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Questions/Comments
from July 8, 2022 Letter

A. Review and Revision

Review the previous element to evaluate the appropriateness, effectiveness, and progress in implementation, and reflect the results of this review in the revised element. (Gov. Code, § 65588 (a) and (b).)

As part of the review of programs in the past cycle, the element must provide an evaluation of the effectiveness of goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female headed households, farmworkers, and persons experiencing homelessness).

To describe actions the City completed during the last Housing Element period to meet the housing needs of special needs populations, the following information has been added to the Housing Element (TBR [Technical Background Report] Chapter on Program Accomplishments, page 6-1 through 6-3):

[The City has also made considerable progress in addressing the housing needs of special needs populations \(e.g., elderly, persons with disabilities, large households, female headed households, farmworkers, and persons experiencing homelessness\), guided by the goals, policies, and related actions of the 2015-2022 Housing Element.](#)

[During the planning period, a number of affordable housing projects were constructed, approved, or proposed that support special needs populations, including:](#)

- [Habitat for Humanity project was constructed, including 20 one, two, and three-bedroom units that are affordable to lower income families, providing new homeownership opportunities for a variety of household types, including large households. The City contributed over \\$4 million to this project. \(Program H-9: Extremely Low-Income and Special Needs Housing, Program H-16: Affordable Housing Development and Program H-17: First-Time Homebuyer Program\)](#)
- [353 Main Street, currently under construction, will provide 125 affordable housing units, of which more than half are for extremely low income households. The project also has 52 two-bedroom units to serve larger households. The City contributed \\$3.5 million to this project. \(Program H-9: Extremely Low-Income and Special Needs Housing and Program H-16: Affordable Housing Development\)](#)
- [707 Bradford Street, constructed during the previous Housing Element cycle, is a 117-unit residential development for seniors at the very low income affordability level. More specifically, ten of the units are for senior homeless veterans, ten units are for seniors that are medically frail and part of the Community Care Settings Program and six units are for seniors who are homeless or at-risk of homelessness and have a mental illness. \(Program H-5: Senior Housing Needs and Program H-16: Affordable Housing Development\)](#)
- [Shores Landing is a senior supportive housing community at the 95-room former Marriott TownPlace Suites hotel in the Redwood Shores neighborhood. The County acquired the property in December 2020 using Homekey Program funds, which were awarded by the State of California. Shores Landing houses the County's most vulnerable residents, extremely low-income seniors aged 62 and older, some of whom have experienced](#)

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homelessness, are at risk of homelessness, have lost their homes due to Covid-19, or are medically-frail seniors enrolled in the County's Community Care Settings program. MidPen and the Mental Health Association of San Mateo County (MHA) offer a robust set of supportive services that include, but are not limited to: case management, housing stability support, individual service plans, community-based referrals, health education and wellness programming, life skills development, lease compliance services, and more. (Program H-5: Senior Housing Needs, Program H-9: Extremely Low-Income and Special Needs Housing, and Program H-16: Affordable Housing Development)

- The new County Navigation Center, currently under construction, will provide a 240-bed, state-of-the-art shelter east of Highway 101 off of Maple Street. The Navigation Center will provide intensive counseling and other support services. The completed facility will include private sleeping units, shared toilet/showers, dining services, and support modules as well as outdoor areas for activities. (Program H-9: Extremely Low-Income and Special Needs Housing)

Additionally, the City made significant progress in addressing homelessness under Policy H4-4 and Program H-9 including the following actions:

- The City's Fair Oaks Community Center, a multi-service facility offering a variety of services to the broader Redwood City community, provides critical services to low-income individuals such as the elderly, female-headed households, and persons with disabilities. Services are offered by a combination of City staff and representatives from public and private nonprofit agencies. The following types of services are available: child care and pre-school, crisis intervention, classes (including ESL/citizenship), exercise, art, computers, food programs, shelter referrals, housing assistance, deposit and rental assistance, immigration and citizenship assistance, and legal services. Older adult services include breakfast and lunch programs, classes, and other activities. Community workers are available to talk with persons needing help deciding what services they need and provide information and referrals to a variety of other programs. The site is part of the core network of community service agencies of San Mateo County and administers the Critical Family Needs Housing Assistance Fund for the Redwood City-North Fair Oaks area.
- To support the needs of persons experiencing homelessness, the City worked on researching and putting together the RV Safe Parking program, a two-year temporary program that combines enforcement related to RV residency-related impacts with a safe parking option for RV residents as they transition back into permanent housing. The program provides on and off-street RV parking permits to accommodate the current population of RV residents in Redwood City. The parking site is located on City-owned property and LifeMoves provides outreach and case management services for participants in both the RV Parking Permit and Safe RV Parking Site Programs, as well as operation of the Safe RV Parking Site. In 2021, the City launched a rapid rehousing program using State Permanent Local Housing Allocation (PLHA) funds specifically for RV Safe Parking Program participants. The program provides a short-term (12 months) rental subsidy, housing search and case management services to help participants transition to permanent housing. Eight households are currently enrolled in the program, of which one has been permanently housed so far.

