	1
Hillsborough	0	0	0	0	0	0	0	0
Menlo Park	3	0	0	0	0	1	0	11
Millbrae	0	0	0	0	0	0	0	0
Pacifica	3	0	0	1	0	1	0	9
Portola Valley	0	0	0	0	0	0	0	0
Redwood City	5	1	1	1	0	1	0	24
San Bruno	0	0	0	0	0	0	0	5
San Carlos	1	0	1	0	0	0	0	4
San Mateo	4	2	2	2	0	0	0	27
South San Francisco	0	0	0	1	0	0	0	6
Woodside	0	0	0	0	0	0	0	2

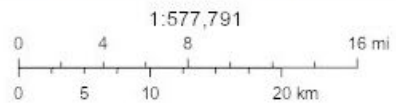
Source: California Department of Housing and Community Development AFFH Data Viewer

**Figure I-6.
Public Housing Buildings, San Mateo County**



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- County Boundaries
- 8 - 35 Units
- 36 - 89 Units
- ≤ 7 Units
- 90 - 160 Units

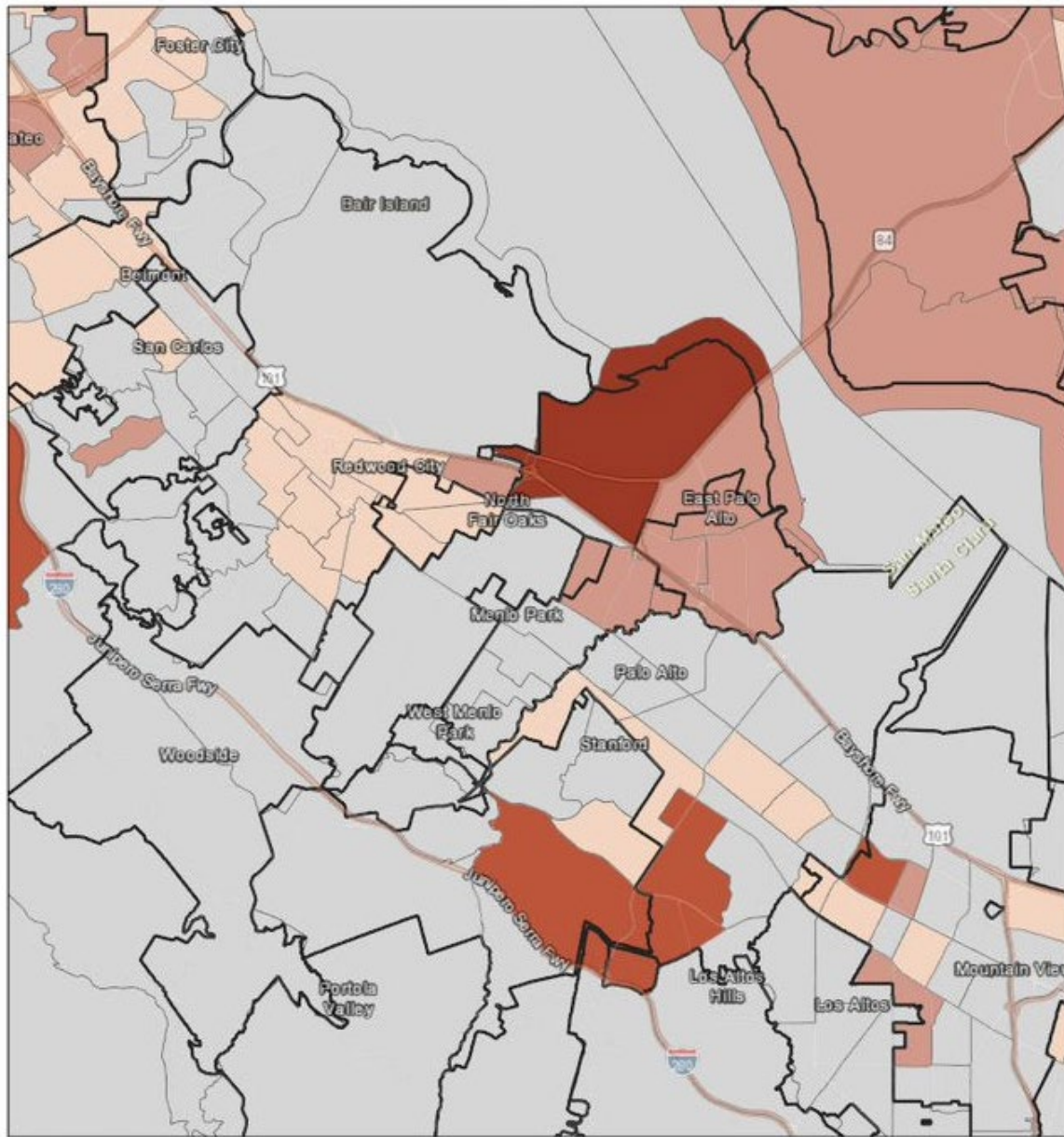


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CA HCD
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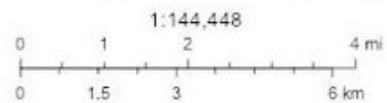
Source: California Department of Housing and Community Development AFFH Data Viewer

**Figure I-7.
Housing Choice Vouchers by Census Tract**



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- City/Town Boundaries
- > 5% – 15%
- (R) Housing Choice Vouchers - Tract
- > 15% – 30%
- No Data
- > 30% – 60%
- > 0 – 5%



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CA HCD
Redwood City, County of San Mateo, California, County of Santa Clara, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021,

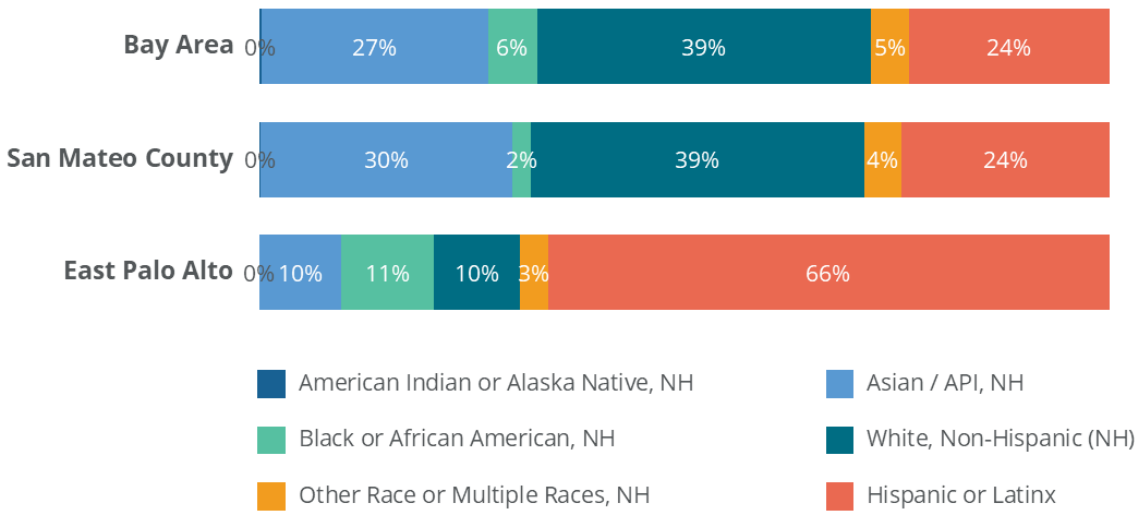
Source: California Department of Housing and Community Development AFFH Data Viewer

SECTION II. Integration and Segregation

Race and ethnicity.

Figure II-1.

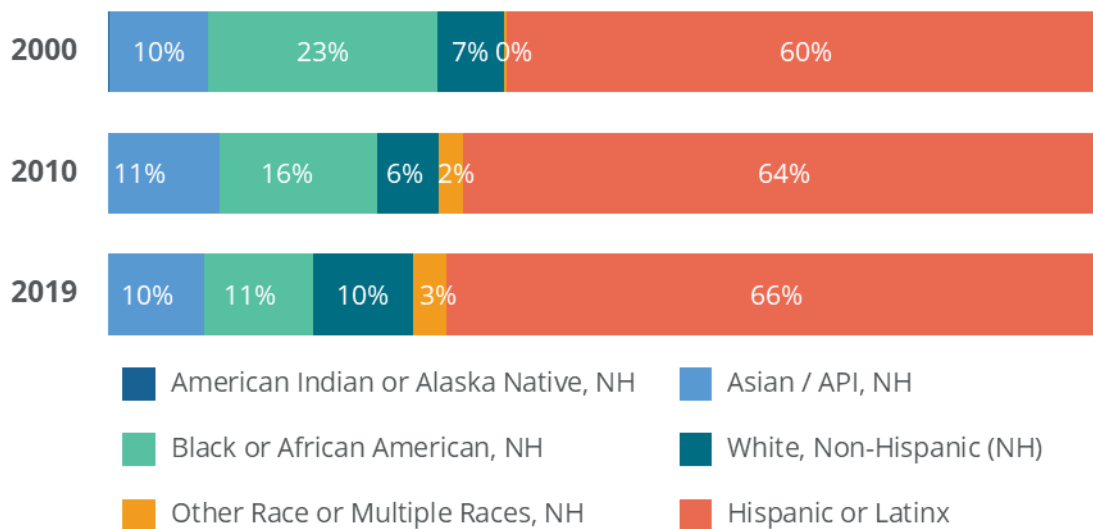
Population by Race and Ethnicity, 2019



Source: ABAG Housing Needs Data Workbook

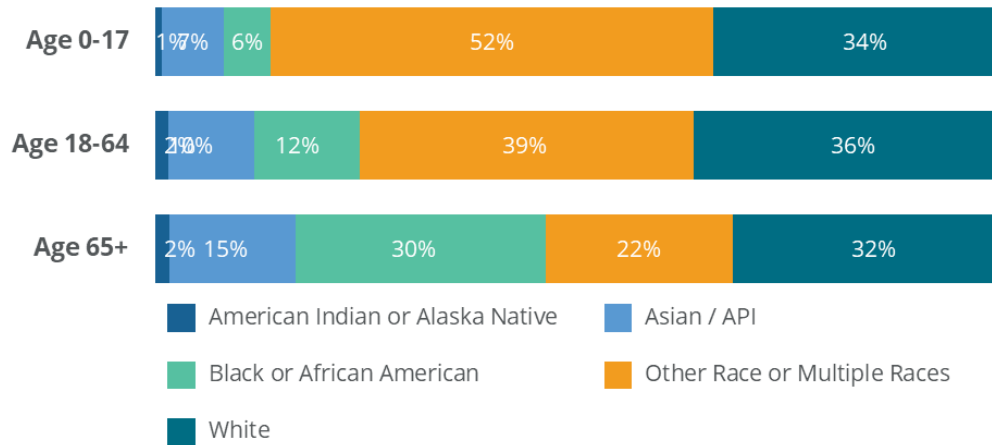
Figure II-2.

Population by Race and Ethnicity, East Palo Alto, 2000-2019



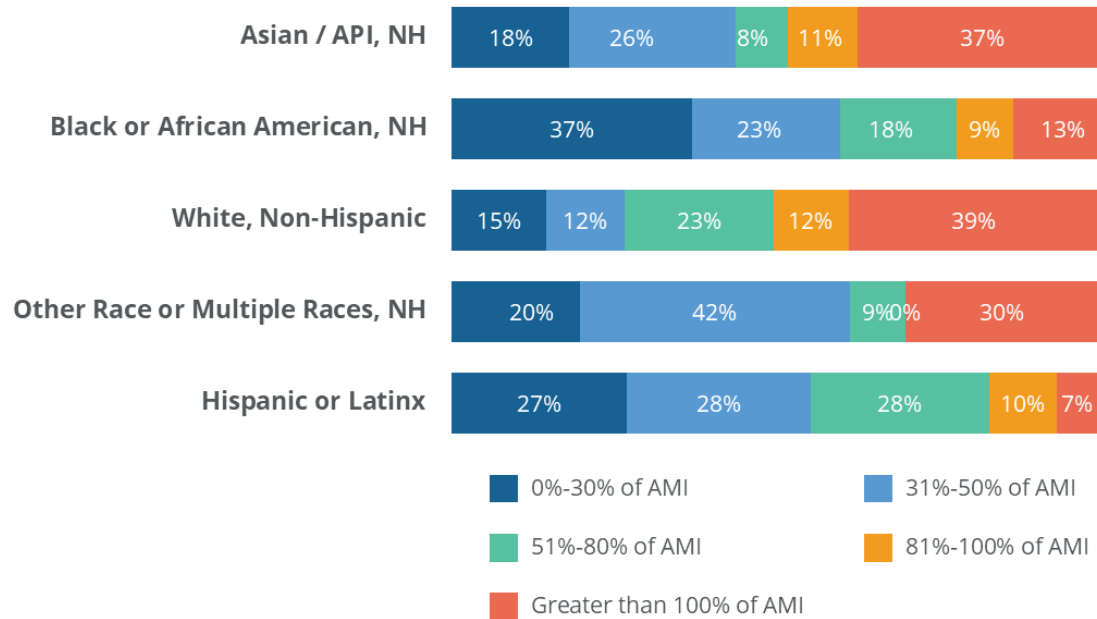
Source: ABAG Housing Needs Data Workbook

Figure II-3.
Senior and Youth Population by Race, East Palo Alto, 2000-2019



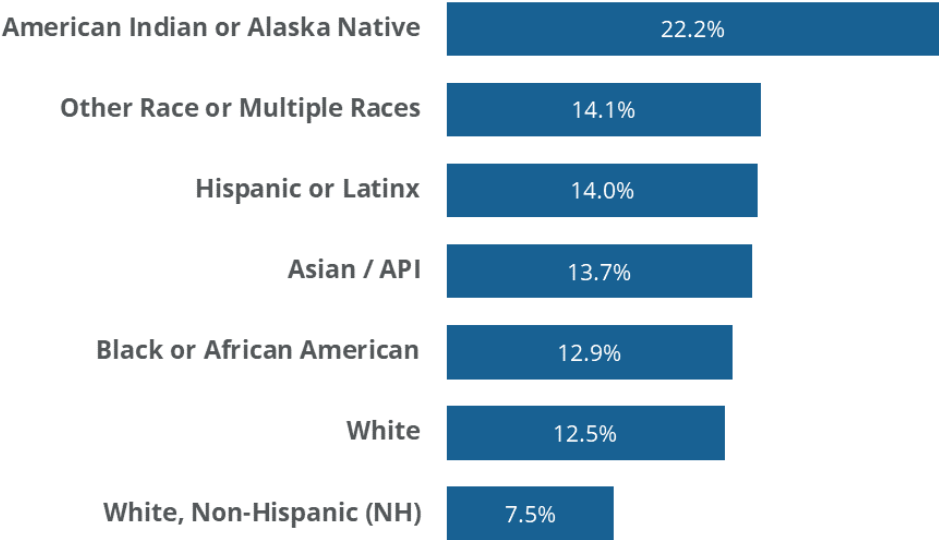
Source: ABAG Housing Needs Data Workbook

Figure II-4.
Area Median Income by Race and Ethnicity, East Palo Alto, 2019



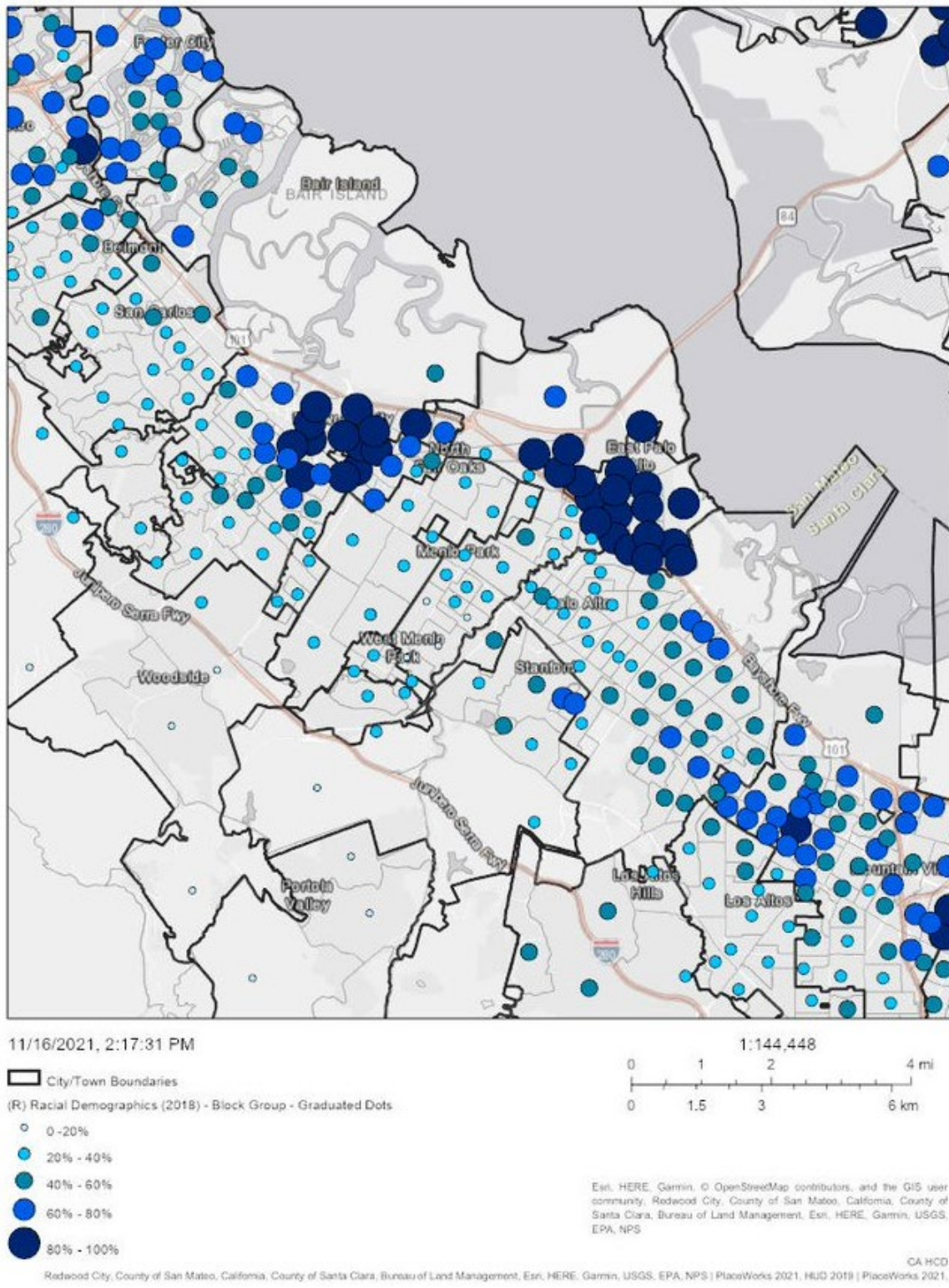
Source: ABAG Housing Needs Data Workbook

**Figure II-5.
Poverty Rate by Race and Ethnicity, East Palo Alto, 2019**



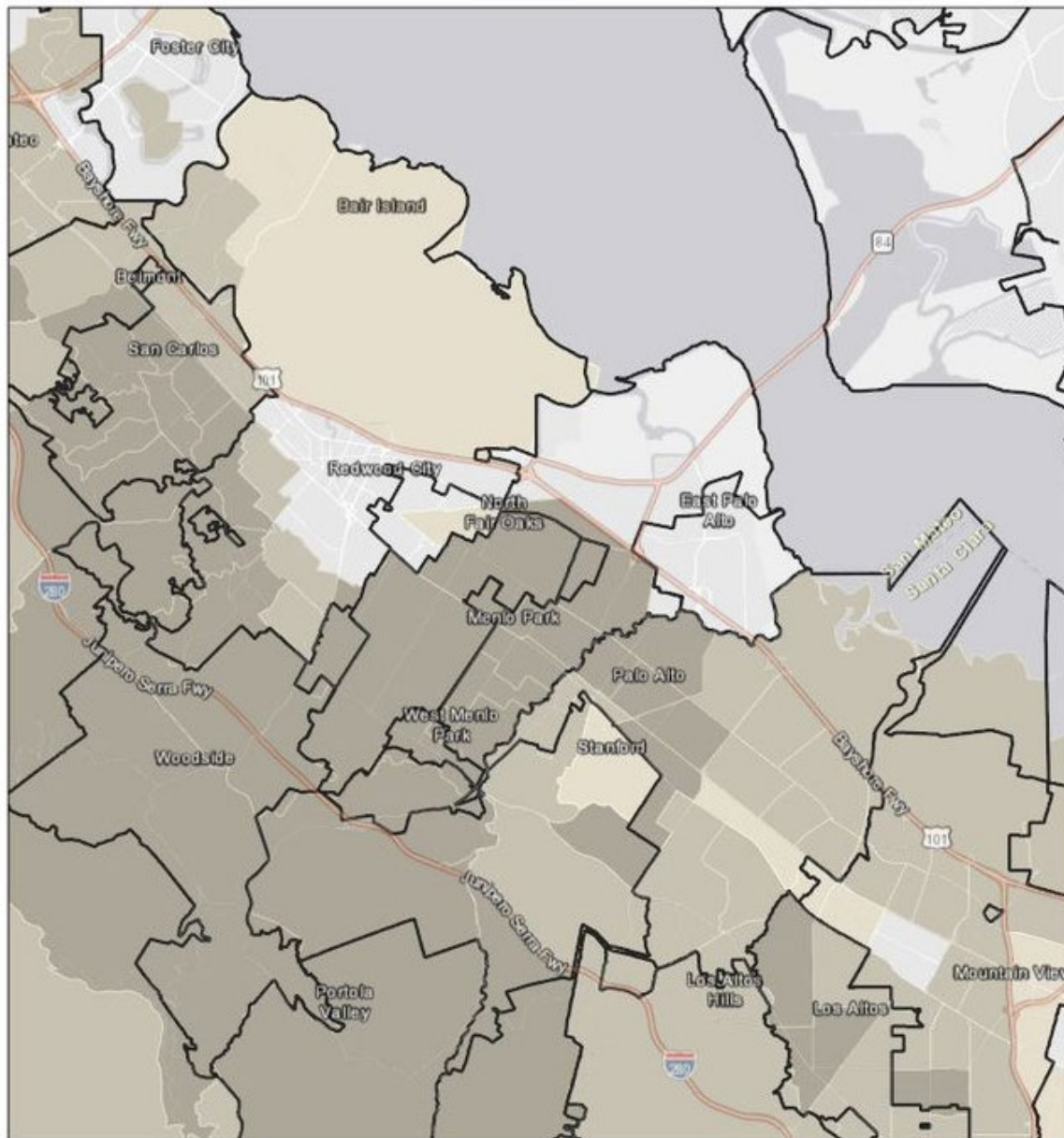
Source: ABAG Housing Needs Data Workbook

Figure II-6.
% Non-White Population by Census Block Groups, 2018



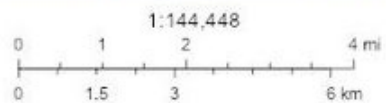
Source: California Department of Housing and Community Development AFFH Data Viewer

**Figure II-7.
White Majority Census Tracts**



11/16/2021, 2:19:20 PM

-  City/Town Boundaries
- (R) Predominant Population - White Majority Tracts
-  Slim (gap < 10%)
-  Sizeable (gap 10% - 50%)
-  Predominant (gap > 50%)

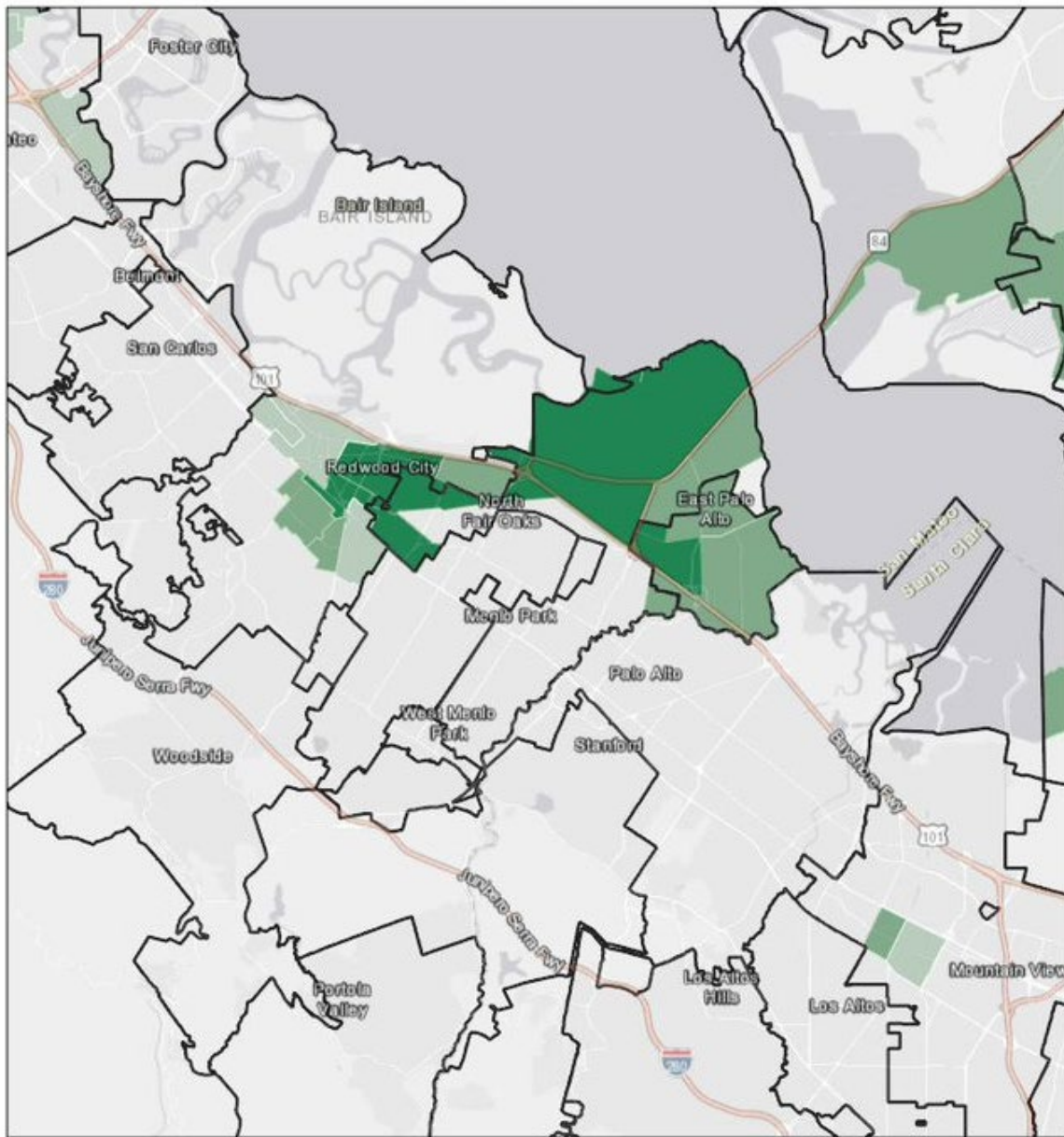


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CA HCD
Redwood City, County of San Mateo, California, County of Santa Clara, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021.

Source: California Department of Housing and Community Development AFFH Data Viewer

**Figure II-9.
Hispanic Majority Census Tracts**

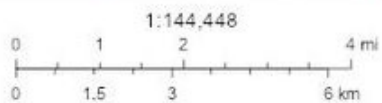


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City/Town Boundaries

(R) Predominant Population - Hispanic Majority Tracts

- Slim (gap < 10%)
- Sizeable (gap 10% - 50%)
- Predominant (gap > 50%)

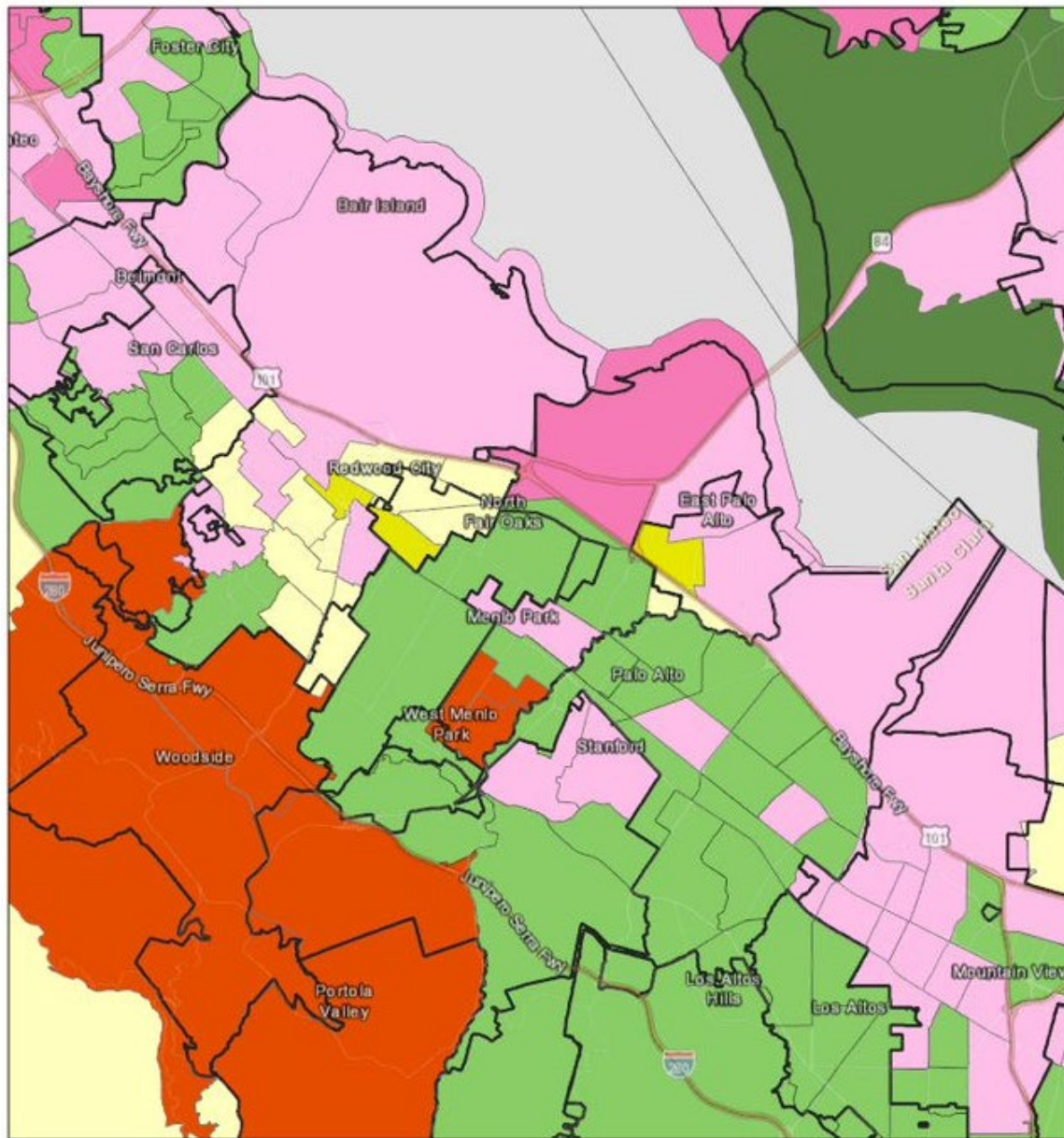


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CA HCD
Redwood City, County of San Mateo, California, County of Santa Clara, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021,

Source: California Department of Housing and Community Development AFFH Data Viewer

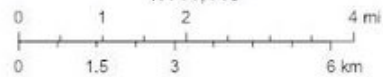
Figure II-10.
Neighborhood Segregation by Census Tract, 2019



11/16/2021, 2:00:04 PM

1:144,448

- City/Town Boundaries
- Mostly Latinx
- Mostly White
- Asian-White
- 3 Group Mix
- Mostly Asian
- 4 Group Mix
- Latinx-White
- Unpopulated Tract

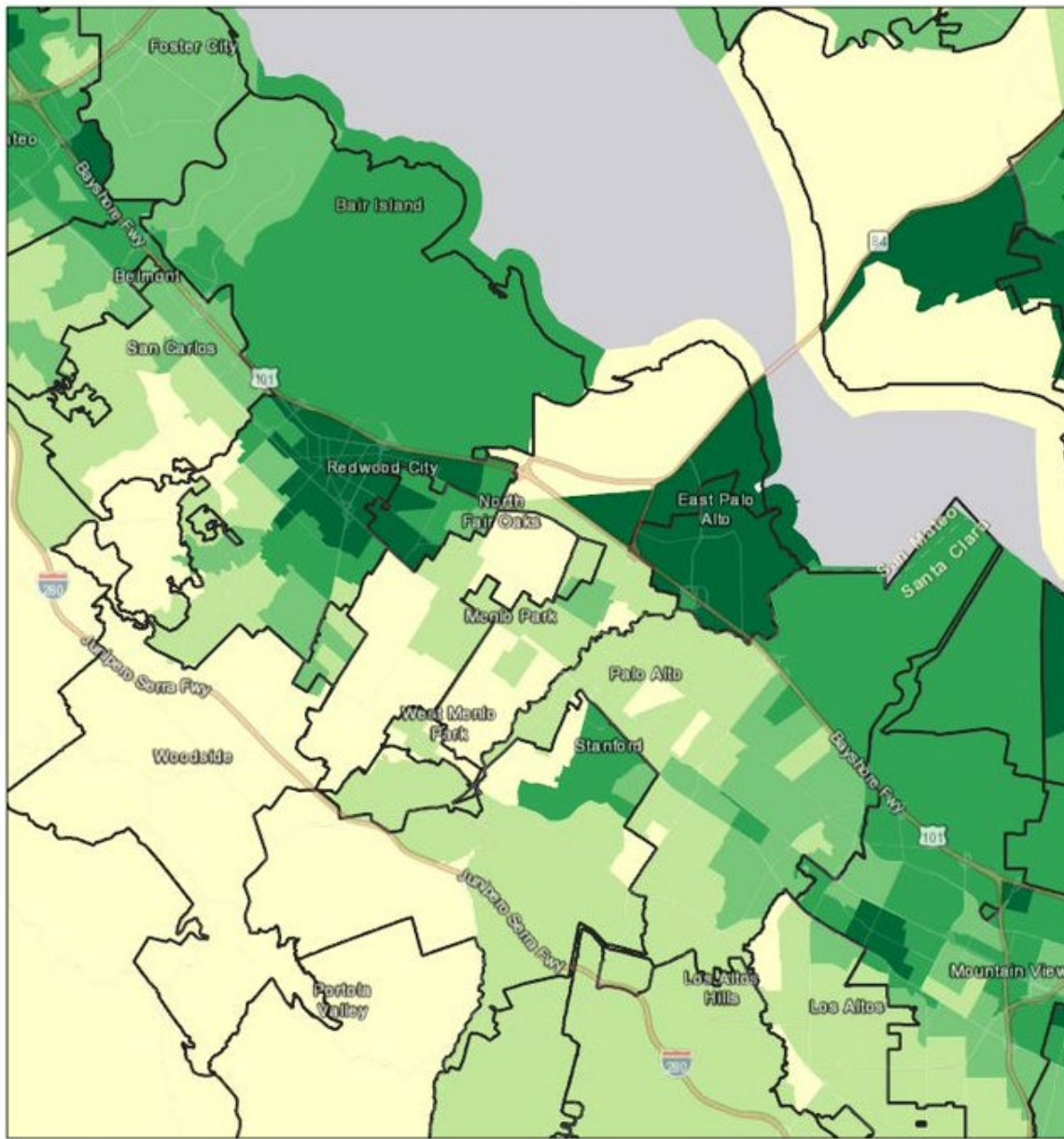


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Redwood City, County of San Mateo, California, County of Santa Clara, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, CAHCD

Source: California Department of Housing and Community Development AFFH Data Viewer

Figure II-11.
Diversity Index by Block Group, 2010

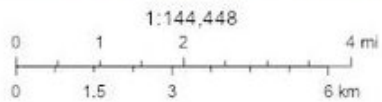


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City/Town Boundaries

(A) Diversity Index (2010) - Block Group

Lower Diversity

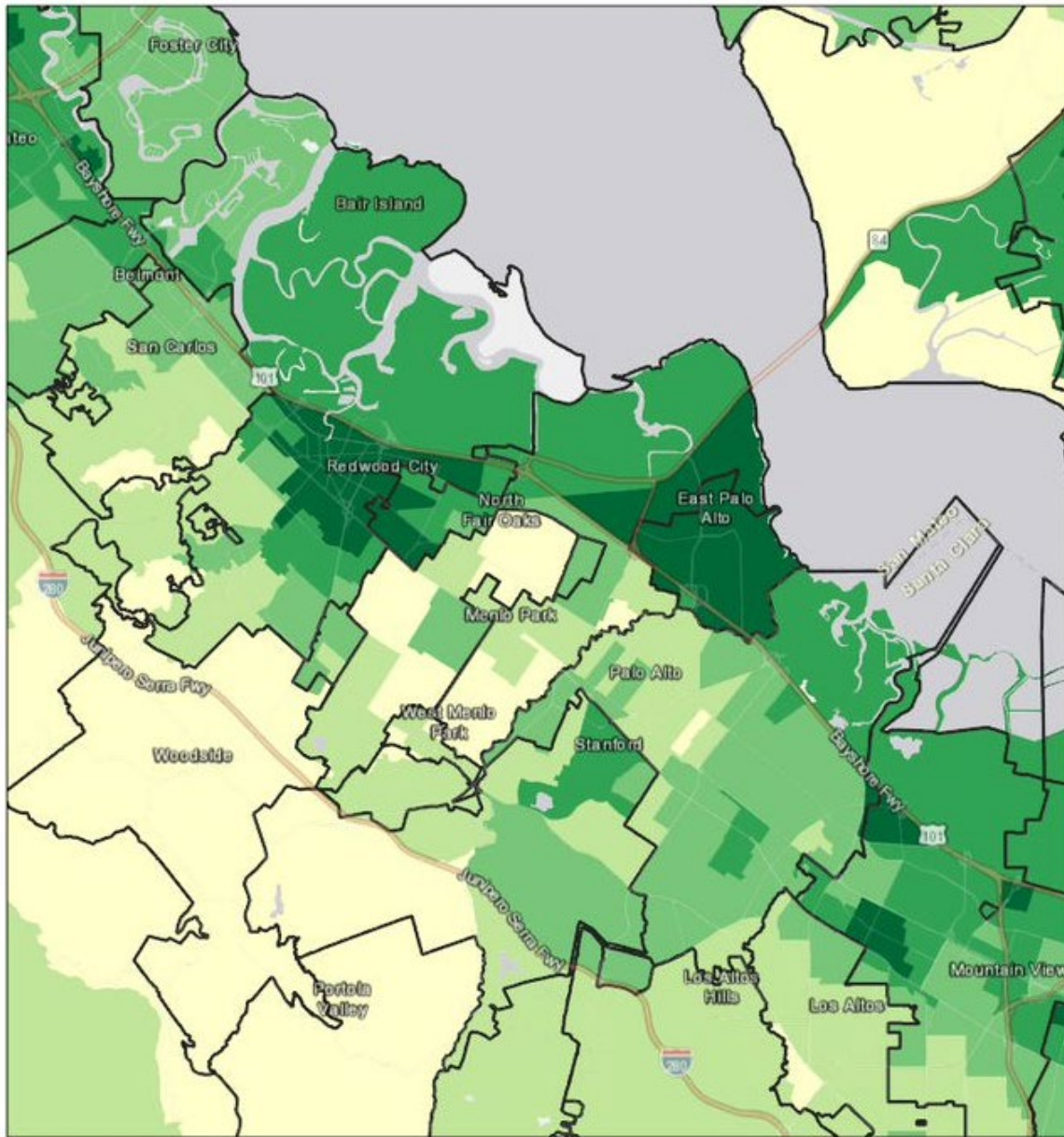


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CA HCD
 Redwood City, County of San Mateo, California, County of Santa Clara, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021.

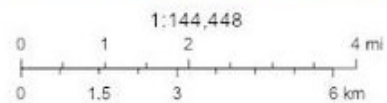
Source: California Department of Housing and Community Development AFFH Data Viewer

Figure II-12.
Diversity Index by Block Group, 2018



11/16/2021, 1:45:19 PM

- City/Town Boundaries
- Lower Diversity
- 40 - 55
- 55 - 70
- 70 - 85
- Higher Diversity



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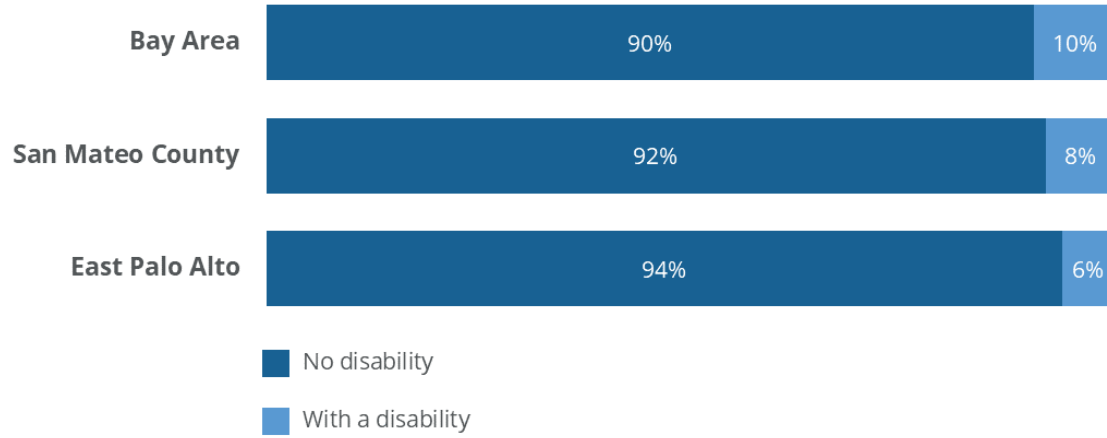
Redwood City, County of San Mateo, California, County of Santa Clara, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, CA HCD

Source: California Department of Housing and Community Development AFFH Data Viewer

Disability status.

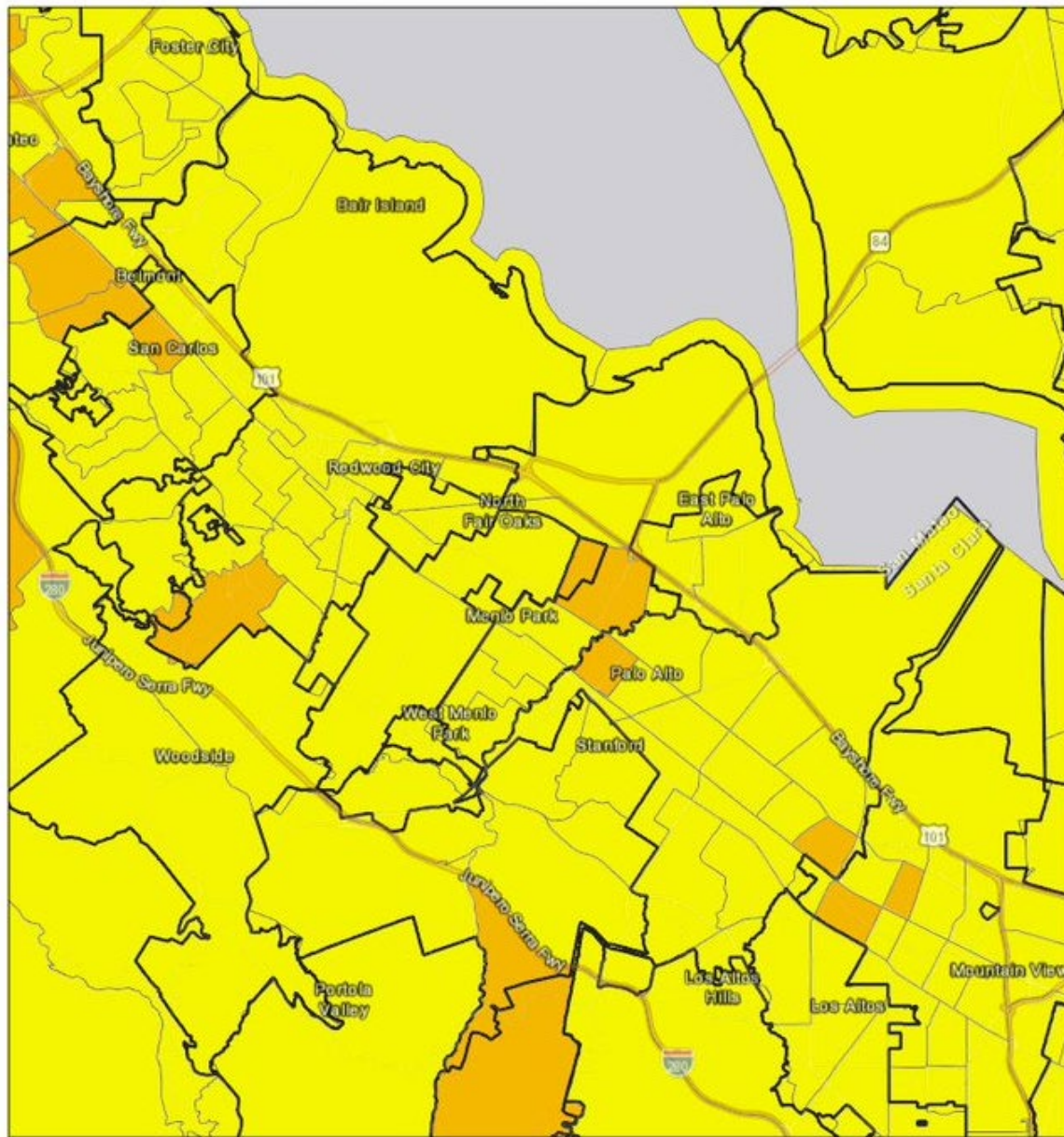
Figure II-13.