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	<p>• The City has also funded the Downtown Streets Team since October 2019. Downtown Streets Team provides volunteer work experience for people experiencing homelessness (e.g., litter pick up in the Downtown) and Team members are provided with basic needs stipends, case management services, and jobs placement services. A total of 68 participants have participated in the Redwood City program, 20 of which are current team members. This has led to four permanent housing placements, seven jobs obtained, and 102 barriers removed.</p> <p>Table H6-1 (2015-2022 Program Accomplishments) was also updated to describe additional efforts completed. Under 2015-2023 Housing Element Program H-12 (page H6-8), additional information has been added as follows:</p> <p>The City has updated ADU standards multiple times to comply with State law, including a revision revisions in 2015, 2017, 2019, and 2021. As a result, development standards have been relaxed, fees reduced or eliminated, and processing has been streamlined. The City coordinates with HCD to ensure compliance with State law and tracks the development of ADUs through the building permit process.</p> <p>The City also contributed funds to an ADU one-stop shop pilot, which provided free project management services to homeowners wanting to build ADUs (https://www.hellobright.org/)</p> <p>In addition, the City partnered with HEART (Housing Endowment and Regional Trust) of San Mateo County to provide free pre-approved plans to residents. Construction plans for the all-electric, detached ADUs can be downloaded by the public at no cost on the City's ADU website along with other informational resources (www.redwoodcity.org/ADU).</p> <p>Table H6-1 (2015-2022 Program Accomplishments) was also updated to describe additional efforts completed. Under 2015-2023 Housing Element Program H-16 (page 6-10), specific dates were added to the discussion of recently completed affordable housing projects:</p> <p>The City has supported several affordable housing projects in recent years that are currently in various stages, which will result in 564 new affordable units.</p> <p><i>2019 Construction Start:</i> 707 Bradford (MidPen) - 117 units (Completed May 2021) 1409 El Camino Real (Greystar IV) - 35 units (Completed Winter 2021)</p> <p><i>2020 Construction Start:</i> 612 Jefferson (Habitat for Humanity) - 20 units 353 Main (ROEM) - 125 units</p>

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	<p><i>Entitled Units:</i></p> <p>1401 Broadway (Broadway Plaza - Sobrato/MidPen) - 120 affordable units 1601 El Camino (South Main Mixed Use - Greystar) - 147 affordable units</p>
<p>B. Housing Needs, Resources, and Constraints</p> <p>1. <i>Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2...shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)</i></p> <p>Enforcement & Outreach: While the element provides some data, the element should also describe whether there have been any fair housing lawsuits or enforcement actions within the City.</p>	<p>To provide additional information on enforcement and outreach actions within the City (and specifically regarding fair housing lawsuits and enforcement actions in the City, additional information is provided in the TBR Fair Housing Assessment Chapter (page H4-14):</p> <p>During this same time period (2007-2021), Project Sentinel also supported investigations of fair housing complaints for 25 households with a total of 83 persons. In addition, Project Sentinel provides consultations and information, serving 98 households with a total of 282 people over the five-year period.</p> <p><u>Project Sentinel noted that while there has been a history of investigations and enforcement action in Redwood City, there has been a significant drop over time, with only one case since 2017. In that case, the tenant was referred to an attorney with Legal Aid Society of San Mateo County.</u></p> <p>The City has not be involved in any housing lawsuits, the following has been added on page H4-14:</p> <p>Fair Housing Legal Cases and Inquiries</p> <p><u>The City of Redwood City has not been involved in any fair housing lawsuits and is not aware of any other fair housing lawsuits or enforcement actions within the City.</u></p>
<p>Integration and Segregation:</p> <p>While the element includes some data on race, familial status, disability, and income, it must also analyze this data such as addressing patterns, trends, conditions,</p>	<p>Significant additional information is added to the Housing Element TBR Fair Housing Assessment Chapter to describe existing integration and segregation conditions in Redwood City.</p> <p>The following geographic analysis has been added regarding race (p. H4-18 to H4-19):</p>

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characteristics, coincidence with other fair housing components (e.g., disparities in access to opportunity, disproportionate housing needs), other relevant factors and local data and knowledge.

For race, the analysis should be geographic and describe concentrations of different races throughout the City.

Regarding disability, the data showed one census tract where the concentration of persons with disabilities was higher; the element should describe and analyze the data provided and relate it to other factors to understand the quality of life conditions and better formulate appropriate policies and programs.

The analysis for familial status must analyze the data within the City as well as how the City differs from the surrounding region.

Response

As shown in Figures II-6 through II-12, which examine where concentrations exist in Redwood City, most of the census tracts in the central part of the city, west of Highway 101, are majority Hispanic¹ while the rest are majority White tracts.² Other cities in the county and the region exhibit similar concentrations of non-White residents, especially cities that are in closer proximity to the San Francisco Bay. Cities such as East Palo Alto, San Mateo, San Bruno, South San Francisco, and Daly City are ethnically diverse and have block groups with concentrations that are greater than 60 percent non-White populations. However, Redwood City differs drastically when compared to its neighboring cities (Atherton, Menlo Park, San Carlos, and Woodside). These neighboring cities are predominantly White majority tracts, and in some block groups these ranges are more than 80 percent (See Figure II-7: White Majority Census Tracts). Figure II-6, which demonstrates the percentage of non-White population by census block groups, indicates that the Central region has a much larger concentration of non-White residents, and given the close proximity to transit and freeway corridors, these areas are likely to be higher in housing density and offer housing options that are relatively affordable. Redwood City has three census tracts in the southwestern portion of the city, nearest to Woodside, that are White majority tracts, no census tracts that are Asian majority tracts, and two tracts that are Hispanic majority tracts (Figure II-9), located in the Central portion of the city. The impact race and ethnicity have on access to opportunity and housing needs are discussed further in Sections III (Access to Opportunity) and Section IV (Disparate Housing Needs).

The following analysis has been added further discussing the Census tract with high proportions of people with disabilities as well as additional factors influencing quality of life conditions and policies in place that improve housing opportunities for people with disabilities (p. H4-20 to H4-21):

According to 2019 ACS data (Figure II-13), the **share of the population living with at least one disability is 7 percent in Redwood City**, slightly lower than San Mateo County's 8 percent. There is one census tract in the City that has ~~a 10 percent to 20~~^{an} 11 percent share of the population living with a disability. **Residents who are 75 years or older experience the most disabilities (46.1 percent), followed by those within the 65 to 74 age group (16 percent).** Geographic concentrations of people living with a disability may indicate **increased access to services, amenities, and transportation that support this population.**

Among the various disability types, the highest disability reported in Redwood City is ambulatory difficulty, which the American Community Survey (ACS) defines based on whether an individual has serious difficulty walking or climbing stairs. The second most prominent type of disability among residents of Redwood City is "independent living difficulties," which the ACS defines based on an individual's capacity to complete errands on their own, such as

¹ Majority census tracts show the predominant racial or ethnic group by tract compared to the next most populous.

² Redlining maps, otherwise known as Home Owners' Loan Corporation (HOLC) maps, are not available for San Mateo County.

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The element must also analyze income and the concentration of poverty within the City that was identified. It should also compare the City to the surrounding areas.

Response

[shopping or doctor's visits. This disability considers the physical, mental, and emotional conditions of the individual performing the previously mentioned activities.](#)

[Figure II-14 shows a slightly higher concentration of residents living with disabilities in one tract relative to the rest of the City. This tract lies in the southwest region of the City, in the Farm Hill neighborhood. In this tract, 10.90 percent of residents have disabilities, compared to surrounding tracts with 5.4 to 8.9 percent of residents with disabilities, which is not significantly higher when compared to the other tracts in the City. The tract with a slightly higher concentration of residents with disabilities also has a sizable or predominantly White population \(as seen in Figure II-7\) and an older population. The southwestern neighborhoods in Redwood City tend to be comprised of detached single-family homes, some of which have residents that have lived there for many years and may be aging in place. This portion of the City has a median age that is greater than 46.5, while the rest of the city has a median age of 38.2 \(the national average\) or below. As noted above, residents that are 65 or older are more likely to experience disabilities. These factors are potential reasons for why this tract might have a slightly higher proportion of persons with disabilities. Additionally, the Kainos Home & Training Center, which provides housing and programming to people with developmental disabilities, is located in this neighborhood.](#)

[Compared to neighboring cities, Redwood City residents fare roughly the same, with similar levels of residents living with disabilities among County census tracts \(20 percent or less\).](#)

[The City has several policies and programs to improve the housing opportunities and accessibility needs of residents with disabilities.](#)

- [• Policy H3.1: Encourage and provide opportunities for housing for special needs groups, including the disabled](#)
- [• Policy: H3.2: Encourage assisted living and other senior housing options](#)
- [• Policy H3.5: Promote accessibility features in housing for people with disabilities](#)
- [• Program H1-5: Accessory Dwelling Units \(ADUs\)
 - \[◦ The City will continue to offer development bonuses for accessible ADUs.\]\(#\)](#)
- [• Program H2-2: Home Repair Programs
 - \[◦ The City continues to provide funding to several home repair programs that provide free accessibility modifications for low income renters and homeowners. The City will work with the program services providers to conduct targeted outreach to the Farm Hill neighborhood.\]\(#\)](#)
- [• Program H6-3: Accessibility
 - \[◦ The City is pursuing implementing a universal design ordinance, including considerations for "vistability" of all units.\]\(#\)](#)

[The following analysis has been added for familial status that compares the data within the City to the surrounding region as well as policies improving housing opportunities for families \(p. H4-21 to H4-23\):](#)

[Under the Fair Housing Act, housing providers may not discriminate because of familial status. Familial status covers: the presence of children under the age of 18, pregnant persons, any person in the process of securing legal custody of a minor child \(including adoptive or foster parents\). Examples of familial status discrimination include refusing to rent to families with children, evicting families once a child joins the family through, e.g., birth,](#)

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adoption, custody, or requiring families with children to live on specific floors or in specific buildings or areas. Single parent households are also protected by fair housing law. Single-parent households require special consideration and assistance because of the greater need for daycare, health care, and other services. In particular, female-headed households with children tend to have lower incomes and a greater need for affordable housing and accessible daycare and other supportive services.

The 2019 ACS shows that Redwood City is home to **more single-person households** than the County overall, with 25 percent of households compared to only 22 percent in the County. Additionally, there are **fewer married couple households in the City (51 percent) and more non-family households (10 percent) compared to the County (55 percent and 8 percent, respectively)**.

Familial status can indicate specific housing needs and preferences. A larger number of nonfamily or single person households indicates a higher share of seniors living alone, young adults living alone or with roommates, and unmarried partners. **Higher shares of nonfamily non-family households indicates indicate a continued need for one- and two-bedroom units.**

The majority of married couple households live in owner occupied housing. Residents living alone are more likely to be renters. The number of housing units available by number of bedrooms and tenure is consistent with the familial status of the households that live in Redwood City.

Figure II-21 indicates that most children living in Redwood City live in married couple households, which is similar to most cities in the County where 60 percent or more of children live in married couple households. Within Redwood City, areas within Central Redwood City are more likely to have children not living in married couple households. Figure II-22 demonstrates that there are census tracts where there is also a significant percentage (between 31 and 35 percent) of single female-headed households. The higher percentage is nearly exclusive to tracts within Redwood City, as neighboring cities such as San Carlos and Menlo Park (and the County of San Mateo as a whole) do not have similar levels of households headed by females. These cities tend to have less than 20 percent of single female-headed households, are wealthier, and have fewer non-White residents.

Within the City (more specifically in the Palm Park neighborhood), 40 to 60 percent of children live in households headed by single females. The areas with greater concentrations of female-headed households coincide with areas previously identified as having a higher percentage of non-White populations (see Figure II-6). Households in these areas are also more likely to be of low- or moderate-income levels (as indicated in Figure II-27), and given the economic challenges portrayed, it can be assumed that lower income female-headed households are also susceptible to experiencing housing cost burden. Figure IV-13, which demonstrates the spatial distribution of renters paying more than 30 percent of their income on housing, overlaps with areas where there are more female-headed households. The intersectionality of socioeconomic burdens that impact households headed by single women further demonstrates the increased need for financial and social resources to be able to support these types of households.

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In order to address the range of resource needs of single female-households, the City has several policies and programs within the Housing Element that promote affordable housing opportunities as well as policies and programs in the Building Community Element to address child care and human service needs.