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



11/16/2021, 2:03:17 PM

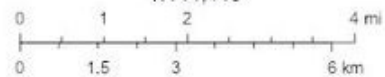
City/Town Boundaries

(R) Population with a Disability (ACS, 2015 - 2019) - Tract

< 10%

10% - 20%

1:144,448



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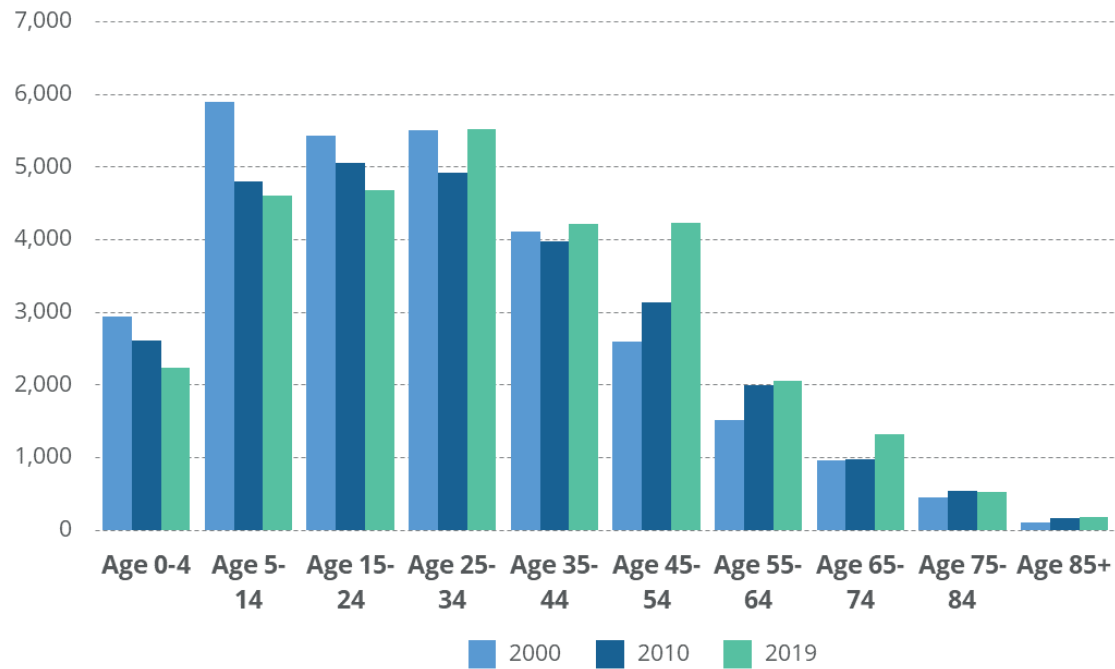
CA HCD
 Redwood City, County of San Mateo, California, County of Santa Clara, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021,

Source: California Department of Housing and Community Development AFFH Data Viewer

Familial status.

Figure II-15.

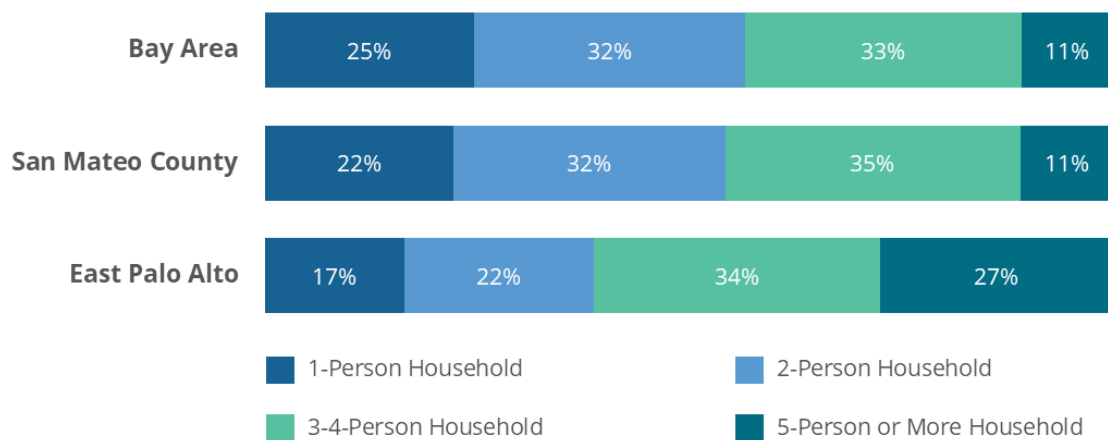
Age Distribution, East Palo Alto, 2000-2019



Source: ABAG Housing Needs Data Workbook

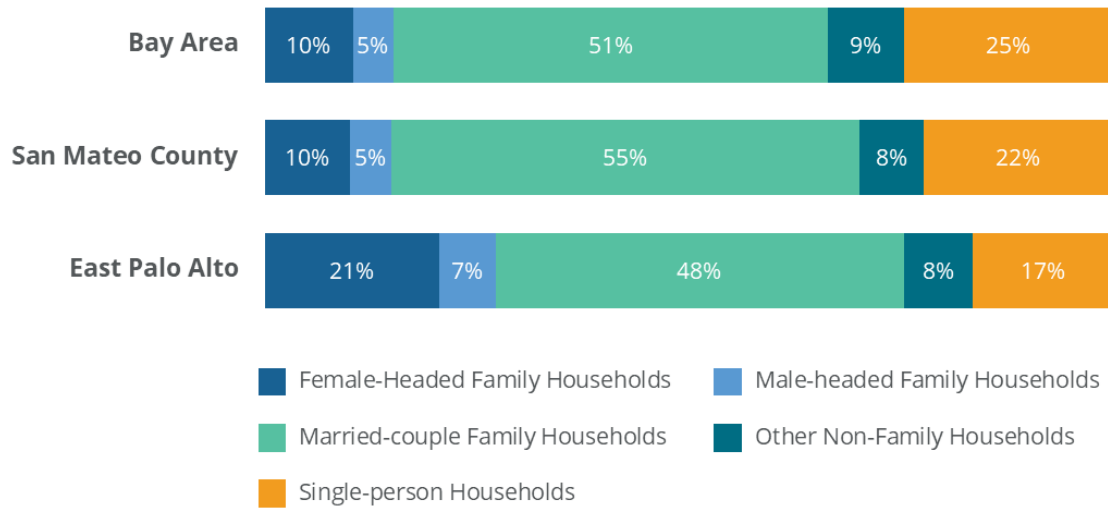
Figure II-16.

Share of Households by Size, 2019



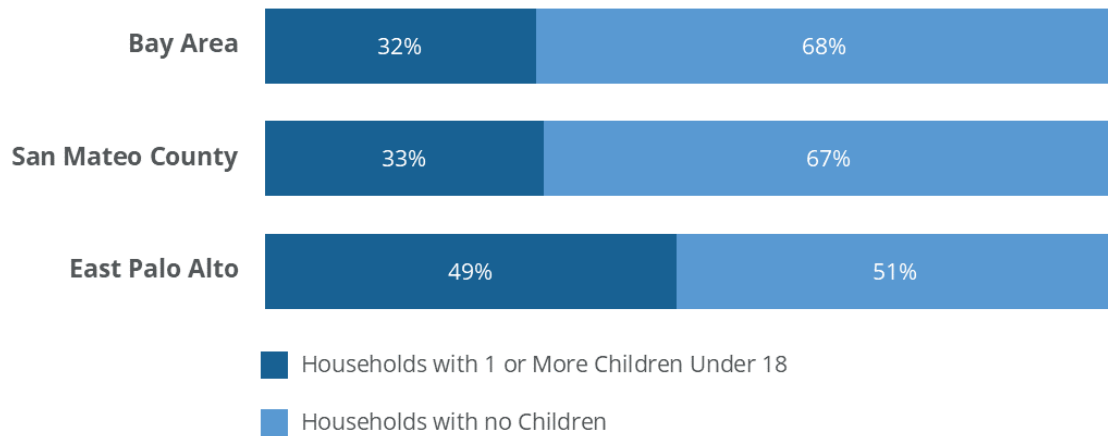
Source: ABAG Housing Needs Data Workbook

Figure II-17.
Share of Households by Type, 2019



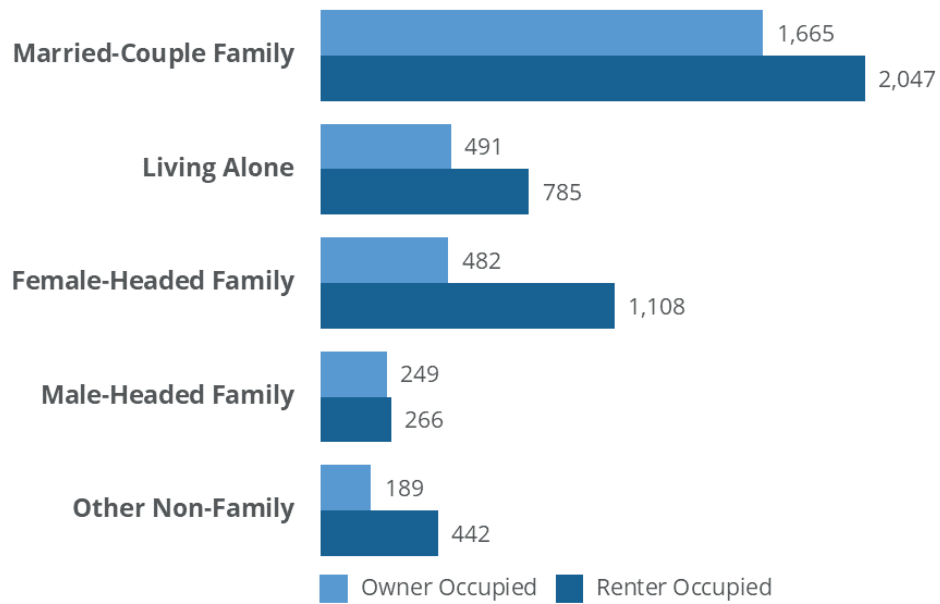
Source: ABAG Housing Needs Data Workbook

Figure II-18.
Share of Households by Presence of Children (Less than 18 years old), 2019



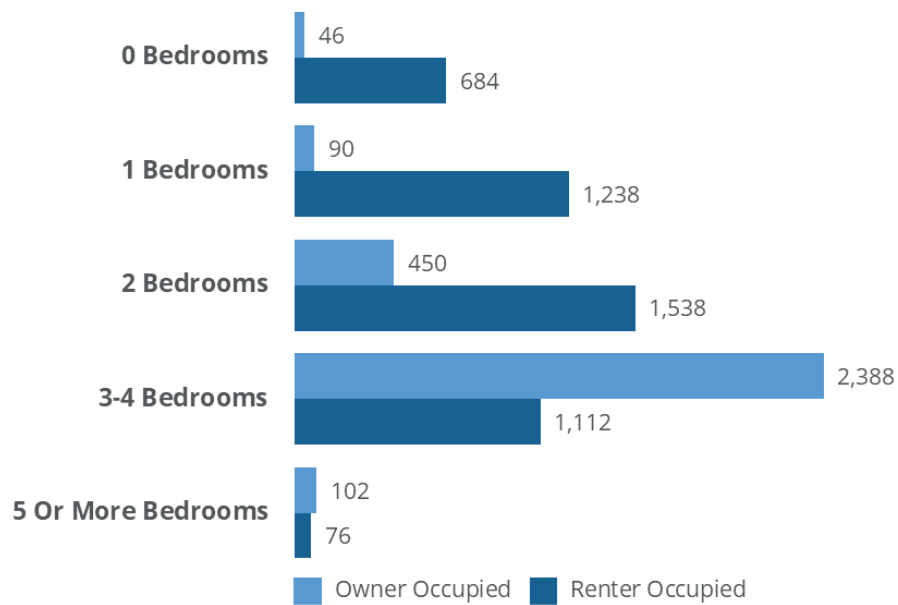
Source: ABAG Housing Needs Data Workbook

Figure II-19.
Housing Type by Tenure, East Palo Alto, 2019



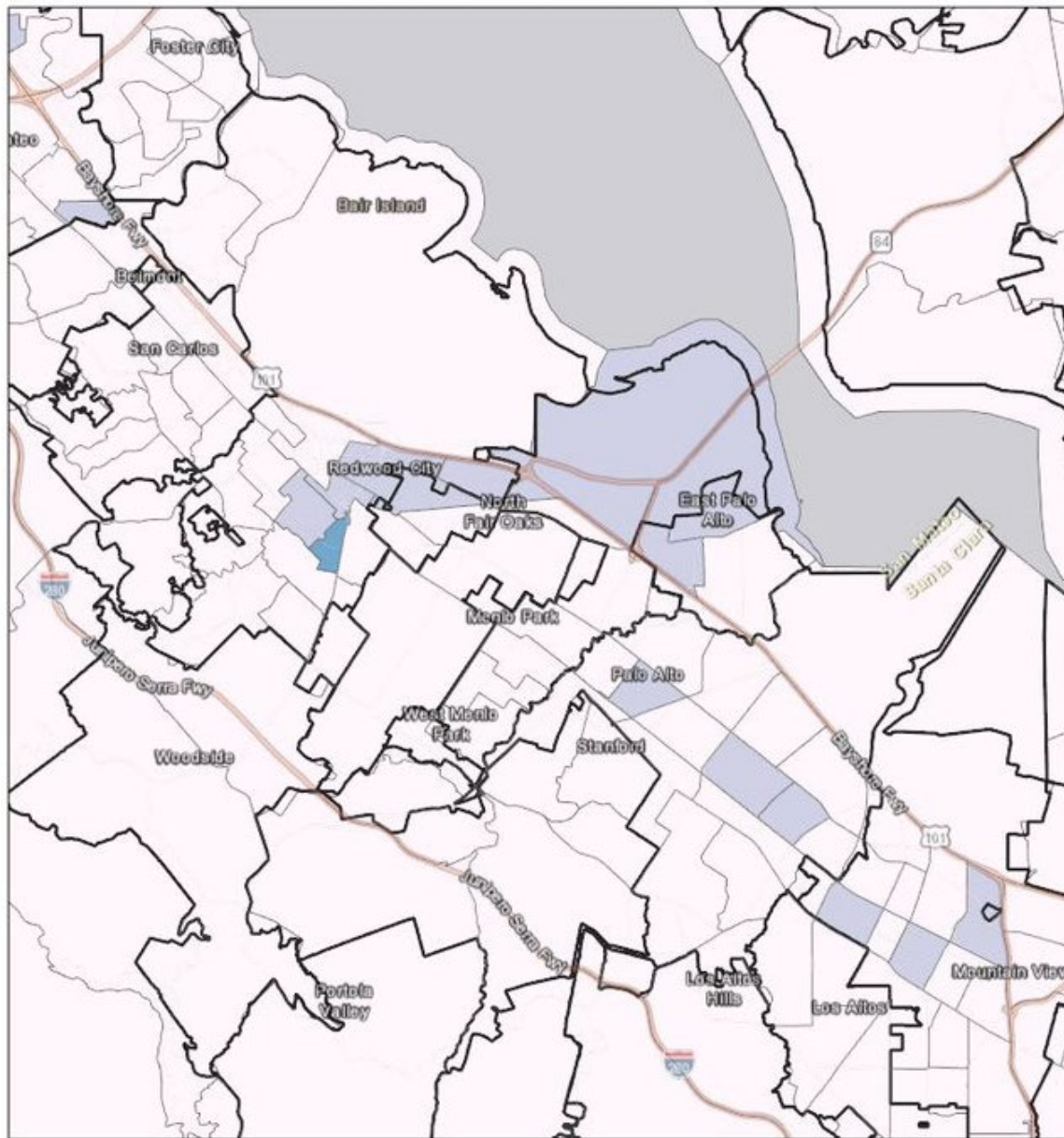
Source: ABAG Housing Needs Data Workbook

Figure II-20.
Housing Units by Number of Bedrooms and Tenure, East Palo Alto, 2019



Source: ABAG Housing Needs Data Workbook

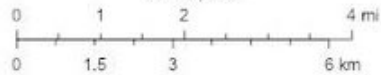
**Figure II-22. [legend missing in HCD provided map]
 % Households with Single Female with Children by Census Tract, 2019**



11/16/2021, 1:27:00 PM

City/Town Boundaries

1:144,448

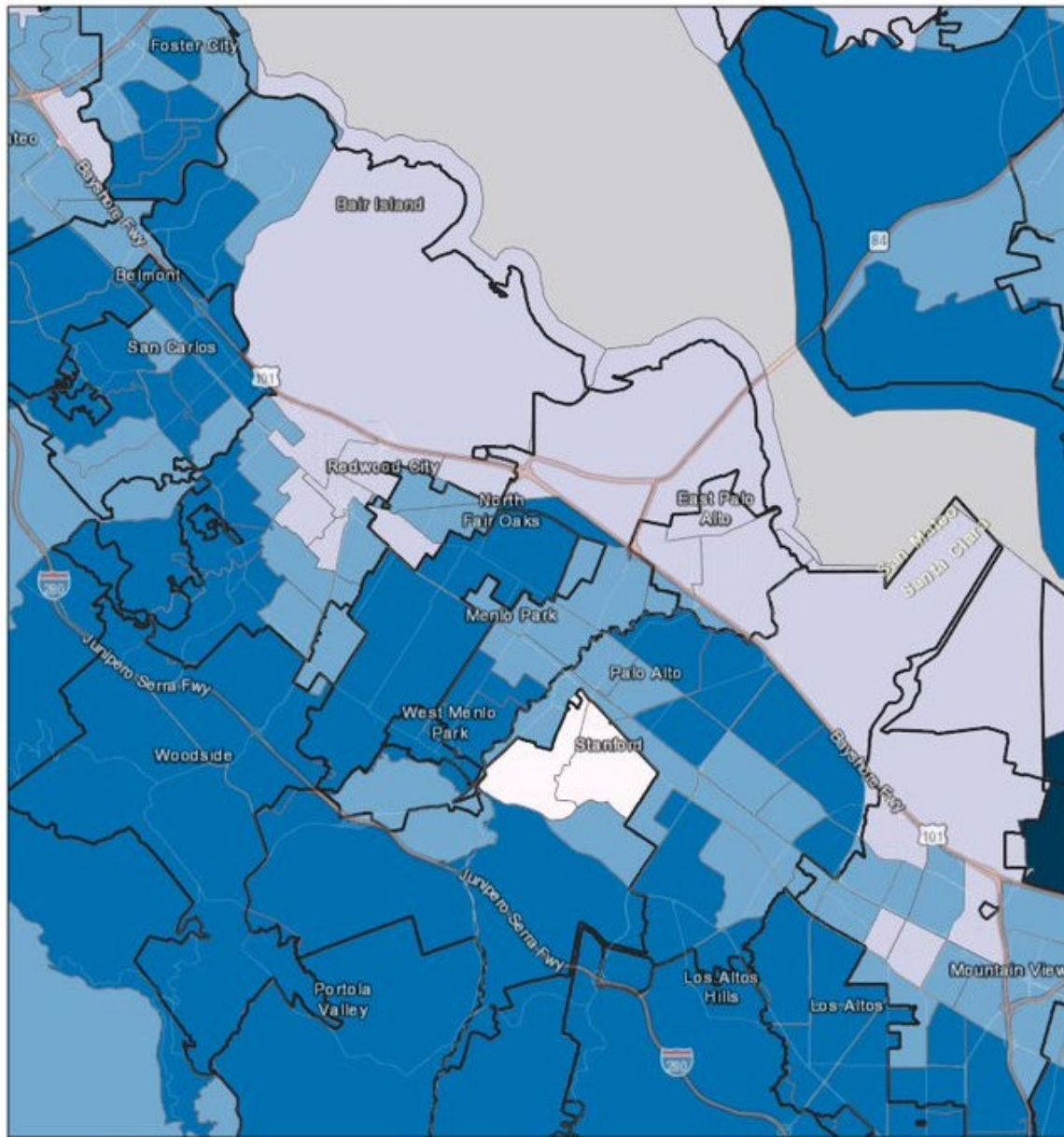


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Source: California Department of Housing and Community Development AFFH Data Viewer

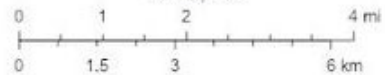
**Figure II-23. [legend missing in HCD provided map]
 % of Married Couple Households by Census Tract, 2019**



11/16/2021, 1:50:32 PM

City/Town Boundaries

1:144,448

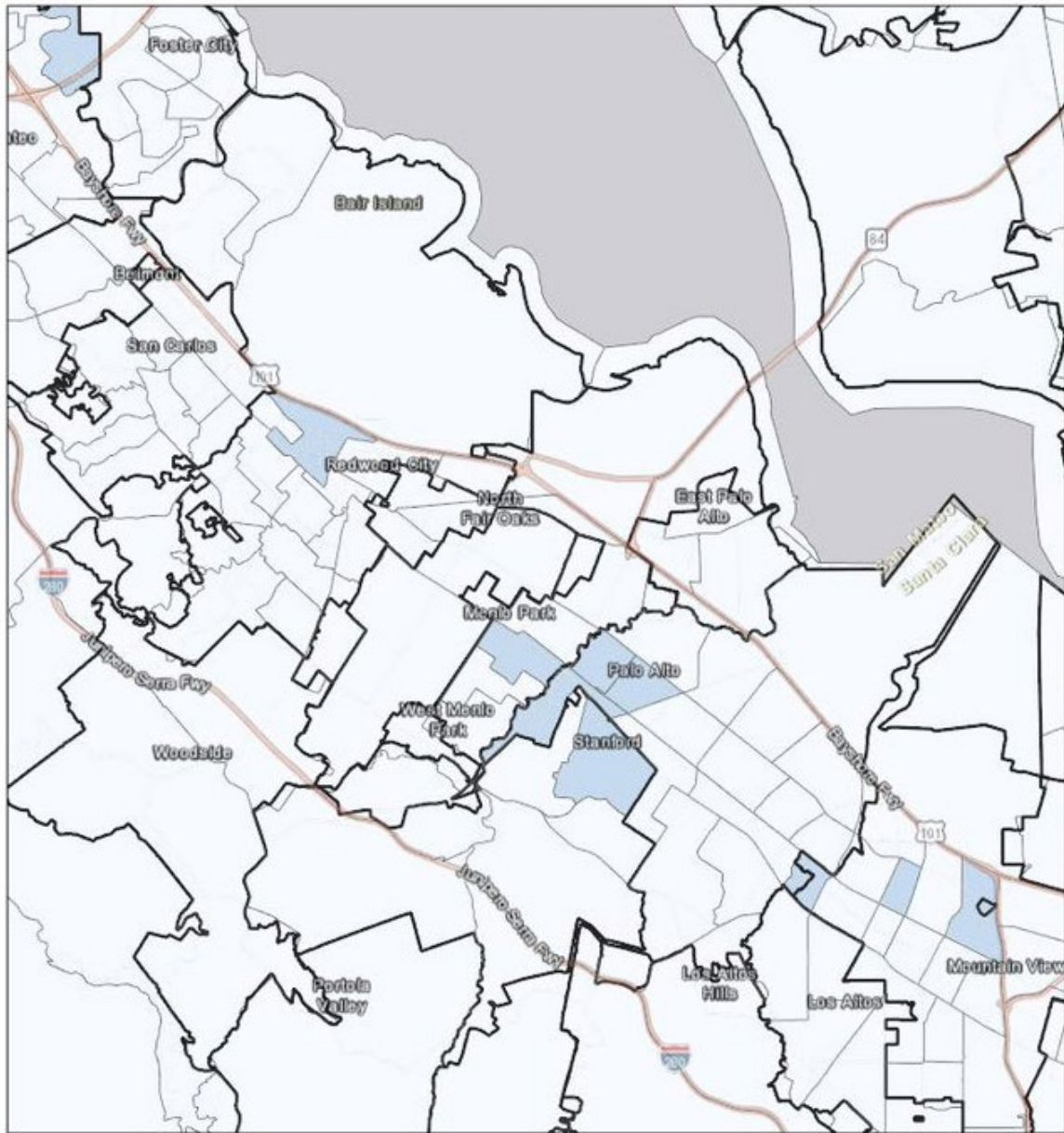


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Source: California Department of Housing and Community Development AFFH Data Viewer

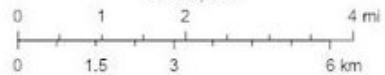
**Figure II-24. [legend missing in HCD provided map]
% of Adults Living Alone by Census Tract, 2019**



11/16/2021, 1:32:53 PM

City/Town Boundaries

1:144,448



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CA HCD

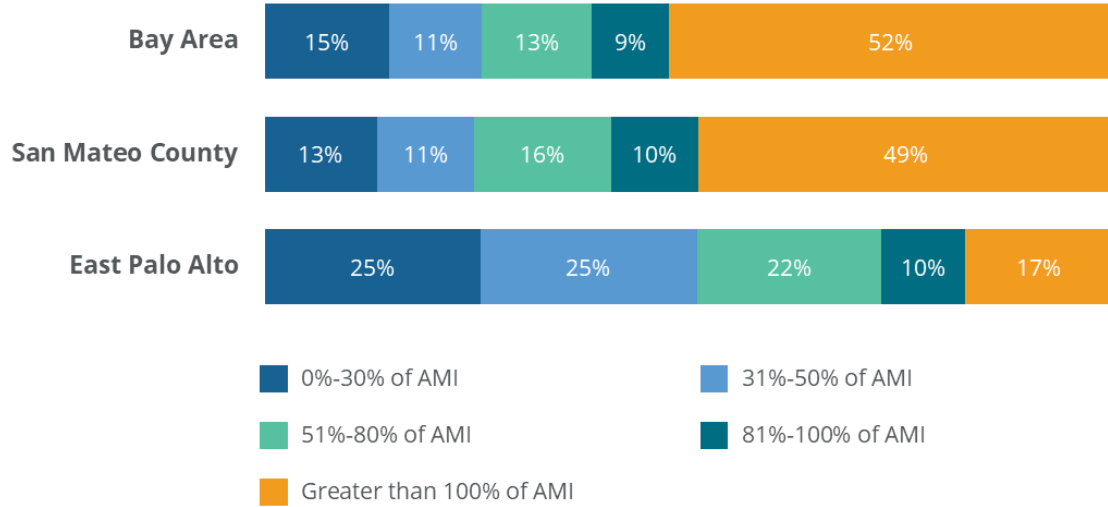
Redwood City, County of San Mateo, California, County of Santa Clara, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021.

Source: California Department of Housing and Community Development AFFH Data Viewer

Household income.

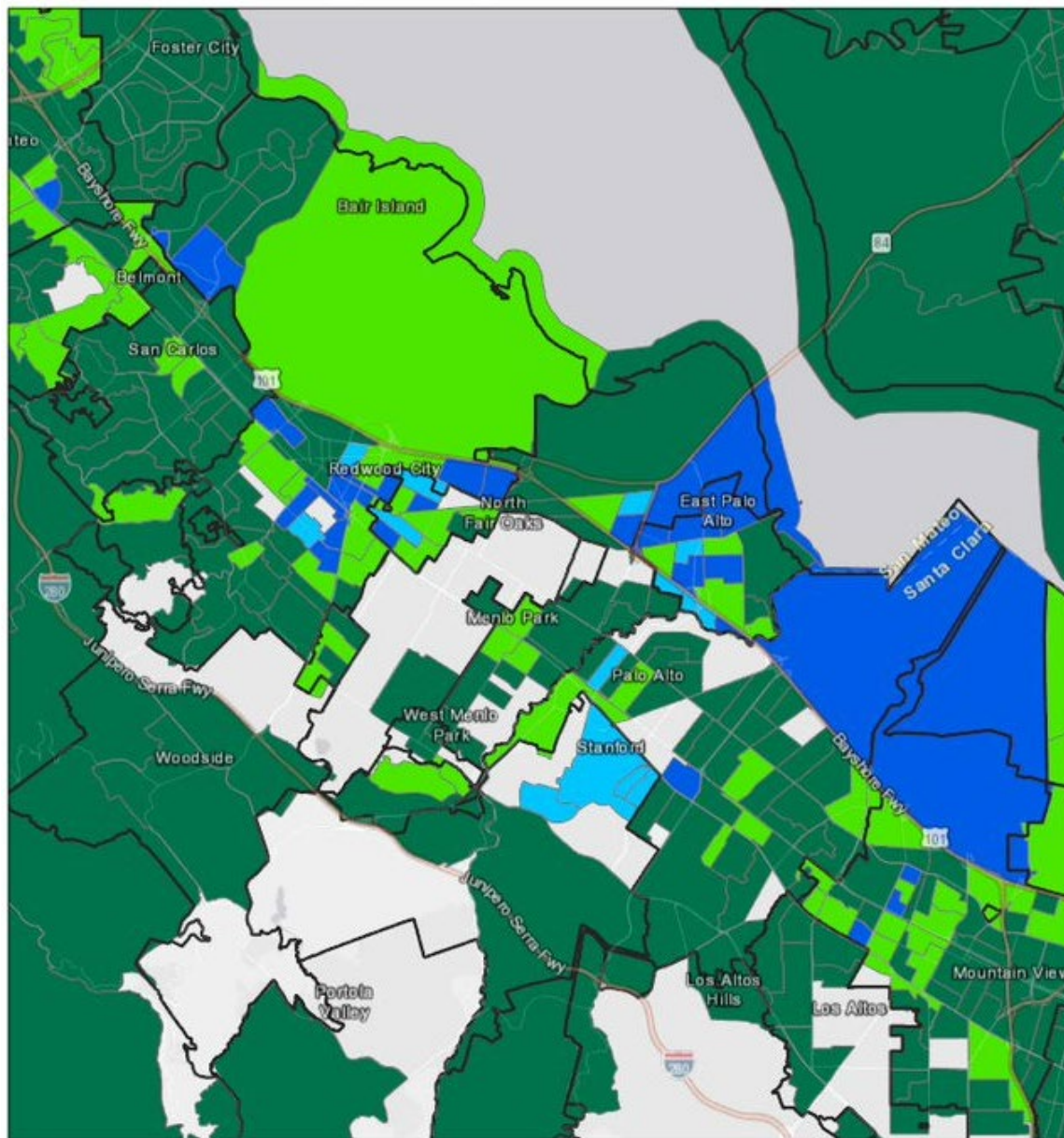
Figure II-25.

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



11/16/2021, 1:56:55 PM

City/Town Boundaries

(R) Median Income (ACS, 2015-2019) - Block Group

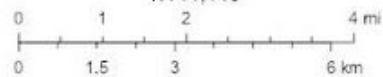
< \$55,000

< \$87,100 (HCD 2020 State Median Income)

< \$125,000

Greater than \$125,000

1:144,448



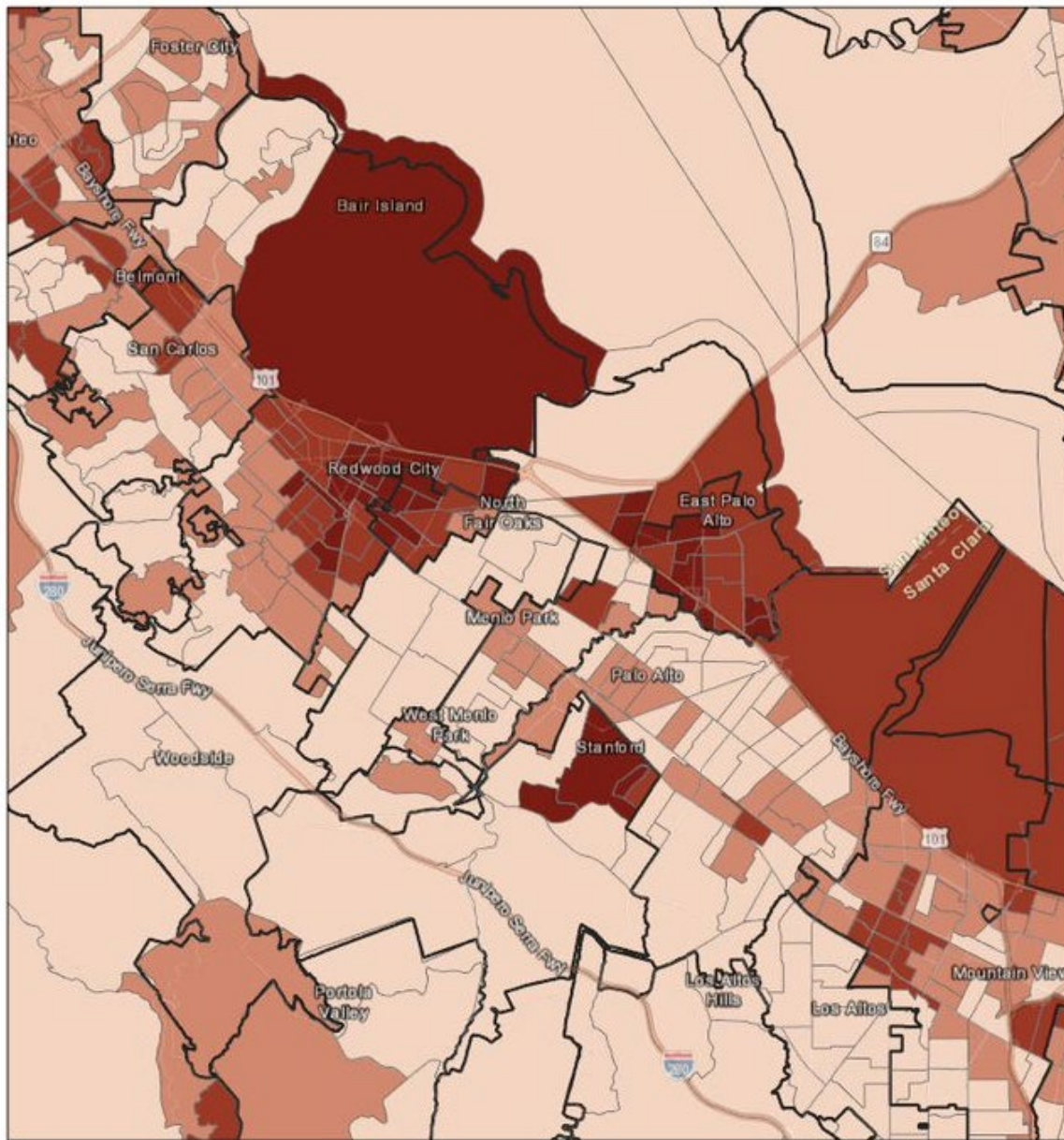
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Redwood City, County of San Mateo, California, County of Santa Clara, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021,

Source: California Department of Housing and Community Development AFFH Data Viewer

Figure II-27.
Low to Moderate Income Population by Block Group

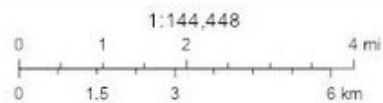


11/16/2021, 1:54:07 PM

City/Town Boundaries

(A) Low to Moderate Income Population (HUD) - Block Group

- < 25%
- 25% - 50%
- 50% - 75%
- 75% - 100%

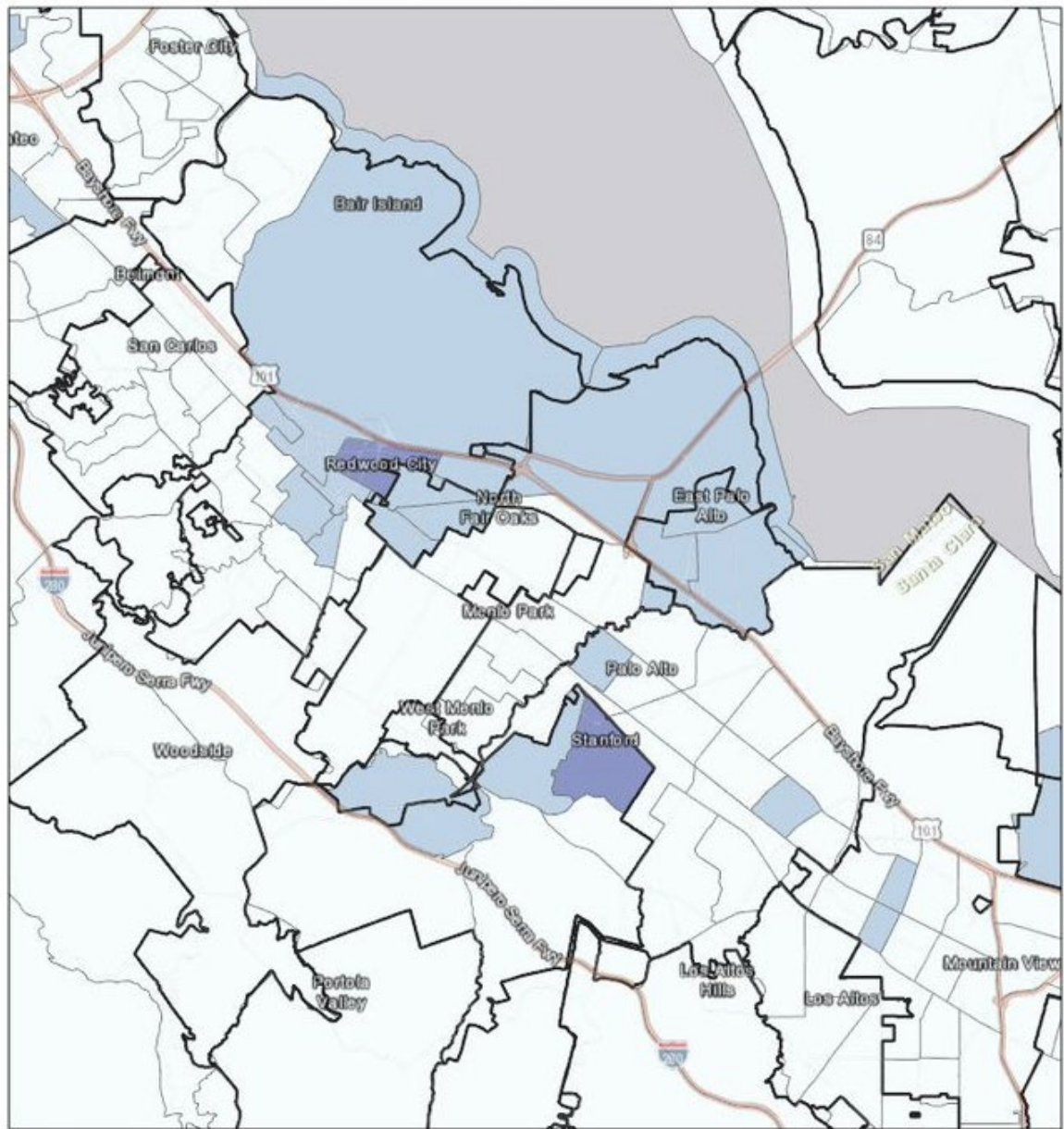


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Source: California Department of Housing and Community Development AFFH Data Viewer

Figure II-28.
Poverty Status by Census Tract, 2019

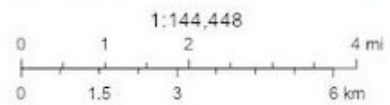


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City/Town Boundaries

(R) Poverty Status (ACS, 2015 - 2019) - Tract

- < 10%
- 10% - 20%
- 20% - 30%

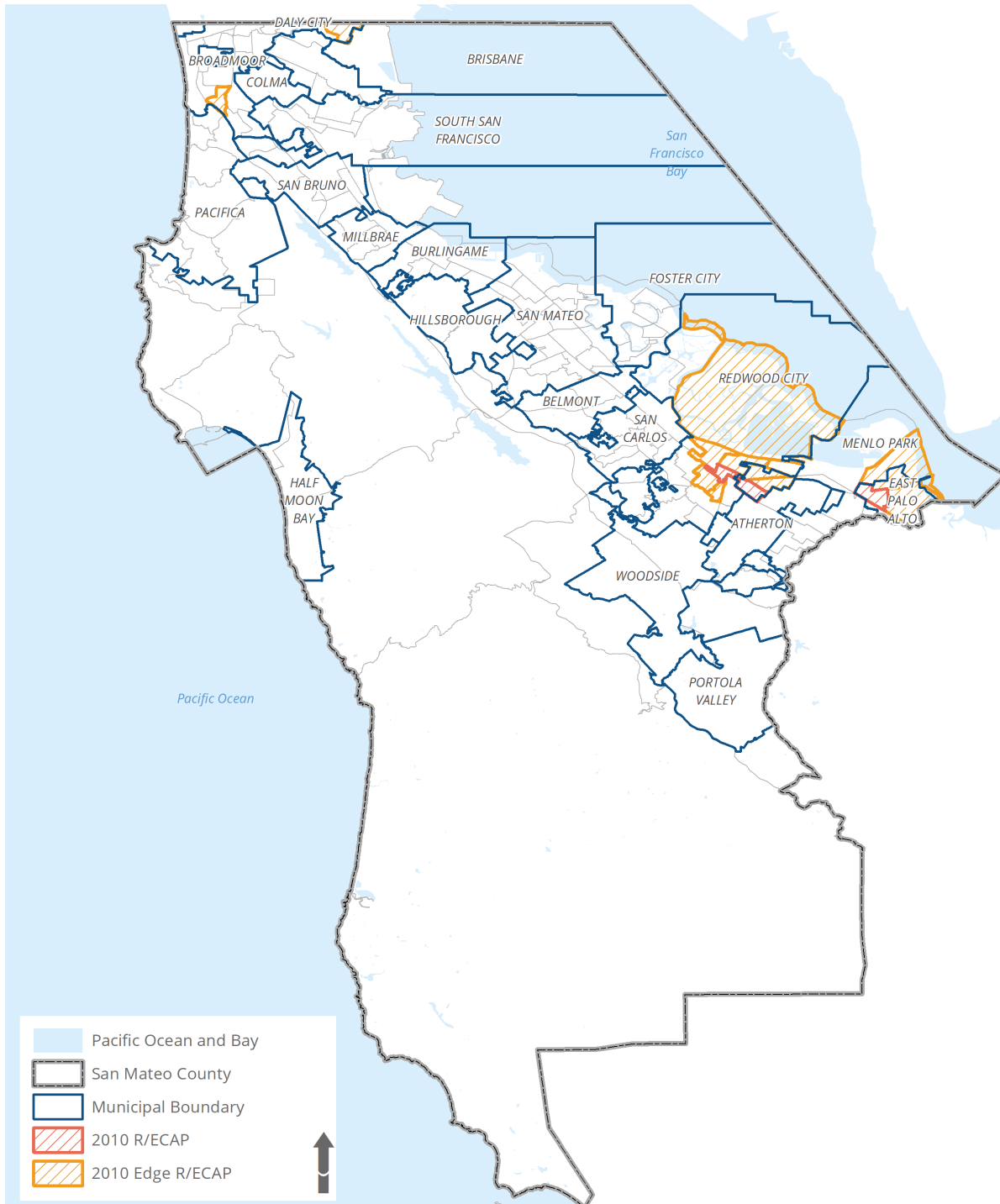


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Redwood City, County of San Mateo, California, County of Santa Clara, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021. HUD 2019 | PlaceWorks 2021.

Source: California Department of Housing and Community Development AFFH Data Viewer

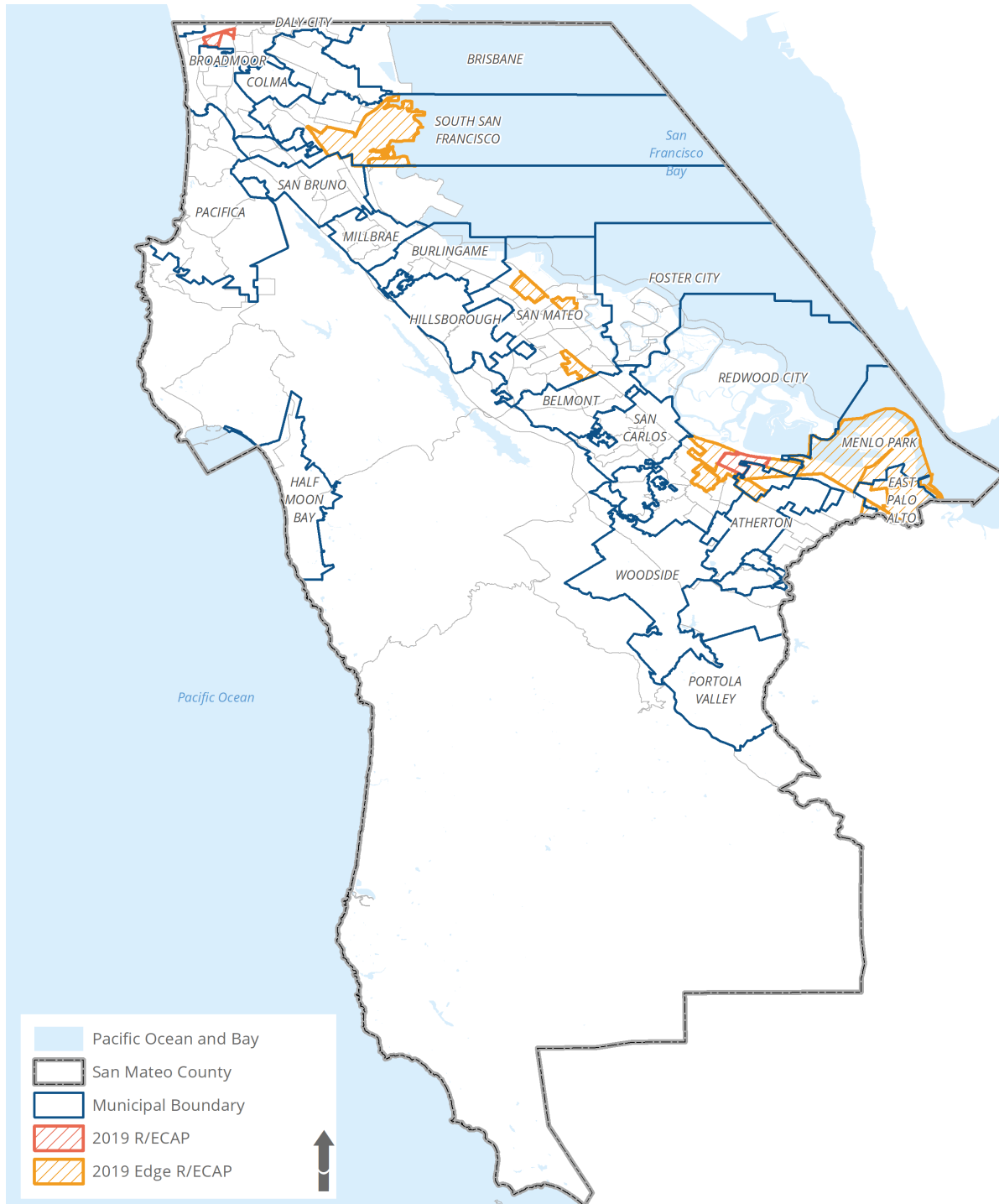
**Figure II-29.
R/ECAPs and Edge R/ECAPs, 2010**



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).