- Housing Element
 - [Program H2-4: Affordable Housing Development/Inclusionary Housing](#)
 - [Program H2-5: First-Time Homebuyer Opportunities](#)
 - [Program H2-8: Acquisition and Rehabilitation of Existing Housing](#)
 - [Program H3-3: Housing Options for Special Needs and Extremely-Low Income Households](#)
 - [Program H5-3: Affirmative Marketing of Accessible and Affordable Housing Units Program H6-1: Anti-Displacement Strategy](#)
- Building Community Element
 - [Program BC-11: Recreation and Human Services Program and Staff Expansion](#)
 - [Program BC-17: Human Services Outreach](#)
 - [Program BC-34: Child Care Zoning](#)
 - In 2021, the zoning ordinance was amended to allow by right large family care homes, and childcare centers of up to 60 children in commercial and mixed-use zoning districts, and childcare centers in all residential districts when located in conjunction with schools and churches. The ordinance update also allows childcare centers and conversions of residential dwellings in all residential zones with a Use Permit.
 - [Program BC-36: Child Care/Preschool Information and Referral Services](#)
 - [Program BC-37: Child Care Facilities in Transit Stations and Large Development Projects](#)
 - Several child care facilities have been provided in recent transit oriented developments
 - [Program BC-38: Preschool and Child Care Educational Needs Support](#)

Additional analysis has been added analyzing income and the concentration of poverty within the City that was identified, including a comparison of the City to surrounding areas (p.H4-23 to H4-24):

The household income distribution by percent of area median income (AMI) in Redwood City is more concentrated at lower incomes than the County, based on the 2019 ACS and shown in Figure II-25. In Redwood City, 28 percent of households have income below 50 percent AMI compared to 24 percent in the County.

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There are several census block groups in the City that have median incomes below the 2020 state median income of \$87,100 and most are located in the central part of the city. [According to the 2020 American Community Survey, the median household income for Redwood City was \\$117,123, compared to a county median income of \\$182,093. Neighboring cities have higher median incomes – Atherton \(\\$250,000+\), Menlo Park \(\\$160,784\), San Carlos \(\\$182,083\) and Woodside \(\\$250,000+\).](#) Both Atherton and Woodside have a median income that is more than twice that of Redwood City. These cities also tend to have smaller proportions of non-White residents. Woodside's non-White population ranges between 10 and 20 percent, Atherton ranges between 20 and 35 percent, Menlo Park ranges between 17 and 40 percent, and San Carlos's non-white population ranges between 20 and 45 percent. Figure II-26 shows the distribution of income levels among block groups in Redwood City, showing a diversity of income levels throughout the City ranging from less than \$55,000 to well above \$125,000. Figure II-27 shows that the Central area of Redwood City is most likely to house low- and moderate-income households. In general, block groups with lower median incomes also tend to have a larger percentage of non-White residents, as previously identified in Figure II-6. Areas that have a higher median income are located in the southwest region of the City, where the population is older, with fewer non-white residents, and median gross rent is greater than \$2,500 (in some areas this is greater than \$3,000), as demonstrated in Figure II-31.

[As indicated in Figure II-28, higher poverty rates \(between 20 percent and 30 percent\) are concentrated in the census tract west of Highway 101 in the Friendly Acres, Stambaugh-Heller, Redwood Village, and Downtown neighborhoods. Within this tract, 22.3 percent of the population earns income below the poverty level. As noted in Figure II-6, this area also has a larger percentage of non-White residents; concentrated poverty disproportionately affects persons of color as indicated in Figure II-5. Poverty is also correlated with other fair housing components, including disparities in access to opportunity and disproportionate housing needs.](#)

[The County as a whole demonstrates a diversity of income levels, with cities outlining the San Francisco Bay considerably more diverse in their income ranges. The majority of block groups throughout the county have incomes levels that are less than \\$125,000; these block groups tend to be more densely populated and ethnically diverse than areas that are more inland and on the west coastal region of the county where median income levels are much higher \(upwards of \\$125,000\). Limited areas within the county have a concentration of poverty, with a few tracts between 10 to 20 percent of residents living below the poverty level, and the only other tract with greater than 20 percent of residents living below the poverty level is located in Palo Alto, near Stanford University.](#)

[The impact income has on access to opportunity and housing needs are discussed further in Sections III \(Access to Opportunity\) and Section IV \(Disparate Housing Needs\).](#)

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Racially/Ethnically Concentrated Areas of Poverty (R/ECAP) and Concentrated Areas of Affluence:

While the element identified R/ECAPs, it must provide an analysis. In addition, the element should address concentrated areas of affluence (Please see HCD's AFFH Data Viewer).

The combination of the R/ECAP and areas of affluence analyses will help guide goals and actions to address fair housing issues.

The analysis should evaluate the patterns and changes over time at a local (e.g., neighborhood to neighborhood) and regional level (e.g., city to region).

Response

The analysis now includes an analysis on concentrated areas of affluence using the latest data from HCD's AFFH Data Viewer. The goals and actions have also been modified based on this new analysis. R/ECAPs have also been evaluated for patterns and changes over time at a local and regional level.

The following has been added further analyzing factors that contribute to R/ECAPs (p. H4-27 to H4-29):

A variety of factors—some global and others local—appear to contribute to concentrated poverty:

- Income inequality is increasing throughout the country.
- New low-income housing is often built in neighborhoods that already have a non-white population of 50 above-average levels of poverty.
- Historic public policies nationwide that tend to block lower-income households from living in middle and upper-income areas have further contributed to the concentration of poverty and increased income segregation.

A report completed by City Observatory in 2014³ studied change in the nation's urban high-poverty neighborhoods over the past four decades. Key findings included:

- From 1970 to 2010, the number of poor people living in high-poverty urban neighborhoods more than doubled from two million to four million, and the number of high-poverty neighborhoods nearly tripled from 1,100 to 3,100.
- The poor in the nation's metropolitan areas are increasingly segregated into neighborhoods of concentrated poverty. In 1970, 28 percent or more (majority minority) AND the of the urban poor lived in a neighborhood with a poverty rate is three times the average tract of 30 percent or more; by 2010, 39 percent of the urban poor lived in such high poverty neighborhoods.
- The poor in the nation's metropolitan areas are increasingly segregated into neighborhoods of concentrated poverty. In 1970, 28 percent of the urban poor lived in a neighborhood with a poverty rate for of 30 percent or more; by 2010, 39 percent of the urban poor lived in such high poverty neighborhoods.
- In the aggregate these neighborhoods lost population, with chronic high-poverty neighborhoods losing 40 percent of their population over four decades.
- Few high-poverty neighborhoods saw significant reductions in poverty. Between 1970 and 2010, only about 100 of the 1,100 high-poverty urban neighborhoods experienced a reduction in poverty rates to below the national average. In contrast to chronically high-poverty neighborhoods, which lost population, these "rebounding" neighborhoods recorded an aggregate 30 percent increase in population.

³ Cortright, Joe and Mahmoudi, Dillon. December 2014. *City Report: Lost in Place: Why the persistence and spread of concentrated poverty—not gentrification—is our biggest urban challenge.*

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boundary that are classified as RCAAs. These tracts are largely concentrated in the southwest region of the City. As previously identified in maps, such as the median income (Figure II-26) and white majority (Figure II-7) maps, the RCAAs coincide with tracts that have higher incomes and fewer non-White residents than other regions of the City such as the Downtown and central area. For example, one of these tracts identified as an RCAA in the southern portion of the City has a median income of \$178,578 and a White population of 74 percent in comparison to one of the edge R/ECAPs north of Redwood Junction where 83 percent of the population is non-White and the median income is \$60,658. Residents in RCAAs are largely homeowners and more likely to be married-couple households compared to the rest of the City. One of the Census tracts in the southwest part of the City also has a larger population of residents living with disabilities (correlating with an older population).

However, the City has significantly fewer RCAAs compared to its neighbors Atherton, Menlo Park, San Carlos and Woodside, which are wholly comprised of RCAAs (Figure II-31). In general, the City has fewer racially and economically exclusive neighborhoods, is more diverse, and offers more affordable housing opportunities (Figures I-8 to I-10) than surrounding communities.

In addition to efforts to facilitate accessory dwelling unit and SB 9 development in traditionally single family neighborhoods, Redwood City has also included Program H1-4 in the Housing Plan to consider additional changes beyond those required by state law to encourage more housing in high opportunity areas.

The following discussion has been added regarding patterns and changes over time at the local and regional level (p. H4-26):

In 2010, there were three census tracts that qualifyqualified as R/ECAPs (19.4 percent poverty rate) in the County and 11 that qualify as edge R/ECAPs (13 percent poverty rate). One of the R/ECAPs was located in Redwood City in 2010, and 5 edge R/ECAP were located in Redwood City—which means they are majority minority and have a poverty rate two times higher than the countywide census tract average. All of these areas were concentrated on the central and eastern part of the City.

In 2019, there are two census tracts that qualify as R/ECAPs (19.1 percent poverty rate) in the county and 14 that qualify as edge R/ECAPs (12.8 percent poverty rate). **Four of the 2019 edge R/ECAPs are located in Redwood City**—which means they are majority minority and have a poverty rate two times higher than the countywide census tract average, — a reduction of one edge R/ECAP compared to 2010 —, and **one of the census tracts that qualify as R/ECAPs is located in Redwood City.** Again, these areas were concentrated on the central and eastern part of the city. These findings correlate with the discussion under Household Income above.

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<p>Disparities in Access to Opportunity: While the element provided some data, additional data and analysis is needed.</p>	<p>Additional data and analysis have been to the discussion on Disparities and Access to Opportunities and relates overall disparities in access to opportunity in the City to the rest of the affirmatively furthering fair housing (AFFH) analysis. See below for how these changes were incorporated.</p>
<p>The element should relate the overall disparities in access to opportunity in the City to the rest of the affirmatively furthering fair housing (AFFH) analysis.</p>	<p>The following has been added relating the overall disparities in access to opportunity in the City to the rest of the affirmatively furthering fair housing (AFFH) analysis (p. H-40 to H-43).</p>
<p>In addition, the element included data on education, but it must analyze the data on both a local and regional level as well as describe the proximity of proficient schools to areas of segregation and R/ECAPs.</p>	<p>Disparities in Access to Opportunity and Relationship to AFFH</p> <p>The Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (TCAC) undertook an effort to evaluate access to opportunity by producing annual opportunity area maps. The maps illustrate an overall composite score derived from characteristics grouped into three main categories: economic, environmental, and educational. The composite score ranges from low to highest resources, with low resources indicating less access to opportunity and high resources indicating greater access to opportunity. The TCAC/HCD Opportunity Maps are intended to display the areas that offer low-income children and adults the best chance at economic advancement, high educational attainment, and good physical and mental health. The primary function of TCAC is to oversee the Low-Income Housing Tax Credit (LIHTC) Program, which provides funding to developers of affordable rental housing. The opportunity maps play a critical role in shaping the future distribution of affordable housing in areas with the highest opportunity. TCAC's composite opportunity score⁴ for Redwood City shows census tracts in the central part of the City and east of Highway 101 fall within low resource areas while the rest of the City is within moderate or high resource areas.</p>
<p>The element must describe what affects the disparities in access to jobs within the City and how it affects protected groups.</p>	<p><u>One of the most pressing issues regarding segregation in Redwood City is the lack of access to opportunity areas and resources – including quality education, environmental health, transportation and employment – for lower income residents of color who have been historically excluded from high opportunity areas due to historical discrimination and lack of access to housing, particularly affordable housing.</u></p>
<p>While the element describes transit plans in the region, it should describe and analyze local and</p>	<p><u>Compared to the county overall and surrounding communities, Redwood City does a better job of providing housing opportunities and housing a diverse set of residents. However, within the City, improvements could be made to address racial/ethnic and geospatial disparities; those disparities are discussed below.</u></p>

⁴ The composite score is composed of the three domain scores (Education, employment, and environment) averaged together to create an index score. For more detail refer to TCAC/HCD methodology: <https://belonging.berkeley.edu/2021-tcac-opportunity-map>

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regional access to transit and provide a map of transit access.