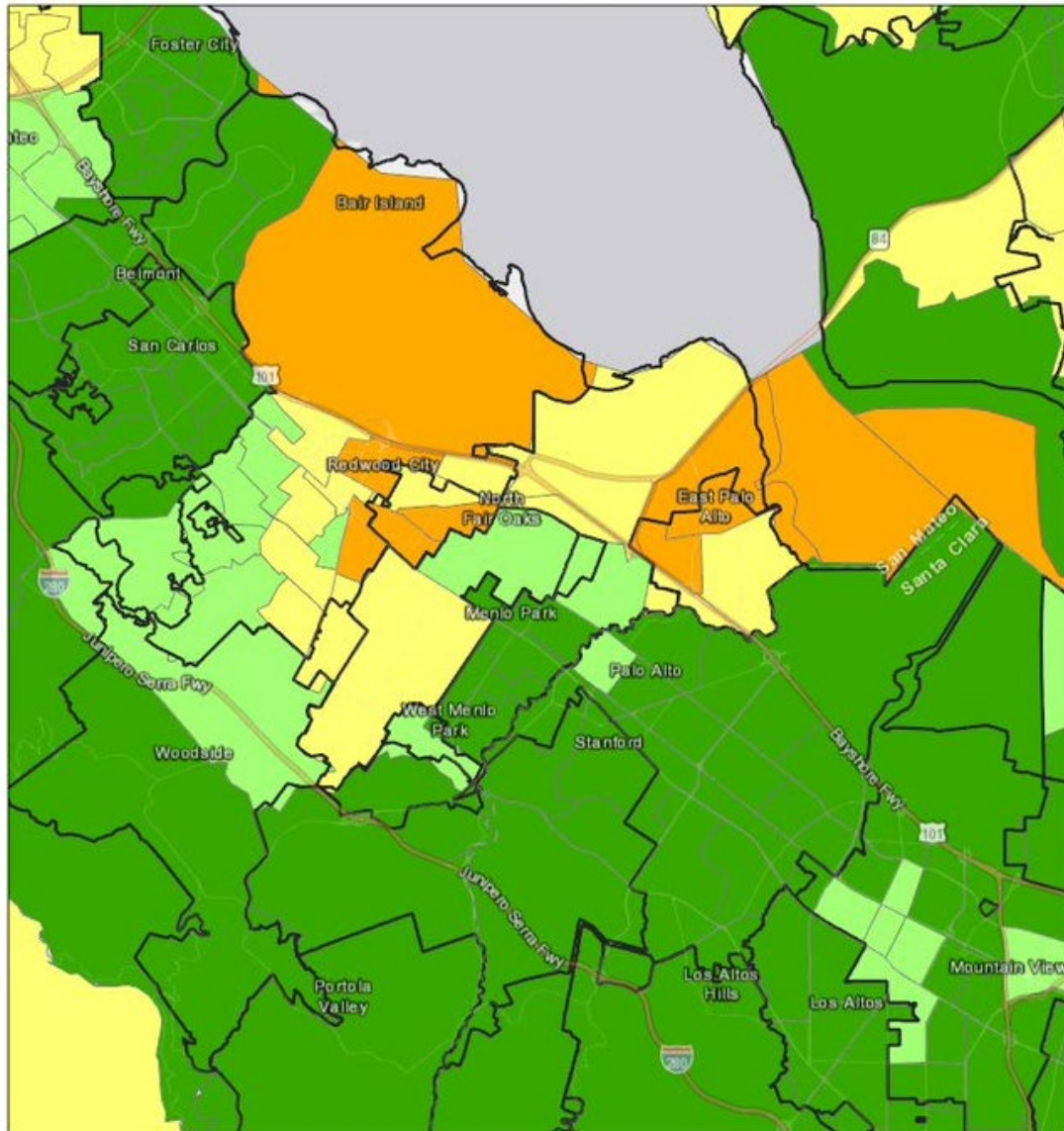
Source: California Department of Housing and Community Development AFFH Data Viewer

SECTION III. Access to Opportunity

Education

Figure III-1.

TCAC Opportunity Areas Education Score by Census Tract, 2021



11/16/2021, 2:34:48 PM

City/Town Boundaries

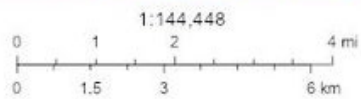
(R) TCAC Opportunity Areas (2021) - Education Score - Tract

< 0.25 (Less Positive Education Outcomes)

0.25 - 0.50

0.50 - 0.75

> 0.75 (More Positive Education Outcomes)

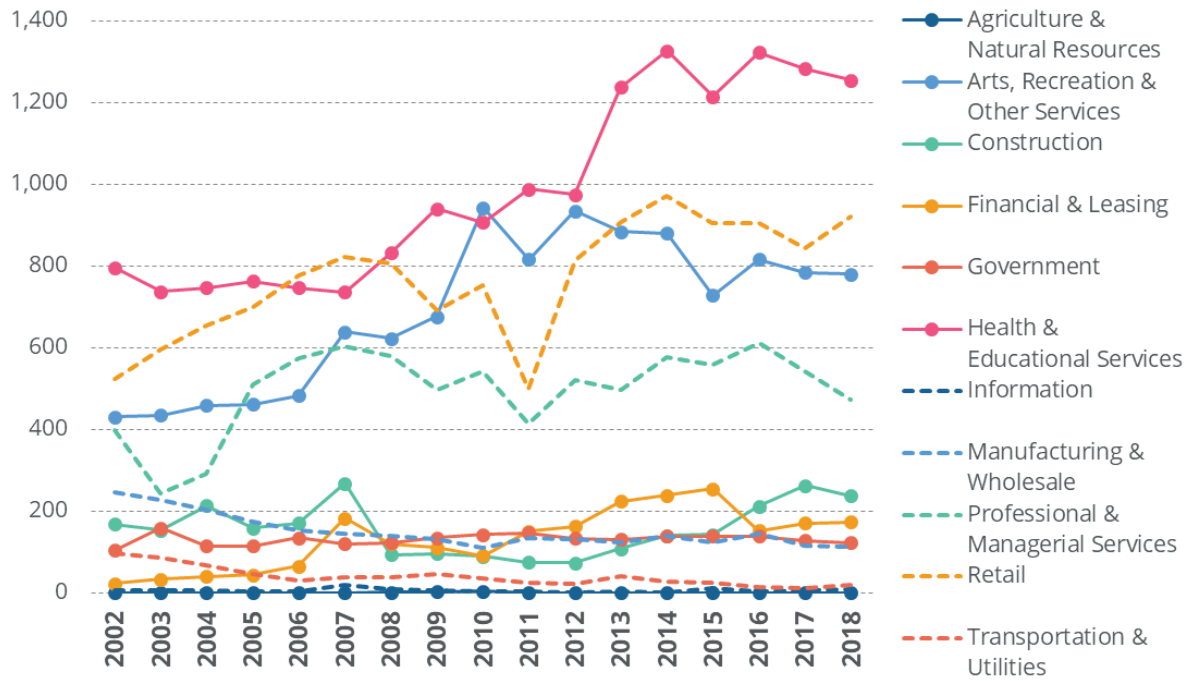


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CA HCD
Redwood City, County of San Mateo, California, County of Santa Clara, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021

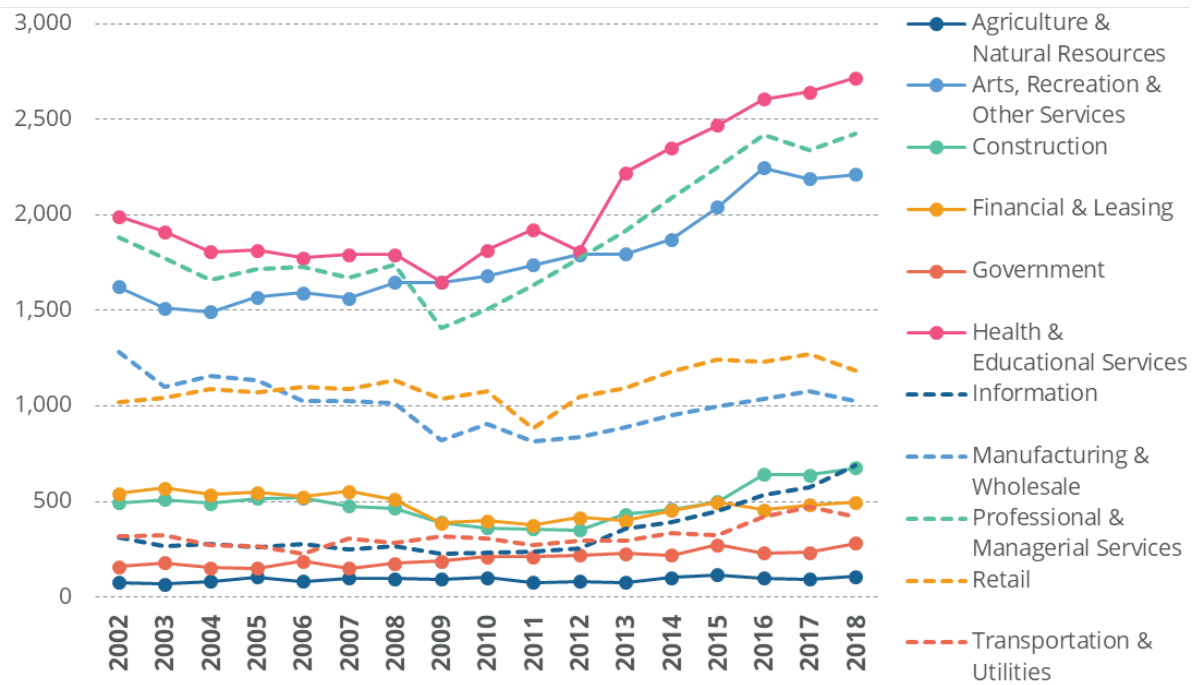
Source: California Department of Housing and Community Development AFFH Data Viewer

Employment
Figure III-2.
Jobs by Industry, East Palo Alto, 2002-2018



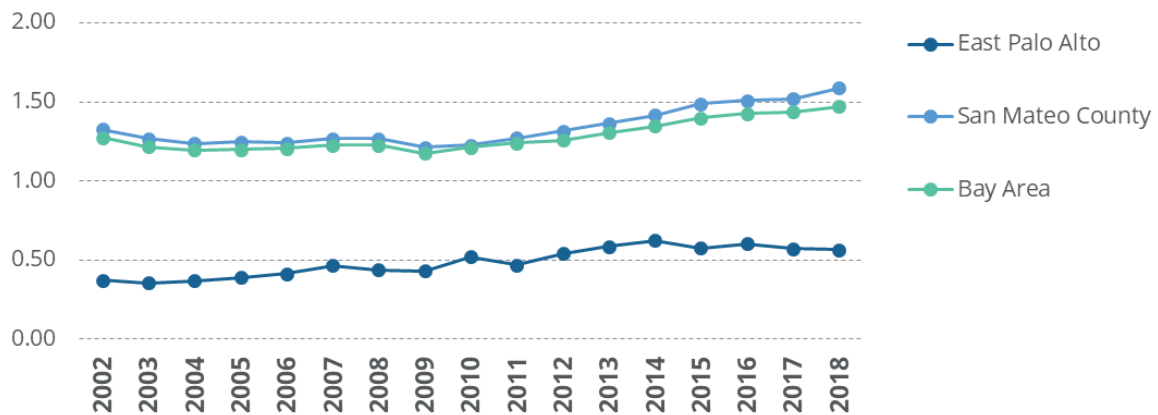
Source: ABAG Housing Needs Data Workbook

Figure III-3.
Job Holders by Industry, East Palo Alto, 2002-2018



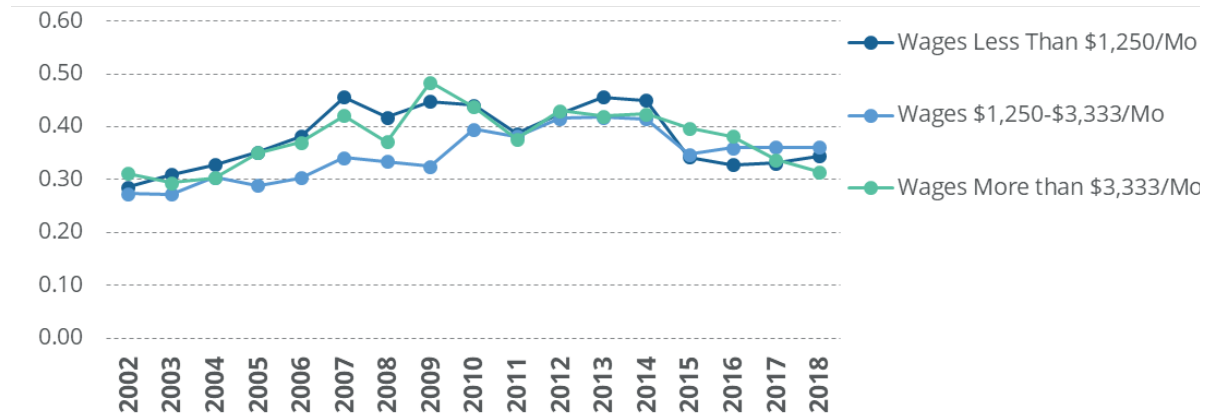
Source: ABAG Housing Needs Data Workbook

Figure III-4.
Jobs to Household Ratio, East Palo Alto, 2002-2018



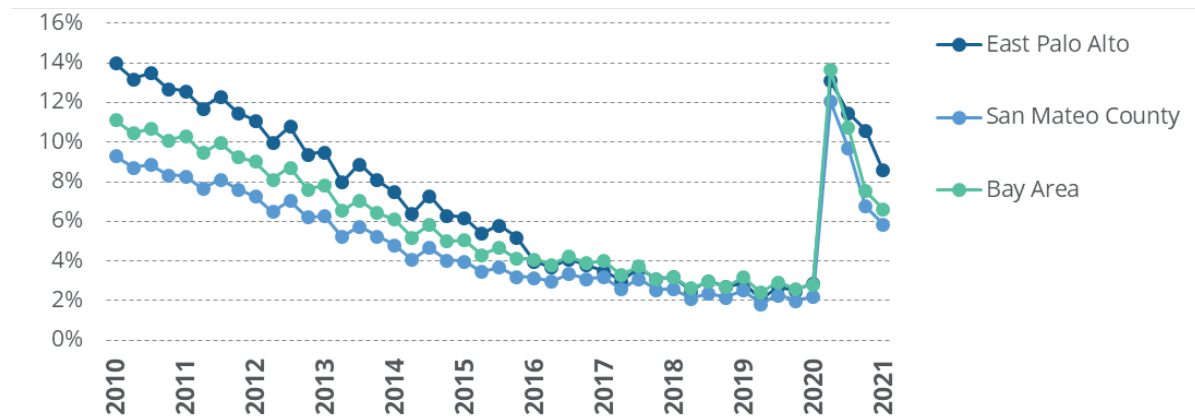
Source: ABAG Housing Needs Data Workbook

Figure III-5.
Jobs to Worker Ratio by Wage, East Palo Alto, 2002-2018



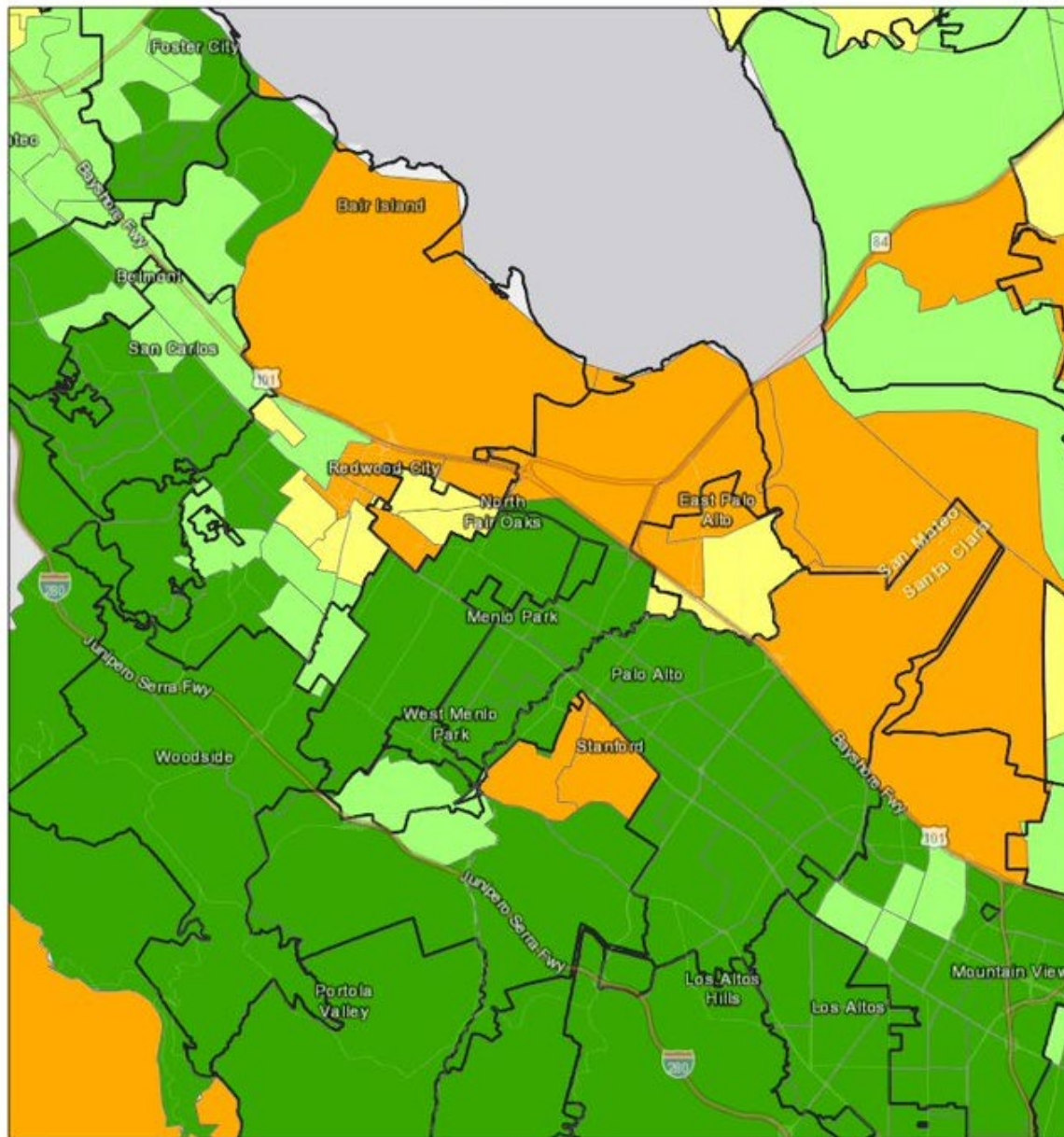
Source: ABAG Housing Needs Data Workbook

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



11/16/2021, 2:33:20 PM

City/Town Boundaries

(R) TCAC Opportunity Areas (2021) - Economic Score - Tract

< 0.25 (Less Positive Economic Outcome)

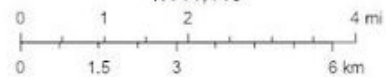
0.25 - 0.50

0.50 - 0.75

> 0.75 (More Positive Economic Outcome)

No Data

1:144,448



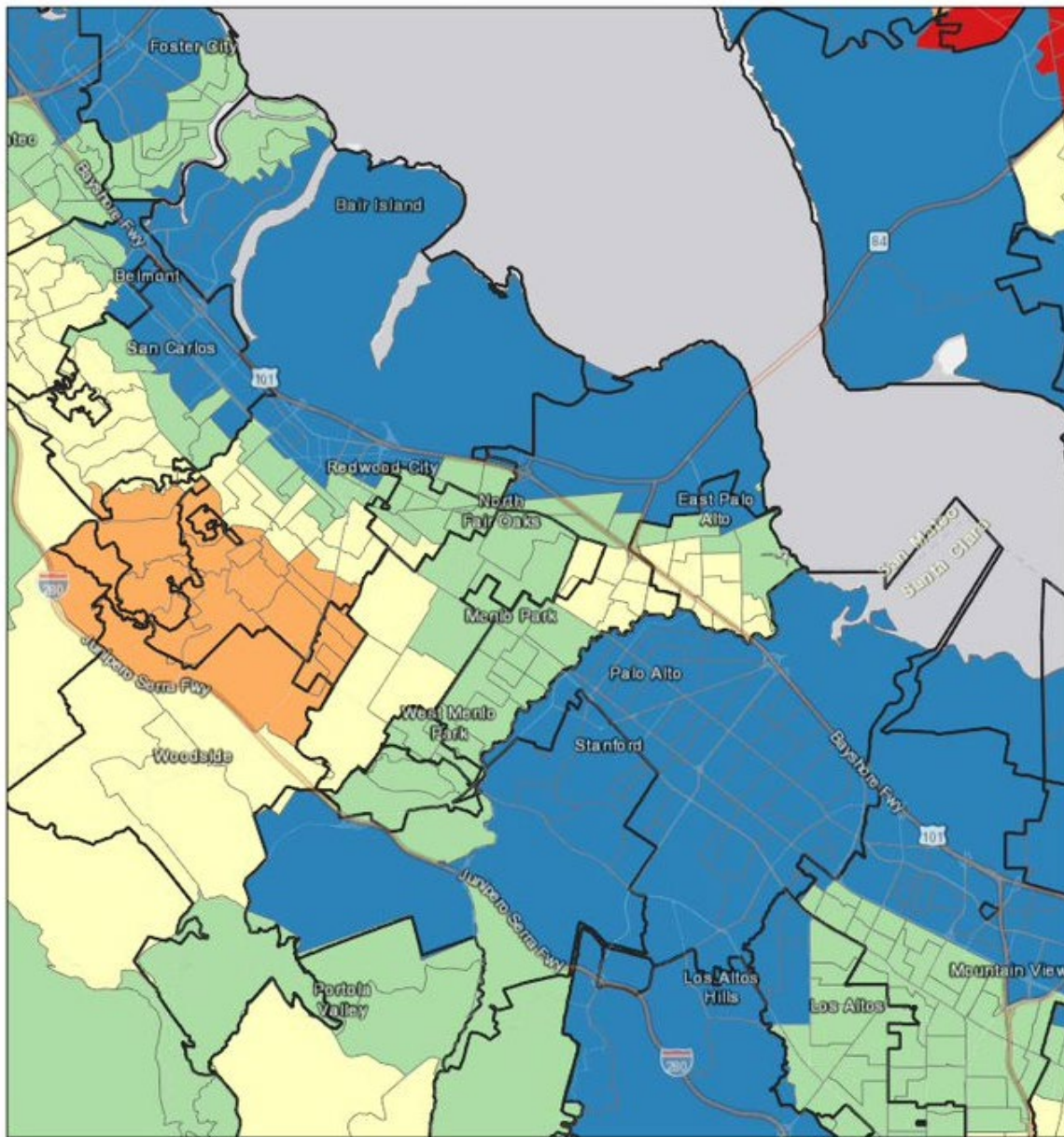
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CA HCO

Redwood City, County of San Mateo, California, County of Santa Clara, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021,

Source: California Department of Housing and Community Development AFFH Data Viewer

Figure III-8.
Jobs Proximity Index by Block Group, 2017



11/16/2021, 2:37:14 PM

1:144,448

City/Town Boundaries

(A) Jobs Proximity Index (HUD, 2014 - 2017) - Block Group

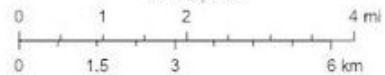
< 20 (Furthest Proximity)

20 - 40

40 - 60

60 - 80

> 80 (Closest Proximity)



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CA HCD
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Source: California Department of Housing and Community Development AFFH Data Viewer

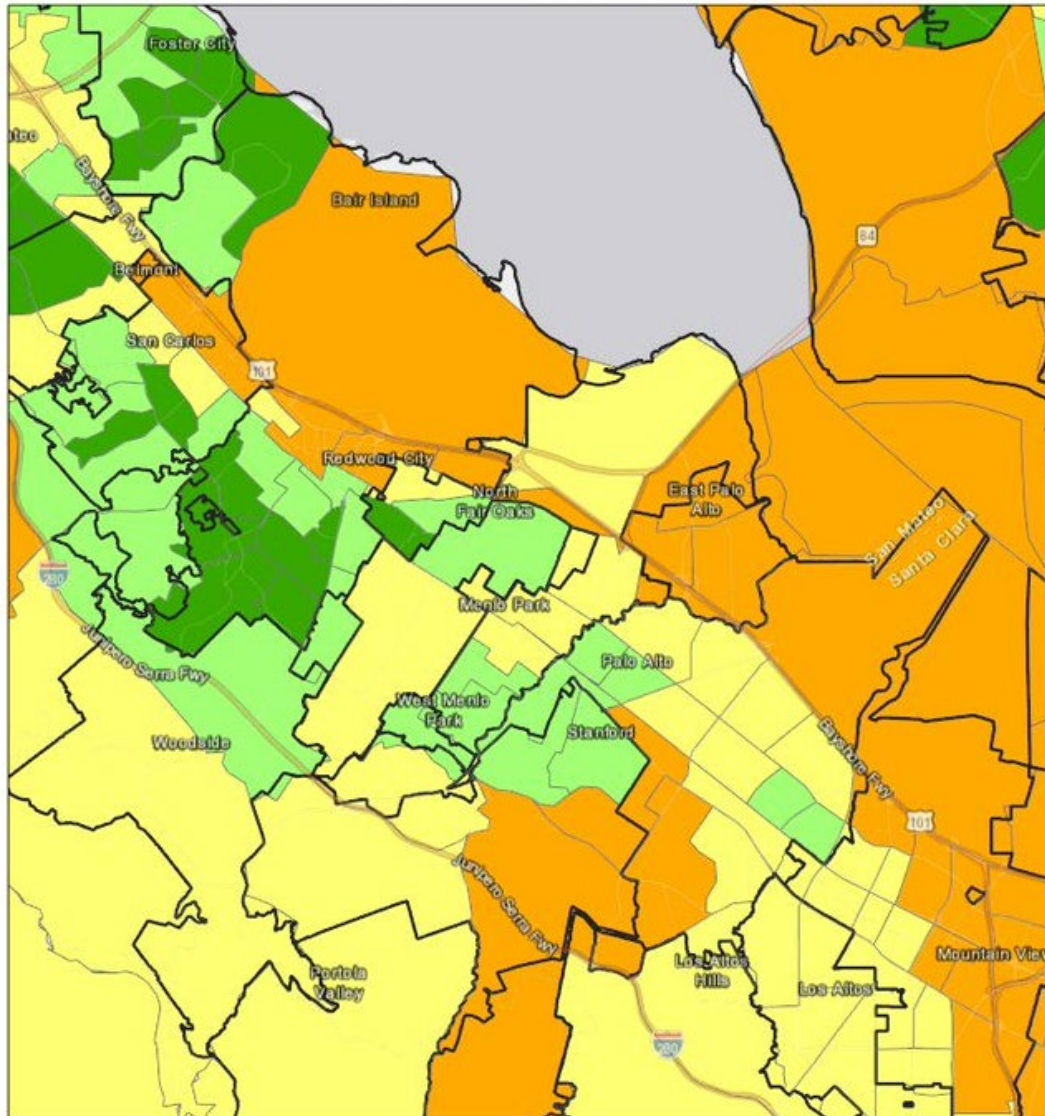
Transportation

[TCAC's transportation opportunity score and maps were not available at the time of this report]

Environment

Figure III-9.

TCAC Opportunity Areas Environmental Score by Census Tract, 2021

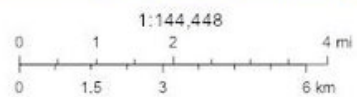


11/16/2021, 2:35:57 PM

City/Town Boundaries

(R) TCAC Opportunity Areas (2021) - Environmental Score - Tract

- < .25 (Less Positive Environmental Outcomes)
- .25 - .50
- .50 - .75
- .75 - 1 (More Positive Environmental Outcomes)

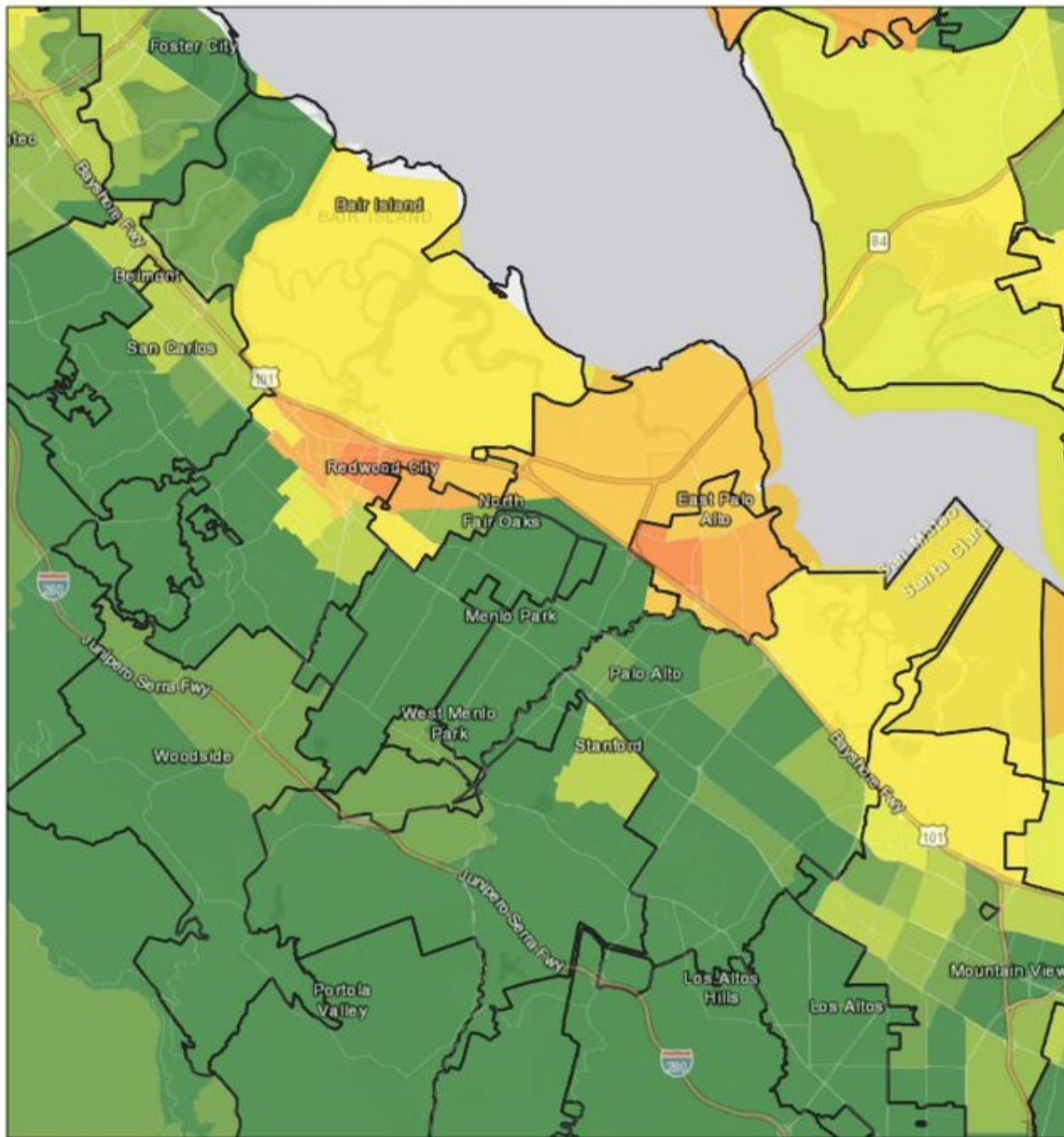


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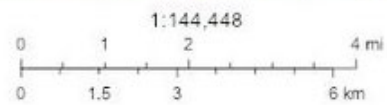
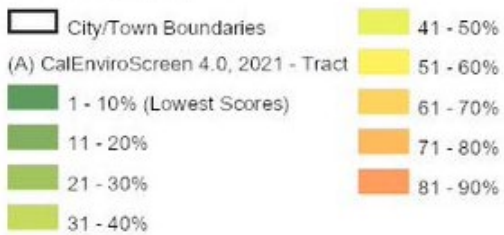
CA HCD
Redwood City, County of San Mateo, California, County of Santa Clara, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021.

Source: California Department of Housing and Community Development AFFH Data Viewer

Figure III-10.
CalEnviroScreen by Census Tract, 2021



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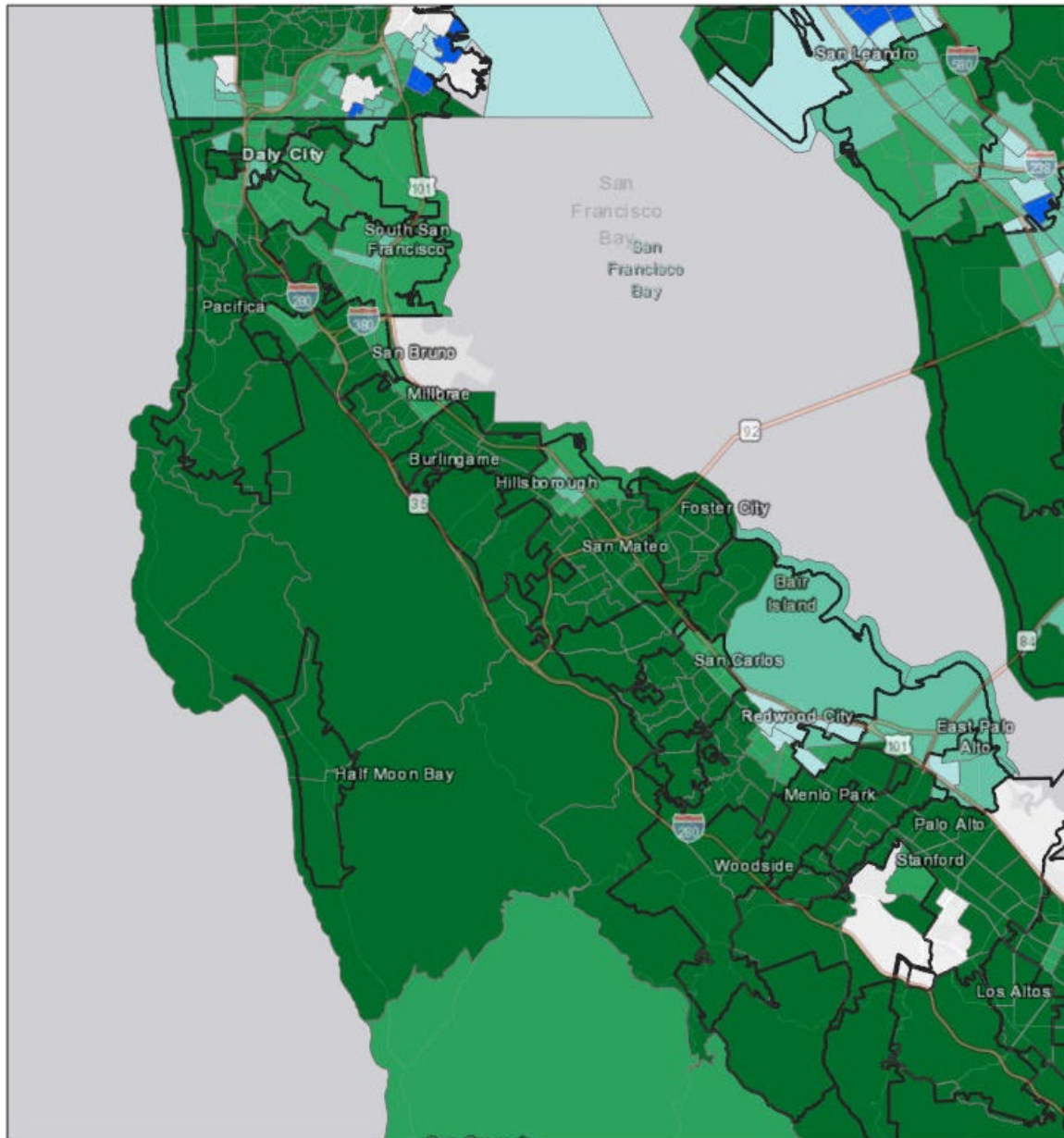


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Redwood City, County of San Mateo, California, County of Santa Clara, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, CA HCD

Source: California Department of Housing and Community Development AFFH Data Viewer

Figure III-11.
Healthy Places Index by Census Tract, 2021

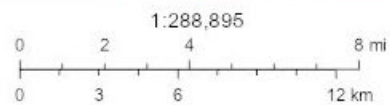


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City/Town Boundaries

(A) Healthy Places Index (PHASC, 2021) - Tract

- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- 80% - 100%



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CA HCD

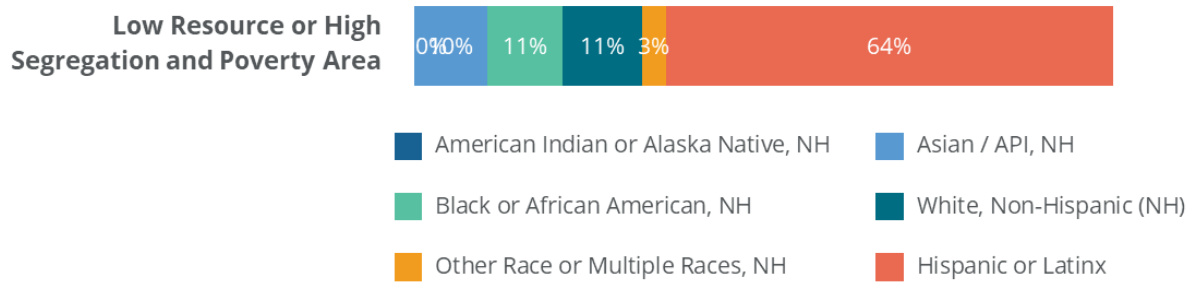
County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021.

Source: California Department of Housing and Community Development AFFH Data Viewer

Patterns in disparities in access to opportunity.

Figure III-12.

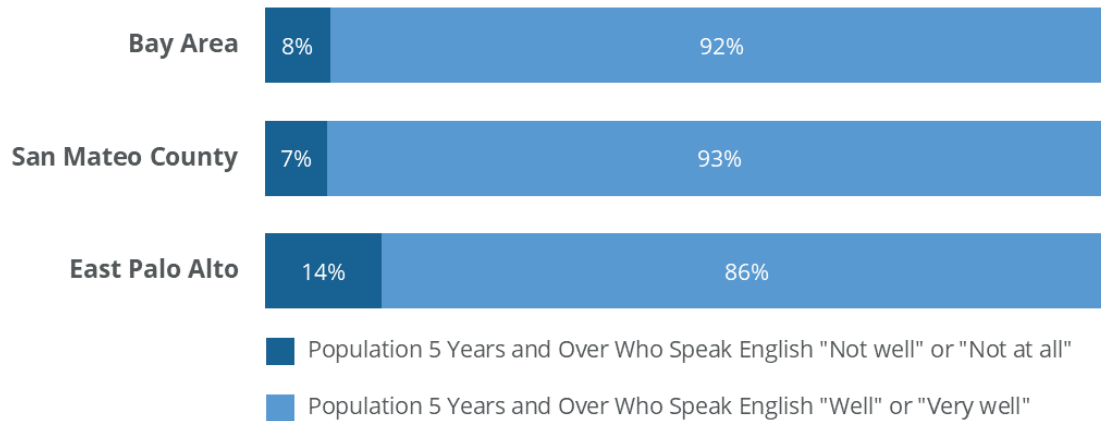
Population Living in Moderate and High Resource Ares by Race and Ethnicity, East Palo Alto, 2019



Source: ABAG Housing Needs Data Workbook

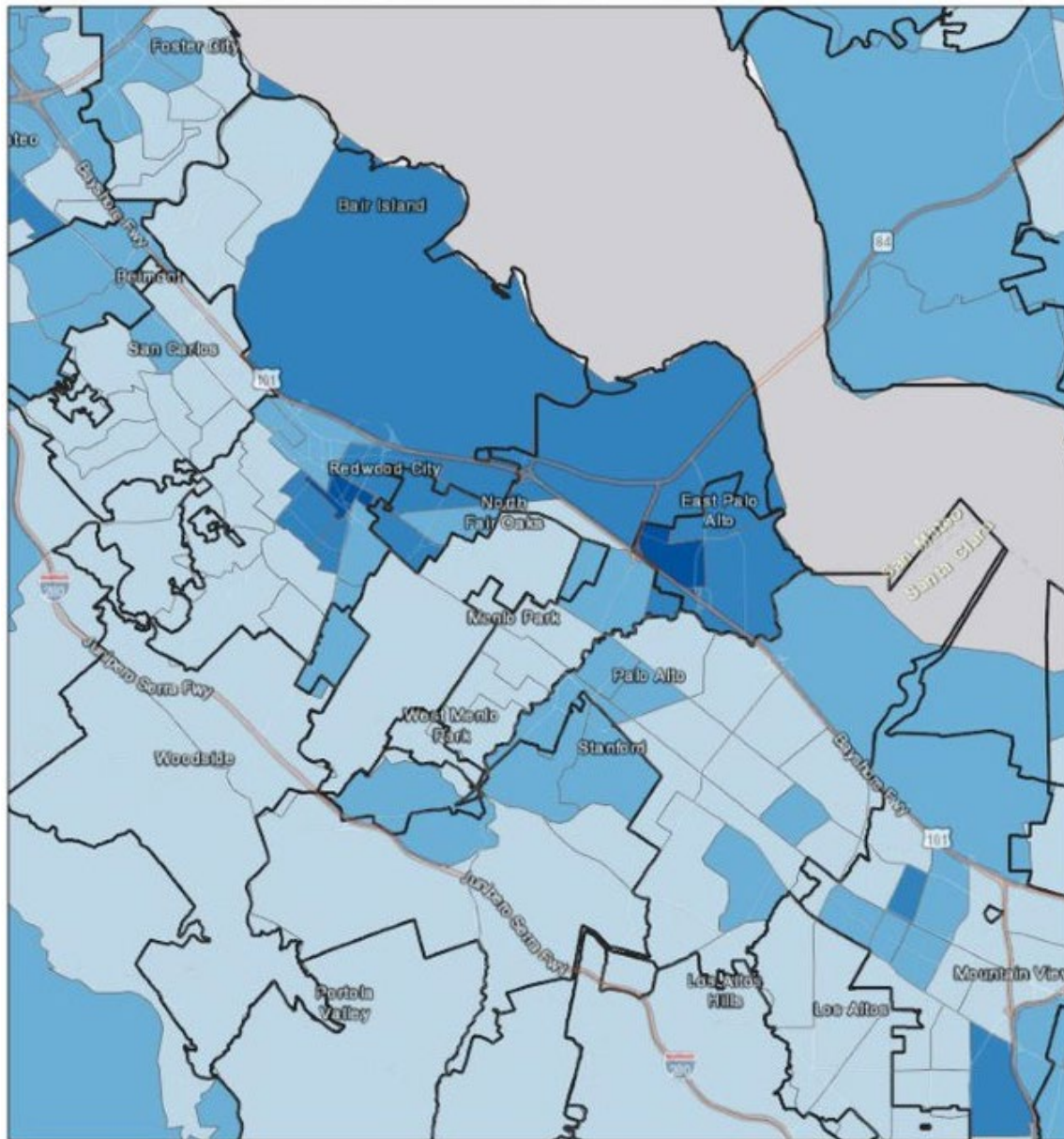
Figure III-13.

Population with Limited English Proficiency, East Palo Alto, 2019



Source: ABAG Housing Needs Data Workbook

Figure III-15.
Social Vulnerability Index by Census Tract, 2018



11/16/2021, 2:38:51 PM

1:144,448

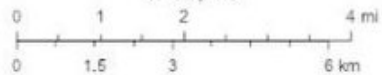
City/Town Boundaries

(A) Social Vulnerability Index (CDC, 2018) - Tract

Lower Vulnerability

Moderate Vulnerability

Higher Vulnerability



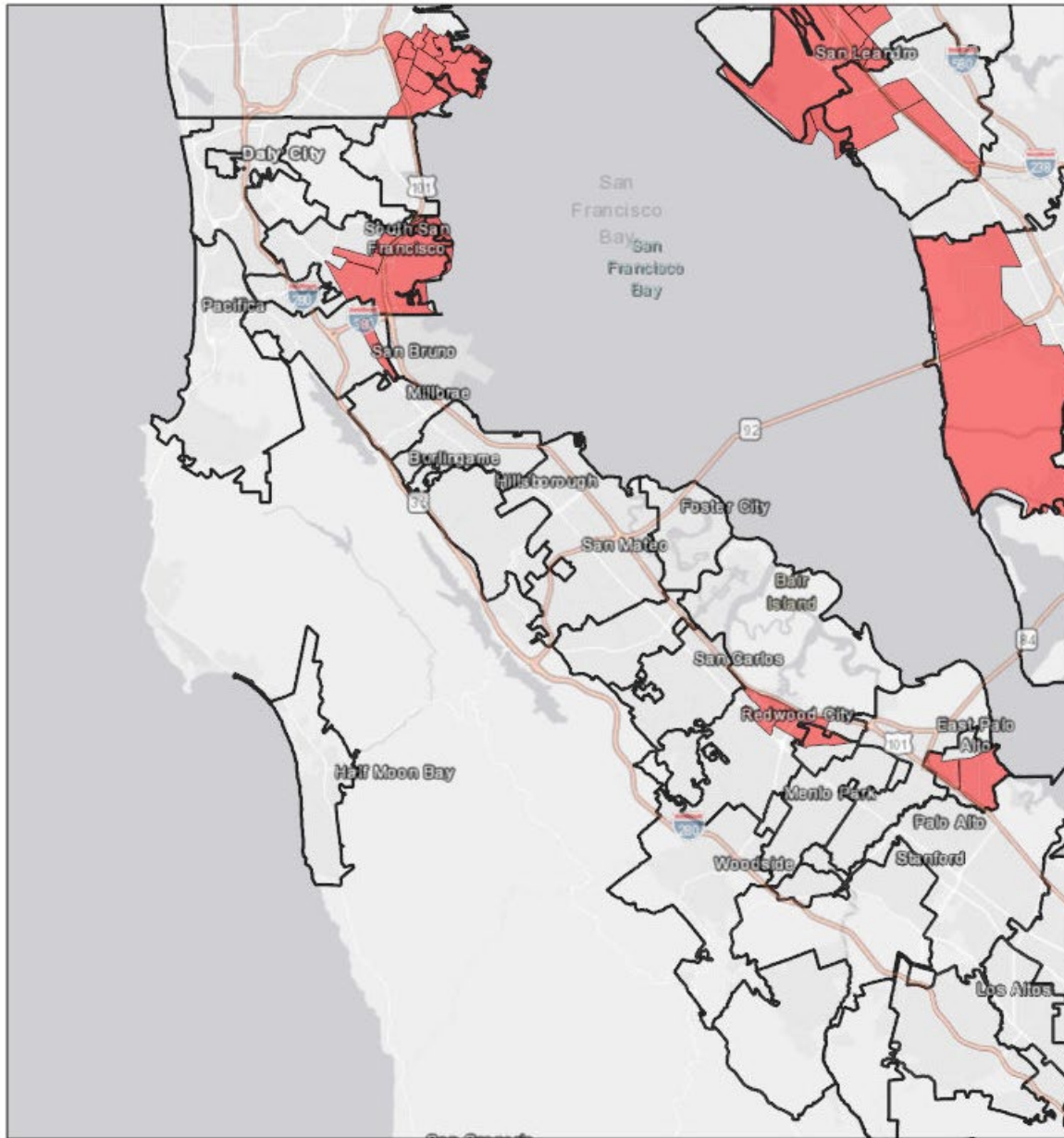
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CA HCD



Redwood City, County of San Mateo, California, County of Santa Clara, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021.