The element must analyze local and regional disparities of environmental access to opportunity. While the local data states where there are worse scores, it must describe the rest of the City and analyze the data.

Response

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 Redwood City. Hispanic and Black or African American residents are more likely to live in low resource areas compared to non-Hispanic White and Asian/Asian/Pacific Islander (API) residents in Redwood City.⁵

- (Figure III-16). Sixty one percent of the population living in low resource areas are Hispanic compared to 14 percent in high resource areas. Conversely, 59 percent of residents living in high resource areas are non-Hispanic White.
- Racial and ethnic minorities are more likely than non-Hispanic White households to experience overcrowding (Figure IV-17). Low and moderate income households are also more likely to be overcrowded (Figure IV-18).
- Countywide, people who identify as American Indian or Alaskan Native, Black, White, and Hispanic are overrepresented in the homeless population compared to their share of the general population (Figure IV-22).
- Hispanic, 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).

Geospatially, the central area of the City (generally identified as Downtown, Stambaugh Heller, Central, Redwood Village, and Friendly Acres neighborhoods) is 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 minority households and higher poverty rates (Figure II-6 and Figure II-28).

- Higher poverty rates between 10 percent and 30 percent (Figure II-28).
- Education opportunity scores⁵ between 0 and 0.5—meaning they have lower education scores compared to the rest of the City and the San Mateo County region (Figure III-1).
- Low economic opportunity scores⁶ between 0 and 0.25 (Figure III-8).
- Low environmental scores⁷—which account for PM2.5⁸, diesel PM, drinking water, pesticides, toxic release, traffic, cleanup sites, groundwater threats, hazardous waste, impaired water bodies, and solid waste sites (Figure III-11).

⁵Tax Credit Allocation Committee's (TCAC) education score is based on math proficiency, reading proficiency, high school graduation rates, and the student poverty rate. Score ranges from 0 to 1.

⁶ TCAC's economic opportunity score is comprised of poverty, adult educational attainment, employment, job proximity, and median home value. Score ranges from 0 to 1.

⁷ TCAC's environmental score are based on the CalEnviroScreen 3.0 indicators. Scores range from 0 to 1. A lower score implies less positive environmental outcomes.

⁸ PM2.5 is defined as fine inhalable particles, with diameters that are generally 2.5 micrometers and smaller.

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Response

- The composite opportunity score⁹ for Redwood City shows census tracts in this area of the city fall within low resource areas while the rest of the city is within moderate or high resource areas (Figure III-16).
- 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. Again, the central area —covering areas in the Central, Stambaugh-Heller, and Redwood Village neighborhoods—is most vulnerable according to the SVI.
- The central area west of Highway 101 —around the Centennial, Downtown, Stambaugh-Heller, Redwood Village, and Friendly Acres neighborhoods—in Redwood City qualifies as a disadvantaged community as defined under SB 535, “disadvantaged communities are defined as the top 25 percent scoring areas from CalEnviroScreen¹⁰ along with other areas with high amounts of pollution and low populations.”¹¹

Efforts to increase affordable housing in areas of opportunity support more successful outcomes in educational attainment, employment, and health. The City's Housing Element lays out a framework to encourage more affordable housing throughout the City to support such outcomes, these efforts including supporting accessory dwelling units (Program H1-5) and SB 9 development (Program H4-5) in traditionally single family neighborhoods and increasing densities in high opportunity areas (Program H1-4).

Additionally, the City is seeking to improve the overall quality of life and neighborhood conditions for all residents. More specifically, the City adopted an Equity Plan in 2021 that seeks to create an inclusive community where success is not predictable by race, ethnicity, or zip code. The City's Equity Plan includes policy directives with the aim of highlighting inequities, advancing staff and constituent understanding of and attention to opportunities to address inequities, and ensuring equity is considered in all City work. Some of Equity Plan initiatives include the Anti-Displacement Strategy, utility forgiveness program, and an update to the 50/50 sidewalk repair program to account for different community needs and resources. Further, the City has and will continue to invest CDBG funding into making improvements in parks and community centers located in the City's lower income neighborhoods.

⁹ TCAC's composite opportunity score is made up of a combination of educational scores, proximity to jobs, access to transportation, and environmental scores and is used to determine low, moderate and high resource opportunity areas.

¹⁰ CalEnviroScreen 4.0 is a statewide risk assessment tool that measures the cumulative impacts of multiple sources of pollution. The indicators were selected based on scientific literature that confirms their detrimental effects on human, and especially child, health; the completeness, accuracy, and currency of the data; and the widespread concerns about each indicator in California. CalEnviroScreen 4.0 was developed to support the Affordable Housing and Sustainable Communities program and other programs that allocate funding from sale of cap-and-trade revenue, but it is explicitly acknowledged as a tool that can be used for a variety of policy and planning purposes.

¹¹ <https://oehha.ca.gov/calenviroscreen/sb535>

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	<h2>Disparities Specific to the Population Living with a Disability</h2> <p>Seven percent of the population in Redwood City are living with at least one disability, a slightly lower share than the county. The most common disabilities in Redwood City are ambulatory (3.3 percent), independent living (2.6 percent), and cognitive (2.5 percent).</p> <p>Of residents with a disability responding to the residents' survey,¹² 32 percent said that their home does not meet the needs of their household member.</p> <p>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.</p> <p>Unemployment is disproportionately high among residents living with a disability at 9 percent compared to 3 percent 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.</p> <p>Residents living with a disability are primarily concentrated geographically in the western part of the City close to Woodside Rd in the Farmhill and Roosevelt neighborhoods. This is likely due to increased transportation access and access to support services. This is likely due to an older population in these neighborhoods. As discussed in more detail in the Disability Status section above, the Housing Element contains several policies and programs to improve the housing opportunities and accessibility needs of residents with disabilities.</p> <p>The following discussion has been added on education, which covers local and regional analysis and proximity of proficient schools to areas of segregation and R/ECAPs (p. H4-33 to H4-36). Appendix B has also been added which provides additional details on education access in Redwood City and San Mateo County.</p> <p>TCAC's The education analysis relies on a variety of measures of school quality, including TCAC's education score, a region and local analysis of the characteristics of schools within Redwood City relative to the region, and an analysis of access to quality schools by Redwood City neighborhood, including those with R/ECAPs.</p>

Seven percent of the population in Redwood City are living with at least one disability, a slightly lower share than the county. The most common disabilities in Redwood City are ambulatory (3.3 percent), independent living (2.6 percent), and cognitive (2.5 percent).