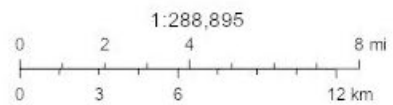
Source: California Department of Housing and Community Development AFFH Data Viewer

Figure III-16.
SB 535 Disadvantaged Communities



10/4/2021, 3:07:03 PM

-  City/Town Boundaries
-  (A) SB 535 Disadvantaged Communities



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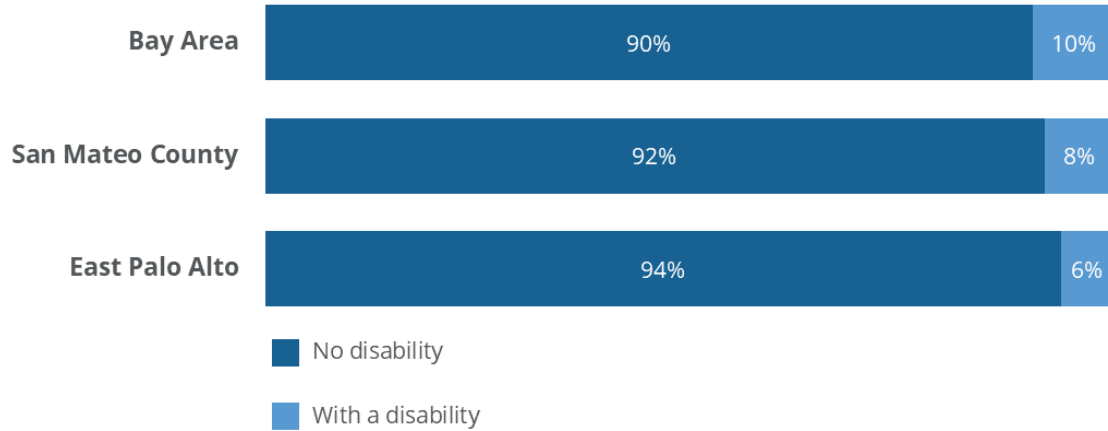
CA HCD
County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021.

Source: California Department of Housing and Community Development AFFH Data Viewer

Disparities in access to opportunity for persons with disabilities.

Figure III-17.

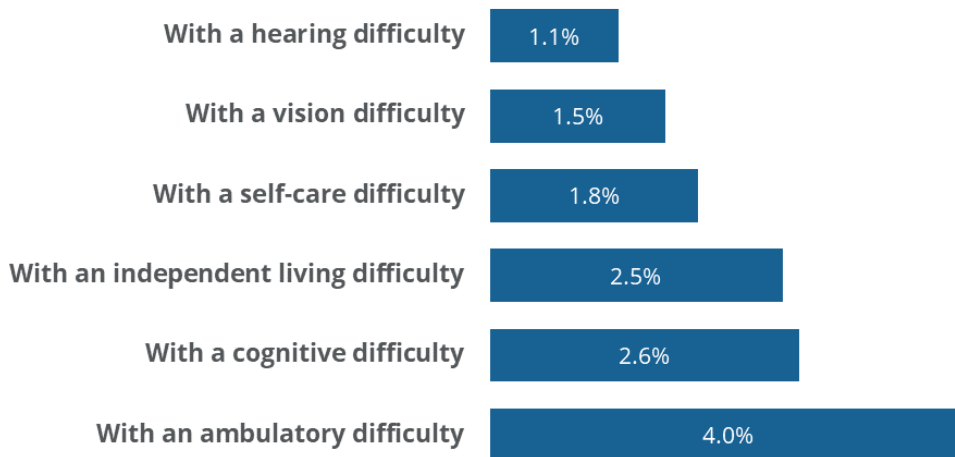
Population by Disability Status, East Palo Alto, 2019



Source: ABAG Housing Needs Data Workbook

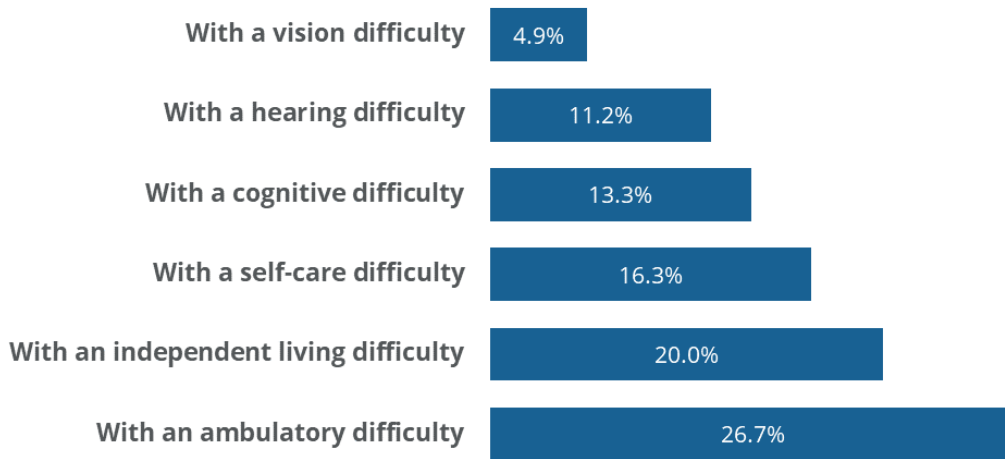
Figure III-18.

Disability by Type for the Non-Institutionalized Population 18 Years and Over, East Palo Alto, 2019



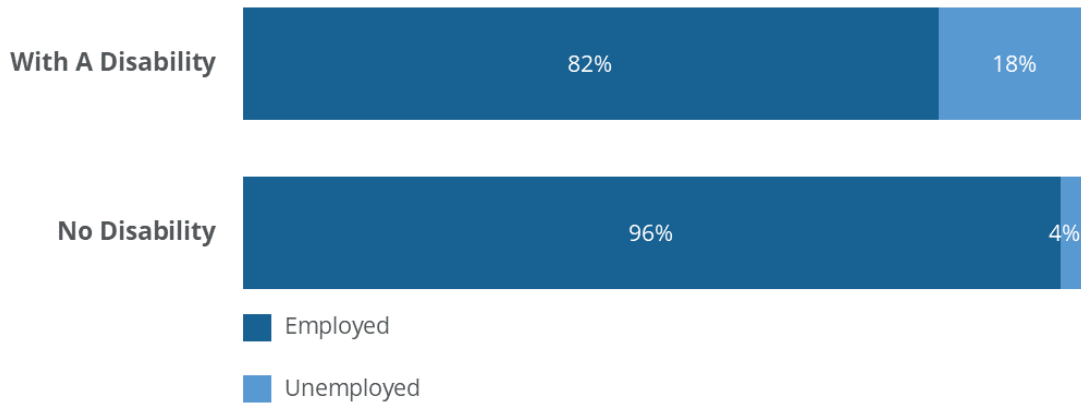
Source: ABAG Housing Needs Data Workbook

Figure III-19.
Disability by Type for Seniors (65 years and over), East Palo Alto, 2019



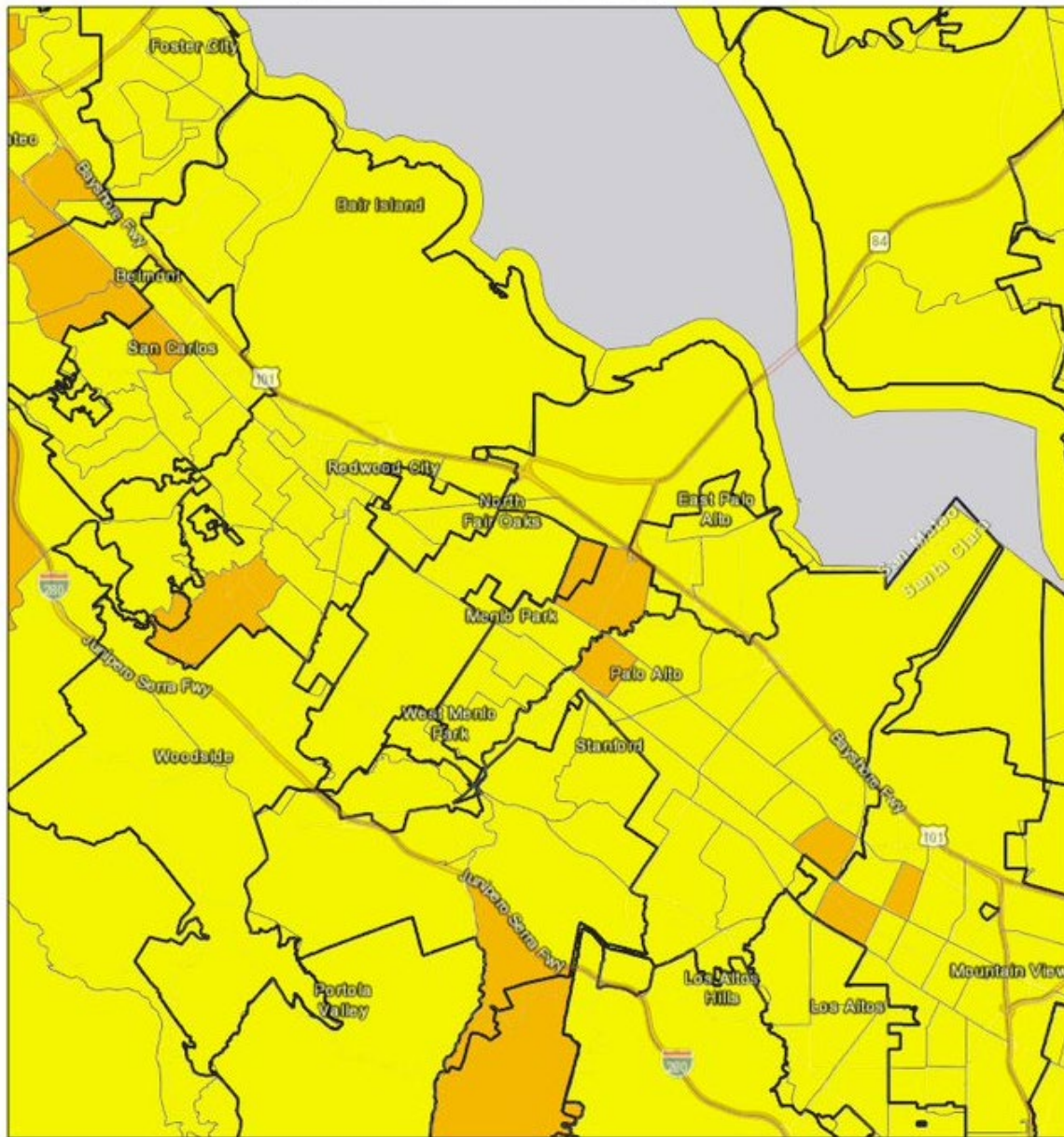
Source: ABAG Housing Needs Data Workbook

Figure III-20.
Employment by Disability Status, East Palo Alto, 2019






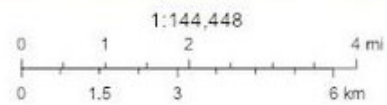
Source: ABAG Housing Needs Data Workbook

Figure III-21.
Share of Population with a Disability by Census Tract, 2019



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-  City/Town Boundaries
- (R) Population with a Disability (ACS, 2015 - 2019) - Tract
-  < 10%
-  10% - 20%



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CA HCD
 Redwood City, County of San Mateo, California, County of Santa Clara, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, H&J 2019 | PlaceWorks 2021,

Source: California Department of Housing and Community Development AFFH Data Viewer

Figure III-22 Mateo County Housing Policies and Programs Analysis

San Mateo County Housing Policies and Programs

Compiled by the Association of Bay Area Governments, February 2016 update; revised July 2016 by San Mateo County staff with updates from 21 Elements

Affordable Housing Policies and Programs	Atherton	Belmont	Brisbane	Burlingame	Colma	Daly City	East Palo Alto	Foster City	Half Moon Bay*	Hillsborough	Menlo Park	Millbrae*	Pacifica	Portola Valley*	Redwood City	San Bruno*	San Carlos	San Mateo	South San Francisco	Woodside	San Mateo County
Reduced Parking Requirements	N	UC	Y	Y	Y	N	Y	Y	N	Y	Y	Y	Y	N	Y	UC	Y	Y	Y	N	N
Streamlined Permitting Process	N	N	Y	N	Y	N	Y	Y	Y	Y	Y	Y	N	N	Y	UC	N	N	Y	N	N
Graduated Density Bonus (parcel assembly)	N	N	Y	N	N	N	N	N	N	N	Y	N	N	N	N	Y	N	Y	N	N	N
Form-based codes	N	N	Y	N	N	N	N	N	N	N	Y	N	N	N	Y	N	Y	Y	N	N	N
Mixed Use Zoning	N	Y	Y	Y	N	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y
Housing Overlay Zone	N	N	N	Y	N	N	UC	N	N	N	Y	N	N	N	UC	N	N	Y	N	N	N
Density Bonus Ordinances	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	N	Y
Inclusionary/Below Market Rate Housing Policy	N	N	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Y
Condominium Conversion Ordinance	N	Y	Y	Y	N	Y	Y	Y	Y	N	Y	Y	Y	N	N	N	N	N	Y	N	Y
Just Cause Evictions	N	N	N	N	N	N	Y	N	N	N	N	N	N	N	N	N	N	N	N	N	N
Rent Stabilization	N	N	N	N	N	N	Y	N	N	N	N	N	N	N	N	N	N	N	N	N	N
Acquisition/Rehabilitation/ Conversion Program	N	Y	Y	N	N	Y	N	Y	N	N	N	N	N	N	Y	Y	Y	Y	N	N	N
Preservation of Mobile Homes (Rent Stabilization ordinances)	N	N	Y	N	N	N	Y	N	N	N	N	N	Y	N	N	N	N	N	N	N	Y
SRO Preservation Ordinances	N	N	Y	N	N	N	N	N	N	N	N	N	N	N	N	N	Y	N	Y	N	N
Homeowner Rehabilitation program	N	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	N	N	Y	Y	Y	N	Y	Y	Y
Other Anti-Displacement Strategies	N	N	N	N	N	N	Y	Y	Y	N	Y	Y	N	N	N	N	N	Y	N	N	Y
Reduced Fees or Waivers	N	N	Y	N	N	Y	UC	Y	N	Y	N	N	N	Y	Y	Y	N	N	Y	N	Y
General Fund Allocation Incl. former RDA "Boomerang" Funds	N	N	Y	N	N	N	Y	N	N	N	Y	N	N	N	N	N	UC	N	N	N	N
In-Lieu Fees (Inclusionary Zoning)	N	N	N	UC	N	Y	Y	N	N	N	Y	Y	Y	Y	Y	Y	Y	N	N	N	Y
Housing Development Impact Fee	N	UC	Y	UC	UC	Y	Y	N	N	N	Y	N	N	Y	Y	UC	Y	Y	N	N	Y
Commercial Development Impact Fee	N	UC	N	UC	N	N	Y	N	N	N	Y	N	N	N	Y	UC	UC	UC	UC	N	Y
Other taxes or fees dedicated to housing	N	N	N	N	N	N	Y	N	N	N	N	N	N	N	N	N	Y	Y	N	N	N
Locally Funded Homebuyer Assistance Programs	N	Y	Y	N	N	N	UC	Y	N	N	Y	N	N	N	Y	N	N	N	N	N	N
Tenant-Based Assistance	N	N	N	N	N	Y	N	Y	N	N	N	N	N	N	N	N	N	N	N	N	N
Home sharing programs	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N	N	Y	N	Y	Y
Has Public Housing? (Y/N)	N	N	N	N	N/A	Y	N	N	N/A	N	N	N/A	N	N/A	N	N/A	N	N	N/A	N	Y
Has Group Homes? (Y/N)	Y	N	Y	Y	N/A	Y	Y	Y	N/A	Y	Y	N/A	N	N/A	Y	N/A	Y	Y	N/A	N	Y
Has a Second Unit Ordinance? (Y/N)	Y	N	Y	Y	N/A	Y	Y	Y	N/A	Y	Y	N/A	Y	Y	Y	N/A	Y	Y	N/A	Y	Y
Has Emergency Shelters? (Y/N)	N	N	N	N	N/A	N	Y	Y	N/A	Y	Y	N/A	N	N/A	Y	N/A	N	Y	N/A	N	Y
Has Affordable Housing Complexes? (Y/N)	N	N	Y	N	N/A	Y	Y	N	N/A	N	Y	N/A	Y	N/A	Y	N/A	Y	Y	N/A	N	Y

ABAG tracked thirty housing policy and program types that represent the most prevalent and important strategies for fostering development of both market rate and affordable housing units. ABAG Staff compiled a summary of policies adopted by each jurisdiction based on the jurisdiction's certified 2007-2014 housing element, and sent the summary to local staff for verification. We have indicated instances in which we were not able to verify or obtain information.

Legend:

- Y: The policy or program is currently in effect in the jurisdiction
- N: The policy or program is not in effect in the jurisdiction
- UC: The policy or program is currently under consideration by the jurisdiction
- N/A: Indicates information was unavailable for jurisdiction

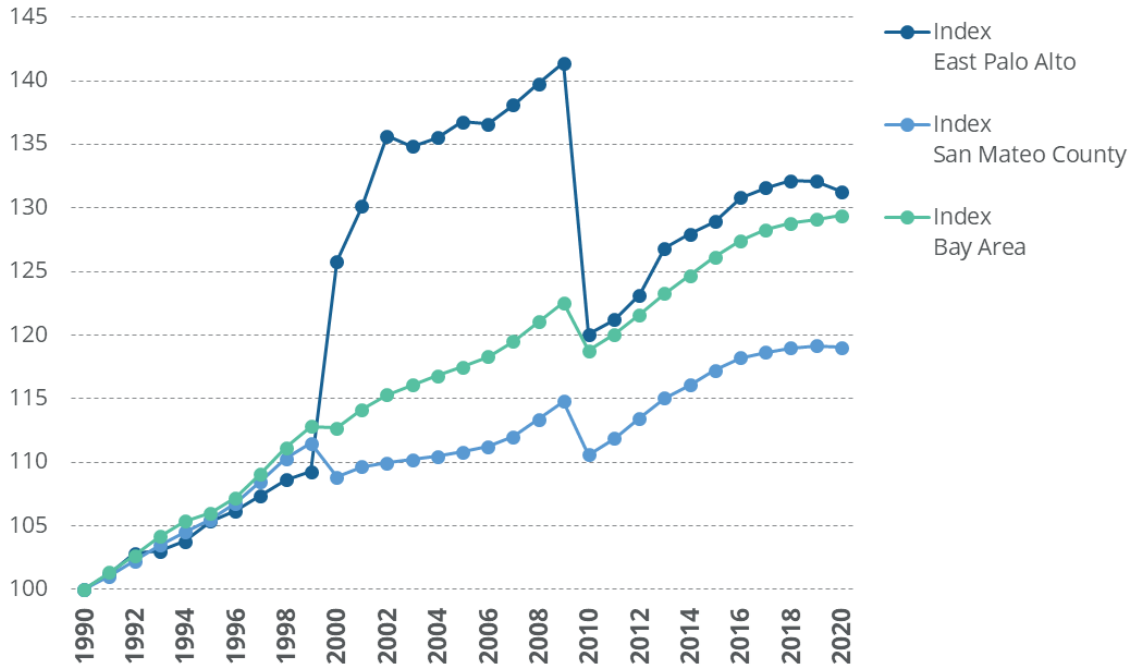
Source: ABAG.

SECTION IV. Disproportionate Housing Needs

Housing needs.

Figure IV-1.

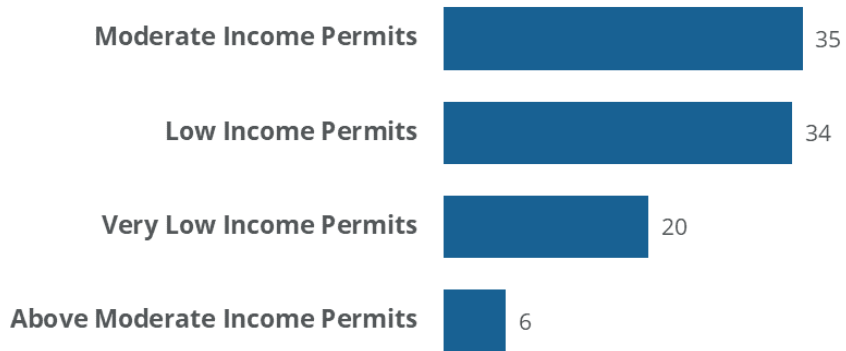
Population Indexed to 1990



Source: ABAG Housing Needs Data Workbook

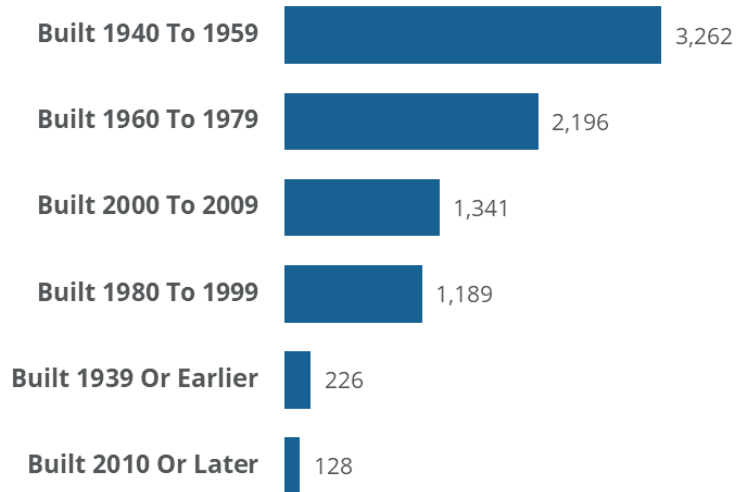
Figure IV-2.
Housing Permits Issued by Income Group, East Palo Alto, 2015-2019

Source:
 ABAG Housing Needs Data
 Workbook

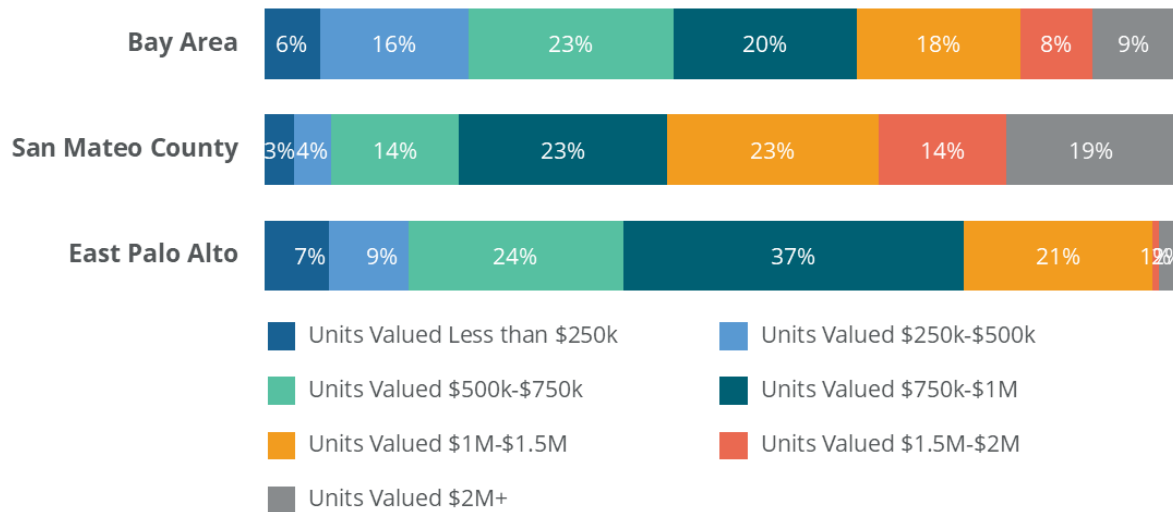


**Figure IV-3.
Housing Units by Year
Built, East Palo Alto**

Source:
ABAG Housing Needs Data Workbook

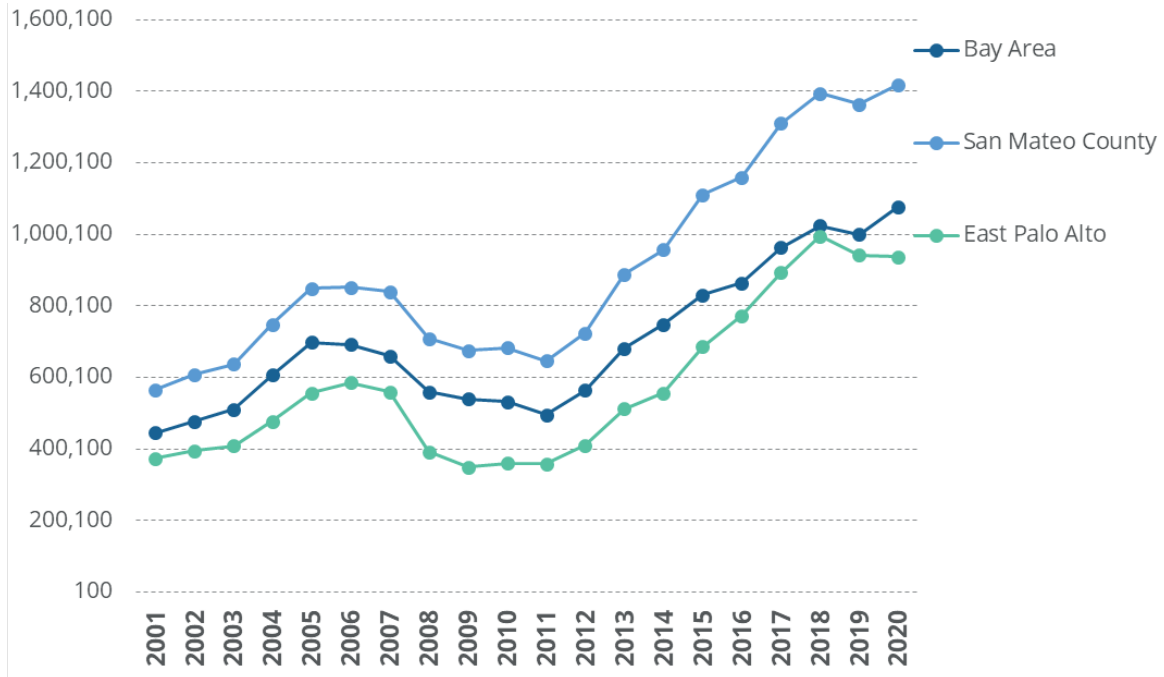


**Figure IV-4.
Distribution of Home Value for Owner Occupied Units, 2019**



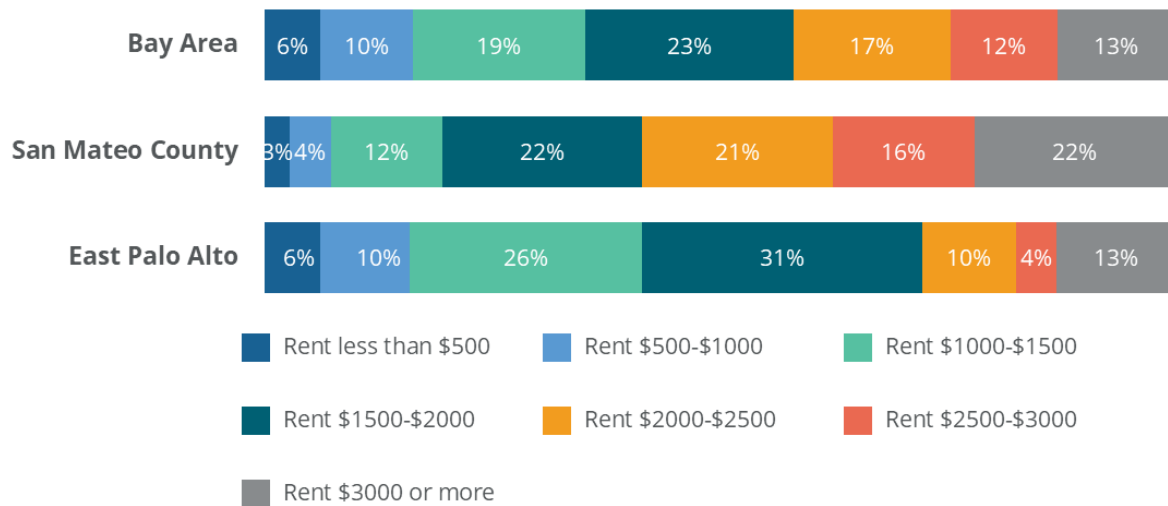
Source: ABAG Housing Needs Data Workbook

Figure IV-5.
Zillow Home Value Index, 2001-2020



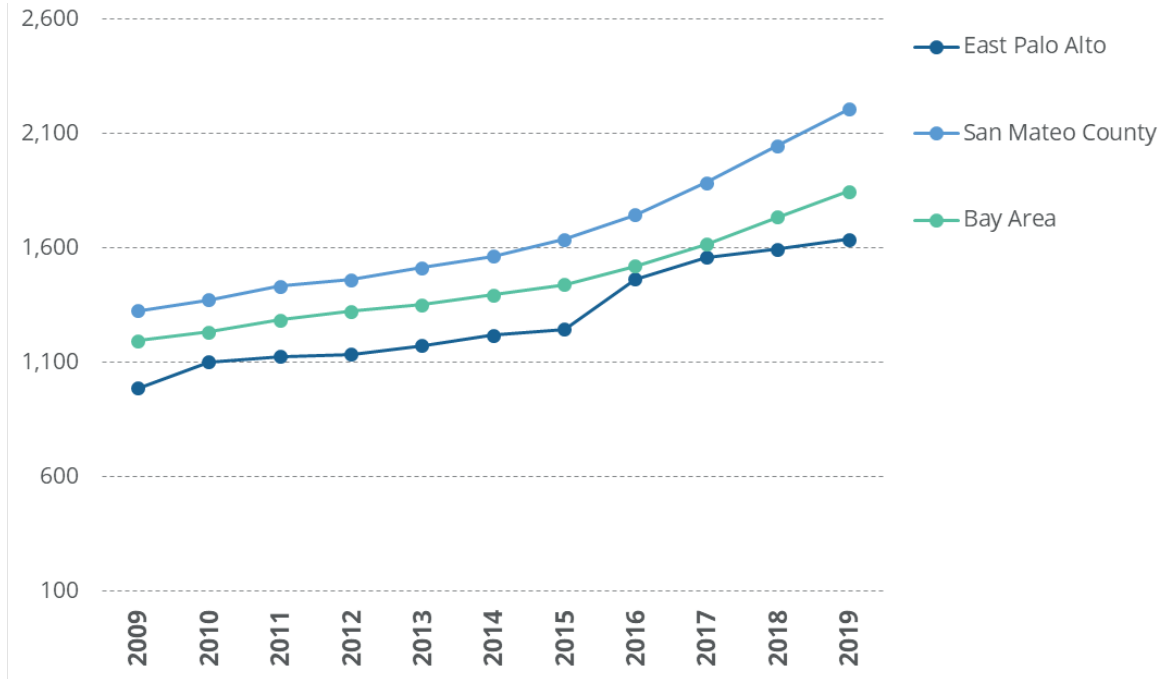
Source: ABAG Housing Needs Data Workbook

Figure IV-6.
Distribution of Contract Rents for Renter Occupied Units, 2019



Source: ABAG Housing Needs Data Workbook

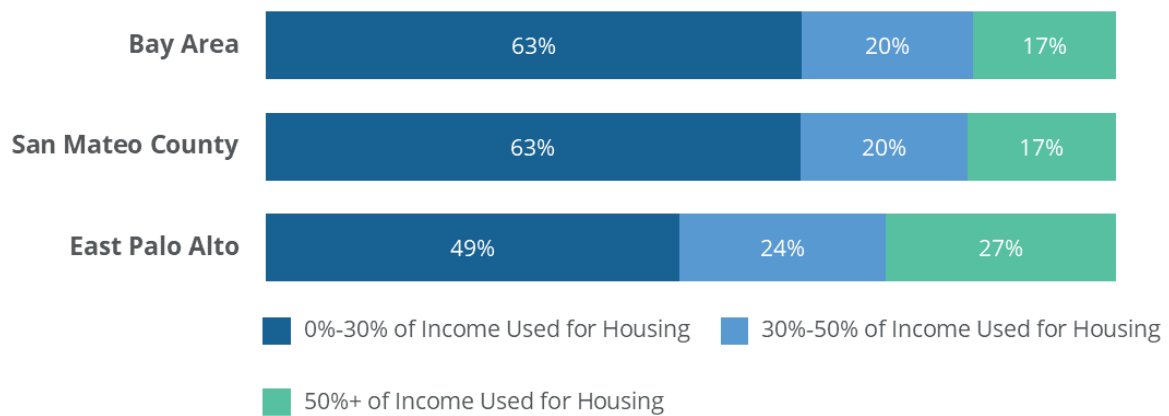
Figure IV-7.
Median Contract Rent, 2009-2019



Source: ABAG Housing Needs Data Workbook

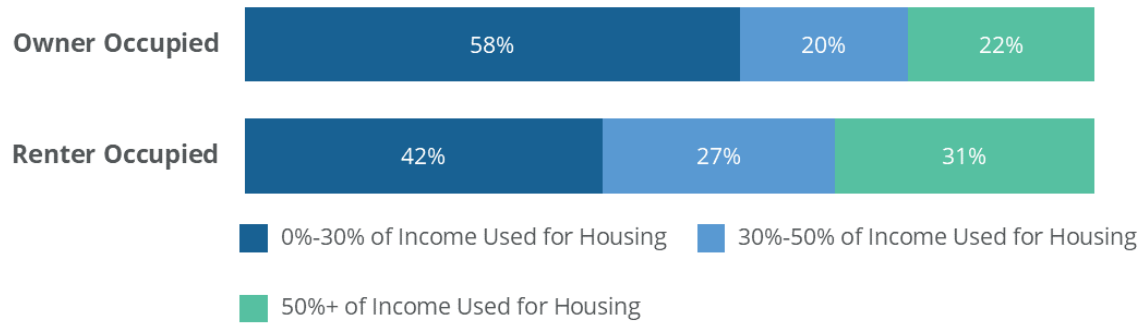
Cost burden and severe cost burden.

Figure IV-8.
Overpayment (Cost Burden) by Jurisdiction, 2019



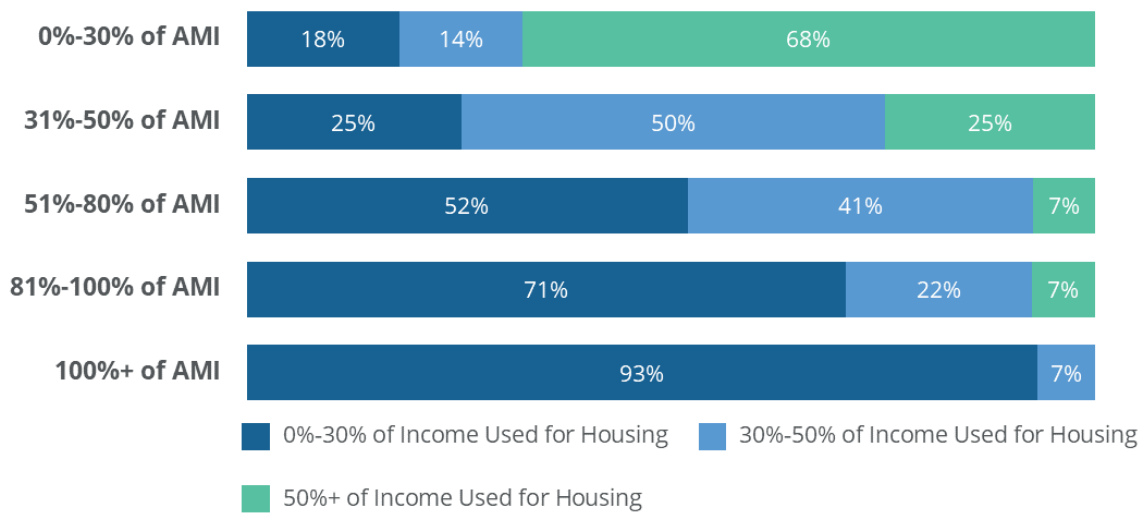
Source: ABAG Housing Needs Data Workbook

Figure IV-9.
Overpayment (Cost Burden) by Tenure, East Palo Alto, 2019



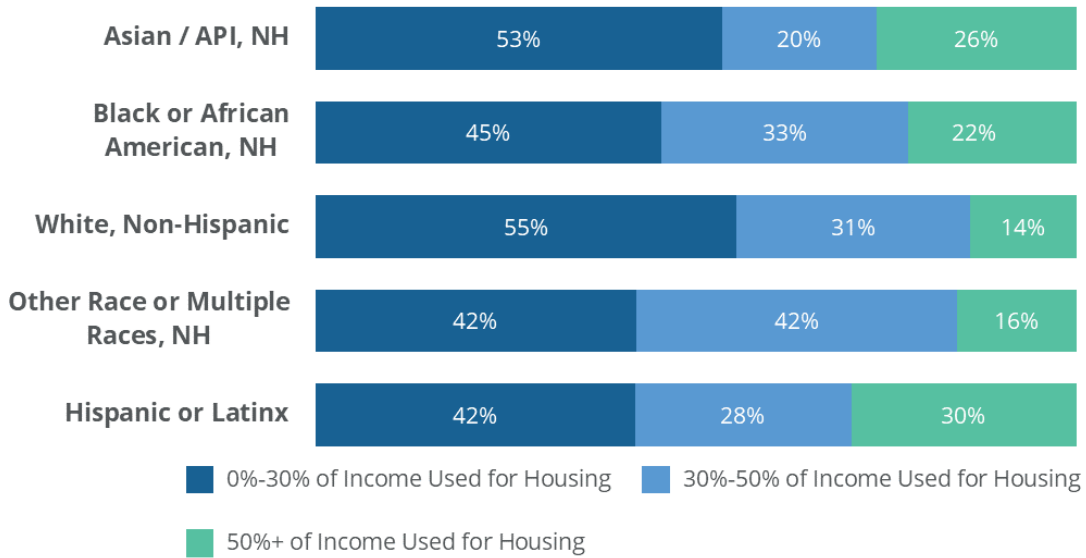
Source: ABAG Housing Needs Data Workbook

Figure IV-10.
Overpayment (Cost Burden) by Area Median Income (AMI), East Palo Alto, 2019



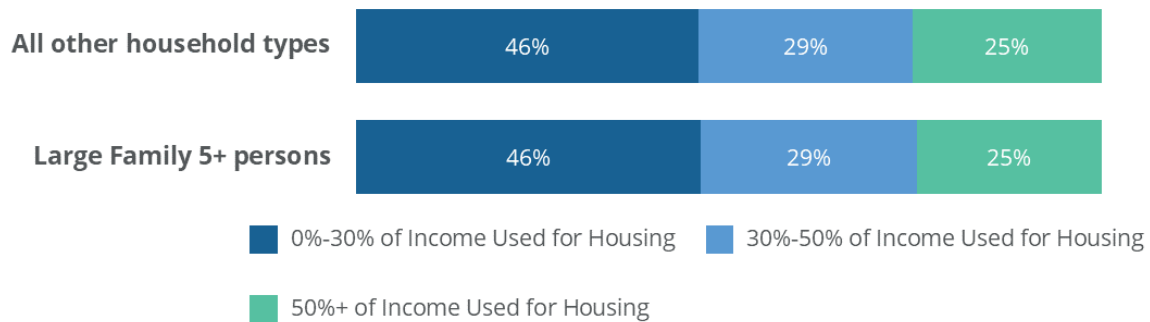
Source: ABAG Housing Needs Data Workbook

Figure IV-11.
Overpayment (Cost Burden) by Race and Ethnicity, East Palo Alto, 2019



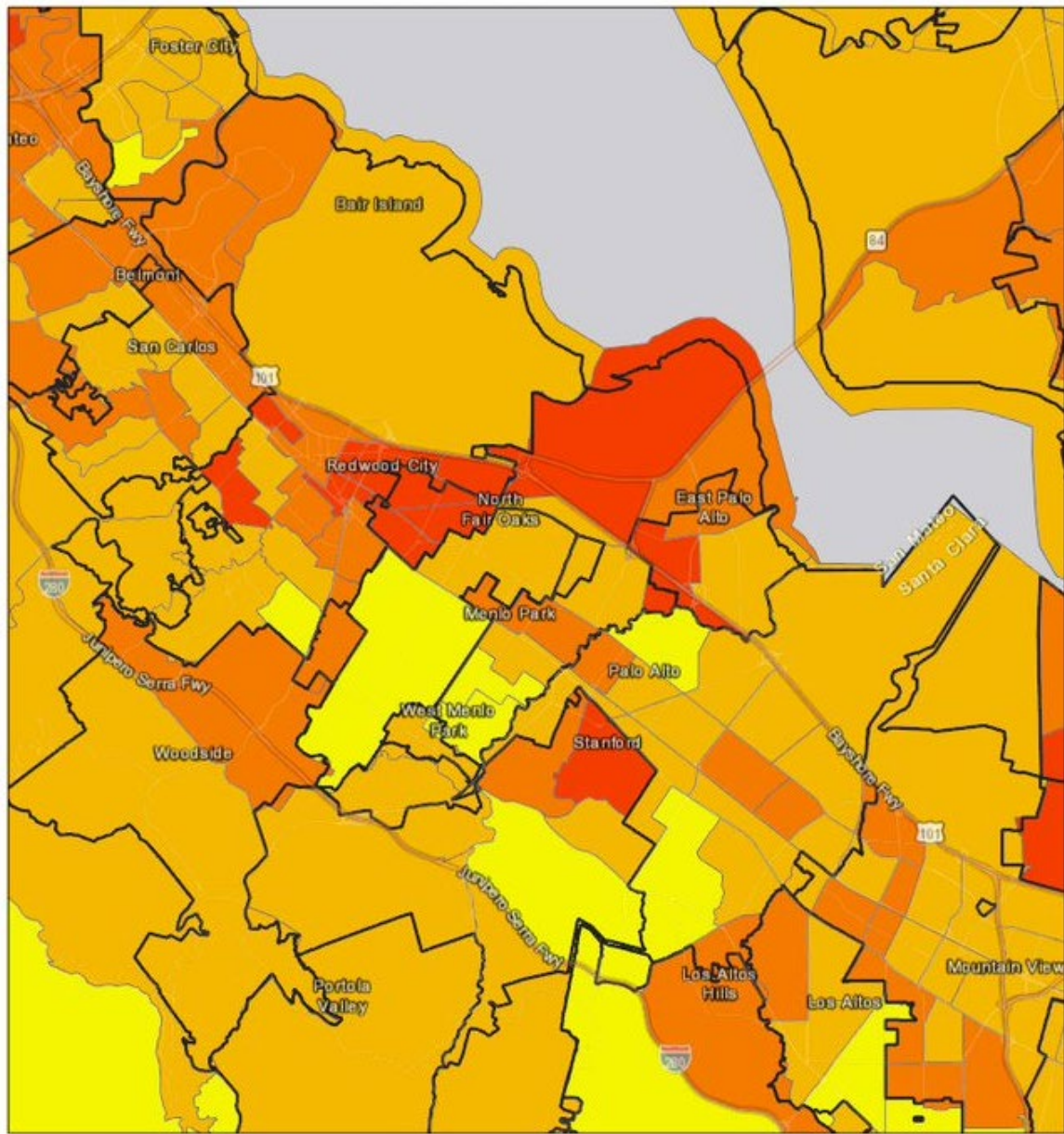
Source: ABAG Housing Needs Data Workbook

Figure IV-12.
Overpayment (Cost Burden) by Family Size, East Palo Alto, 2019



Source: ABAG Housing Needs Data Workbook

Figure IV-13.
Overpayment (Cost Burden) for Renter Households by Census Tract, 2019



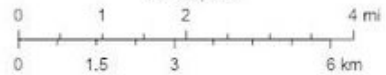
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City/Town Boundaries

(R) Overpayment by Renters (ACS, 2015 - 2019) - Tract

- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%

1:144,448



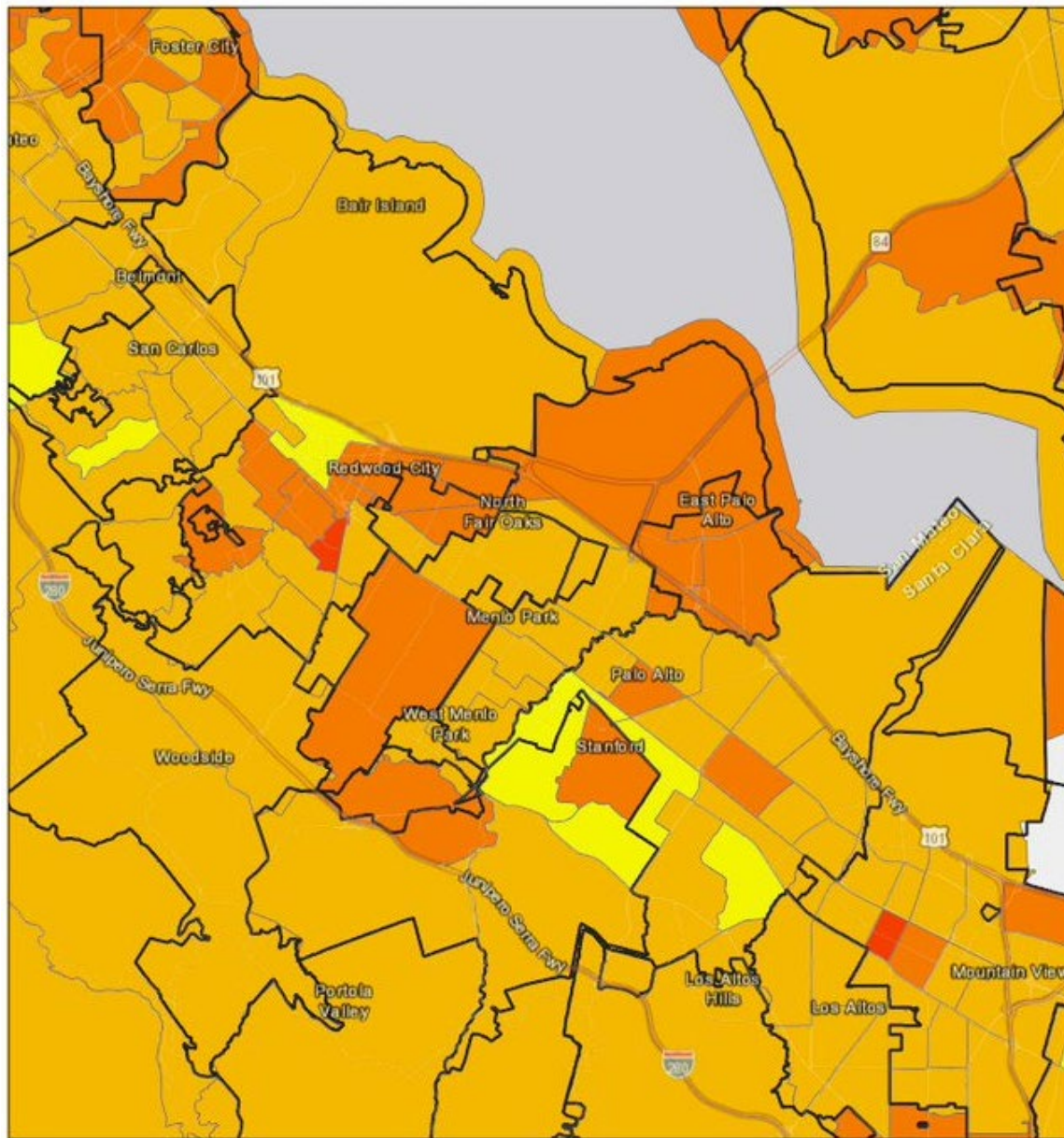
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CA HCD

Redwood City, County of San Mateo, California, County of Santa Clara, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021.