Of residents with a disability responding to the [residents' survey](#),¹² 32 percent said that their home does not meet the needs of their household member.

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 9 percent compared to 3 percent 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.

Residents living with a disability are primarily concentrated geographically in the western part of the City close to Woodside Rd in the Farmhill and Roosevelt neighborhoods. [This is likely due to increased transportation access and access to support services.](#) [This is likely due to an older population in these neighborhoods.](#) As discussed in more detail in the Disability Status section above, the Housing Element contains several policies and programs to improve the housing opportunities and accessibility needs of residents with disabilities.

The following discussion has been added on education, which covers local and regional analysis and proximity of proficient schools to areas of segregation and R/ECAPs (p. H4-33 to H4-36). Appendix B has also been added which provides additional details on education access in Redwood City and San Mateo County.

[TCAC's](#) [The education analysis relies on a variety of measures of school quality, including TCAC's education score, a region and local analysis of the characteristics of schools within Redwood City relative to the region, and an analysis of access to quality schools by Redwood City neighborhood, including those with R/ECAPs.](#)

¹² A total of 62 persons who responded to this survey question indicated that a member of their household had a disability.

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[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, **a few census tracts in Redwood City score below 0.25**—opportunity scores are presented on a scale from zero to one and the higher the number, the more positive the outcomes (see Figure III-1). These census tracts are **east of Highway 101 and in the central part of the city**.

...

[Figure III-2 shows the percentile rankings of public schools in Redwood City and surrounding cities. The ranking system was developed by Public School Review, an online tool that provides detailed profiles of public schools across the United States and their surrounding communities. The scores are based on overall testing scores, which looks at a school's math and English proficiency test scores for the 2018-2019 school year. Schools in Redwood City range widely from schools in the top five percent to the bottom 50 percent of the state. Schools with lower ranking scores are generally in the northeast \(Redwood Village\) and southeast \(Woodside Plaza\) regions of the city. The areas within which these schools are located coincide with predominantly non-White neighborhoods in the City \(Figure II-6\) and lower income neighborhoods \(Figure II-27\). These schools are also in lower resource TCAC opportunity areas, as previously shown. When comparing lower performing schools \(Figure III-2\) with R/ECAPS Figure II-30, there is one school located within the R/ECAP in Redwood City and a number of schools located in Edge R/ECAPs \(Table 4-2\).](#)

Table 4-2: School Performance and R/ECAPs

<u>School Name</u>	<u>2019 Edge R/ECAP</u>	<u>2019 R/ECAP</u>	<u>State Ranking</u>	<u>School Performance Score</u>
Design Tech High	No	No	Top 30%	8/10
Henry Ford Elementary	No	No	Top 50%	7/10
Hoover Elementary	No	Yes	Bottom 50%	4/10
John F. Kennedy Middle	No	No	Top 50%	6/10
McKinley Institute of Technology	Yes	No	Bottom 50%	5/10
North Star Academy	Yes	No	Top 1%	10/10
Orion Alternative	No	No	Top 30%	8/10

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	<u>Redwood Shores Elementary</u>	<u>No</u>	<u>No</u>	<u>Top 10%</u>	<u>10/10</u>
	<u>Rocketship Redwood City</u>	<u>No</u>	<u>No</u>	<u>Top 50%</u>	<u>6/10</u>
	<u>Roosevelt Elementary</u>	<u>No</u>	<u>No</u>	<u>Bottom 50%</u>	<u>5/10</u>
	<u>Roy Cloud Elementary</u>	<u>No</u>	<u>No</u>	<u>Top 10%</u>	<u>10/10</u>
	<u>Sandpiper Elementary</u>	<u>No</u>	<u>No</u>	<u>Top 5%</u>	<u>10/10</u>
	<u>San Mateo County Special Education</u>	<u>No</u>	<u>No</u>	<u>Bottom 50%</u>	<u>1/10</u>
	<u>Sequoia High</u>	<u>No</u>	<u>No</u>	<u>Top 50%</u>	<u>7/10</u>
	<u>Summit Preparatory Charter High</u>	<u>No</u>	<u>No</u>	<u>Top 50%</u>	<u>7/10</u>
	<u>Taft Elementary</u>	<u>Yes</u>	<u>No</u>	<u>Bottom 50%</u>	<u>4/10</u>

In general, throughout the region, areas with higher concentrations of affluence have higher performing schools, as demonstrated by the school performance in neighboring San Carlos (Figure III-2). More affluent families (this is often correlated with lower minority percentage student bodies as well) often have additional resources to support outside tutoring and test preparation. Furthermore, studies point to the fact that there is a strong correlation between a child's parents' educational achievement and the child's educational outcomes.¹³

¹³ Benner, A. D., Boyle, A. E., & Sadler, S. (2016). Parental involvement and adolescents' educational success: The roles of prior achievement and socioeconomic status. *Journal of Youth and Adolescence*, 45(6), 1053–1064. <https://doi.org/10.1007/s10964-016-0431-4>; Dubow, E. F., Boxer, P., & Huesmann, L. R. (2009). Long-term effects of parents' education on children's educational and occupational success. *Merrill-Palmer Quarterly*, 55(3), 224–249. <https://doi.org/10.1353/mpq.0.0030>; Kalil, A., Ryan, R., & Corey, M. (2012). Diverging destinies: Maternal education and the developmental gradient in time with children. *Demography*, 49(4), 1361–1383. <https://doi.org/10.1007/s13524-012-0129-5>

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School performance based on standardized testing generally does not paint a complete picture of the school. Studies indicate that standardized tests reward memorization but may discourage more analytical thinking.¹⁴ The tests do not evaluate creativity, problem solving, critical thinking, artistic ability, or other knowledge areas that cannot be judged through the standard testing process. Additionally, because of the small sample of knowledge that is tested, standardized tests provide a very incomplete picture of student achievement.