Source: California Department of Housing and Community Development AFFH Data Viewer

Figure IV-14.
Overpayment (Cost Burden) for Owner Households by Census Tract, 2019

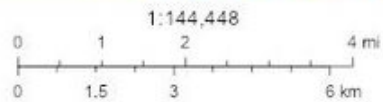


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City/Town Boundaries

(R) Overpayment by Home Owners (ACS, 2015 - 2019) - Tract

- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%



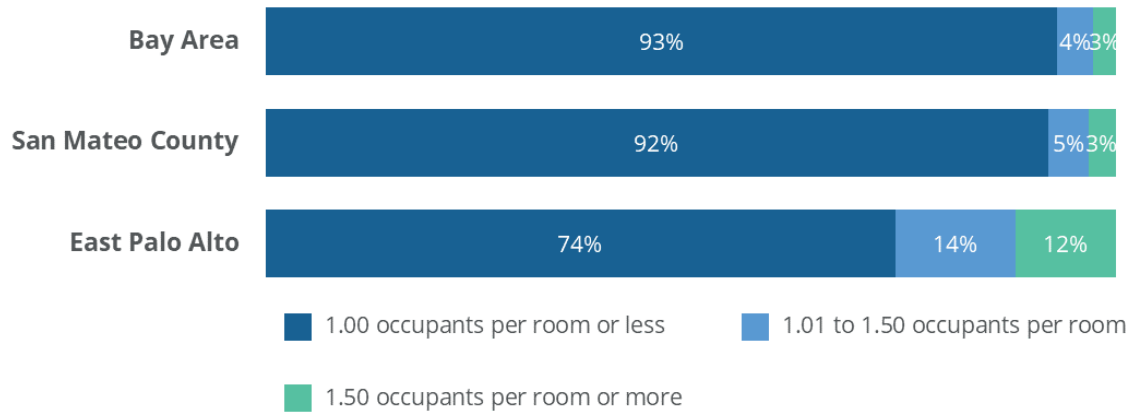
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Redwood City, County of San Mateo, California, County of Santa Clara, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, CA HCD

Source: California Department of Housing and Community Development AFFH Data Viewer

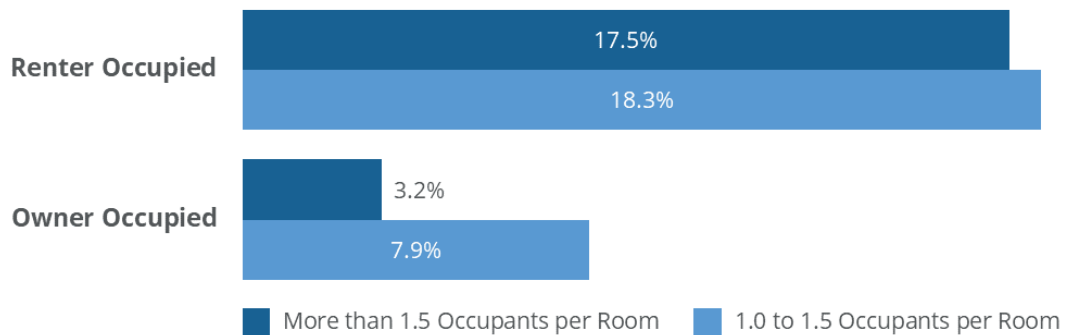
Overcrowding.

Figure IV-15.
Occupants per Room by Jurisdiction, 2019



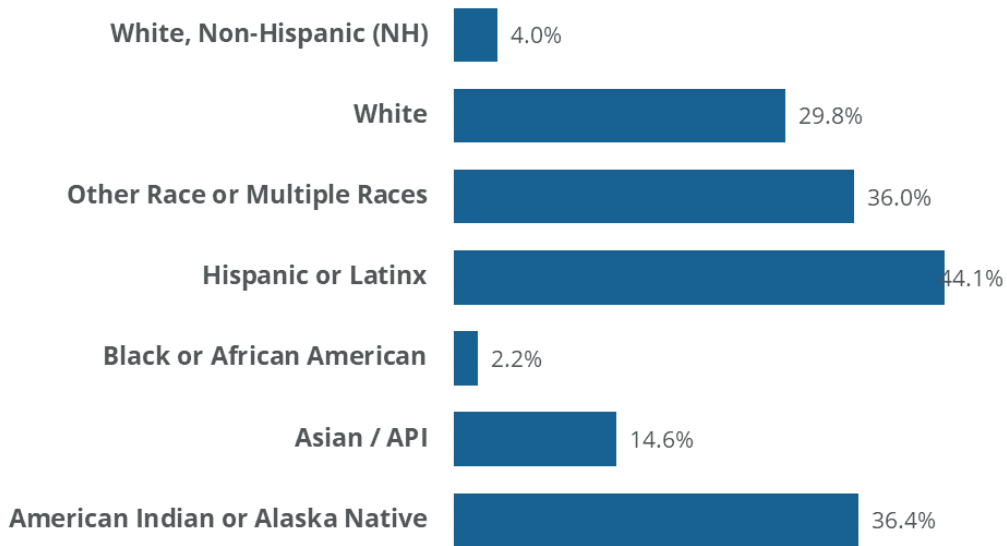
Source: ABAG Housing Needs Data Workbook

Figure IV-16.
Occupants per Room by Tenure, East Palo Alto, 2019



Source: ABAG Housing Needs Data Workbook

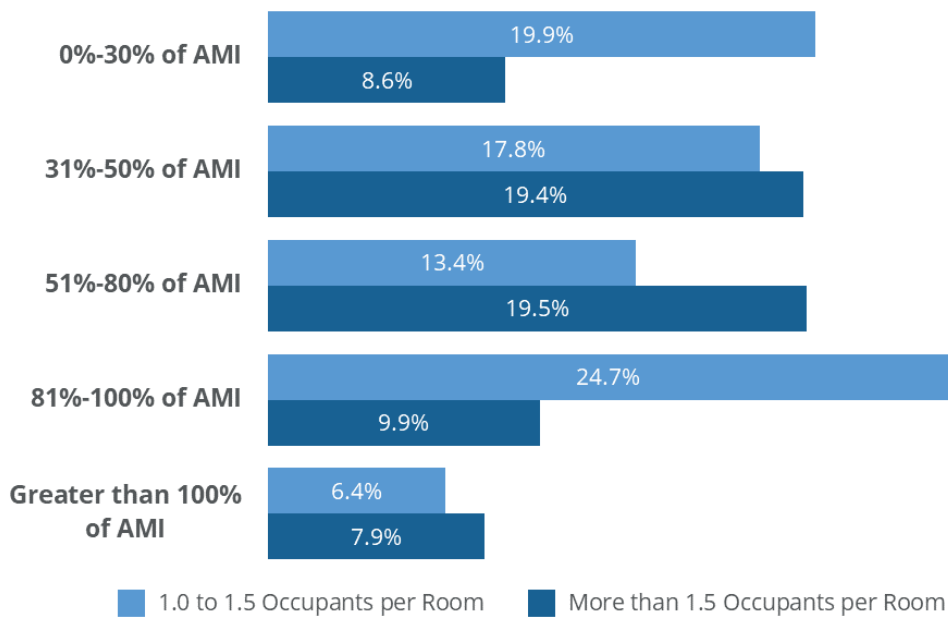
Figure IV-17.
Overcrowding by Race and Ethnicity, East Palo Alto, 2019



Note: Overcrowding is indicated by more than 1 person per room.

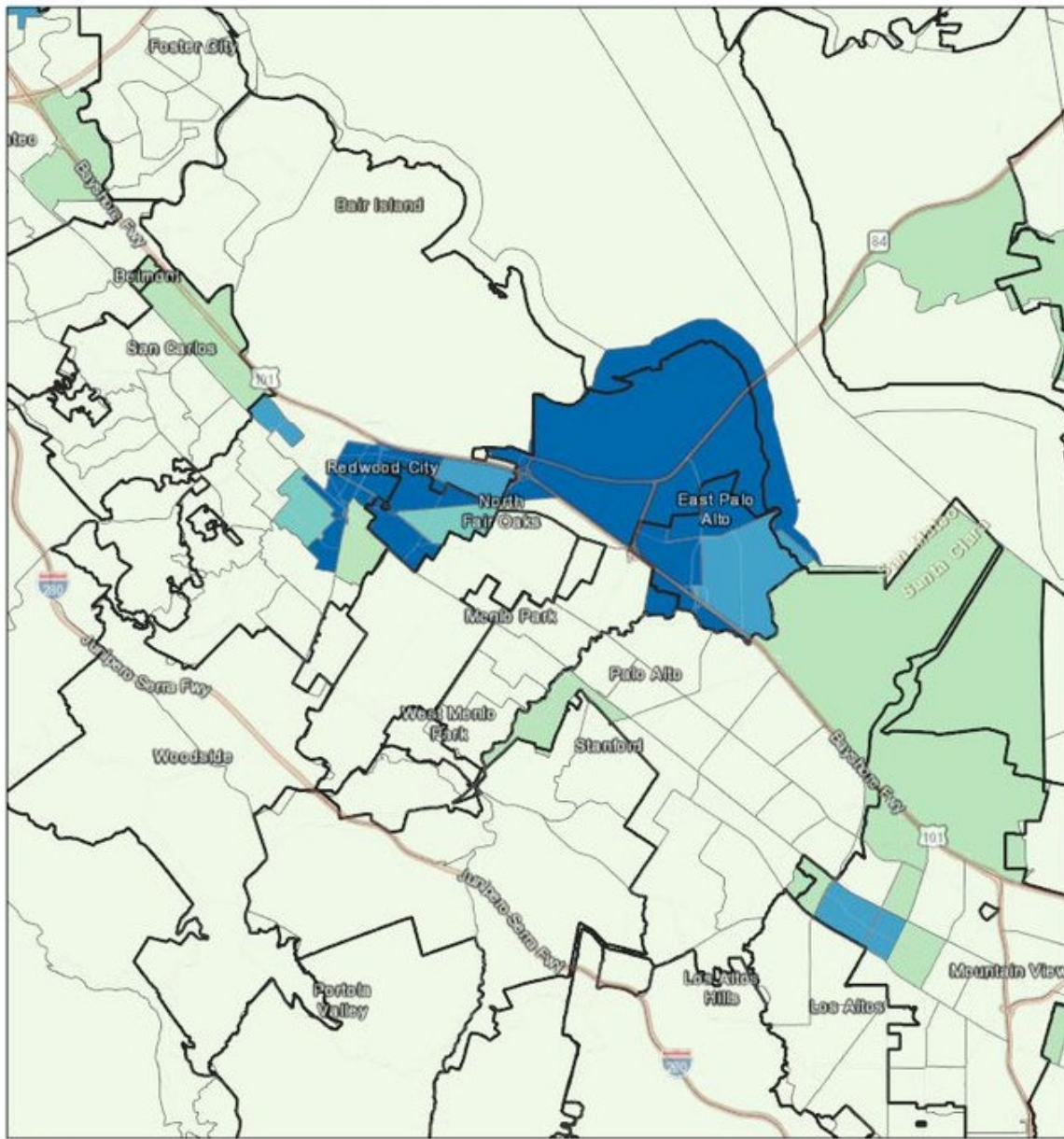
Source: ABAG Housing Needs Data Workbook

Figure IV-18.
Occupants per Room by AMI, East Palo Alto, 2019



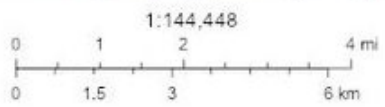
Source: ABAG Housing Needs Data Workbook

Figure IV-19.
Overcrowded Households by Census Tract, 2019



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City/Town Boundaries	12.01% - 15%
(R) Overcrowded Households (CHHS) - Tract	15.01% - 20%
< 8.2% (Statewide Average)	> 20%
8.3% - 12%	



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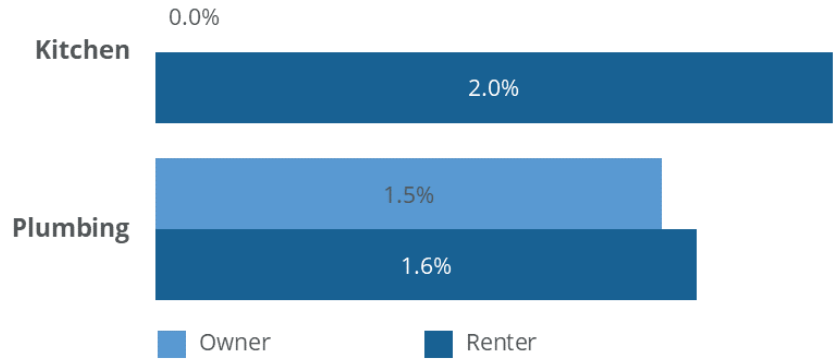
CA HCD
 Redwood City, County of San Mateo, California, County of Santa Clara, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021.

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, East Palo Alto, 2019



Source: ABAG Housing Needs Data Workbook

Homelessness.

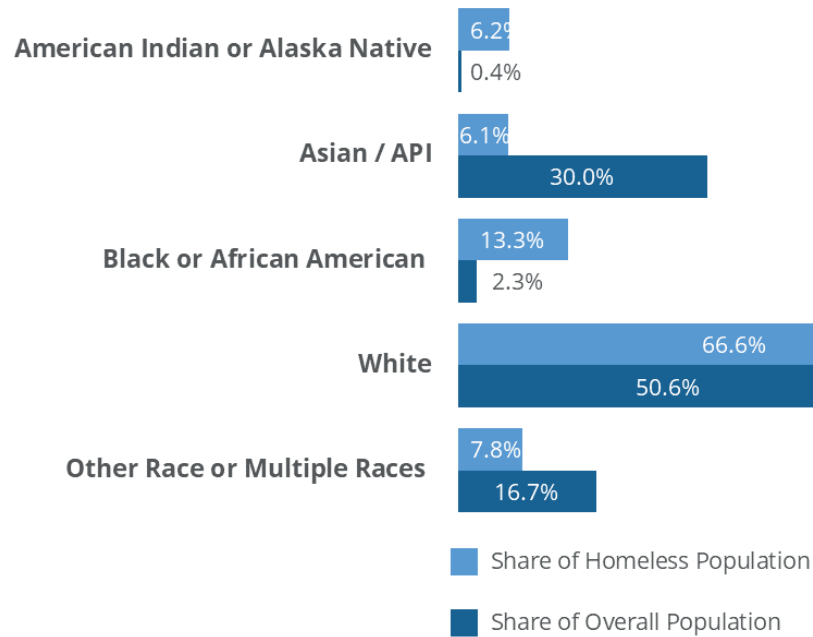
Figure IV-21.

Homelessness by Household Type and Shelter Status, San Mateo County, 2019

Source:
ABAG Housing Needs Data
Workbook

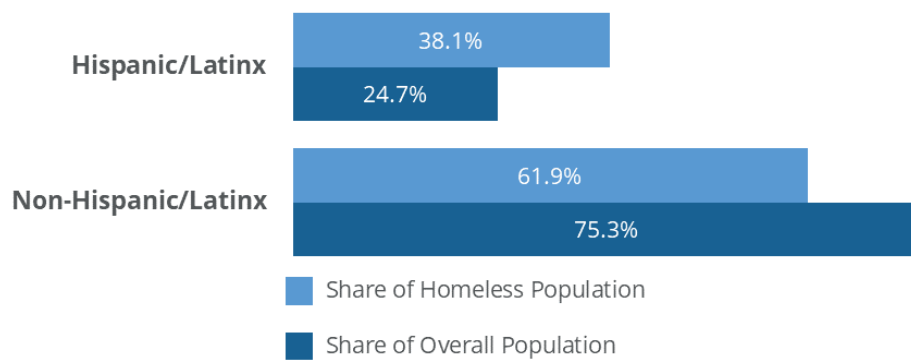
	People in Households Solely Children	People in Households with Adults and Children	People in Households Without Children
Sheltered - Emergency Shelter	0	68	198
Sheltered - Transitional Housing	0	271	74
Unsheltered	1	62	838

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

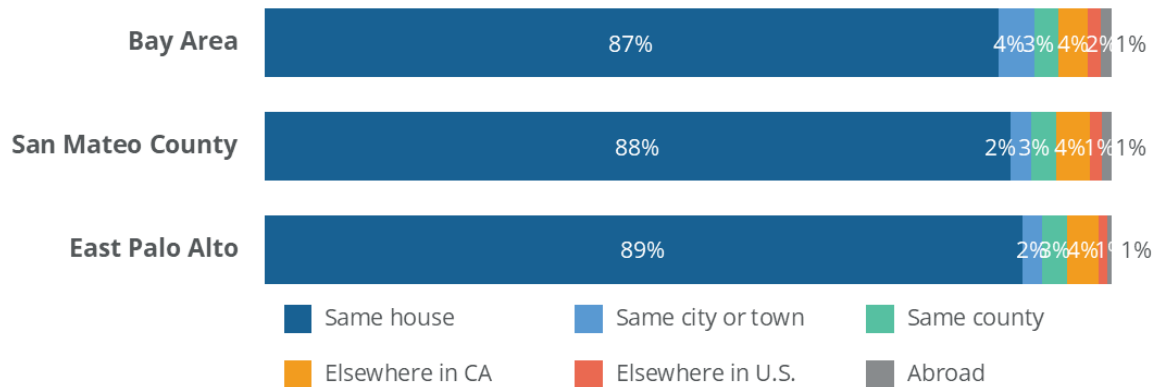
Figure IV-24.
Characteristics of the Population Experiencing Homelessness, San Mateo County, 2019

	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

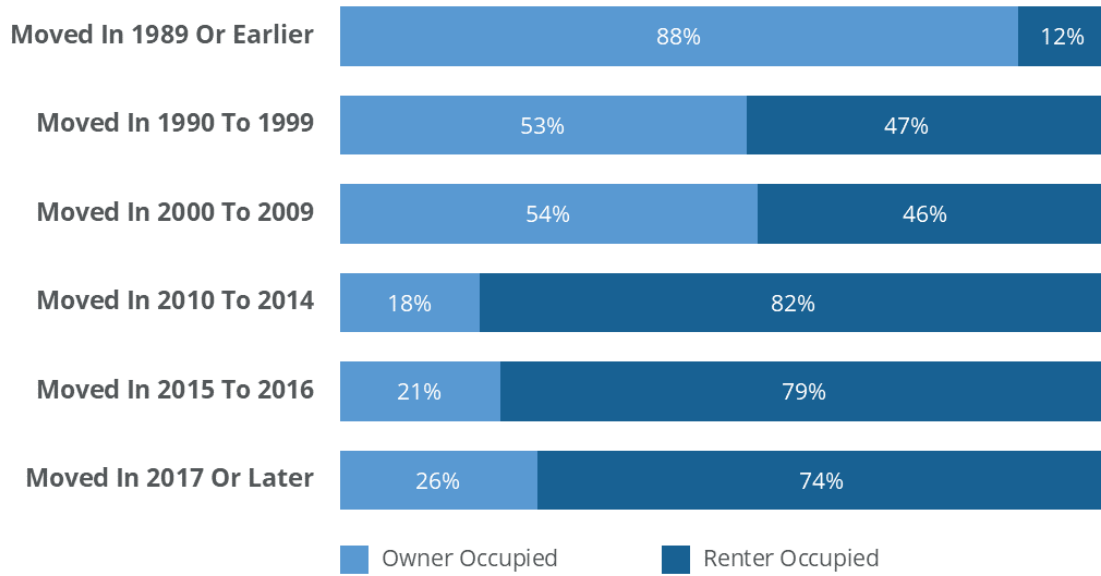
Displacement.

Figure IV-25.
Location of Population One Year Ago, East Palo Alto, 2019



Source: ABAG Housing Needs Data Workbook

Figure IV-26.
Tenure by Year Moved to Current Residence, East Palo Alto, 2019



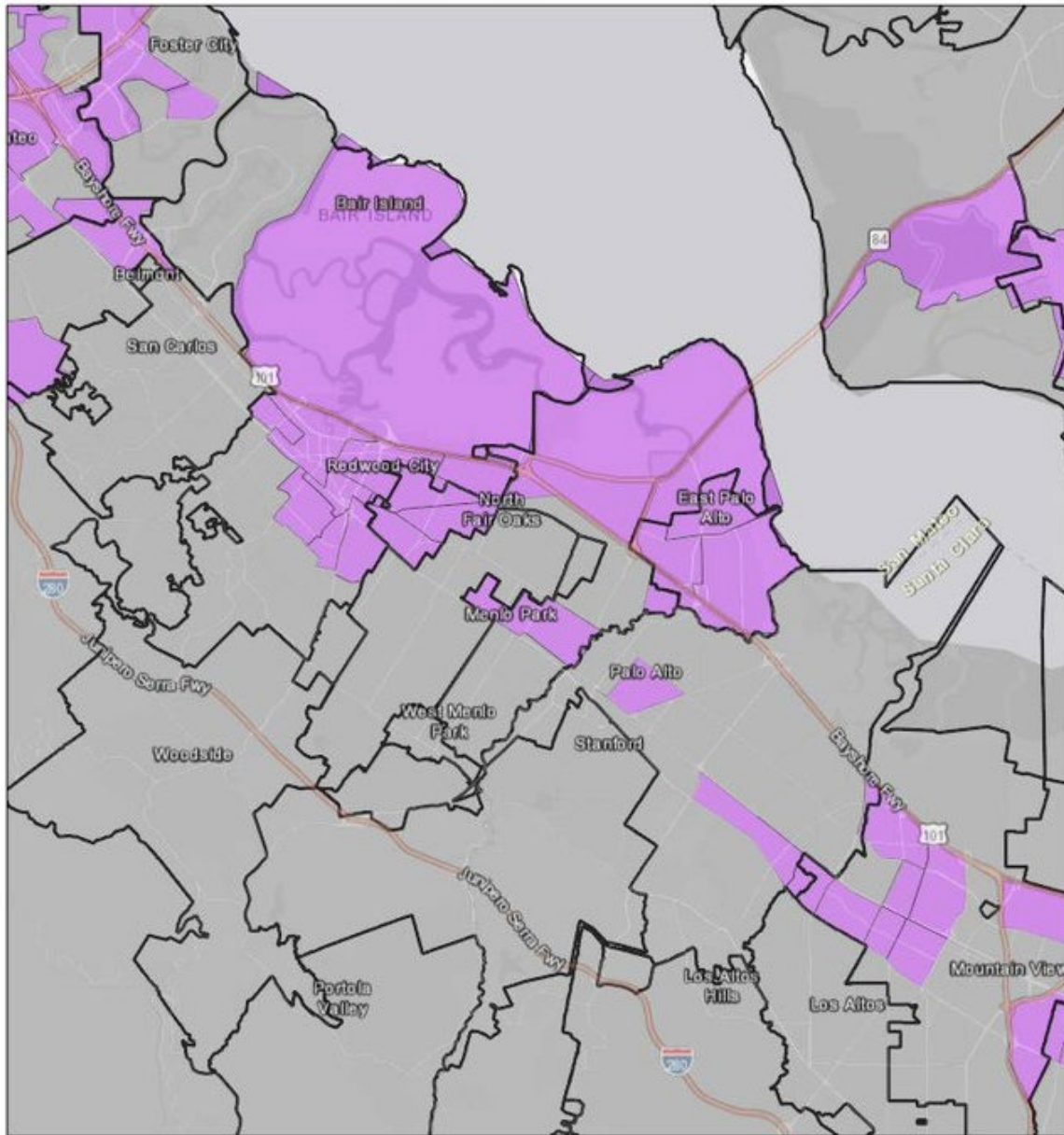
Source: ABAG Housing Needs Data Workbook

Figure IV-27.
Assisted Units at Risk of Conversion, East Palo Alto, 2019




	Low	Moderate	High	Very High	Total Assisted Units in Database
East Palo Alto	466	0	0	0	466
San Mateo County	4,656	191	359	58	5,264
Bay Area	110,177	3,375	1,854	1,053	116,459

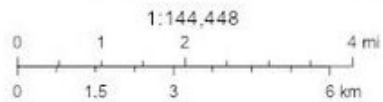
Source: ABAG Housing Needs Data Workbook

Figure IV-28.
Census Tracts Vulnerable to Displacement



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-  City/Town Boundaries
- (A) Sensitive Communities (UCB, Urban Displacement Project)
-  Vulnerable
-  Other

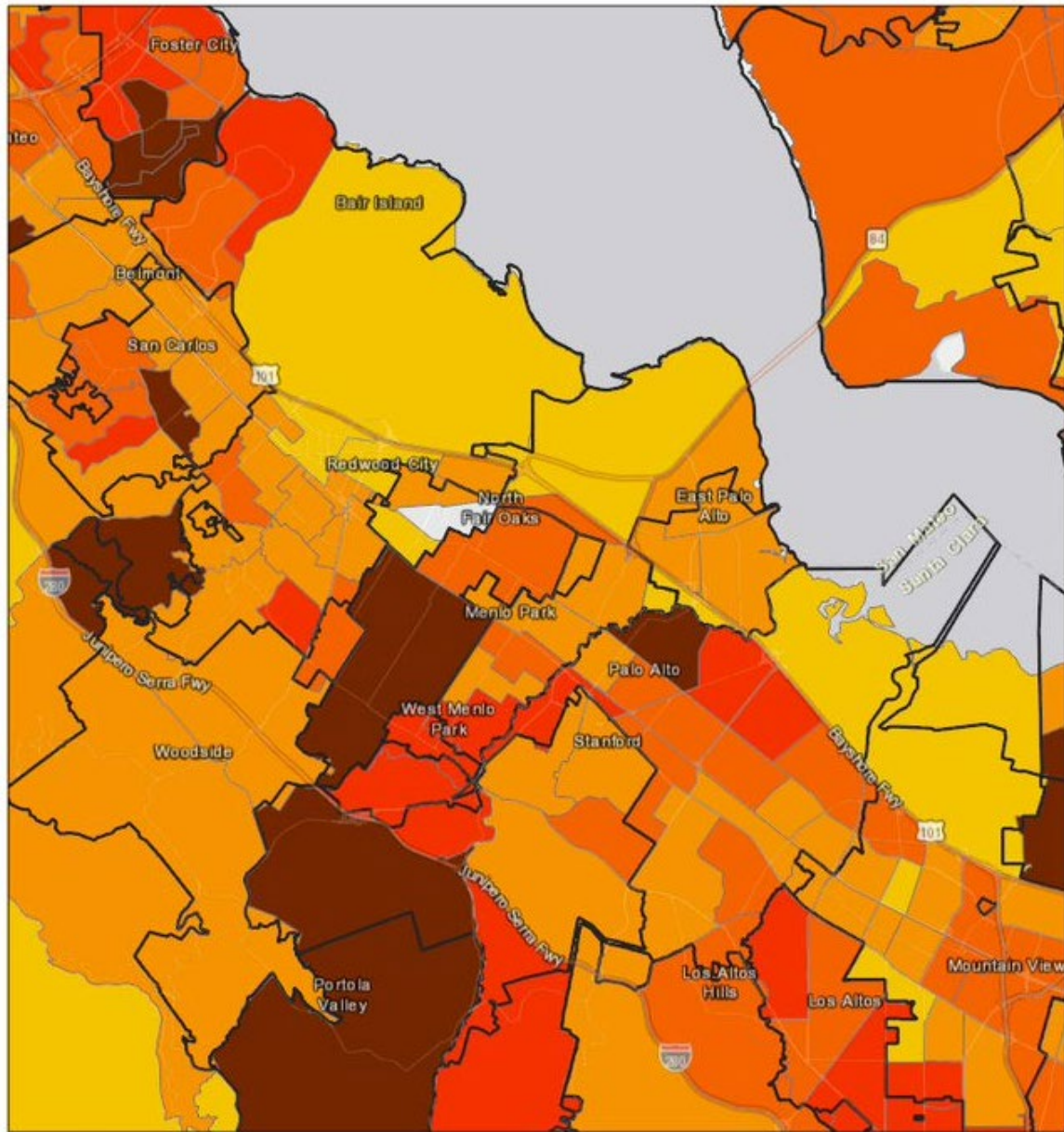


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Redwood City, County of San Mateo, California, County of Santa Clara, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, CA HCD

Source: California Department of Housing and Community Development AFFH Data Viewer

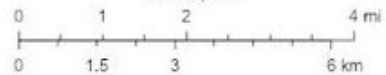
Figure IV-29.
Location Affordability Index by Census Tract



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- City/Town Boundaries
- <\$2,500
- (R) Location Affordability Index (HUD) - Tract <\$3,000
- <\$1,500
- Greater than \$3,000
- <\$2,000

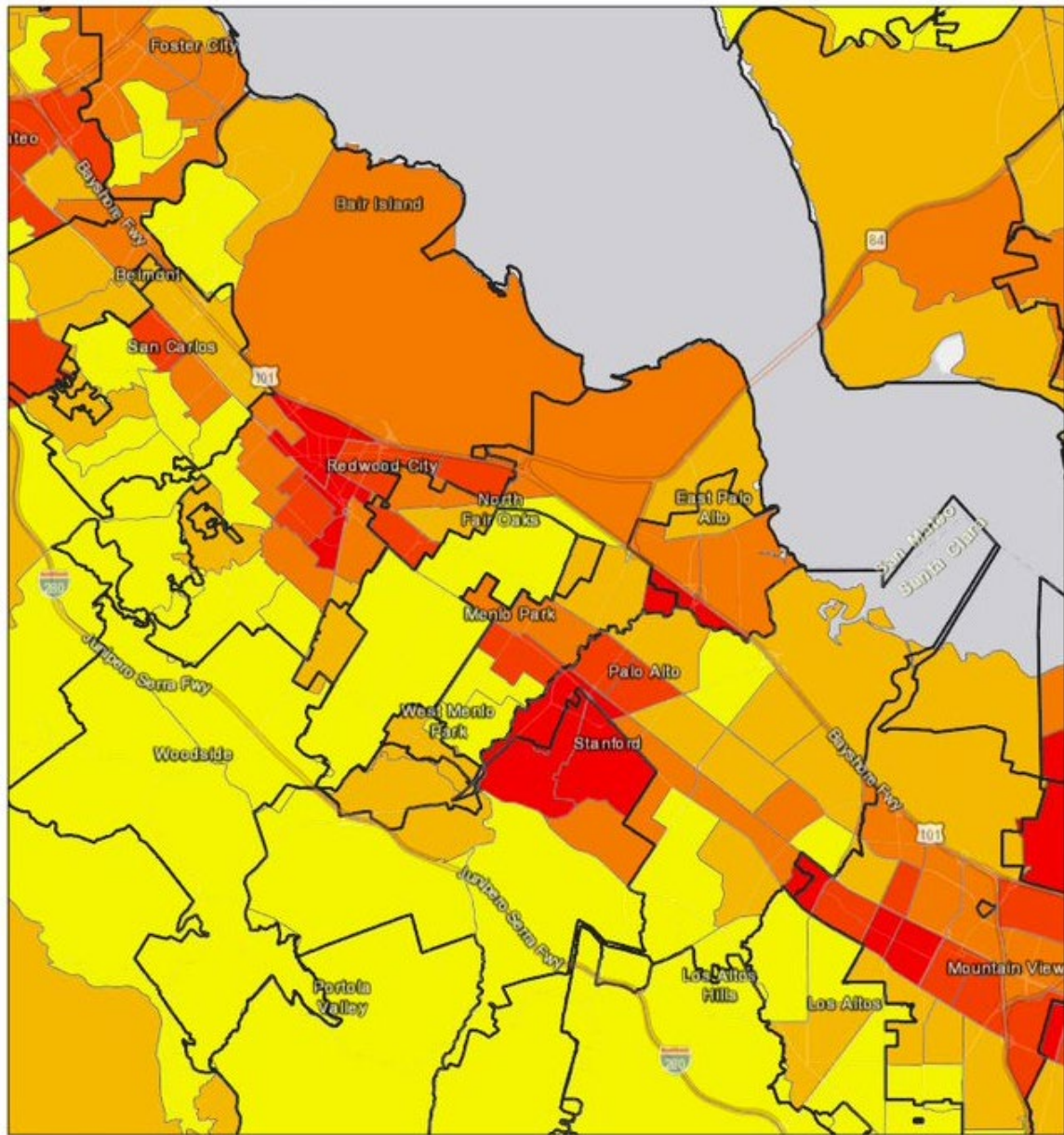


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CA HCD
 Redwood City, County of San Mateo, California, County of Santa Clara, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021.

Source: California Department of Housing and Community Development AFFH Data Viewer

Figure IV-30.
Share of Renter Occupied Households by Census Tract, 2019



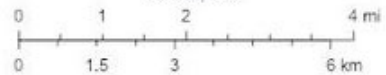
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City/Town Boundaries

(R) Percent of households in renter - occupied housing units (HUD) - Tract

- ≤ 20 %
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%

1:144,448



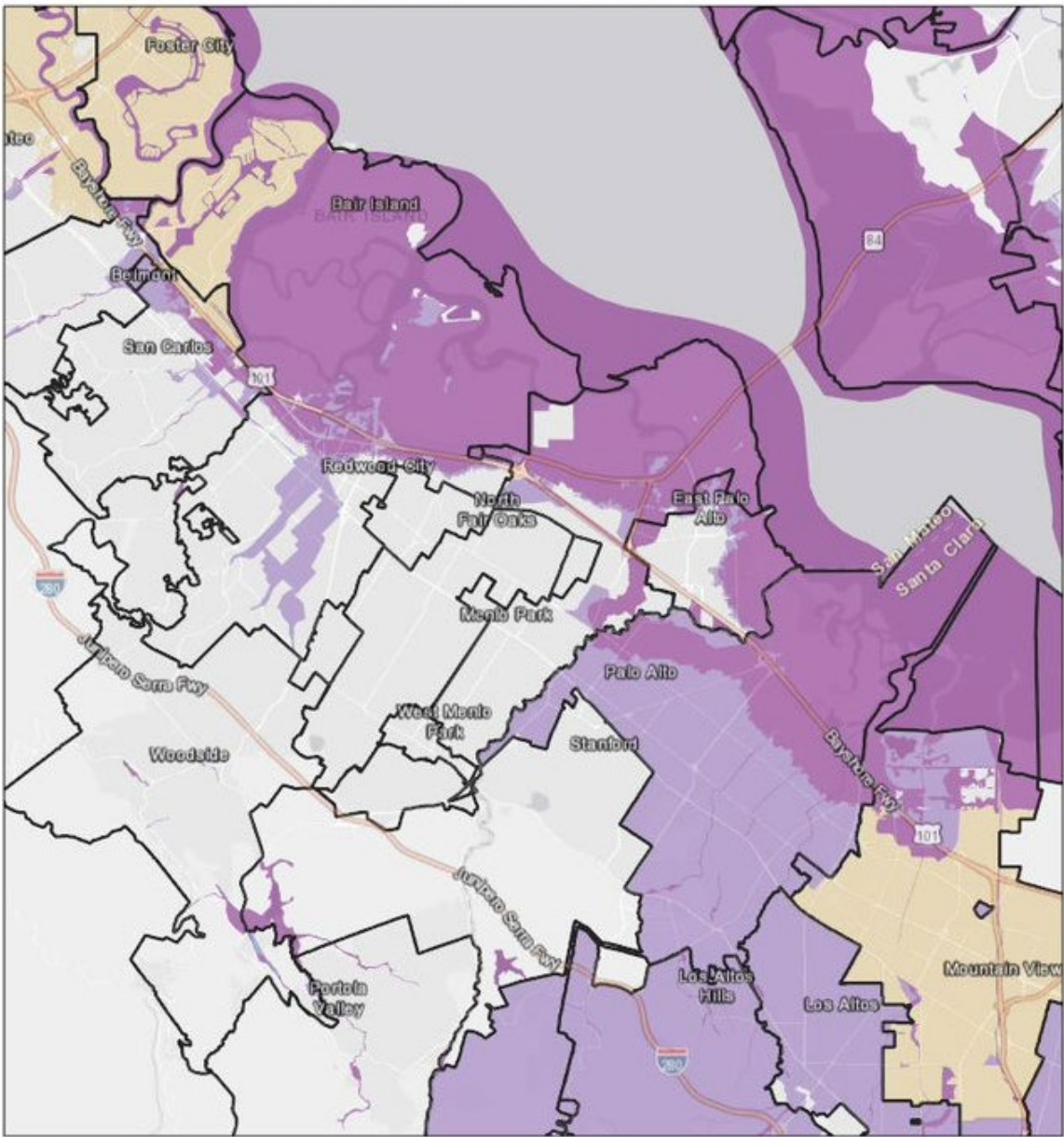
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CA HCD

Redwood City, County of San Mateo, California, County of Santa Clara, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021.

Source: California Department of Housing and Community Development AFFH Data Viewer

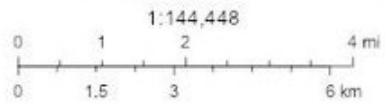
Figure IV-31.
Special Flood Hazard Areas, 2000



11/16/2021, 2:44:18 PM

(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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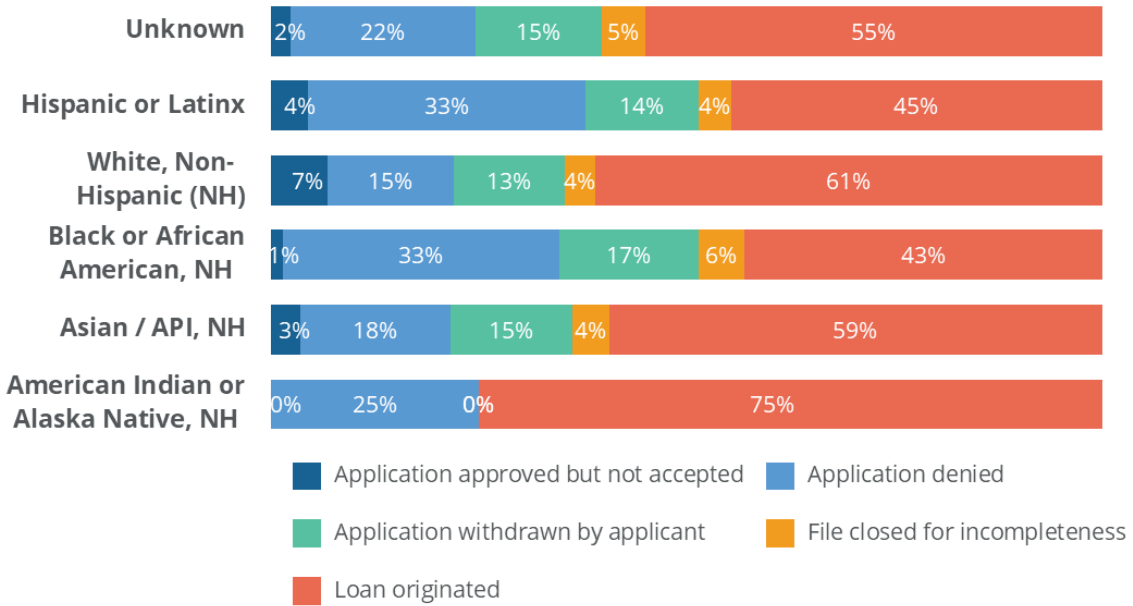
CA HCD
 Redwood City, County of San Mateo, California, County of Santa Clara, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021.

Source: California Department of Housing and Community Development AFFH Data Viewer

Other considerations.

Figure IV-32.

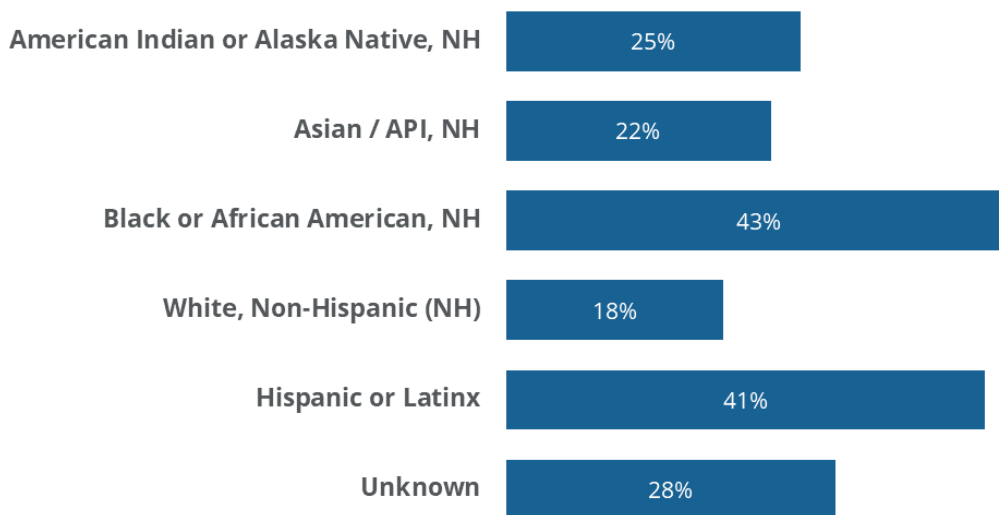
Mortgage Applications by Race and Ethnicity, East Palo Alto, 2018-2019



Source: ABAG Housing Needs Data Workbook

Figure IV-33.

Mortgage Application Denial Rate by Race and Ethnicity, East Palo Alto, 2018-2019



Source: ABAG Housing Needs Data Workbook§

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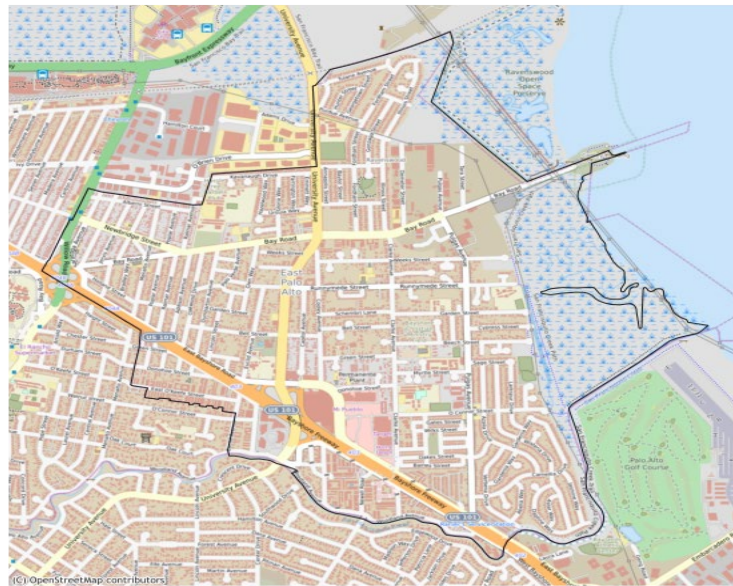
APPENDIX C2 AFFH SEGREGATION REPORT

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AFFH SEGREGATION REPORT: EAST PALO ALTO

UC Merced Urban Policy Lab and ABAG/MTC Staff

Version of Record: March 06, 15:54:04



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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.⁷² 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.^{73,74} 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 segregation for a single group, while the dissimilarity index measures segregation between two groups.

⁷² <https://www.justice.gov/crt/fair-housing-act-2>

⁷³ HCD AFFH Guidance Memo

⁷⁴ The 2015 HUD rule was reversed in 2020 and partially reinstated in 2021.

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.”⁷⁵ 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).⁷⁶ ABAG/MTC plans to issue a separate report detailing the existing land use policies that influence segregation patterns in the Bay Area.

Definition of Terms - Geographies

Neighborhood: In this report, “neighborhoods” are approximated by tracts.⁷⁷ 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.

⁷⁵ For more information, see <https://belonging.berkeley.edu/most-segregated-cities-bay-area-2020>.

⁷⁶ 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.

⁷⁷ 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 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 EAST PALO ALTO

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.⁷⁸ 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 race⁷⁹

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")⁸⁰

2.1 Neighborhood Level Racial Segregation (*within City of East Palo Alto*)

Racial dot maps are useful for visualizing how multiple racial groups are distributed within a specific geography. The racial dot map of East Palo Alto in Figure 47 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.

⁷⁸ More information about the Census Bureau's definitions of racial groups is available here: <https://www.census.gov/topics/population/race/about.html>.

⁷⁹ 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.

⁸⁰ 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.

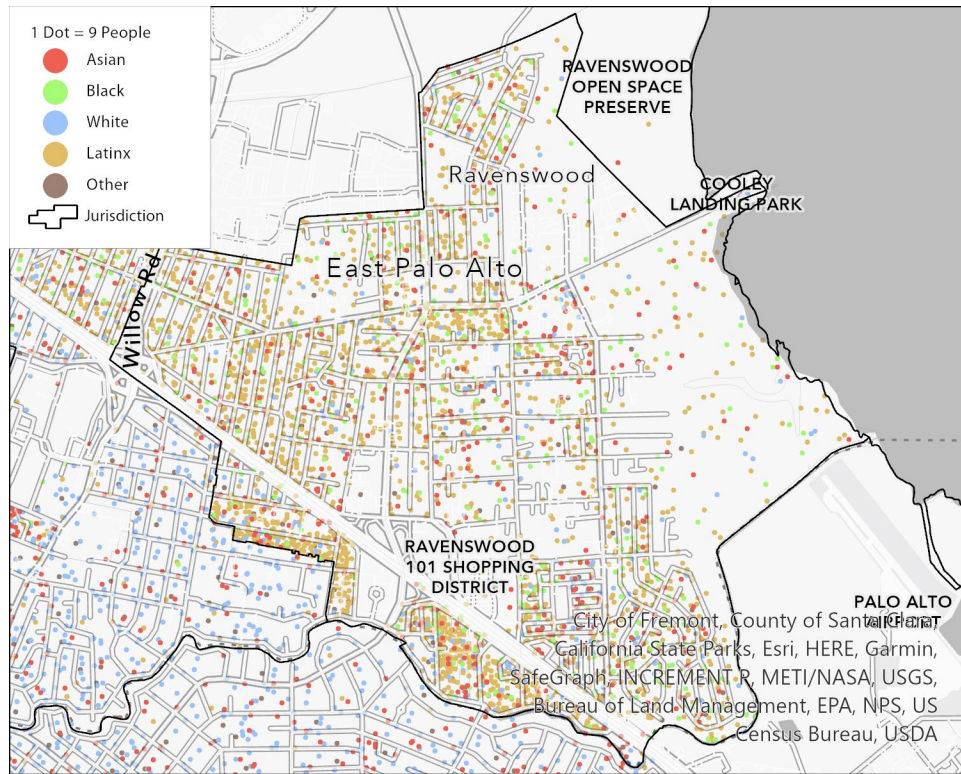


Figure 47: Racial Dot Map of East Palo Alto (2020)

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 East Palo Alto 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 East Palo Alto the most isolated racial group is Latinx residents. East Palo Alto’s isolation index of 0.672 for Latinx residents means that the average Latinx resident lives in a neighborhood that is 67.2% Latinx. 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 East Palo Alto for the years 2000, 2010, and 2020 can be found in Table 9 below. Among all racial groups in this jurisdiction, the Black 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 2020.⁸¹ 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 9 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 9: Racial Isolation Index Values for Segregation within East Palo Alto

Race	East Palo Alto			Bay Area Average
	2000	2010	2020	2020
Asian/Pacific Islander	0.098	0.114	0.123	0.245
Black/African American	0.251	0.172	0.124	0.053
Latinx	0.578	0.634	0.672	0.251
White	0.150	0.137	0.084	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 48 below shows how racial isolation index values in East Palo Alto 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 East Palo Alto, 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.

⁸¹ 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).

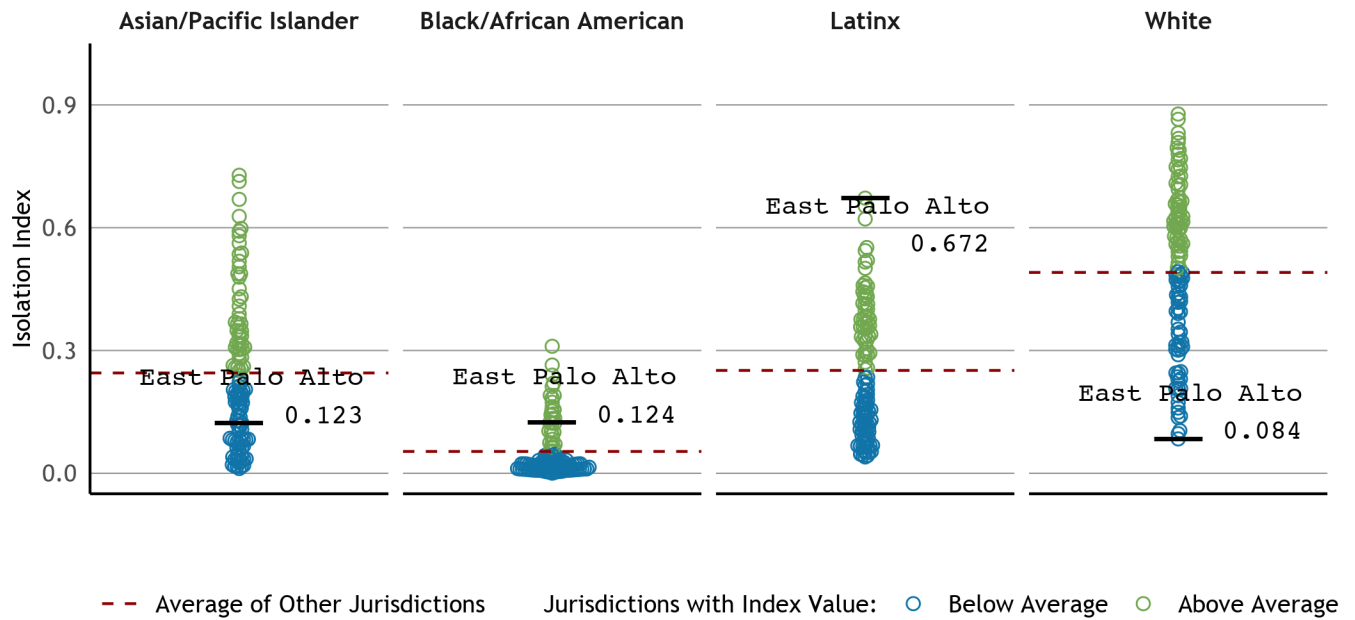


Figure 48: Racial Isolation Index Values for East Palo Alto Compared to Other Bay Area Jurisdictions (2020)

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 12), 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.

City of East Palo Alto has no groups making up less than 5 percent of its population.

Table 10 below provides the dissimilarity index values indicating the level of segregation in East Palo Alto 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 East Palo Alto the highest segregation is between Black and white residents (see Table 10). East Palo Alto's Black /white dissimilarity index of 0.225 means that 22.5% of Black (or white) residents would need to move to a different neighborhood to create perfect integration between Black residents and white residents.

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 10 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 10: Racial Dissimilarity Index Values for Segregation within East Palo Alto

Race	East Palo Alto			Bay Area Average
	2000	2010	2020	2020
Asian/Pacific Islander vs. White	0.451*	0.370	0.127	0.185
Black/African American vs. White	0.537	0.439	0.225	0.244
Latinx vs. White	0.406	0.341	0.170	0.207
People of Color vs. White	0.443	0.361	0.149	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 49 below shows how dissimilarity index values in City of East Palo Alto 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 East Palo Alto, and each dashed red line represents the Bay Area average for the dissimilarity index for that pairing. Similar to Figure 48, 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.

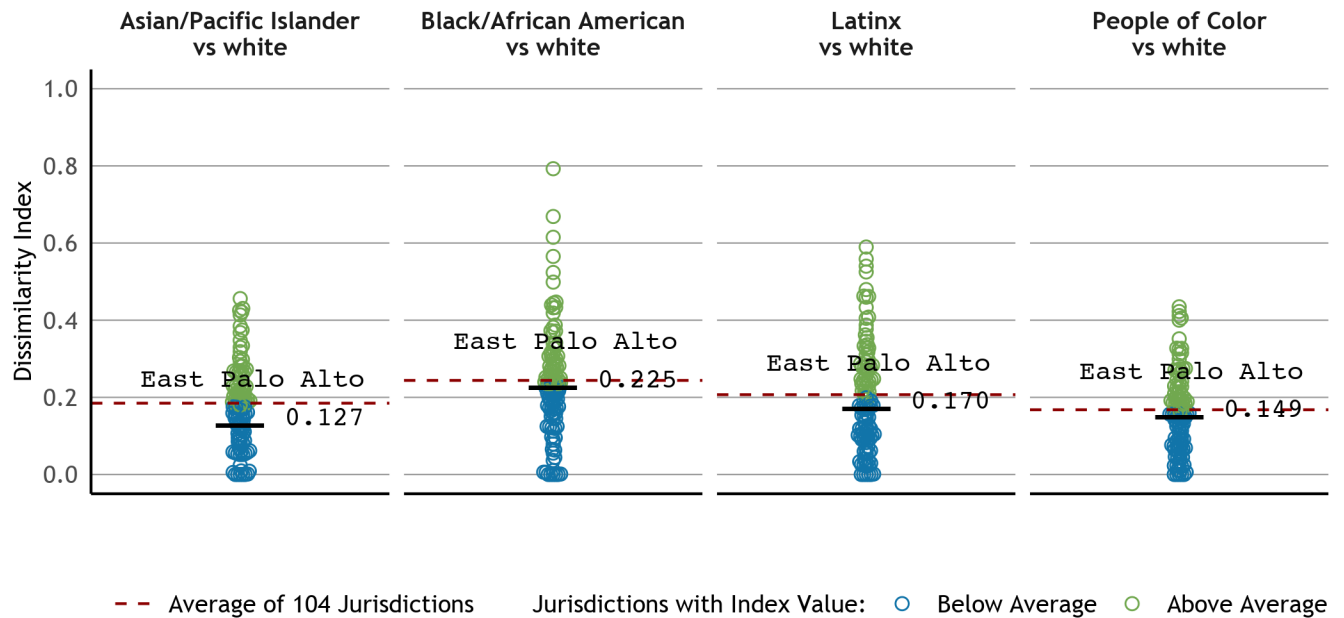


Figure 49: Racial Dissimilarity Index Values for East Palo Alto Compared to Other Bay Area Jurisdictions (2020)

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 East Palo Alto for the years 2000, 2010, and 2020 can be found in Table 11 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 East Palo Alto 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 East Palo Alto was lower than the average value for Bay Area jurisdictions, indicating that neighborhood level racial segregation in East Palo Alto is less than in the average Bay Area city.

Table 11: Theil’s H Index Values for Racial Segregation within East Palo Alto

Index	East Palo Alto			Bay Area Average
	2000	2010	2020	2020
Theil's H Multi-racial	0.040	0.035	0.018	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 50 below shows how Theil’s H index values for racial segregation in East Palo Alto 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 East Palo Alto, 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.

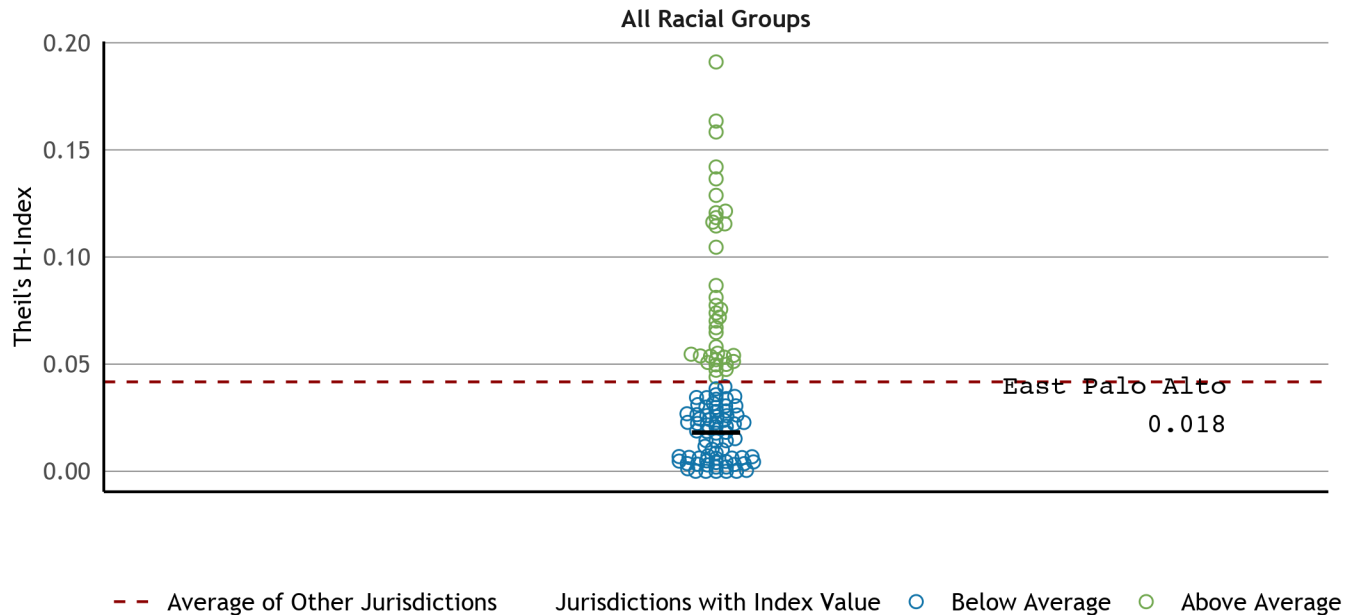


Figure 50: Theil’s H Index Values for Racial Segregation in East Palo Alto Compared to Other Bay Area Jurisdictions (2020)

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 East Palo Alto 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 51 below presents a racial dot map showing the spatial distribution of racial groups in East Palo Alto as well as in nearby Bay Area cities.

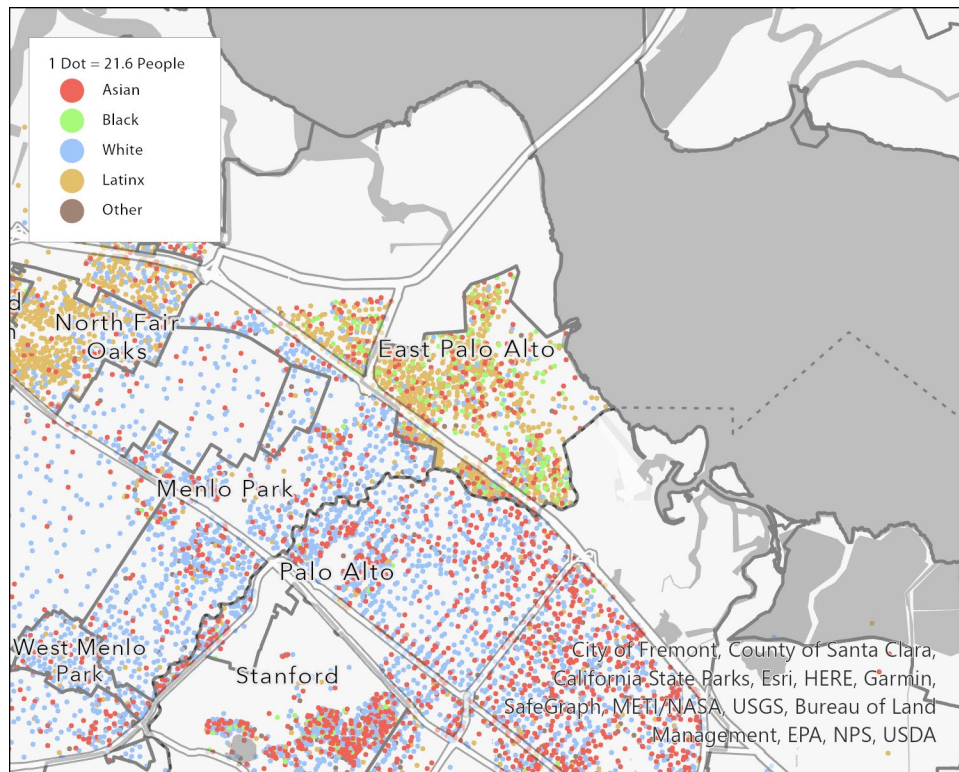


Figure 51: Racial Dot Map of East Palo Alto and Surrounding Areas (2020)

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 East Palo Alto 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 East Palo Alto for the years 2000, 2010, and 2020 can be found in Table 12 below. The table also provides the racial composition of the nine-county Bay Area. As of 2020, East Palo Alto has a lower share of white residents than the Bay Area as a whole, a higher share of Latinx residents, a higher share of Black residents, and a lower share of Asian/Pacific Islander residents.

Table 12: Population by Racial Group, East Palo Alto and the Region

Race	East Palo Alto			Bay Area
	2000	2010	2020	2020
Asian/Pacific Islander	2.1%	11.0%	11.9%	28.2%
Black/African American	22.5%	15.8%	10.6%	5.6%
Latinx	58.8%	64.5%	66.5%	24.4%
Other or Multiple Races	10.1%	2.4%	3.3%	5.9%
White	6.5%	6.2%	7.7%	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 52 below compares the racial demographics in East Palo Alto to those of all 109 Bay Area jurisdictions.⁸² 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 East Palo Alto 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.

⁸² 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.

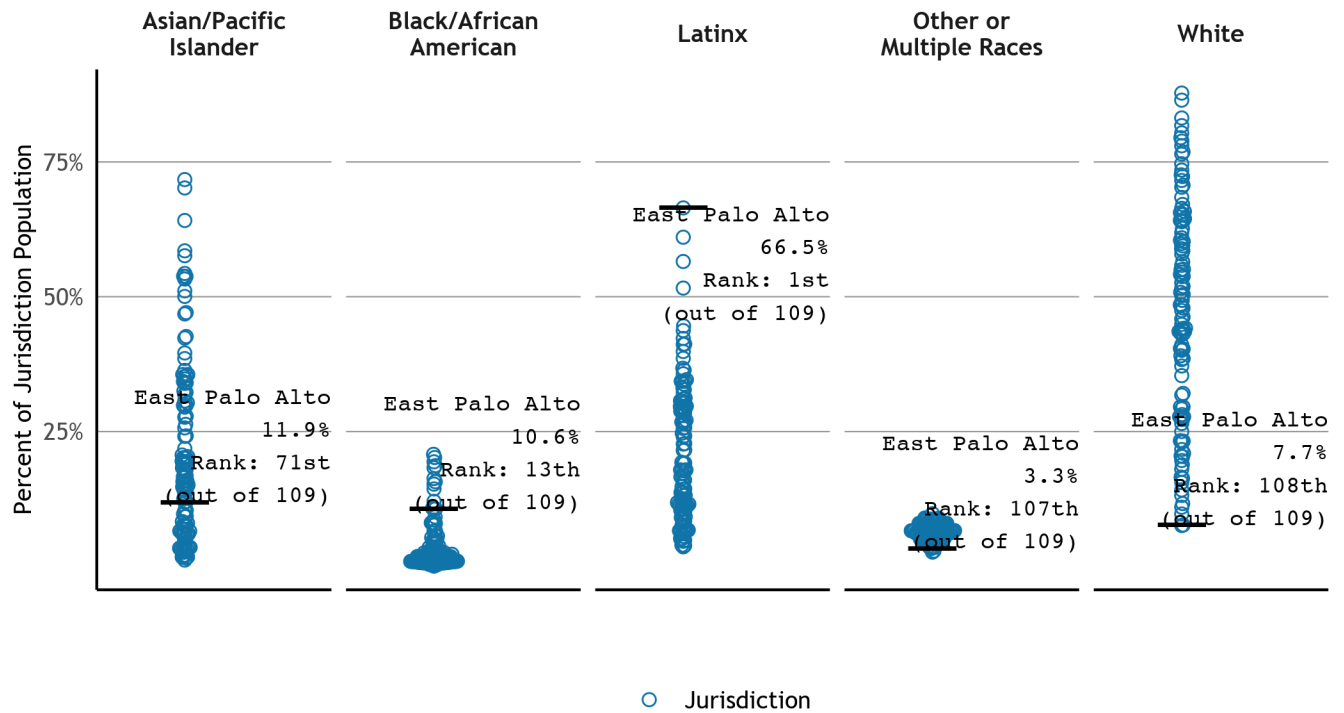


Figure 52: Racial Demographics of East Palo Alto Compared to All Bay Area Jurisdictions (2020)

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 53 below also illustrates regional racial segregation between East Palo Alto and other jurisdictions. This map demonstrates how the percentage of people of color in East Palo Alto 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.

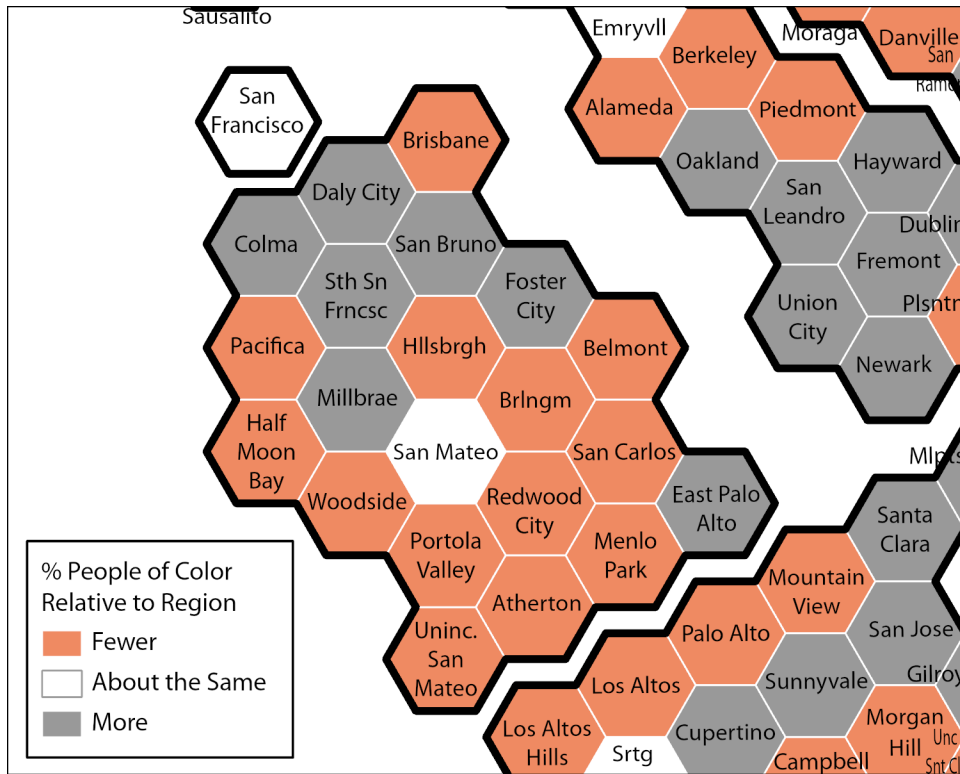


Figure 53: Comparing the Share of People of Color in East Palo Alto and Vicinity to the Bay Area (2020)

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 13 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 13, 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 13 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 13 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 13 reflect recommendations made in HCD’s AFFH guidance for calculating dissimilarity at the region level.⁸³ The regional value for the Theil’s H index measures how

⁸³ 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 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.

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* East Palo Alto)

Income segregation can be measured using similar indices as racial segregation. Income dot maps, similar to the racial dot maps shown in Figures 47 and 51, are useful for visualizing segregation between multiple income groups at the same time. The income dot map of East Palo Alto in Figure 54 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.

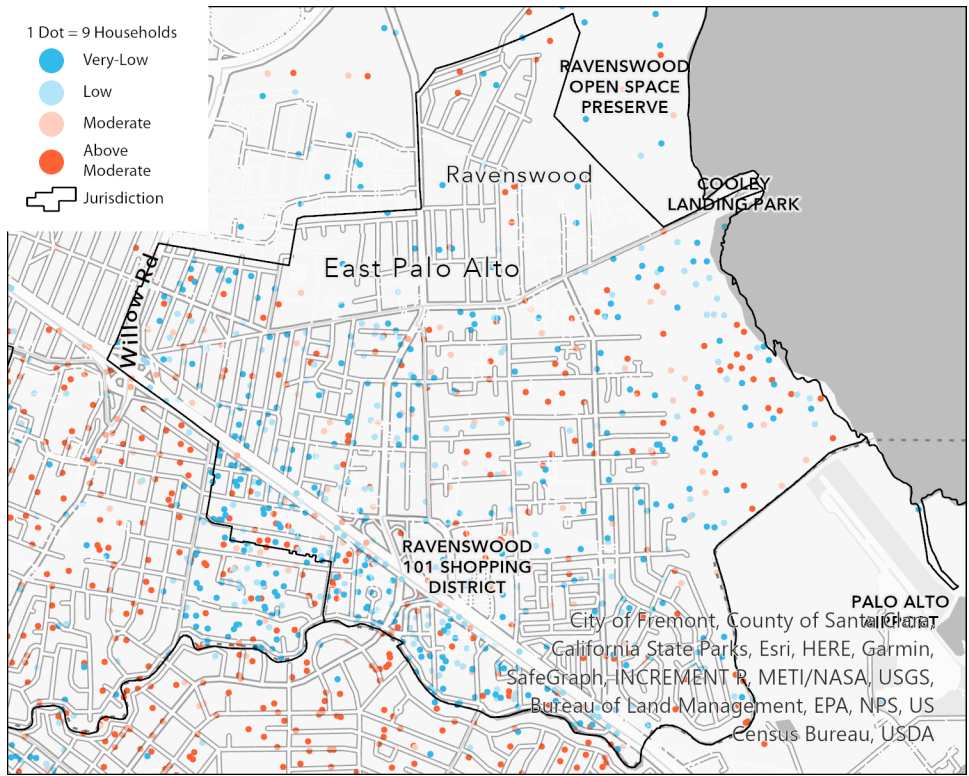


Figure 54: Income Dot Map of East Palo Alto (2015)

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 East Palo Alto 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 East Palo Alto for the years 2010 and 2015 can be found in Table 14 below.⁸⁴ Very Low-income residents are the most isolated income group in East Palo Alto. East Palo Alto’s isolation index of 0.561 for these residents means that the average Very Low-income resident in East Palo Alto lives in a neighborhood that is 56.1% Very Low-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 14 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 14 indicates the average isolation index value for very low-income residents across Bay Area

⁸⁴ 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](#).

jurisdictions is 0.269, 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 14: Income Group Isolation Index Values for Segregation within East Palo Alto

Income Group	East Palo Alto		Bay Area Average
	2010	2015	2015
Very Low-Income (<50% AMI)	0.503	0.561	0.269
Low-Income (50%-80% AMI)	0.256	0.200	0.145
Moderate-Income (80%-120% AMI)	0.131	0.149	0.183
Above Moderate-Income (>120% AMI)	0.142	0.116	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 55 below shows how income group isolation index values in East Palo Alto 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 East Palo Alto, 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.

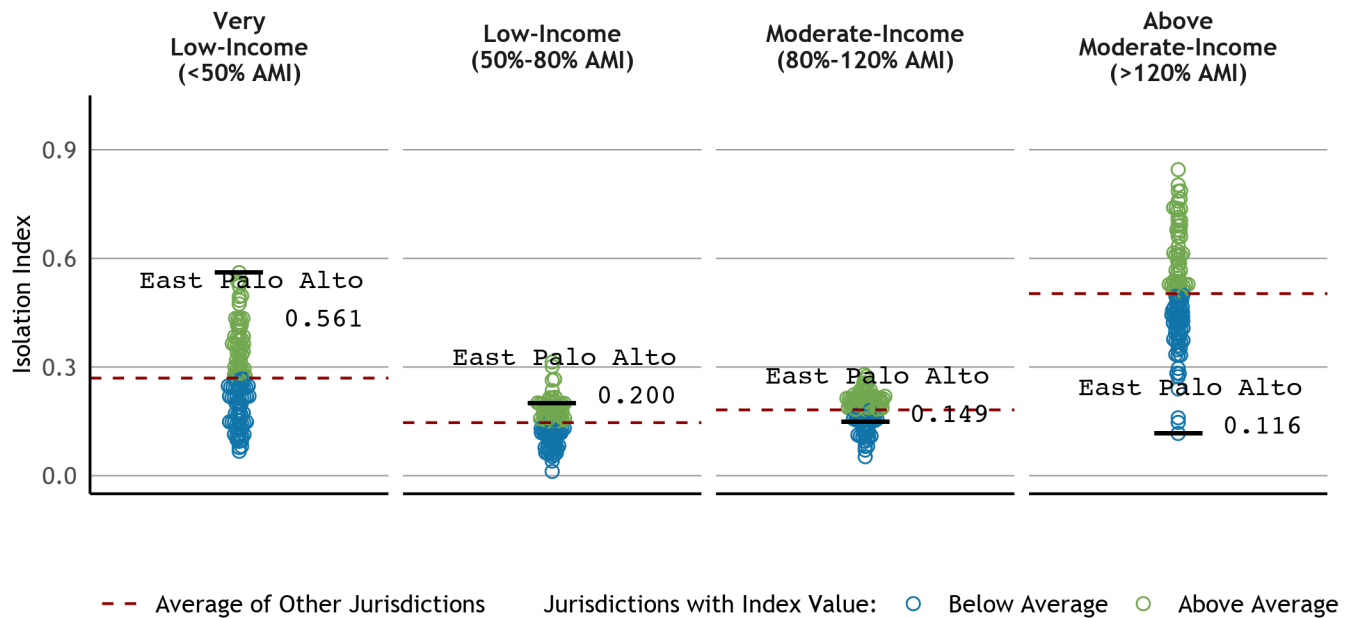


Figure 55: Income Group Isolation Index Values for East Palo Alto Compared to Other Bay Area Jurisdictions (2015)

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 15 below provides the dissimilarity index values indicating the level of segregation in East Palo Alto 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.⁸⁵ Segregation in East Palo Alto between lower-income residents and residents who are not lower-income decreased between 2010 and 2015. Additionally, Table 15 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 15 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.

In 2015, the income segregation in East Palo Alto between lower-income residents and other residents was lower than the average value for Bay Area jurisdictions (See Table 15). This means that the lower-

⁸⁵ For more information, see page 32 of HCD’s AFFH Guidance Memo.

income residents are less segregated from other residents within East Palo Alto compared to other Jurisdictions in the region.

Table 15: Income Group Dissimilarity Index Values for Segregation within East Palo Alto

Income Group	East Palo Alto		Bay Area Average
	2010	2015	2015
Below 80% AMI vs. Above 80% AMI	0.103	0.090	0.198
Below 50% AMI vs. Above 120% AMI	0.114	0.106	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 56 below shows how dissimilarity index values for income segregation in East Palo Alto 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 East Palo Alto, 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.

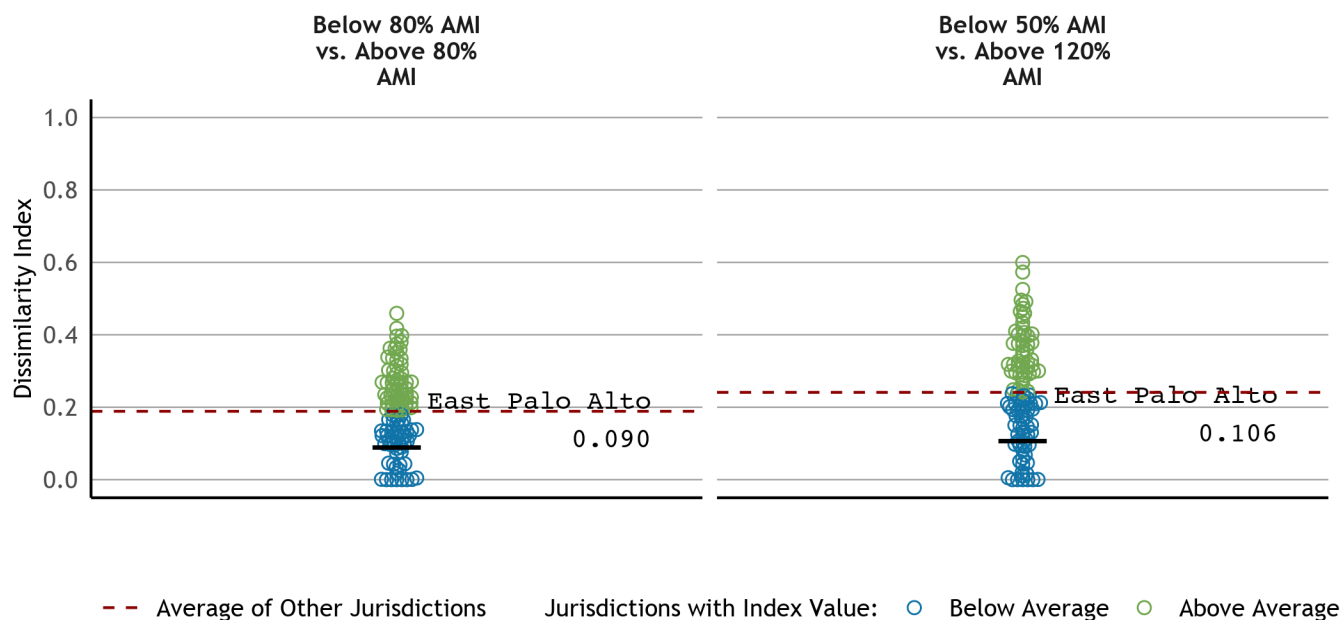


Figure 56: Income Group Dissimilarity Index Values for East Palo Alto Compared to Other Bay Area Jurisdictions (2015)

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 East Palo Alto for the years 2010 and 2015 can be found in Table 16 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 East Palo Alto was about the same amount as it had been in 2010. In 2015, the Theil's H Index value for income group segregation in East Palo Alto was lower than the average value for Bay Area jurisdictions, indicating there is less neighborhood level income segregation in East Palo Alto than in the average Bay Area city.

Table 16: Theil's H Index Values for Income Segregation within East Palo Alto

Index	East Palo Alto		Bay Area Average
	2010	2015	2015
Theil's H Multi-income	0.014	0.011	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 57 below shows how Theil's H index values for income group segregation in East Palo Alto 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 East Palo Alto, 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.

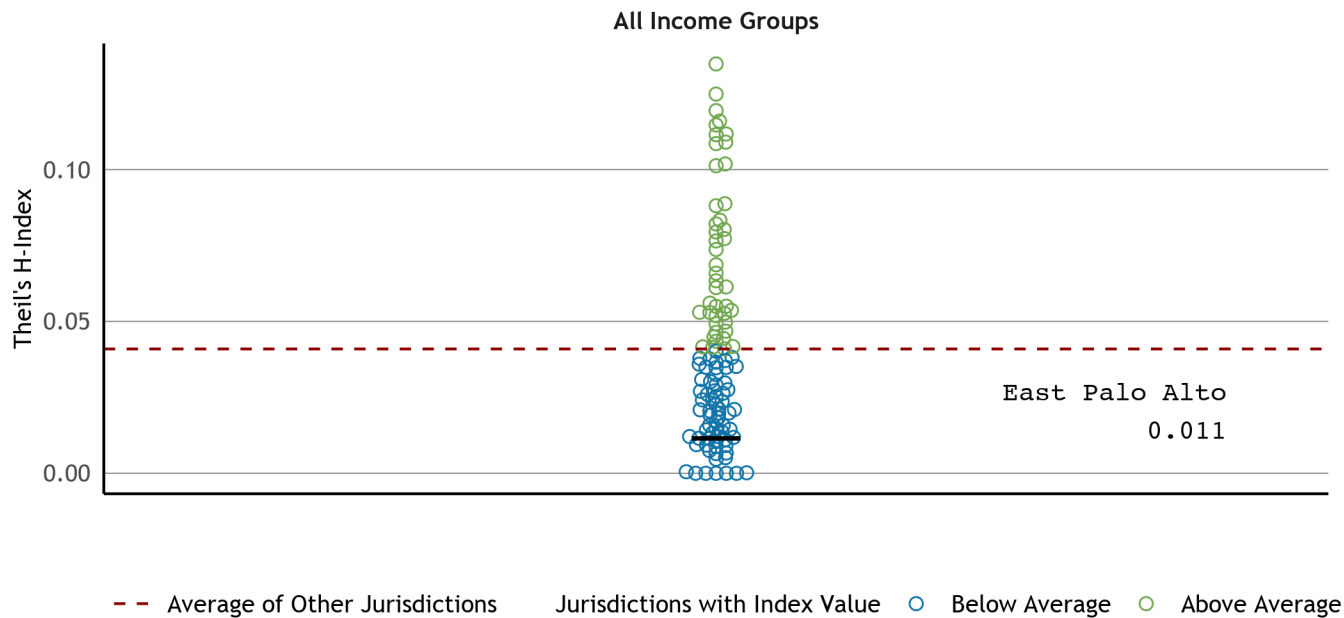


Figure 57: Income Group Theil's H Index Values for East Palo Alto Compared to Other Bay Area Jurisdictions (2015)

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* East Palo Alto 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 58 below presents an income dot map showing the spatial distribution of income groups in East Palo Alto as well as in nearby Bay Area jurisdictions.

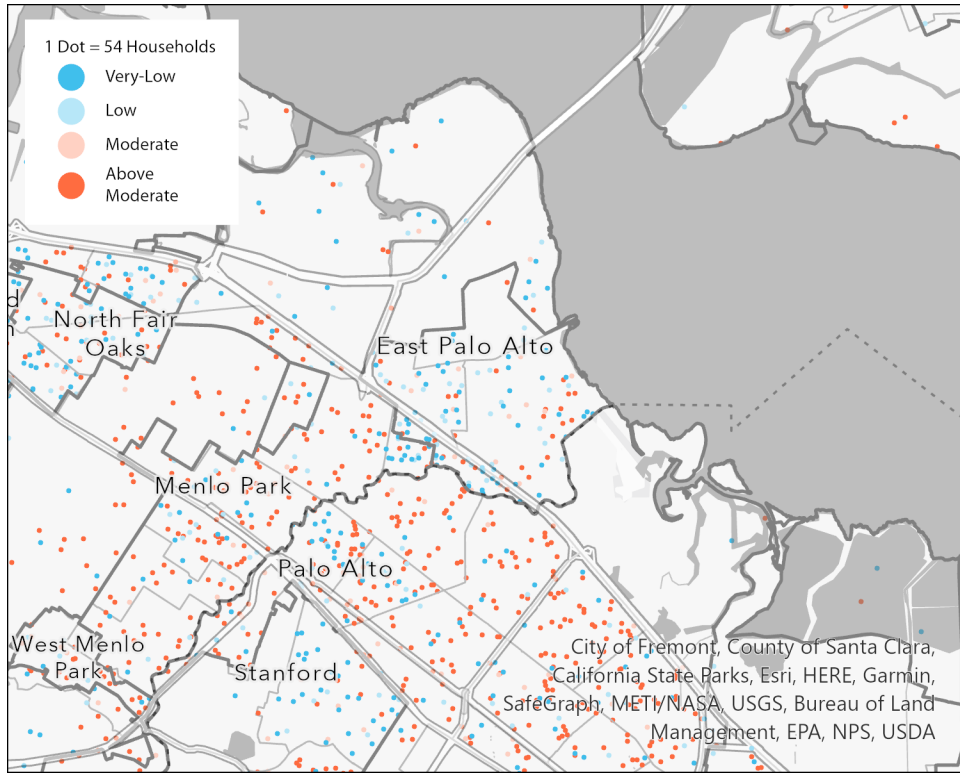


Figure 58: Income Dot Map of East Palo Alto and Surrounding Areas (2015)

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 East Palo Alto 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 East Palo Alto differs from the region. The income demographics in East Palo Alto for the years 2010 and 2015 can be found in Table 17 below. The table also provides the income composition of the nine-county Bay Area in 2015. As of that year, East Palo Alto had a higher share of very low-income residents than the Bay Area as a whole, a higher share of low-income residents, a lower share of moderate-income residents, and a lower share of above moderate-income residents.

Table 17: Population by Income Group, East Palo Alto and the Region

Income Group	East Palo Alto		Bay Area
	2010	2015	2015
Very Low-Income (<50% AMI)	51.2%	57.96%	28.7%
Low-Income (50%-80% AMI)	25.29%	19.04%	14.3%
Moderate-Income (80%-120% AMI)	11.99%	14.12%	17.6%
Above Moderate-Income (>120% AMI)	11.52%	8.88%	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 59 below compares the income demographics in East Palo Alto to other Bay Area jurisdictions.⁸⁶ Like the chart in Figure 49, 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 East Palo Alto 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.

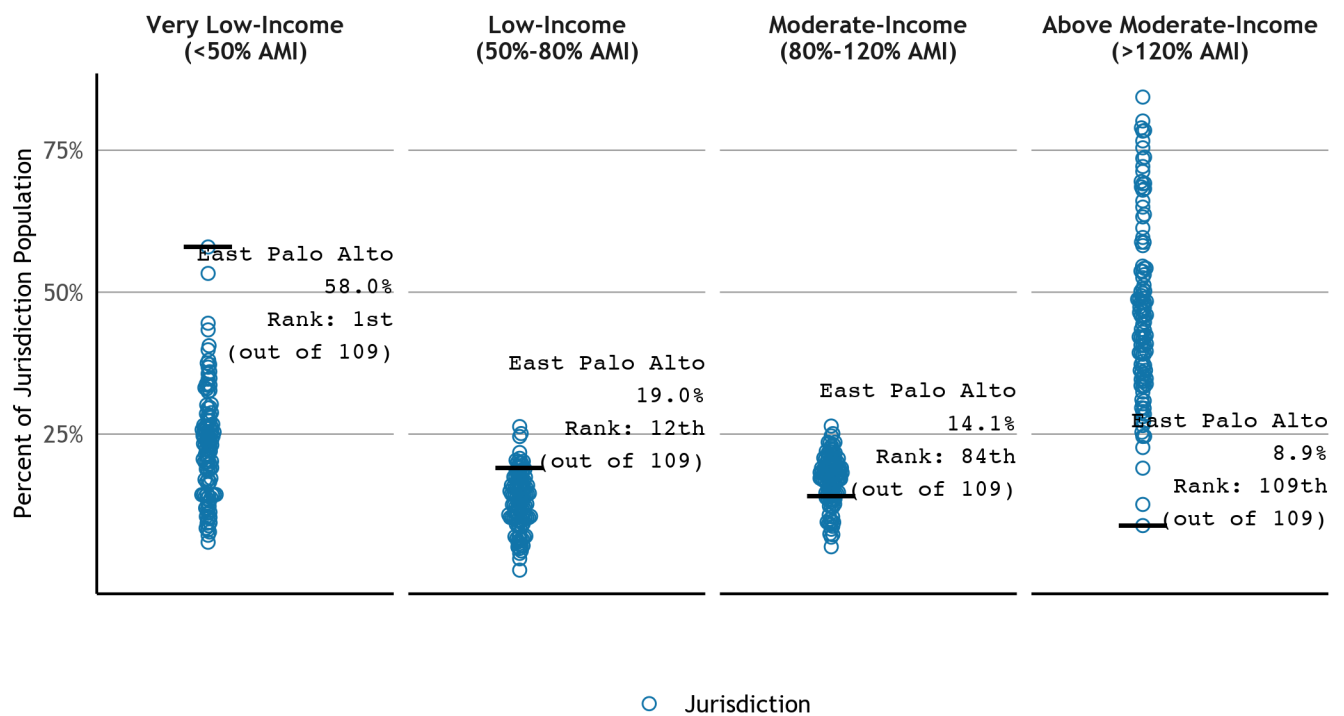


Figure 59: Income Demographics of East Palo Alto Compared to Other Bay Area Jurisdictions (2015)

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.

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 13, Table 18 presents dissimilarity index, isolation index, and Theil’s H index

⁸⁶ 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.

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 18, 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 18 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 18: 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 East Palo Alto

- 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, Latinx residents are the most segregated compared to other racial groups in East Palo Alto, as measured by the isolation index. Latinx residents live in neighborhoods where they are less likely to come into contact with other racial groups.
- Among all racial groups, the Black 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 East Palo Alto the highest level of racial segregation is between Black and white residents.⁸⁷
- According to the Theil's H-Index, neighborhood racial segregation in East Palo Alto declined between 2010 and 2020. Neighborhood income segregation stayed about the same between 2010 and 2015.
- Very Low-income residents are the most segregated compared to other income groups in East Palo Alto. Very Low-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 decreased between 2010 and 2015. In 2015, the income segregation in East Palo Alto between lower-income residents and other residents was lower than the average value for Bay Area jurisdictions.

4.2 Segregation Between City of East Palo Alto and Other jurisdictions in the Bay Area Region

- East Palo Alto has a lower share of white residents than other jurisdictions in the Bay Area as a whole, a higher share of Latinx residents, a higher share of Black residents, and a lower share of Asian/Pacific Islander residents.

⁸⁷ 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 23 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, East Palo Alto has a higher share of very low-income residents than other jurisdictions in the Bay Area as a whole, a higher share of low-income residents, a lower share of moderate-income residents, and a lower 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 19 in this appendix combines data from Table 9, Table 10, and Table 11 in the body of the report. Table 20 in this appendix combines data from Table 14, Table 15, and Table 16 in the body of the report. Table 21 represents a duplication of Table 13 in the body of the report; Table 22 represents a duplication of Table 18 in the body of the report; Table 23 in this appendix represents a duplication of Table 12 in the body of the report, while Table 24 represents a duplication of Table 17 in the body of the report.

Table 19: Neighborhood Racial Segregation Levels in East Palo Alto

Index	Race	East Palo Alto			Bay Area Average
		2000	2010	2020	2020
Isolation	Asian/Pacific Islander	0.098	0.114	0.123	0.245
	Black/African American	0.251	0.172	0.124	0.053
	Latinx	0.578	0.634	0.672	0.251
	White	0.150	0.137	0.084	0.491
Dissimilarity	Asian/Pacific Islander vs. White	0.451*	0.370	0.127	0.185
	Black/African American vs. White	0.537	0.439	0.225	0.244
	Latinx vs. White	0.406	0.341	0.170	0.207
	People of Color vs. White	0.443	0.361	0.149	0.168
Theil's H Multi-racial	All	0.040	0.035	0.018	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 20: Neighborhood Income Segregation Levels in East Palo Alto

Index	Income Group	East Palo Alto		Bay Area Average
		2010	2015	2015
Isolation	Very Low-Income (<50% AMI)	0.503	0.561	0.269
	Low-Income (50%-80% AMI)	0.256	0.200	0.145
	Moderate-Income (80%-120% AMI)	0.131	0.149	0.183
	Above Moderate-Income (>120% AMI)	0.142	0.116	0.507
Dissimilarity	Below 80% AMI vs. Above 80% AMI	0.103	0.090	0.198
	Below 50% AMI vs. Above 120% AMI	0.114	0.106	0.253
Theil's H Multi-racial	All	0.014	0.011	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 21: 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 22: 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 23: Population by Racial Group, East Palo Alto and the Region

Race	East Palo Alto			Bay Area
	2000	2010	2020	2020
Asian/Pacific Islander	2.1%	11.04%	11.9%	35.8%
Black/African American	22.51%	15.83%	10.62%	5.6%
Latinx	58.79%	64.45%	66.47%	28.2%
Other or Multiple Races	10.06%	2.44%	3.33%	24.4%
White	6.54%	6.23%	7.67%	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 24: Population by Income Group, East Palo Alto and the Region

Income Group	East Palo Alto		Bay Area
	2010	2015	2015
Very Low-Income (<50% AMI)	51.2%	57.96%	28.7%
Low-Income (50%-80% AMI)	25.29%	19.04%	14.3%
Moderate-Income (80%-120% AMI)	11.99%	14.12%	17.6%
Above Moderate-Income (>120% AMI)	11.52%	8.88%	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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APPENDIX C3: AFFH COMMUNITY ENGAGEMENT

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AFFH Appendix.

Community Engagement

This section reports the findings from the resident survey conducted of San Mateo County residents to support the AFFH analysis of Housing Elements. It explores residents' housing, affordability, and neighborhood challenges and experiences with displacement and housing discrimination. The survey also asks about residents' access to economic opportunity, captured through residents' reported challenges with transportation, employment, and K-12 education. The survey was offered in both English and Spanish.

The resident survey was available online, in both Spanish and English, in a format accessible to screen readers, and promoted through jurisdictional communications and social media and through partner networks. A total of 2,382 residents participated.

The survey instrument included questions about residents' current housing situation, housing, neighborhood and affordability challenges, healthy neighborhood indicators, access to opportunity, and experience with displacement and housing discrimination.

Explanation of terms. Throughout this section, several terms are used that require explanation.

- "Precariously housed" includes residents who are currently homeless or living in transitional or temporary/emergency housing, as well as residents who live with friends or family but are not themselves on the lease or property title. These residents may (or may not) make financial contributions to pay housing costs or contribute to the household in exchange for housing (e.g., childcare, healthcare services).
- "Disability" indicates that the respondent or a member of the respondent's household has a disability of some type—physical, mental, intellectual, developmental.
- "Single parent" are respondents living with their children only or with their children and other adults but not a spouse/partner.
- "Tenure" in the housing industry means rentership or ownership.
- "Large households" are considered those with five or more persons residing in a respective household.
- "Seriously Looked for Housing" includes touring or searching for homes or apartments, putting in applications or pursuing mortgage financing.

Sampling note. The survey respondents do not represent a random sample of the county or jurisdictions' population. A true random sample is a sample in which each individual in the population has an equal chance of being selected for the survey. The self-selected nature of the survey prevents the collection of a true random sample. Important insights and themes can still be gained from the survey results, however, with an understanding of the differences among resident groups and between jurisdictions and the county overall. Overall, the data provide a rich source of information about the county's households and their experience with housing choice and access to opportunity in the communities where they live.

Jurisdiction-level data are reported for cities with 50 responses or more. Response by jurisdiction and demographics are shown in the figure below. Overall, the survey received a very strong response from typically underrepresented residents including: people of color, renters, precariously housed residents, very low income households, households with children, large households, single parents, and residents with disabilities.

Figure 1.
Resident Survey Sample Sizes by Jurisdictions and Selected Characteristics

	County	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	82	173	130	53	148	63	59	55	84	163	99	175	832
Race/Ethnicity														
African American	134	7	4	9	8	10	6	4	4	5	14	4	17	15
Hispanic	397	9	14	26	27	13	8	1	8	12	59	13	31	149
Asian	500	9	26	43	6	32	6	8	13	14	11	19	23	249
Other Race	149	10	6	8	3	14	3	3	3	3	9	7	13	47
Non-Hispanic White	757	35	89	27	4	44	27	27	15	35	54	36	58	195
Tenure														
Homeowner	1,088	51	96	39	9	89	26	46	18	42	37	48	58	409
Renter	1,029	30	65	67	36	43	28	7	33	38	105	41	88	324
Precariously Housed	309	8	12	26	12	17	14	5	7	13	23	16	29	87
Income														
Less than \$25,000	282	11	12	21	15	12	11	5	6	7	40	11	29	61
\$25,000-\$49,999	265	9	10	22	9	8	6	3	6	7	28	5	20	97
\$50,000-\$99,999	517	14	38	43	10	26	11	3	10	17	37	22	40	206
Above \$100,000	721	24	69	16	8	64	12	30	14	32	31	40	40	251
Household Characteristics														
Children under 18	840	24	53	50	26	44	17	18	20	29	61	37	64	287
Large households	284	7	11	20	18	8	3	5	7	8	20	13	15	133
Single Parent	240	8	15	19	11	12	9	3	7	7	30	9	21	49
Disability	711	25	41	38	22	40	22	13	17	29	62	34	65	210
Older Adults (age 65+)	736	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 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 large households, Hispanic households, and residents in South San Francisco and Redwood City.
- **Nearly 4 in 10 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 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*. The impacts are higher for African American households, single parents, households that make less than \$25,000, and precariously housed respondents.
- 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, 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 Daly City, East Palo Alto, 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 household, 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, 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 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.

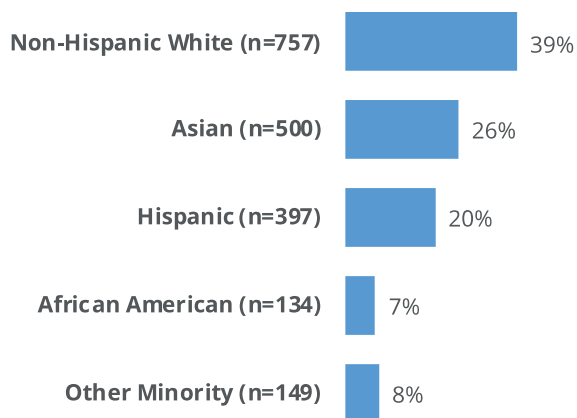


Figure 3.
Survey Respondents
by Tenure

Note:

n=2,426.

Source:

Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

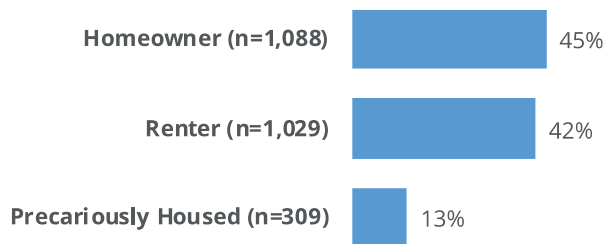


Figure 4.
Survey Respondents
by Income

Note:
 n=1,785.

Source:
 Root Policy Research from the 2021-
 2022 21 Elements AFFH Resident
 Survey.

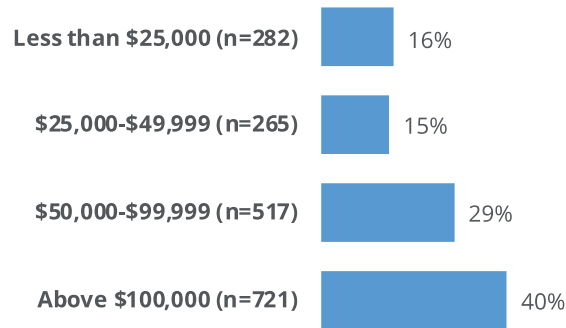


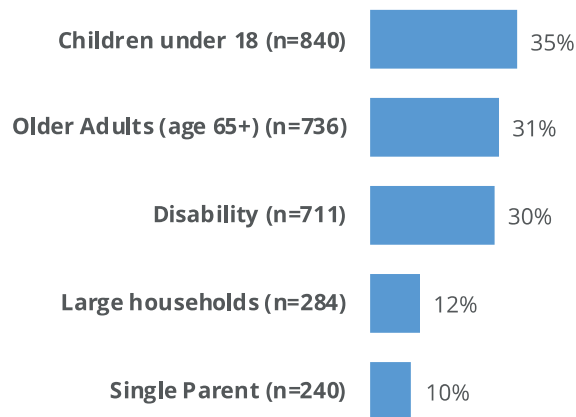
Figure 5.
Survey Respondents
by Selected
Household
Characteristics

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 28 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 and Pacifica 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 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 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.
- Nearly 40% of jurisdictions' respondents reported a higher rate than the county for the following housing or neighborhood challenges: *My home/apartment is in bad condition, 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	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	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%	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%	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%	10%	13%	17%	14%	9%	10%	2%	23%	15%	20%	11%	15%	13%
My home/apartment is in bad condition	11%	14%	9%	15%	12%	3%	7%	0%	11%	18%	14%	5%	15%	10%
My landlord refuses to make repairs despite my requests	6%	14%	3%	5%	12%	4%	5%	2%	2%	9%	9%	5%	10%	5%
I live too far from family/friends/my community	6%	5%	4%	8%	4%	5%	8%	6%	6%	3%	8%	4%	7%	5%
I don't feel safe in my building/neighborhood	6%	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%	7%	7%	7%	10%	2%	14%	2%	8%	9%	3%	4%	8%	4%
I have bed bugs/insects or rodent infestation	5%	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%	5%	1%	3%	8%	11%	3%	2%	4%	5%	3%	3%	4%	2%
None of the above	42%	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 three figures segment the answers by:

- Housing affordability challenges only; and
- Neighborhood challenges only.

Housing 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, 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.
- San Mateo, East Palo Alto, 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 more likely to have trouble keeping up with property taxes.
- City of San Mateo, Daly City and Redwood City respondents are more likely to have bad credit or an eviction history impacting their ability to rent

Overall, nearly 40% 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	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	73	157	115	51	134	58	50	50	77	147	93	160	728
I can't keep up with my utilities	10%	5%	6%	15%	16%	5%	12%	4%	12%	8%	12%	9%	15%	9%
I'm often late on my rent payments	8%	5%	6%	10%	20%	3%	7%	2%	8%	4%	12%	4%	11%	7%
I can't keep up with my property taxes	6%	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%	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%	7%	3%	3%	2%	7%	3%	4%	4%	5%	3%	3%	6%	2%
None of the above	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 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 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, and San Bruno experience challenges with school quality in their neighborhoods.
- Residents in Brisbane, Hillsborough, Pacific, 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 30% 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* and *There are not enough job opportunities in the area*.

Figure 6c.
Top 5 Neighborhood Challenges Experienced by Jurisdiction

25% Above County average
 25% Below County average

Neighborhood Challenges	County	Jurisdiction													
		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	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%	18%	13%	25%	40%	4%	18%	23%	20%	15%	21%	14%	12%	16%	
Schools in my neighborhood are poor quality	15%	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%	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%	29%	7%	9%	10%	14%	18%	25%	17%	21%	12%	13%	15%	10%	
There are not enough job opportunities in the area	12%	8%	7%	20%	17%	8%	14%	0%	20%	13%	11%	11%	18%	12%	
None of the above	50%	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, and
- 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. Hispanic, Other Race, and Precariously housed residents are also more likely to experience this challenge.
- African American, Asian, Hispanic, Renters, and Precariously Housed groups are more likely to experience bed bugs or rodent infestation in their homes.
- African American, Hispanic, Renters, and Precariously Housed groups 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.
- Hispanic, Other Race, and Renter respondents are more likely to worry that if they request a repair it will result in a rent increase or eviction and to report that their homes are in bad condition.

Figure 7a.
Top 10 Housing Challenges Experienced by Race/Ethnicity and Tenure

25% Above County average
 25% Below County average

Housing or Neighborhood Condition	County	African American	Asian	Hispanic	Other Race	Non-Hispanic White	Homeowner	Renter	Precariously Housed
Valid cases	2,159	132	489	392	144	734	986	974	301
I would like to move but I can't afford anything that is available/income too low	31%	30%	32%	50%	31%	20%	7%	48%	56%
My house or apartment isn't big enough for my family	20%	16%	21%	35%	22%	11%	12%	29%	18%
I worry that if I request a repair it will result in a rent increase or eviction	14%	17%	13%	23%	19%	11%	2%	28%	13%
My home/apartment is in bad condition	11%	12%	9%	16%	17%	10%	6%	17%	10%
My landlord refuses to make repairs despite my requests	6%	20%	7%	10%	10%	5%	2%	13%	10%
I live too far from family/ friends/my community	6%	15%	6%	6%	13%	6%	5%	8%	9%
I don't feel safe in my building/ neighborhood	6%	13%	6%	6%	9%	5%	4%	8%	7%
I need help taking care of myself/my home and can't find or afford to hire someone	5%	14%	7%	5%	6%	5%	5%	6%	11%
I have bed bugs/insects or rodent infestation	5%	14%	8%	7%	5%	4%	4%	9%	9%
The HOA in my neighborhood won't let me make changes to my house or property	4%	14%	8%	4%	3%	3%	5%	3%	7%
None of the above	42%	18%	37%	24%	38%	58%	68%	21%	13%

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

The above trends are similar for the **most acute housing affordability challenges**. As shown in Figure 7b, African American and Hispanic households, as well as renters and those precariously housed, experience affordability challenges at a higher rate than the county overall. Non-Hispanic White residents and homeowners experience these same challenges at a lower rate than the county.

- African American residents experience all five affordability challenges at a greater rate than the county overall.
- In addition to being more likely to not pay utility bills or rent on time, African American residents are more than four times as likely than the average county respondent to have a Section 8 voucher and worry that their landlord will raise their rent more than the voucher payment.
- Along with African American residents, Hispanic households, renters, and precariously housed households are most likely to experience difficulty paying utility bills, as well as have bad credit or eviction/foreclosure history impacting their ability to find a place to rent.
- These groups, with the exception of those precariously housed, are also more likely to be late on their rent payments.

Figure 7b.
Top 5 Affordability Challenges Experienced by Race/Ethnicity and Tenure

■ 25% Above County average
■ 25% Below County average

Affordability Challenges	County	African American	Asian	Hispanic	Other Race	Non-Hispanic White	Homeowner	Renter	Precariously Housed
Valid cases	2,130	132	487	391	146	739	983	953	293
I can't keep up with my utilities	10%	22%	11%	17%	14%	5%	5%	15%	15%
I'm often late on my rent payments	8%	13%	6%	12%	12%	4%	1%	15%	8%
I can't keep up with my property taxes	6%	16%	8%	4%	5%	7%	9%	5%	14%
I have bad credit/history of evictions/foreclosure and cannot find a place to rent	4%	5%	3%	8%	4%	2%	1%	6%	11%
I have Section 8 and I am worried my landlord will raise my rent higher than my voucher payment	4%	18%	5%	6%	7%	2%	2%	7%	8%
None of the above	73%	32%	70%	63%	64%	83%	84%	61%	54%

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

As shown in Figure 7c, African American and precariously housed residents experience neighborhood challenges at a higher rate than the county. These two groups experience neighborhood issues related to transportation more acutely than county residents overall. In addition to Other race respondents, they are also more likely to identify the lack of job opportunities in their respective neighborhoods.

Additionally, Hispanic residents are more likely to live in neighborhoods with poor performing schools than the average county respondent. Homeowners are also more likely to report that they cannot access public transit easily or safely.

Figure 7c.
Top 5 Neighborhood Challenges Experienced by Race/Ethnicity and Tenure

■ 25% Above County average
■ 25% Below County average

Neighborhood Challenges	County	African American	Asian	Hispanic	Other Race	Non-Hispanic White	Homeowner	Renter	Precariously Housed
Valid cases	2,079	133	486	389	146	737	975	918	284
My neighborhood does not have good sidewalks, walking areas, and/or lighting	17%	14%	17%	19%	16%	18%	18%	15%	18%
Schools in my neighborhood are poor quality	15%	13%	18%	20%	17%	13%	18%	13%	13%
Bus/rail does not go where I need to go or does not operate during the times I need	15%	33%	16%	13%	17%	17%	17%	14%	24%
I can't get to public transit/bus/light rail easily or safely	14%	24%	15%	11%	16%	16%	18%	11%	19%
There are not enough job opportunities in the area	12%	22%	14%	12%	19%	9%	9%	15%	20%
None of the above	50%	23%	46%	48%	45%	53%	49%	51%	36%

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Differences in needs by household status. As shown in Figure 8a, single parents, households making less than \$50,000, households with children under 18 and those with a member experiencing a disability experience the majority of housing challenges 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 or because their income is too low.

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 less than \$25,000, single parents, and households with children under 18 experience all five affordability challenges at a greater rate than the average county respondent.

Households making less than \$25,000 and households with a member experiencing a disability also disproportionately report affordability challenges.

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.

Eighty percent 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%) tenants reported the highest rates of seriously looking for housing. Among respondents by income, households making less than \$25,000 (71%) had the highest rate. However, 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								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		None of the Above
Jurisdiction											
County	56%	26%	22%	14%						45%	928
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 (22%).

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
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 rent.

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, and households with a member experiencing a disability.
- 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.

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														
			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	Criminal background	I had/ have COVID	The language I speak	Foreclosure	n
Jurisdiction																	
County	39%	1154	18%		44%		19%	21%									449
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.

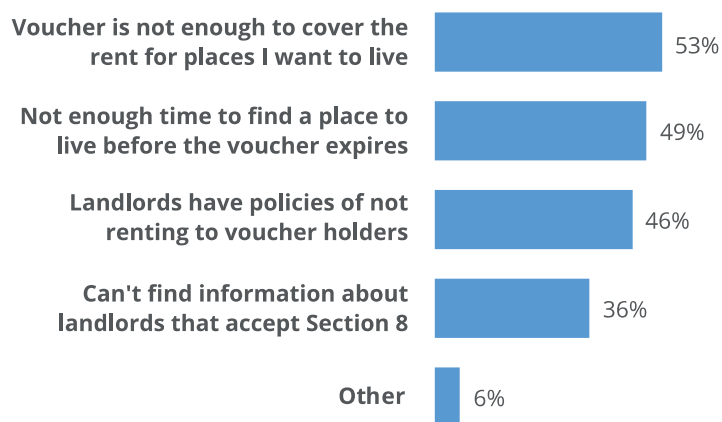


Figure 13. How difficult is it to find a landlord that accepts a housing voucher?

	Percent with a Housing Voucher					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
	Not difficult	Somewhat difficult	Very difficult										
Jurisdiction													
County	12%	18%	55%	27%	250	53%	49%	46%	36%	6%	203		
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, and single parent households 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 the city of 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	Housing was unsafe (e.g., domestic assault,	Forced out for no reason	Health/ medical reasons	I was behind on rent	Poor condition of property	Utilities were too expensive/ shut off		Natural disaster/ flooding/ fire
Jurisdiction															
County	21%	2066	29%	19%	18%										417
Brisbane	24%	67				25%		31%		25%					16
Burlingame	22%	152	24%		30%	18%									33
Daly City	25%	115	35%	27%					31%						26
East Palo Alto	32%	50	20%	20%			20%								15
Foster City	11%	130			21%	21%			21%	43%					14
Half Moon Bay	31%	51			31%	25%									16
Hillsborough	12%	52				33%	33%		33%	33%	33%				6
Milbrae	27%	44					42%	33%		25%				25%	12
Pacifica	21%	75			31%			31%	31%						16
Redwood City	29%	146	31%							21%					42
San Bruno	25%	89	33%	29%				24%							21
San Mateo	37%	153	35%	31%						20%					54
South San Francisco	12%	712	42%	15%	16%										81
Race/Ethnicity															
African American	59%	134				29%		30%	28%						79
Asian	22%	500				31%		22%	22%						109
Hispanic	29%	397	33%	22%						18%					115
Other Race	28%	149	54%					20%				24%			41
Non-Hispanic White	14%	757	27%	20%	31%										102
Tenure															
Homeowner	8%	975		27%		25%		31%							75
Renter	34%	905	32%	18%	22%										292
Precariously Housed	48%	280	23%				24%		23%						132
Income															
Less than \$25,000	45%	282	28%	20%				20%	20%						127
\$25,000-\$49,999	30%	265	31%		19%					18%					78
\$50,000-\$99,999	22%	517	32%	22%	18%										115
Above \$100,000	8%	721			27%	20%	23%								60
Household Characteristics															
Children under 18	30%	840	27%			20%	19%								249
Large Households	20%	284	32%		19%					18%					57
Single Parent	55%	240				24%		24%	20%						131
Disability	34%	711	26%	20%			20%	20%							241
Older Adults (age 65+)	22%	736	23%	22%		22%									162

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Children changing schools after displacement. Overall, for households with children that were displaced in the past five years, 60% of children in those households have changed schools. The most common outcomes reported among these respondents included *school is more challenging* (28%), *they feel less safe at the new school* (25%), and *they are in a worse school* (24%) (Figure 15).

Among respondents by race/ethnicity, non-Hispanic White households (44%) were the only subgroup to report that being displaced resulted in their children being in better schools. Of African American households that were displaced and have children, 87% reported that their children changed schools. Of these respondents, 32% reported that their children *feel safer at the new school* but also *have fewer activities*.

Among respondents by tenure, precariously housed (78%) and homeowner (74%) households had the highest proportion of children who changed schools. The most common outcomes for precariously housed households included *School is less challenging/they are bored* (35%) and their children *feel less safe at school* (34%). For homeowner households, 39% reported that *school is more challenging*, followed by 31% who reported that their children *feel less safe at school*.

Among respondents by selected household characteristics, older adult (77%), single parent (74%), households with a member experiencing a disability (70%), and households with children under 18 (67%) all reported high proportions of children who changed schools. The most common outcomes for these respondents included *School is more challenging* and *they feel less safe at the new school*.

Figure 15. Children Changing Schools and Outcomes, Displaced Households

	Percent of Children that Changed Schools	Total n	School change outcomes									
			School is less challenging/they are bored	School is more challenging	School provides more support for students with disabilities, IEP, and/or 50	They are in a better school	They are in a worse school	They feel less safe at the new school	They feel safer at the new school	They have fewer activities	They have more activities	Things are about the same
Jurisdiction												
County	60%	306		28%				24%	25%			183
Brisbane	81%	16		38%					31%	31%		13
Burlingame	55%	22	33%	33%							33%	12
Daly City	41%	17	43%			29%		29%			29%	7
East Palo Alto	54%	13	43%	57%				29%				7
Foster City	62%	13									50%	8
Half Moon Bay	58%	12		43%				29%	29%	43%		7
Hillsborough	60%	5							67%			3
Milbrae	82%	11		33%				44%	44%	33%		9
Pacifica	91%	11						50%				10
Redwood City	52%	23				25%	33%		25%			12
San Bruno	67%	18	33%				33%		33%			12
San Mateo	66%	35	32%				32%					22
South San Francisco	36%	56		26%		26%					26%	19
Race/Ethnicity												
African American	87%	69	30%	30%					32%	32%		60
Asian	73%	91	27%	32%				32%	27%			66
Hispanic	49%	91		23%				30%	23%	25%		44
Other Race	65%	31		40%				30%	25%	25%		20
Non-Hispanic White	60%	60	28%	31%		44%			28%			36
Tenure												
Homeowner	74%	66		39%				29%	31%			49
Renter	58%	213	25%	30%					25%			122
Precariously Housed	78%	104	35%						34%	30%		80
Income												
Less than \$25,000	65%	92	22%	32%					35%			60
\$25,000-\$49,999	66%	56	25%					28%	28%	25%		36
\$50,000-\$99,999	55%	85		30%		28%			23%			47
Above \$100,000	59%	44	35%	31%				38%				26
Household Characteristics												
Children under 18	67%	237		32%				23%	25%			158
Large Households	45%	44		32%		26%					32%	19
Single Parent	74%	124		32%				28%	29%			92
Disability	70%	188	26%	28%					30%			132
Older Adults (age 65+)	77%	117		35%				29%	29%			89

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Experience with housing discrimination. Overall, 19% of survey respondents felt they were discriminated against when they looked for housing in the area.⁸⁸ 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 happened.

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 households and Brisbane residents (both groups top response was *Moved/found another place to live*). Similarly, survey respondents from Foster City and Redwood City 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:

⁸⁸ 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"*
- *"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 tenía 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
	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
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 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 I 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
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
Millbrae	40%	82%	17	25%					25%	25%			25%	25%	25%	4
Pacifica	39%	93%	29				100%									2
Redwood City	42%	68%	62	33%	28%	28%				33%						18
San Bruno	40%	82%	34	50%		33%		33%								6
San Mateo	43%	72%	65	41%	47%					41%						17
South San Francisco	30%	68%	210	35%	28%	32%										57
Race/Ethnicity																
African American	71%	87%	95		40%		40%	33%								15
Asian	31%	77%	157	29%	34%	26%			26%							35
Hispanic	41%	70%	162	37%	54%				35%							46
Other Race	38%	71%	56	63%		50%	44%									16
Non-Hispanic White	32%	77%	241	33%		27%		21%								52
Tenure																
Homeowner	29%	82%	280	35%		37%		37%								43
Renter	39%	73%	347	41%	40%				27%							88
Precariously Housed	56%	71%	154		37%		26%				33%					43
Income																
Less than \$25,000	59%	71%	167		42%				27%		23%					48
\$25,000-\$49,999	40%	67%	107		45%	45%	45%									31
\$50,000-\$99,999	35%	77%	180	43%	26%	24%										42
Above \$100,000	23%	82%	167	52%		34%		41%								29
Household Characteristics																
Children under 18	35%	78%	293		40%		29%		32%							63
Large Households	35%	70%	99	41%	45%				34%							29
Single Parent	58%	81%	139		48%		28%		41%							29
Older Adults (age 65+)	46%	76%	337	44%	29%	30%										79

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Transportation. Over 80% of respondents indicated the type of transportation used most often is driving a personal vehicle. This share was relatively similar across the majority of jurisdictions and was the number one type of transportation used across all jurisdictions and demographic characteristics.

The groups with the lowest proportion of those who primarily drive included African American (40%), households making less than \$25,000 (53%), single parents (57%), and precariously housed (57%) respondents.

As shown in Figure 18, on average respondents are fairly satisfied with their transportation situation. Those groups somewhat or not at all satisfied with their transportation options include African American (58%), Brisbane (51%), single parents (45%) and precariously housed (44%) respondents.

Figure 18.
Are you satisfied with your current transportation options?

Source:
 Root Policy Research from the
 2021-2022 21 Elements AFFH
 Resident Survey.

	Entirely satisfied	Mostly satisfied	Somewhat unsatisfied	Not at all satisfied	n
Jurisdiction					
County	29%	45%	20%	6%	1,903
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, 71%
- Owners, 65%
- Income greater than \$100,000, 54%
- Residents of Foster City, 53%
- White, 51%
- Residents of Burlingame, 50%

The highest proportion of respondents among groups that selected *Help me with a downpayment or purchase* includes:

- Renters, 44%
- Large households, 42%
- Residents of Daly City, 41%
- Hispanic, 39%
- Precariously housed, 39%
- Residents of the City of San Mateo, 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 residents, 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:

- 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 33% of Half Moon Bay 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, 48%
- Burlingame, 47%
- Foster City, 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.

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APPENDIX D: SITES INVENTORY

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APPENDIX D1: SITES INVENTORY METHODOLOGY

965 WEEKS STREET

Prior Housing Element?	Yes
APN	063-232-210 063-232-220 063-232-230
Acreage	2.52
Current GP and Zoning	High Density Residential (General Plan) R-HD zoning 22-43 du/acre Urban Residential (Specific Plan) up to 40 du/acre
Unit Breakdown	42 VLI, 93 LI, 1 Above Mod
Site Details (incl. existing use)	Entitled project on vacant, City-owned parcel. Fully affordable project with financing plan that includes Low-Income Housing Tax Credits and other sources of public funding, including City loans.
Methodology used to determine realistic capacity	This is an entitled project that has applied for several rounds of state funding and was provided City loan funds. Unit mix and affordability codified in regulatory agreement with City are reflected here.
Environmental	Mitigated Negative Declaration for the site completed during entitlement phase.
Infrastructure	Water –This project will benefit from City capital improvements; most significantly, the upgrade of the Weeks Street water line between Cooley and Pulgas. Applicant is responsible for obtaining clearance from Menlo Fire. Sewer – applicant is responsible for obtaining clearance from EPASD.
Other constraints	None known.

1804 BAY ROAD

Prior Housing Element?	No
APN	063-231-240
Acreage	.99 acre
Current GP and Zoning	Mixed-Use Corridor (General Plan) MUC-2 zoning 22-65 du/acre Bay Road Central (Specific Plan) zoning 50 du/acre
Unit Breakdown	10 VLI, 65 Above-Mod

Site Details (incl. existing use)	SB 35-cleared mixed-use residential and retail project with density bonus. Owner currently considering options to sell the land and preliminarily approved plans and a new project could require discretionary review if major changes proposed.
Methodology used to determine realistic capacity	Development application and SB 35 zoning clearance.
Environmental	N/A due to SB 35.
Infrastructure	Water – applicant will be required to obtain clearance from Menlo Fire. Water is provided by the City System along Bay Road. Sewer –applicant will be required to obtain clearance from EPASD.
Other constraints	None known.

UNIVERSITY CLARUM CORNER 2331 UNIVERSITY (Nonvacant)

Prior Housing Element?	Yes
APN	063-201-250, 063-201-260, 063-201-290
Acreage	.89 acres
Current GP and Zoning	Mixed Use Corridor (General Plan) MUC-2 zoning 22-65 du/acre
Unit Breakdown	4 LI, 3 MOD, 26 Above-Mod
Site Details (incl. existing use)	Multifamily mixed-use; condominiums over ground floor retail. Demolition of existing single-family home on property.
Methodology used to determine realistic capacity	This project was entitled with the unit mix shown here. The unit mix may change if the entitlements are sold to another developer. Conditions of approval include right of first refusal for current tenant for one of the below market-rate units in the new development and tenant relocation assistance to be provided to tenant.
Environmental	CEQA Categorical Exemption. The site contains no wetlands, creeks, natural areas, and is not located adjacent to the Bay. Based on the General Plan EIR (2016), the site does not contain the aquatic, salt marsh, riparian or other habitats that may support special status species. The property was the subject of a Phase I Environmental Site Assessment (ESA) (Lowney Associates, 2003) that concluded that no hazardous materials incidents have been reported in this location or nearby locations that would likely affect the site. Kimley-Horn (2020) performed an updated regulatory database search and found that no new recorded hazardous sites are located at the project site.

Infrastructure	<p>As a project designated as mixed-use in the City’s General Plan and studied in the General Plan EIR, the Clarum Corner Notice of Exemption found that the site can be serviced by all existing utilities and public services. Water shall be provided by the City’s System on University Avenue.</p> <p>Applicant remains responsible for obtaining clearance from Menlo Fire and for obtaining a permit from EPASD and/or paying any required fees.</p>
Other constraints	None known.

1201 RUNNYMEDE

Prior Housing Element?	Yes
APN	063-271-090
Acreage	.932 acres
Current GP and Zoning	High Density Residential (General Plan) zoning 22-43 du/acre Urban Residential (Specific Plan) up to 40 du/acre
Unit Breakdown	3 LI, 3 MOD, 26 Above-Mod
Site Details (incl. existing use)	Entitled multifamily condominium project on a vacant lot.
Methodology used to determine realistic capacity	This project was entitled with the unit mix shown here. Applicant has contacted City to discuss developing at a somewhat lower density; this would require new Planning entitlement. The unit mix may change if the entitlements are sold to another developer.
Environmental	<p>CEQA Categorical Exemption.</p> <p>The site contains no wetlands, creeks, natural areas, and is not located adjacent to the Bay. Based on the General Plan EIR (2016), the site does not contain the aquatic, salt marsh, riparian or other habitats that may support special status species.</p> <p>Kimley-Horn (2020) performed an updated regulatory database search and found that no new recorded hazardous sites are located at the project site.</p>
Infrastructure	<p>As a project designated as mixed-use in the City’s General Plan and studied in the General Plan EIR, the Clarum Corner Notice of Exemption found that the site can be serviced by all existing utilities and public services. Water to be provided by the City’s System on Runnymede Street.</p> <p>Applicant remains responsible for obtaining clearance from Menlo Fire and permit from EPASD and/or for paying any required fees.</p>
Other constraints	None known.

760 WEEKS STREET

Prior Housing Element?	Yes
APN	063-252-320
Acreage	.52 acres
Current GP and Zoning	Medium Density Residential (General Plan) RMD-2 zoning 12-22 du/acre
Unit Breakdown	1 LI, 1 MOD, 8 Above-Mod units.
Site Details (incl. existing use)	SB 35-cleared townhome project with density bonus on a vacant lot.
Methodology used to determine realistic capacity	Based on ministerially approved development proposal.
Environmental	N/A due to SB 35.
Infrastructure	Water – applicant will still be required to obtain clearance from Menlo Fire. Water to be provided by the City’s System on Weeks Street. Sewer –applicant is responsible for obtaining permit from EPASD and for paying any required fees.
Other constraints	None known.

120-126 MAPLE LANE

Prior Housing Element?	No
APN	063-720-190, 063-720-180, 063-720-170, 063-720-160
Acreage	.177 acres
Current GP and Zoning	Medium Density Residential (General Plan) RMD-1 zoning 12-15 du/acre
Unit Breakdown	4 Above-Mod
Site Details (incl. existing use)	4- unit subdivision on vacant land. Inclusionary Housing Agreement between the City and the developer required developer to pay a fee in-lieu of constructing 2 residential units affordable to VLI and LI households.
Methodology used to determine realistic capacity	Entitled project, as described in Inclusionary Housing Agreement.

Environmental	CEQA Categorical Exemption (assumed)
Infrastructure	Water – applicant will still be required to obtain clearance from Menlo Fire. Adequate water can be provided by the existing private water system in the Maple Lane Subdivision. Sewer –applicant is responsible for obtaining permit from EPASD and for paying any required fees.
Other constraints	None known.

NO ADDRESS/APN 063265300 (Runnymede/Clarke)

Prior Housing Element?	No
APN	063-265-300
Acreage	.156 acres
Current GP and Zoning	Medium Density Residential (General Plan) RMD-1 zoning 12-15 du/acre
Unit Breakdown	1 LI, 2 Above-Mod
Site Details (incl. existing use)	Deed-restricted ADU at 70% AMI pursuant to Inclusionary Housing Agreement with City of East Palo Alto, as approved by the City Council.
Methodology used to determine realistic capacity	Approved plans and executed Inclusionary Housing Agreement.
Environmental	CEQA Categorical Exemption
Infrastructure	Water – applicant is responsible for obtaining clearance from Menlo Fire. Water to be provided by the City’s System on Runnymede Street which is fed from Clarke Avenue. Sewer –applicant is responsible for obtaining permit from EPASD and for paying any required fees.
Other constraints	None known.

LINCOLN ST. (APN 063-186-270)

Prior Housing Element?	No
APN	063-186-270
Acreage	.254 acres

Current GP and Zoning	Low-Density Residential (General Plan) R-LD zoning up to 12 du/acre
Unit Breakdown	1 VLI, 3 Above-Mod
Site Details (incl. existing use)	SB 9 application to build 2 rental units with 2 ADUs on vacant lot. The inclusionary component of the development proposal to deed-restrict an attached ADU as an alternative compliance option to paying the Inclusionary In-Lieu Fee was approved by City Council on July 19, 2022.
Methodology used to determine realistic capacity	Development proposal.
Environmental	Anticipated CEQA Categorical Exemption due to size of project.
Infrastructure	Water – applicant is responsible for obtaining clearance from Menlo Fire. Water provided by Palo Alto Park Mutual Water Company. Sewer – applicant is responsible for obtaining permit from EPASD and for paying any required fees.
Other constraints	None known.

Projects Not Approved, but High Probability of Development

WOODLAND PARK COMMUNITIES EUCLID IMPROVEMENTS (NONVACANT)

Prior Housing Element?	No
APN	063-282-010, 063-282-020, 063-282-030, 063-282-040, 063-282-050, 063-282-060, 063-282-070, 063-282-580, 063-282-090, 063-281-020, 063-281-030, 063-281-040, 063-281-100, 063-281-110
Acreage	3.9 acres
Current GP and Zoning	Multifamily High-Density R-HD-5 zoning 22-43 du/acre And R-UHD Multifamily Urban High Density 43-86 du/acre
Unit Breakdown	444 Above-Mod
Site Details (incl. existing use)	Redevelopment of 161 existing rent-controlled apartments to 605 units, or 444 net new units. This project is requesting a General Plan Amendment (to create “Neighborhood Center Residential Overlay”) and zoning code changes. Project is subject to Westside Area Plan anti-displacement policies.
Methodology used to determine realistic capacity	The number of total units and affordable units is based on the development application, inclusionary housing ordinance, and pending Development Agreement between the City and the developer, Sand Hill/Woodland Park Communities.
Environmental	On July 1, 2021, the City issued a Notice of Availability of the Draft Environmental Impact Report (DEIR) for a 76-day public comment period which ended on September 15, 2021. A Final EIR is being prepared.
Infrastructure	Domestic water capacity is sufficient to support the proposed project. However, East Palo Alto’s water supply distribution is insufficient to provide adequate pressure and flow for the Euclid Improvements Project’s fire suppression. Menlo Park Fire District has required that the applicant provide approximately 0.5 million gallons (MG) of water for fire flow, and the Applicant will construct a 1.5M gallon tank at an offsite location to improve water pressure and flow for the Westside neighborhood. Applicant is responsible for obtaining clearance from EPASD prior to starting construction. Staff does not believe that these infrastructure constraints will result in a lower number of units.
Other constraints	Project subject to Development Agreement and lengthy approval process.

FOUR CORNERS 1675 BAY RD.

Prior Housing Element?	No
APN	063-111-250
Acreage	6.1 acres
Current GP and Zoning	Mixed Use High (General Plan) MUH zoning – up to 86 du/acre 4 Corners (Specific Plan) up to 60 du/acre
Unit Breakdown	36 VLI, 144 Above-Mod
Site Details (incl. existing use)	Mixed-use project on a vacant site with retail, housing, and office.
Methodology used to determine realistic capacity	The number of total units and affordable units is based on the development application and inclusionary housing ordinance requirement of 20%. Using the 20% requirement, rather than assuming all affordable units is a conservative estimate given the zoning, which allows for a density suitable for lower-income housing.
Environmental	EIR forthcoming. Notice of Preparation pending.
Infrastructure	Water – applicant will still be required to obtain clearance from Menlo Fire. Water to be provided by the City’s System on University Avenue and Bay Road. Sewer –applicant is responsible for obtaining clearance from EPASD and for paying any required fees. Other necessary measures will be determined by the EIR.
Other constraints	The project must request an amendment to the current Specific Plan to accommodate one of the proposed uses (life science/laboratory) and the proposed height. The proposed community and office space will respectively require an administrative use permit and a conditional use permit to be in conformance with Specific Plan. Alternatively, updates to the Ravenswood/4 Corners Specific Plan may better align the proposed project and the Specific Plan, which could help the project achieve greater density for the residential component.

717 DONOHOE

Prior Housing Element?	No
APN	063-374-350
Acreage	.66 acres
Current GP and Zoning	Medium Density Residential (General Plan) RMD-2 zoning 12-22 du/acre
Unit Breakdown	1 LI, 1 MOD, 12 Above-Mod units.

Site Details (incl. existing use)	Vacant lot multifamily condominium project.
Methodology used to determine realistic capacity	Based on development proposal and inclusionary requirement.
Environmental	Anticipated CEQA Categorical Exemption. Analysis shows that there are no serpentine soils, riparian, wetland, or other aquatic areas on or adjacent to the site. As a project with more than 10,000 square feet of impervious surfaces, it will be subject to the requirements of the Municipal Regional Stormwater Permit (MRP) for the San Francisco Bay Area and must implement site design, source control, and Low Impact Development (LID)-based stormwater treatment controls to treat post-construction stormwater runoff.
Infrastructure	Water – The proposed 14 multi-family residences would result in a relatively small incremental increase in water demand and is consistent with the City’s projected growth. The project would connect to the existing water main in Donohoe Street. Sewer –applicant is responsible for obtaining permit from EPASD and for paying any required fees. However, the project is expected to cause a relatively small incremental increase in sanitary sewer demand, consistent with projected growth in the General Plan, and would connect to the existing sewer main in Donohoe Street. Applicant is still responsible for obtaining clearance from Menlo Fire and EPASD.
Other constraints	None known. Site access – check Engineering’s comments.

990 GARDEN

Prior Housing Element?	No
APN	063-344-420, 063-344-450
Acreage	1.32 acres
Current GP and Zoning	Low Density Residential (General Plan) R-LD zoning up to 12 du/acre
Unit Breakdown	2 LI, 6 Above-Mod
Site Details (incl. existing use)	Lot merger and subdivision of two vacant parcels for 6 single family dwellings with ADUs and one duplex. While the inclusionary portion of this project has been approved by the City Council (the developer proposed an alternative) and the tentative map was approved by the Planning Commission, the design review hearing has been continued to September 2022.

Methodology used to determine realistic capacity	Based on development proposal and inclusionary requirement.
Environmental	CEQA Categorical Exemption. The site does not contain wetlands, creeks, or natural areas, and is not connected to nearby Baylands or marsh habitat. Based on the General Plan EIR (2016), the site does not contain the aquatic, salt marsh, riparian or other habitats that may support special status species. Kimley-Horn (July 2021) performed an updated regulatory database search of the Department of Toxic Substances Control Envirostor website and the State Water Resources Control Board's (SWRCB) Geotracker website to identify if any new hazardous material regulated facilities or sites within or proximate to the project are present. The target property was <u>not</u> listed in any of the databases searched by Kimley-Horn.
Infrastructure	The project would connect to existing electrical, communications, water, sewer and storm drain infrastructure that currently exists within public rights of way. The project included a utility plan, domestic water analysis and sewer capacity analysis to confirm that the project can be served by existing infrastructure. Applicant is still responsible for obtaining clearance from Menlo Fire. Sewer –applicant is responsible for obtaining permit from EPASD and for paying any required fees. However, the project is expected to cause a small increase in sanitary sewer demand from 8 units.
Other constraints	None known.

2340 COOLEY (Nonvacant)

Prior Housing Element?	No
APN	063-253-410
Acreage	.26 acres
Current GP and Zoning	Medium Density Residential (General Plan) RMD-2 zoning 12-22 du/acre
Unit Breakdown	1 LI, 7 Above-Mod
Site Details (incl. existing use)	Redevelopment of site with single family home (owner-occupied) with density bonus. Planning Commission review anticipated in fall 2022.
Methodology used to determine realistic capacity	Development proposal and inclusionary requirement/density bonus analysis.
Environmental	Anticipated CEQA Categorical Exemption due to size of project.

Infrastructure	Water – applicant is responsible for obtaining clearance from Menlo Fire. Water to be provided by the City’s System Sewer –applicant is responsible for obtaining permit from EPASD and for paying any required fees.
Other constraints	None known.

Projects with Lower Probability of Development, But Development Interest

547 RUNNYMEDE

Prior Housing Element?	No
APN	063-201-190
Acreage	.45
Current GP and Zoning	Medium-Density Residential (General Plan) RMD-2 zoning 12-22 du/acre
Unit Breakdown	7 Above-Mod
Site Details (incl. existing use)	Preliminary proposal for a townhome development on vacant parcel.
Methodology used to determine realistic capacity	Assumed density for unit calculation is 15 du/acre, which is comparable to other developments with this zoning and adjusted downwards due to smaller size of site.
Environmental	Anticipated CEQA Categorical Exemption due to size of project.
Infrastructure	Water – applicant is responsible for obtaining clearance from Menlo Fire. Water to be provided by the City’s System. Sewer –applicant is responsible for obtaining permit from EPASD and for paying any required fees.
Other constraints	None known.

1062 RUNNYMEDE

Prior Housing Element?	No
APN	063-262-060
Acreage	.92
Current GP and Zoning	Low Density Residential (General Plan) R-LD zoning up to 12 du/acre
Unit Breakdown	6 Above-Mod
Site Details (incl. existing use)	Preliminary proposal for subdivision with four single family homes (and 4 ADUs).
Methodology used to determine realistic capacity	Unit calculation assumes 6 du/acre, which is comparable to other R-LD-zoned projects of this size.
Environmental	Anticipated CEQA Categorical Exemption due to size of project.

Infrastructure	Water – applicant is responsible for obtaining clearance from Menlo Fire. Water to be provided by the City’s System. Sewer –applicant is responsible for obtaining permit from EPASD and for paying any required fees.
Other constraints	None known.

812 GREEN

Prior Housing Element?	No
APN	063-373-110
Acreage	.89
Current GP and Zoning	Low Density Residential (General Plan) R-LD zoning up to 12 du/acre
Unit Breakdown	5 Above-Mod
Site Details (incl. existing use)	Site has a preliminary proposal for a subdivision with five single family homes.
Methodology used to determine realistic capacity	Assumes 6 du/acre, which is comparable to other R-LD-zoned projects of this size.
Environmental	Anticipated CEQA Categorical Exemption due to size of project.
Infrastructure	Water – applicant is responsible for obtaining clearance from Menlo Fire. Water to be provided by the City’s System. Sewer –applicant is responsible for obtaining permit from EPASD and for paying any required fees.
Other constraints	None known.

842 GREEN

Prior Housing Element?	No
APN	063-373-130
Acreage	.59
Current GP and Zoning	Low Density Residential (General Plan) R-LD zoning up to 12 du/acre
Unit Breakdown	4 Above-Mod

Site Details (incl. existing use)	Preliminary proposal on this site for a subdivision with three single family homes.
Methodology used to determine realistic capacity	Assumes 6 du/acre, which is comparable to other R-LD-zoned projects of this size.
Environmental	Anticipated CEQA Categorical Exemption due to size of project.
Infrastructure	Water – applicant is responsible for obtaining clearance from Menlo Fire. Water to be provided by the City’s System. Sewer –applicant is responsible for obtaining permit from EPASD and for paying any required fees.
Other constraints	None known.

801 DONOHOE

Prior Housing Element?	No
APN	063-374-170
Acreage	.45
Current GP and Zoning	Medium Density Residential (General Plan) R-MD-2 zoning 12 to 22 du/acre
Unit Breakdown	5 Above-Mod
Site Details (incl. existing use)	Parcel has a preliminary proposal for a subdivision with five single family homes. While single family homes may not be the primary intended use of a site with this zoning per the General Plan, the density may be more realistic, given the size of the site.
Methodology used to determine realistic capacity	Assumed density for unit calculation of 12 du/acre (the minimum) results in 5 units.
Environmental	Anticipated CEQA Categorical Exemption due to size of project.
Infrastructure	Water – applicant is responsible for obtaining clearance from Menlo Fire. Water to be provided by the City’s System. Sewer –applicant is responsible for obtaining permit from EPASD and for paying any required fees.
Other constraints	None known.

755 SCHEMBRI LANE

Prior Housing Element?	No
APN	063-361-400, 063-361-260
Acreage	1.435 acres
Current GP and Zoning	2 lots: R-LD zoning up to 12 du/acre and RMD-1 zoning 12-15 du/acre
Unit Breakdown	17 Above-Mod
Site Details (incl. existing use)	Some preliminary property owner interest in building 6 single family homes on the property. However, design remains conceptual.
Methodology used to determine realistic capacity	Unit calculation based on 12 du/acre, which is reasonable given density of other projects with this zoning and size of site.
Environmental	Anticipated CEQA Categorical Exemption due to size of project.
Infrastructure	Water – applicant is responsible for obtaining clearance from Menlo Fire. Water to be provided by the City’s System. Sewer –applicant is responsible for obtaining permit from EPASD and for paying any required fees.
Other constraints	None known.

807 E. BAYSHORE

Prior Housing Element?	No
APN	062-221-340
Acreage	.55 acres
Current GP and Zoning	Low-Density Mixed-Use (General Plan) MUL-1 zoning up to 22 du/acre
Unit Breakdown	12 Above-Mod
Site Details (incl. existing use)	Preapplication to demolish commercial space and build 6 apartments on second and third floor of new building.
Methodology used to determine realistic capacity	Assumed density at 15 du/acre, given density of other projects with this zoning and tentative nature of preapplication.
Environmental	Anticipated CEQA Categorical Exemption due to size of project.
Infrastructure	Water – applicant is responsible for obtaining clearance from Menlo Fire. Water to be provided by the City’s System.

	Sewer –applicant is responsible for obtaining permit from EPASD and for paying any required fees.
Other constraints	None known.

851 WEEKS

Prior Housing Element?	Yes
APN	063-221-240
Acreage	.65 acres
Current GP and Zoning	High Density Residential (General Plan) High Density Residential zoning 22-43 du/acre Urban Residential (Specific Plan) up to 40 du/acre
Unit Breakdown	16 VLI, 10 LI
Site Details (incl. existing use)	Site was recently considered for affordable housing as part of another development in the City to fulfill the project’s inclusionary housing obligation. No preapplication was submitted, but feasibility was discussed for affordable units. A future developer would seek to maximize the density, as affordable developers have done elsewhere in the City, likely leveraging density bonus. For purposes of analysis, assumed 40 du/acre. The developer may still pay an in-lieu fee as part of its inclusionary housing plan, rather than build the inclusionary housing units, therefore decreasing the probability of development.
Methodology used to determine realistic capacity	Assumed density bonus. Applied RHNA 6 distribution to total units to calculate VLI and LI units.
Environmental	Potential CEQA Categorical Exemption due to size of project.
Infrastructure	Water – applicant is responsible for obtaining clearance from Menlo Fire. Water to be provided by the City’s System Sewer –applicant is responsible for obtaining permit from EPASD and for paying any required fees.
Other constraints	None known.

Publicly Owned Sites with Potential for Development or Redevelopment

2415 UNIVERSITY – 2 parcels (Nonvacant)

Prior Housing Element?	No
APN	063-103-370, 063-103-360
Acreage	.76 acres, 1.285 acres
Current GP and Zoning	Public/Institutional (General Plan) – nonresidential zoning 4 Corners (Specific Plan) up to 60 du/acre
Unit Breakdown	61 VLI
Site Details (incl. existing use)	County-owned Government Center currently under study; there is some potential for housing on the site.
Methodology used to determine realistic capacity	4 Corners zoning allows for maximum 60 du/acre on the site. Given existing use as Government Center, continued need to accommodate these uses, and underutilized space in the form of surface parking adjacent to Government Center, staff is assuming 30 du/acre for housing density. Staff has also taken into consideration the proposed density of the development across University Ave., Four Corners (currently proposed as 30 du/acre but is subject to change).
Environmental	Anticipated Initial Study.
Infrastructure	Water – applicant is responsible for obtaining clearance from Menlo Fire. Sewer –applicant is responsible for obtaining permit from EPASD and for paying any required fees.
Other constraints	County and City are currently working on feasibility study of these sites. However, this cooperation must continue to ensure development over the next 8 years.

2277 UNIVERSITY (Nonvacant)

Prior Housing Element?	Yes
APN	063-302-460
Acreage	.36 acres
Current GP and Zoning	Mixed-Use Corridor MUC-1 zoning 22-65 du/acre
Unit Breakdown	20 VLI
Site Details (incl. existing use)	City-owned parcel to be exchanged with County of San Mateo for the site at 2216 Beech St. and developed as housing. There is currently a single-family home

	structure on the site used by the City. It is possible the County may acquire a neighboring site, which would result in a parcel just over .5 acres.
Methodology used to determine realistic capacity	The current zoning of MUC-1 allows for 22-65 du/acre. For comparison, there are two entitled developments on this list with MUC-2 zoning, which contains the same density minimum/maximum (22-65 du/acre), but which allows for uses other than residential above the ground floor, whereas MUC-1 zoning allows for residential uses only above the ground floor. Those two developments proposed a density of 75 du/acre (65 maximum plus density bonus) and 37 du/acre, respectively. Given the intention to use this site as affordable housing, staff assumes 55 du/acre, roughly the average of the two other sites. Assumes all units VLI.
Environmental	Anticipated CEQA Categorical Exemption due to size of project.
Infrastructure	Water – applicant is responsible for obtaining clearance from Menlo Fire. Sewer –applicant is responsible for obtaining permit from EPASD and for paying any required fees.
Other constraints	None known.

560 BELL ST.* (nonvacant; *would require rezoning)

Prior Housing Element?	No
APN	063-292-320
Acreage	3.86 acres (assumes .736 acres, or 20% of site, for redevelopment)
Current GP and Zoning	Parks and Recreation (General Plan) PR zoning – nonresidential The code says that “other uses determined to be compatible may also be allowed” so the City may not have to rezone for this use.
Unit Breakdown	14 VLI, 8 LI
Site Details (incl. existing use)	Site not zoned for housing, but there is some interest in redevelopment with housing.
Methodology used to determine realistic capacity	Applied 30 du/acre density to 20% of the parcel (.736 acres), which is the area expected to be redeveloped for housing on the second floor, for total of 22 units, with VLI/LI breakdown based on RHNA 6 distribution. Surrounding uses include Mixed-Use High zoning, which allows for up to 86 du/acre.
Environmental	Unknown. Anticipated Initial Study.
Infrastructure	Water – applicant is responsible for obtaining clearance from Menlo Fire. Sewer –applicant is responsible for obtaining permit from EPASD and for paying any required fees.
Other constraints	Building housing on this parcel would require rezoning.

RAVENSWOOD ELEMENTARY SCHOOL DISTRICT BAY RD. SITE/APN 063090080

Prior Housing Element?	No
APN	063-090-080
Acreage	2.59 acres
Current GP and Zoning	Public/Institutional (General Plan) – nonresidential zoning This would require rezoning.
Unit Breakdown	Assumed breakdown: 26 VLI, 26 LI, 26 MOD.
Site Details (incl. existing use)	Ravenswood School District vacant site planned for teacher affordable housing. See attached letter in Appendix D2 demonstrating the district’s intent.
Methodology used to determine realistic capacity	Based on size of parcel and surrounding zoning (single family residential), assumed 30 du/acre for a total of 78 affordable units.
Environmental	To be determined. Possible EIR.
Infrastructure	Water – applicant is responsible for obtaining clearance from Menlo Fire. Sewer –applicant is responsible for obtaining permit from EPASD and for paying any required fees.
Other constraints	The Ravenswood Elementary School District would be required to work with the state to develop this site as housing, as its City zoning designation currently does not allow for residential. The project is dependent upon the school district’s progress during the eight-year planning period. This site may have to go through the City’s process and would therefore require rezoning.

Nonresidential Zoning, But Residential Development Application (RBD)

EPA WATERFRONT

Prior Housing Element?	No
APN	063-050-050
Acreage	29.6 (but developable area approx. 9 acres)
Current GP and Zoning	Industrial Buffer (General Plan) -- – non-residential Industrial Flex Overlay (Specific Plan) – non-residential
Unit Breakdown	52 VLI, 208 Above-Mod

Site Details (incl. existing use)	This is a vacant parcel, much of which is restricted to open space or recreation. It is likely to be rezoned to allow for housing. Of this, there would be a minimum 20% inclusionary requirement, and potentially additional affordable housing required as part of RBD update process/rezoning.
Methodology used to determine realistic capacity	While the zoning currently does not allow for housing, re-zoning would allow the developer to build housing units on this parcel (without infringing on sensitive environmental areas). The 260-unit total is contained in the applicant's 2021 proposal. City could assume all lower-income units on this site, given the size and zoning of the parcel. However, knowing there is a development application for market-rate units, staff is assuming 20% (inclusionary) as the default.
Environmental	This project will require an EIR. The NOP is pending.
Infrastructure	Water – applicant will still be required to obtain clearance from Menlo Fire. Sewer –applicant is responsible for obtaining clearance from EPASD and for paying any required fees. Other necessary measures will be determined by the EIR.
Other constraints	Aside from zoning, this project contains commercial square footage that cumulatively (together with other proposed projects in the Specific Plan area) exceeds the commercial square footage evaluated in the 2013 RBD EIR. The project is expected to build a lower amount of commercial than proposed, subject to the RBD update process. This is not, however, expected to affect the number of proposed housing units. This is a staff-recommended site for rezoning to allow for residential.

HARVEST THE LANDING HOUSING OFFSITE 1103 WEEKS (Nonvacant)

Prior Housing Element?	No
APN	063240360, 063240370, 063240380, 063240270
Acreage	1.6 acres
Current GP and Zoning	General Industrial (General Plan) -- nonresidential zoning Ravenswood Employment Center (Specific Plan)
Unit Breakdown	95 VLI
Site Details (incl. existing use)	Applicant is partnering with Eden Housing to develop a 95- unit affordable project with ground floor civic/nonprofit space on ground floor. Site contains an unoccupied (according to applicant; must be verified) single family unit. Would require re-zoning of the parcel.

Methodology used to determine realistic capacity	Based on affordable housing proposal.
Environmental	This project will require an EIR. The NOP is pending.
Infrastructure	Water – applicant is responsible for obtaining clearance from Menlo Fire. Sewer –applicant is responsible for obtaining permit from EPASD and for paying any required fees.
Other constraints	This site must be re-zoned for housing and is therefore subject to the Ravenswood/4 Corners Specific Plan Update process and its related rezoning. However, this is a staff-recommended site for rezoning to allow for residential.

SOUTH OF WEEKS/FORMER PRIMARY SCHOOL SITE (1200 Weeks St.)/ APN 063271490

Prior Housing Element?	No
APN	063-271-490
Acreage	2.7 acres
Current GP and Zoning	Industrial Transition (Specific Plan) - nonresidential
Unit Breakdown	51 VLI, 30 LI
Site Details (incl. existing use)	This site is not zoned for housing and does not have a development application or known developer interest. However, the size is properly sized for lower-income housing and is one of the focus parcels for the RBD update (to be rezoned for residential).
Methodology used to determine realistic capacity	If rezoned to an existing zoning, such as Urban Residential, which would allow for up to 40 du/acre, the site could accommodate up to 108 units. This calculation assumes development of site with 30 du/acre density, or a total of 81 units.
Environmental	Anticipated Categorical Exemption given size of site and location within RBD area.
Infrastructure	Water – applicant is responsible for obtaining clearance from Menlo Fire. Sewer –applicant is responsible for obtaining permit from EPASD and for paying any required fees.
Other constraints	None known.

Sites with (Re)development Potential in Ravenswood Business District

791 WEEKS (Nonvacant)

Prior Housing Element?	Yes
APN	063-221-390
Acreage	.89
Current GP and Zoning	High Density Residential (General Plan) R-HD zoning 22-43 du/acre Urban Residential (Specific Plan) up to 40 du/acre
Unit Breakdown	22 VLI, 12 LI
Site Details (incl. existing use)	Well-sized site with single family home on the property and zoning that supports higher-density housing. Assumes 30 du/acre realistic development capacity for 34 total units.
Methodology used to determine realistic capacity	Applied RHNA 6 distribution to 34 total units to calculate VLI and LI units.
Environmental	To be determined. Assumed CEQA Categorical Exemption, given size of site.
Infrastructure	Water – applicant is responsible for obtaining clearance from Menlo Fire. Sewer –applicant is responsible for obtaining permit from EPASD and for paying any required fees.
Other constraints	None known.

1923 BAY RD.

Prior Housing Element?	No
APN	063-132-110
Acreage	.99 acres
Current GP and Zoning	Mixed-Use Corridor (General Plan) MUC-2 zoning 22-65 du/acre Bay Road Central (Specific Plan) zoning up to 50 du/acre
Unit Breakdown	25 VLI, 15 LI
Site Details (incl. existing use)	Vacant site. Potential interest in developing mixed-use on the site. Density sufficient to support lower-income housing. Calculation assumes 40 du/acre, which is reasonable given proposals for developments in the area (e.g., 1804 Bay Rd. has a density of 75 du/acre with density bonus, or 65 du/acre without).

Methodology used to determine realistic capacity	Applied RHNA 6 distribution to 40 total units to calculate VLI and LI units.
Environmental	Unknown. Assumed Initial Study, given history of property.
Infrastructure	Water – applicant is responsible for obtaining clearance from Menlo Fire. Sewer –applicant is responsible for obtaining permit from EPASD and for paying any required fees.
Other constraints	Site has an active code enforcement case. Site may require environmental remediation, given current use (parked vehicles).

APPENDIX D2: RAVENSWOOD CITY SCHOOL DISTRICT LETTER OF INTEREST

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RAVENSWOOD

CITY SCHOOL DISTRICT

2120 Euclid Ave.
East Palo Alto, CA 94303
p: (650) 329-2800
f: (650) 323-1072
www.ravenswoodschools.org
@RavenswoodCSD

October 12, 2022
City of East Palo Alto
1960 Tate Street
East Palo Alto, CA 94303

Dear Ms. Camacho –

I am writing on behalf of the Ravenswood City School District (Ravenswood) about the City of East Palo Alto’s Housing Element. Ravenswood owns a significant amount of land across the City of East Palo Alto and is committed to using that land to provide all students with an excellent education,

At this time, we are interested in seriously exploring changing the zoning at an underutilized field located off Bay Road that we own (highlighted in red below) as part of the parcel Ravenswood owns at 2450 Ralmar Avenue, East Palo Alto, 94303.

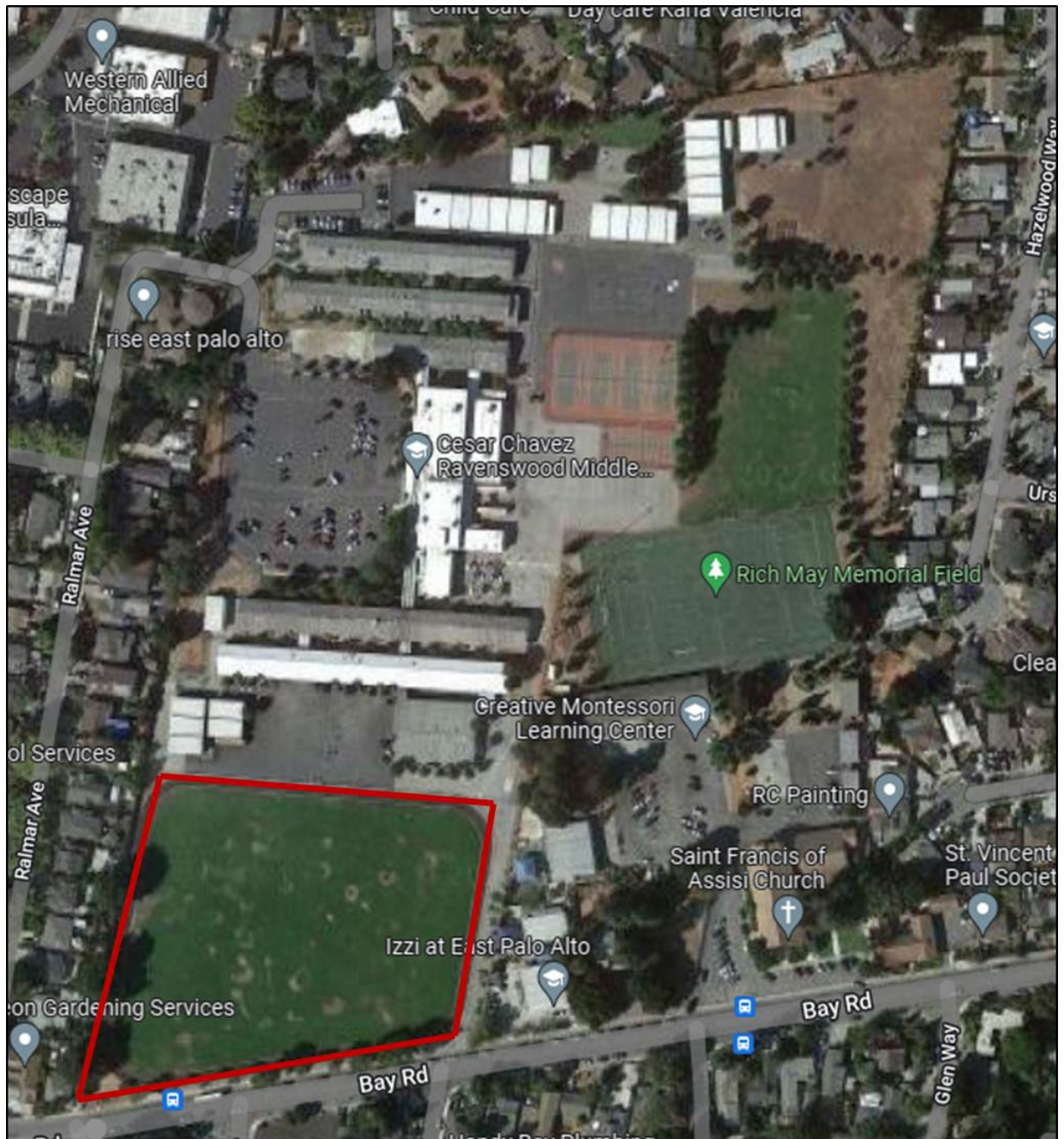
To be clear: at this time the Ravenswood Board of Trustees has not authorized a specific project for that site. However, the District is interested in exploring various options for the site and is interested in potentially using that site to address the significant need for housing among our staff and to address the regional housing crisis.

Happy to answer any questions that could be helpful.

Sincerely,

Will

William Eger
Ravenswood City School District
Chief Business Officer
weger@ravenswoodschools.org
650-329-2800



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APPENDIX E: RHNA 5 HOUSING WORKPLAN PROGRESS

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Appendix E: RHNA 5 Housing Workplan Progress

<i>RHNA 5 Housing Element Program</i>	<i>Program Description and Objective</i>	<i>Progress and Appropriateness</i>
1.1 Meet with local non-profit housing developers	Meet with local non-profit and for-profit developers to promote the affordable housing goals outlined in this Housing Element.	Timeframe: annually. City Staff has worked with EPA CAN DO, Eden Housing, and MidPen to develop affordable housing (Light Tree Apartments, 965 Weeks) and preserve affordable housing (Nugent Square, Bay Oaks).
1.2 Consortium of non-profit developers	Support the continuation of a consortium of non-profit affordable housing developers to acquire and maintain property as affordable housing and to redevelop property for the purpose of preserving or developing housing.	Timeframe: annually. There is no existing consortium of non-profit developers. However, in April 2020, the City held a “Meet & Greet” for affordable housing developers and East Palo Alto faith communities hosted by the City.
1.3 Make loans to developers using set aside	Make loans, as feasible, to developers using the Affordable Housing Trust Fund to create affordable units.	Timeframe: variable; depends on revenue. The City made a loan commitment to the 965 Weeks project from its Housing Successor fund (\$714,000) and an additional conditional commitment of \$1.7 million to the project through the Local Housing Trust Fund program; that program was awarded in 2021.
1.4 Encourage 2nd Unit Development	Encourage the production of second units as an affordable housing alternative and achieve an average of eight new secondary units annually. Evaluate success of recent policy changes. Consider implementing an amnesty program for illegal second units.	Timeframe: ongoing. The ADU Technical Working Group continued to meet monthly throughout 2021/2. The City collaborated with EPACANDO and City Systems on the ADU Streamlining initiative (funded by an SB 2 grant) and with EPACANDO on the CalHOME grant for ADUs/JADUs.
1.5 Secure two million dollars for housing development	Secure at least \$2,000,000 for housing development, and seek loan and grant funds from private, County, State, and federal sources. Funding will provide gap financing and/or infrastructure improvements, as necessary and appropriate for affordable housing projects	Timeframe: ongoing. The Local Housing Trust Fund application for 965 Weeks included a match for a City commitment of \$1.7 million. The City applied for and received a CalHOME grant award of \$2 million in 2019. The 965 Weeks affordable housing development received an AHSC award in 2021. The awards far exceeded the goal of \$2 million.

1.6 Acquire development sites	Continue to acquire potential development sites for affordable housing, particularly for large family households. Use funds from the Affordable Housing Program to purchase sites. Evaluate opportunities as resources become available.	Timeframe: ongoing. No specific actions in the Housing Element period.
1.7 Mobile Home and Manufactured Homes	Continue to support development opportunities that allow for or incorporate mobile homes and manufactured homes within the City as a low-cost housing option.	Timeframe: ongoing. The application for 2 modular units was approved by the Planning Department in 2020 for placement on the City-owned Tanklage site (1798 Bay Rd.). An application for temporary use of 2081 Bay Rd. and adjacent sites for production of manufactured housing was approved in 2022.
1.8 Permit Manufactured Homes on permanent foundations	Continue to permit manufactured housing on permanent foundations in single-family neighborhoods, and treat them the same as traditional single-family housing during the design review process	Timeframe: ongoing. There is an ongoing effort to support this housing type, though the City has not taken additional actions during this RHNA period. Under the provisions of State Law, the Planning Division treats manufactured homes in the same manner as originally constructed single family homes.
1.9 Improve Earthquake Readiness and Resilience	<p>Improve East Palo Alto’s Earthquake Readiness and Resilience:</p> <ul style="list-style-type: none"> • Create a fragile housing inventory, • If appropriate, develop and implement a soft story retrofit program, • Develop and implement a cripple wall retrofit program, • Require hazard disclosure for renters, and • Ensure that major upgrades and repairs to existing buildings address seismic and flood-related hazards 	Timeframe: ongoing. The City adopted the Multi-Jurisdictional Hazard Mitigation Plan in 2017. Work to renew this Plan began in 2021 and was completed in 2022.
1.10 Floodplain Management	Continue to implement Government Code Section 65302, which involves analysis and policies regarding flood hazard and management. Annually review floodplain management policies in accordance with FEMA regulations and the CRS program. Additionally, review the Land Use Element for areas subject to flooding to facilitate the identification of sites for future Housing Element updates.	Timeframe: annually. Flood risk has been incorporated into the Housing Element update for the RHNA 6 cycle.

1.11 Multi-Family Rental Inspection	Consider developing a multifamily rental inspection program.	Timeframe: Not completed as of 2022. San Mateo County is the lead party on conducting multi-family rental inspections. The Building Division conducts life-safety inspections by referrals/complaints.
1.12 New Buildings follow Crime Prevention through Environmental Design	Ensure that new buildings follow the principals of Crime Prevention through Environmental Design.	Timeframe: ongoing. City staff conducts CPTED analysis on all major projects via the East Palo Alto Police Department.
2.1 Four Corners TOD Specific Plan	Implement the Ravenswood / 4 Corners TOD Specific Plan, which guides the conversion of the existing light and heavy industrial uses into higher density residential, commercial, and mixed-use uses that will support a future potential transit station.	Timeframe: ongoing. The Ravenswood/Four Corners Specific Plan was adopted by the City Council in 2013. The City is currently making targeted updates to the Specific Plan area due to the amount of development interest. This is expected to be completed in 2023.
3.1 Review city ordinances and policies to reduce barriers to housing	On a regular basis, review City ordinances and programs regulating residential uses and construction practices to ensure consistency with the Housing Element and the rest of the General Plan and identify/correct any provisions that: (a) unnecessarily increase the cost of housing; (b) extend the time required for processing applications; or (c) preclude provision of housing to meet special needs.	Timeframe: annually. The City updated its zoning code in 2018 to address issues and concerns with development and is once again reviewing the code to ensure consistency throughout. Updates to the zoning code are expected to take place in 2023.
3.2 965 Weeks Street redeveloped as affordable housing	Ensure that 965 Weeks (Olson Property) is redeveloped as affordable housing. Complete RFP <i>and</i> select a developer to complete the housing for lower income households.	Timeframe: 2019. A developer (MidPen Housing) was selected via an RFP process and the Planning Commission approved the project in December 2019. City Council approved the Disposition, Development, and Loan Agreement and Ground Lease for the project in December 2020.
4.1 Improve permit processing times especially for affordable housing projects	Continue to process residential development permits expeditiously, providing priority review status for affordable housing to reduce holding and administration costs.	Timeframe: annual review of processing procedures. The City reviewed its first “streamlined” project under SB 35 in 2020 (completed early 2021). ADU processing times were reduced with the Zoning Clearance process for ministerial review of projects, and the process continues to be improved upon. No other specific actions were taken to shorten processing times.

4.2 Continue to implement Affordable Housing Program	Continue to implement the Affordable Housing Program, which requires developers to pay into a fund that is used to mitigate the impacts of their development.	Timeframe: ongoing. The City maintains an Inclusionary Housing program, Commercial Linkage Fee program, and Local Preference program, and monitors its BMR portfolio through EPACANDO.
4.3 Provide low-interest loans and/ or grants for affordable housing to extremely low, very low, and low income	Explore the possibility of providing low-interest loans and/or grants to pay for housing affordable to extremely low-, very low- and low-income households (when built by nonprofit developer), as well as the waiving of building and planning fees for said housing. If there is funding and appropriate opportunities, provide funding.	Timeframe: annual assessment of resources. As of January 21, 2020, the full amount of the Catalyst Fund, an affordable housing fund received from Facebook and administered by Local Initiatives Support Corporation (LISC), was committed to the Light Tree Apartments project and the 965 Weeks Street project. The City committed a loan of \$714,000 to the 965 Weeks project from the Housing Successor Fund in December 2020. The City also rolled out its CalHome ADU/JADU Loan program for low-income households in 2022, which includes a deed restriction on the ADU or JADU to be rented to a low-income household.
4.4 Evaluate, improve, and promote City ordinances that facilitate affordable housing	Evaluate, improve, and promote City ordinances that facilitate affordable housing development, including: (a) secondary units; (b) off-street parking standards; (c) development standards; (d) Planned Unit Development; (e) BMR; (f) density bonus; and (g) mixed-use/high-density residential development in Ravenswood and University Corner/Bay Road areas. Provide information on these mechanisms to developers to promote their use	Timeframe: annually. The City updated its ADU ordinance in 2020 to reflect changes in state law. The City is reviewing its Development Code to make necessary updates to align with state law, and to ensure internal consistency. A targeted zoning code update is expected in 2023. 2020 and 2021 saw a significant increase in ADU applications and approvals with affordability restrictions on ADUs.
4.5 Determine feasibility of forming a local land trust	Support local land trust(s) as a way to expand affordable housing opportunities, once one is begun, or take steps to have one land trust in operation.	Timeframe: ongoing. The City participates in the Housing Endowment and Regional Trust (HEART) of San Mateo County, which is recognized by HCD as a Regional Housing Trust Fund. The City and its partners continue to implement the two-year Challenge Grant (2020-22) and subsequent Breakthrough Grant (2022-24) from the San Francisco Foundation to establish a community land trust and cooperative ownership opportunities in East Palo Alto.

4.6 Provide better information to the public and policymakers about housing issues	Develop and disseminate newsletters, fact sheets, brochures, and other mediums to communicate to the public the City’s policies and programs regarding housing development in an adequate and timely manner.	Timeframe: ongoing/as-needed. City staff began a revision of the City’s website in 2020, with improvements to the Planning webpage that include updated fact sheets and forms. The Inclusionary Housing Guidelines were approved by City Council in October 2020 (posted in 2021). The City submitted multiple comment letters to HCD on major housing grant programs (e.g., AHSC) and to CDLAC regarding tax-exempt bond allocations.
4.7 Encourage development on small parcels	Disseminate the design toolkit to assist developers of small parcels. This toolkit provides ideas and examples of techniques to develop small lots while providing usable open space, contributing to a pedestrian environment, and enhancing community character.	Timeframe: ongoing. No specific actions taken during the Housing Element period.
4.8 Bring wells into operation at Gloria Bay and Pad D	Bring wells into operation at Gloria Bay and Pad D site to provide potable water to the city, including completing water treatment facilities if necessary.	Timeframe: 2018. Gloria Bay Well was completed in 2018. The Environmental Impact Report (EIR) was for Pad D was certified in December 2020. Construction on Pad D was near completion in 2022.
5.1 Encourage Senior Housing	Continue to support senior projects by permitting smaller unit sizes, parking requirement reduction, and common dining facilities.	Timeframe: ongoing. No new applications have been submitted for senior housing projects in the Housing Element period..
5.2 Reasonable Accommodations Ordinance	Implement the reasonable accommodation ordinance, which provides zoning and land use exceptions for housing serving persons with disabilities. The ordinance, adopted in 2011, provides people with disabilities a simple, ministerial process to receive minor exemptions to land use, zoning and building regulations. Publicize ordinance through the city’s website, notices at city offices, in the city newsletter and mailings, and with relevant stakeholder groups.	Timeframe: ongoing/publicize annually. No specific actions in the Housing Element period.
5.3 Financial Assistance/Priority Planning for Affordable Housing	Provide financial assistance and priority permitting for at least one affordable housing development in East Palo Alto. Base funding decisions on the Comprehensive Affordable Housing Plan. Objective is to assist 40 units.	Timeframe: ongoing. The City Council adopted a five-year Affordable Housing Strategy in 2018; the goal was to produce an additional 500 deed-restricted affordable units. The City has permitted two affordable housing developments during this time (Light Tree, 965 Weeks).

5.4 Promote Emergency Shelters	Continue to permit emergency shelters in the Light Industrial (M-1) zone without discretionary permits. Within this zone, emergency shelters are subject to the same development and management standards that apply to the other permitted uses.	Timeframe: ongoing. The City’s only shelter, a Low Barrier Navigation Center, is located outside of this zone. No emergency shelters were permitted in the M-1 zone in the Housing Element period,
5.5 Transitional and Supportive Housing	Continue to permit transitional and supportive housing as a residential use and only subject to those restrictions that apply to other residential uses of the same type in the same zone.	Timeframe: ongoing. No specific actions in the Housing Element period.
5.6 Encourage Transitional Housing	Accommodate and facilitate the development of additional transitional housing facilities that serve victims of domestic violence, homeless individuals, and/or formerly incarcerated persons.	Timeframe: bi-annual assessment of needs and resources. No specific action in the Housing Element period.
5.7 Single Room Occupancy (SRO) Housing	Continue to allow by right the development of Single-Room-Occupancy projects in High Density Residential Zones.	Timeframe: annual review and confirmation. No specific action in the Housing Element period.
5.8 Residential Care Facilities	Continue to enforce the spacing requirement for residential care facilities, as identified in Section 6515.5 of the East Palo Alto Zoning Ordinance, which is currently seven hundred and fifty feet (750) for facilities that house ten persons or more, and 500 feet for facilities that house 6-10 residents.	Timeframe: ongoing. No specific actions in the Housing Element period.
5.9 Implement High Priority Items	Implement high priority items from Homeless Solutions Plan: <ul style="list-style-type: none"> • Identify Point Person on Homelessness • Create a Year-Round “Services Lite” Shelter • Expand Homeless Outreach Team • Develop Rapid Re-Housing Capacity Create Permanent Supportive Housing 	Timeframe: 2020. The City began regularly reporting to City Council on homelessness starting in 2021. An interdepartmental staff team continues to meet, as do monthly City-led meetings with the County of San Mateo Homeless Services Agency and service providers LifeMoves and Project WeHOPE. The County and these partners have significantly increased capacity for homeless outreach and rapid-rehousing since 2020.
6.1 Rent Stabilization	Implement the Rent Stabilization and Eviction for Just Cause Ordinance.	Timeframe: ongoing. City staff continues to implement the June 2010 Rent Stabilization Ordinance adopted by the voters.

6.2 Maximum Legal Rents	Annually certify maximum legal rents that can be charged in the city.	Timeframe: annually. City staff is annually certifying the legal rents that can be charged in the City.
6.3 Working with Nonprofits	Work with non-profit housing service providers to provide education and legal assistance to secure tenant rights.	Timeframe: Ongoing. City staff refer residents to Community Legal Services and the Legal Aid Society of San Mateo County for certain housing related issues. In 2019, the City released an RFP for tenant services, and in 2020, local nonprofits Community Legal Aid Services in East Palo Alto, Youth United for Community Action, and Nuestra Casa received funding for tenant education, tenant protections, and emergency assistance. Also in 2020, the City provided additional funding to nonprofit agencies to assist tenants with COVID-19-related financial hardships and prevent evictions. The City released an RFP for tenant education and assistance in fall 2022.
6.4 Monitor BMR Units	Monitor housing units developed as part of the City's Affordable Housing Impact Fee Ordinance to ensure compliance. Monitor affordable units with deed-restrictions to ensure long-term availability of these units as affordable housing. Current terms of affordability are 59 years for ownership and 99 years for rental, both resetting when properties are sold.	Timeframe: annually. The City has contracted with EPACANDO since 2019 to administer the City's BMR portfolio. This is an ongoing endeavor that included the refinancing and re-sale of BMR units in 2020-2022.
6.5 BMR and Condo Conversion Ordinance	Monitor the effectiveness of the City's affordable housing mitigation programs, including the Affordable Housing Program and the Condominium Conversion Ordinance, as tools to facilitate affordable housing development. In particular, the fees associated with each program will be reassessed to confirm their ability to meet the City's affordable housing goals.	Timeframe: ongoing, fees are reassessed annually. City staff continues to monitor the City's BMR units and Condo Conversion Ordinance.

6.6 Affordable Housing Strategy	Develop a Comprehensive Affordable Housing Strategy to identify ways of increasing the supply of affordable housing in the city. The study should examine the success of current programs, including the density bonus ordinance, as well as the potential for new programs (e.g., affordable housing overlay zone). Topics to study include affordable housing overlay zone, the strategy should also prioritize spending for the city’s affordable housing trust fund and access to affordable housing.	Timeframe: 2016. The City completed an Affordable Housing Strategy in 2018; some of the workplan items are included in this report. Staff provide updates at regular intervals to City Council.
6.7 Discourage Mobile Home Removal or Relocation	Discourage removal or relocation of conforming mobile home parks by enforcing East Palo Alto’s mobile home park closure and relocation requirements.	Timeframe: ongoing. City staff ensure compliance with State laws related to mobile home parks on an ongoing basis. Since September 2020, staff have closely monitored the conversion process of the Palo Mobile Estates Mobile Home Park.
6.8 Mobile Home Park Ownership Program Funds	Assist eligible mobile home park residents in receiving Mobile Home Park Resident Ownership Program (MPROP) funds.	Timeframe: ongoing, based on State funding opportunities. Staff began preparing an application to the Mobile home Park Rehabilitation and Resident Ownership Program (MPRROP) program to support the Palo Mobile Estates conversion in September 2020 but were unable to submit the application in this cycle because the project did not yet meet key threshold criteria.
6.9 Mobile Home Funds	Work with the property owners of existing mobile home parks to prepare infrastructure studies of said parks.	Timeframe: ongoing. No specific actions during the Housing Element period.
6.10 Home Sharing Program	Support HIP Housing Home Sharing Program as part of a collection of policies, programs, and practices for addressing the housing needs of those at the lowest income levels including seniors, those living with disabilities, those at risk of homelessness and female head of households. Objective is to make 10 home sharing placements by 2022.	Timeframe: ongoing. - The City refers individuals to the HIP home sharing program on an ongoing basis and contributes to the Home Sharing Program annually.

7.1 Financial/Credit Counseling	<p>Make first-time homebuyer funds and mortgage enhancement available through as many means as possible, including:</p> <ul style="list-style-type: none"> • Participate in the San Mateo County Mortgage Credit Certificate Program (MCC), which aims to enhance the affordability of both new and existing homes for first- time low- to moderate-income homebuyers. Educate prospective buyers about the MCC (i.e., distribute materials), seeking to enroll at least 5 lower- and moderate-income East Palo Alto households annually. • Provide first-time homebuyer assistance to lower- and moderate-income households with funding available from the County HOME program. 	<p>Timeframe: ongoing implementation of existing programs. The City’s BMR administrator, EPACANDO, provides financial counseling to homeowners in the City’s BMR portfolio.</p>
7.2 First-Time Homebuyer Assistance/Low-Interest Loans	<p>Work with lenders and fair-housing service providers to provide credit counseling workshops in East Palo Alto that assist residents in understanding home improvement and purchase processes and how to access financing. Inform households about opportunities to increase access to housing through credit repair to enhance, while educating them to recognize predatory lending and discrimination.</p>	<p>Timeframe: ongoing. No specific actions during the Housing Element period.</p>
7.3 City Resident / Employee Housing Assistance	<p>Investigate new program possibilities that provide down payment assistance and/or low-interest loans for City employees and residents. Use new programs to provide down payment assistance and/or low-interest loans to at least five very low-, low-, or moderate- income households by 2022.</p>	<p>Timeframe: 2018. No actions taken on this item in the Housing Element period.</p>
8.1 Condominium Conversion Ordinance	<p>Implement the Condominium Conversion Ordinance.</p>	<p>Timeframe: ongoing. No specific actions taken in the Housing Element period.</p>
8.2 Replacement and Preservation of Rent-Stabilized Units	<p>Conserve units governed by the Rent Stabilization Program by limiting commercial redevelopment which would reduce the supply of affordable units.</p>	<p>Timeframe: ongoing. No specific actions taken in the Housing Element period.</p>

8.3 No Net Loss	If legally defensible, implement a no net loss housing policy ensuring that development in the West Side that results in the loss of affordable housing be required to replace that affordable housing.	Timeframe: Policy developed in 2015. Most recently, the City reviewed the Woodland Park Communities development proposal (for 605 residential units on the Westside) for compliance with the 2035 General Plan; in particular, the specific policies within Chapter 11 (Westside Area Plan) that require newly- rezoned properties to provide affordable housing.
8.4 Short-Term Rentals	Monitor the use of homes as short-term vacation rentals. If appropriate, consider additional legislation.	Timeframe: annually. The City began study of a short-term rental ordinance in 2020, with specific updates to the Transient Occupancy Tax (TOT) policy related to short-term rentals included as part of a 2020 ballot measure. The ballot measure did not succeed and work on short-term rental policy was temporarily de-prioritized due to the COVID-19 pandemic. This work has not resumed.
9.1 Public Outreach on health and safety	Distribute literature on the health and safety risks of lead-based paint and continue to work with the San Mateo County Housing and Code Enforcement Division to explore resources and programs available to address lead-based paint in the City’s housing stock.	Timeframe: ongoing. City staff refer residents to the County Health Department on health issues related to housing. No specific actions during the Housing Element period.
9.2 Home Repair Program	Refer East Palo Alto homeowners to the San Mateo County Housing and Community Development Division’s Home Repair Program and explore ways to increase homeowner participation. Disseminate information on the Home Repair Program through brochures available at public counters and the City’s website.	Timeframe: ongoing, through referrals. This program is no longer available. While partnerships with Rebuilding Together and other organizations provided assistance to households with unpermitted garage conversions prior to 2020, some programs are longer funded. Staff continues to disseminate information about resources such as Habitat for Humanity, dependent on funding.
9.3 County Funded Rehabilitation Program	Inform homeowners on the availability of County-funded rehabilitation assistance with County brochures and multi-lingual postings to the City of East Palo’s website. Work with the County to host local workshops on rehabilitation assistance for City residents.	Timeframe: ongoing. Staff provides information at the counter and on the City’s website, but this is dependent upon availability of programs. The City is not aware of any rehabilitation assistance programs at this time.
9.4 Rehabilitation of Programs (Home)	Assist eligible extremely low-, very low-income and low-income homeowners in the City in pursuing funds to aid in the rehabilitation and renovation of their homes.	Timeframe: ongoing. No specific actions in the Housing Element period.

9.5 Foreclosure Assistance	Provide resources for homeowners facing foreclosure on the City’s website, including links to loan servicers and agencies that can provide counseling and legal assistance.	Timeframe: ongoing. Residents are referred to Community Legal Services and the Legal Aid Society of San Mateo County for foreclosure issues.
9.6 Affordable Project Housing Management	For affordable housing projects that have received financial assistance from the City, identify projects where a history of complaints and failed inspections by authorized agencies indicate continued and uncorrected mismanagement. Contact identified property managers to determine a Timeframe: for correction or negotiate change in property management per the stipulations set forth in the financial agreement between the City and the affordable housing developer.	Timeframe: ongoing. The City reviews annual compliance reporting from all deed-restricted multifamily housing sites in East Palo Alto. In February 2020, the City issued a Notice of Default to the Courtyard at Bay Road Apartments for non- compliance and Health and Building Code violations. The City continued to follow up in 2020 with the owner. This activity is ongoing.
10.1 Fair Housing Program Referrals	Support, publicize, and make referrals to fair housing and legal assistance programs that provide information, counseling, and investigation services concerning housing discrimination. Publicize ordinance through the city’s website, notices at city offices, in the city newsletter and mailings, and with relevant stakeholder groups.	Timeframe: ongoing. City staff, on an ongoing basis, refer residents to housing and legal assistance programs concerning housing discrimination.
10.2 Predatory Lending Protections	Support local, regional, State, and federal initiatives in addressing predatory lending practices to protect the most vulnerable segments of the community.	Timeframe: ongoing. City staff, on an ongoing basis, refer residents to local, regional, State and Federal initiatives that address predatory lending.
10.3 Housing Discrimination Prevention	Support private and public efforts to prevent discrimination in the sale or rental of housing.	Timeframe: ongoing. City staff comply with state and federal laws related to fair housing.
11.1 Annual Housing Element Monitoring	Allocate financial and staff resources to maintain a monitoring system that collects information on the accomplishments and lessons learned of concerning the Housing Element’s objectives and programs. Prepare detailed progress report for review by the City Council, stakeholders, and the general public.	Timeframe: annually, through annual progress reports. City staff annually prepare a Housing Element Progress Report in accordance with State law.

11.2 Housing Study Sessions	The City Council shall hold public meetings and study sessions to discuss various housing policies in the city and to exchange input and information with residents and developers about housing needs, resources, and program options. To the extent possible, publish a schedule of study sessions.	Timeframe: annually, through public meetings and study sessions. Study sessions were held throughout the Housing Element period on a variety of housing topics, including individual residential developments, the Inclusionary Housing program, and a potential affordable housing overlay zone.
11.3 Website Updates	Update the website and explore other means to communicate important housing concerns, policies, and programs to the general public.	Timeframe: ongoing, overview and update annually. The City migrated its website to a new platform in 2020 and staff continues to improve department webpages.
11.4 Annual Housing Reports	Report to the City Council on the state of housing in East Palo Alto.	Timeframe: annually. The City provides semiannual updates to the City Council on progress on the 5-year Affordable Housing Strategy and other housing topics throughout the year.
12.1 Enforce State Energy Codes	Enforce State Energy Code for new residential construction and additions/renovations to existing structures.	Timeframe: ongoing. Building Division staff, on an ongoing basis, enforce the State Energy Code for new residential and additions/constructions to existing units. The City adopted a Building Electrification and Electric Vehicle Infrastructure Reach Codes Ordinance in October 2020.
12.2 Grants for Energy Efficiency	Pursue funding sources for rehabilitation loans and grants to low-income homeowners to improve energy efficiencies, such as replacing existing energy inefficient appliances.	Timeframe: ongoing. No specific actions during the Housing Element period.