See also Appendix B: Disparate Access to Educational Opportunities for additional detail on educational access in Redwood City and San Mateo County.

The following analysis has been added describing factors that affect the disparities in access to jobs within the City and how it affects protected groups (p. H4-36 to H4-37):

TCAC's economic opportunity score (0 to 1) is comprised of poverty, adult educational attainment, employment, job proximity, and median home value. The City's historical pattern of development has played a critical role in the location of jobs in the city. As the County seat and the first city to incorporate in San Mateo County, Downtown Redwood City was the original concentration of office and government uses, as well as social services. During the 1980s, 1990s, and 2000s, Downtown saw disinvestment and related outcomes. However, Downtown has experienced a resurgence. Today, Downtown Redwood City is known as an activity center and is in high demand for new housing and office opportunities. HUD's job proximity index shows these areas are in relatively close proximity to jobs (Figure III-9).

As indicated in Figure III-9, which measures how close neighborhoods are to major employment centers, job proximity in Downtown and the northeastern part of the City at large is high (ranking the highest in the HUD Jobs Proximity Index). This area is also correlated with the highest diversity (Figure II-11; see also Figure II-6: Percent Non-White Population.) In addition to concentrations of non-White population, this area is also home to higher levels of low- and moderate-income households (Figure II-27). Children living in single female parent households are also likely to live near areas of better job proximity in Redwood City (Figure II-22).

Hispanic and African American residents are more likely than others to work low wage jobs that do not support the region's housing prices, resulting in higher rates of cost burden and overcrowding, and migration into communities like Redwood City that offer relative affordability.

However, higher numbers of persons with disabilities (Figure II-14) are located further from the jobs centers, in the hills in the southwestern area of Redwood City. The higher rate of disabilities in this area is correlated with a higher percentage of seniors, who may be retired. In Redwood City, areas with the lowest economic opportunity scores—(Figure III-8)—below 0.25— are concentrated in the central part of the City and tend to coincide with

¹⁴ Harris, Phillip. Standardized Tests Do Not Effectively Measure Student Achievement. Association for Educational Communications and Technology, 2012; "Standardized Tests." International Encyclopedia of the Social Sciences. 2nd ed., vol. 8, 2008.

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R/ECAP and edge R/ECAP areas. HUD's job proximity index—which measures how close neighborhoods are to major employment centers—shows these areas are in relatively close proximity to jobs

The following has been added describing and analyzing local and regional access to transit (p. H4-37 to H4-39) and now includes an updated map of transit access showing the latest information from transit providers (p. H4-97):

~~[TCAC's transportation opportunity score and maps were not available at the time of this report]~~ SamTrans provides bus services in San Mateo County including Redi-Wheels paratransit service. The San Mateo County Transit District acts as the administrative body for transit and transportation programs in the county including SamTrans and the Caltrain commuter rail. [The Redwood City Station is a Caltrain commuter rail station located in Downtown Redwood City.](#)

In 2018, the Metropolitan Transportation Commission ([MTC](#)[MTC](#)), which covers the entire Bay Area, adopted a coordinated public transit and human services transportation plan. While developing the coordinated plan, the [MTC](#)[MTC](#) conducted extensive community outreach about transportation within the area. Below is a summary of comments relevant to Redwood City and San Mateo County.

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

While some comments related to the use of car share, transportation network companies (TNCs), or autonomous vehicles as potential solutions, other comments called for the increased accessibility and affordability of these services in the meantime."¹⁵

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

¹⁵ https://mtc.ca.gov/sites/default/files/MTC_Coordinated_Plan.pdf

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MTC.¹⁶ TRACS highlights that improving accessibility requires engagement for the community because there are no “watch-dog” systems in place to hold agencies accountable.

As part of the TRACS outreach process, respondents were asked to share their compliments or good experiences with MTC regional and local 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 percent over the next 20 years and the district is experiencing unprecedented increases in paratransit ridership. The plan is targeted at developing effective mobility programs for residents with disabilities and older adults including viable alternatives to paratransit, partnerships, and leveraging funding sources.¹⁷

MTC also launched Clipper START—an 18-month pilot project—in 2020 which provides fare discounts on single transit rides for riders whose household income is no more than double the federal poverty level.¹⁸

Public transit in Redwood City is focuses on higher density corridors, commute trips and disadvantaged residents. Service providers for transit include Caltrain, SamTrans, Commute.org (shuttles), and Stanford (Marguerite Shuttle). Public transit lines and bus stops are located along main roads in the City. Figure III-10 illustrates that all neighborhoods in the City are within a ½ mile distance from the nearest bus stop or bus line. The alltransit.cnt.org website publishes transit scores for geographic areas by measuring the number of transit trips per week a household takes and the quality of transit service available to connect residents and jobs. Based on these factors, Redwood City has a performance score of 5.7 out of 10, meaning there is a moderate combination of trips per week and number of jobs accessible enabling a moderate number of people to take transit to work. This score is slightly lower than San Mateo County as a whole (with a score of 6.1). The data also indicates that 88.4 percent of all jobs in the City are located within ½ mile of transit. As for transit accessibility by tenure for Redwood City residents, it is evenly split, roughly 50.5 percent of owner-occupied households are within a half mile of transit, while 49.5 percent of renter-occupied households are within a half mile. In San Mateo County as a whole, owner-occupied households are more likely to live within a half mile to transit stops/lines than renter-occupied households (57.5 percent and 42.5 percent, respectively).

¹⁶ <https://wid.org/transportation-accessibility/>

¹⁷ https://www.samtrans.com/Planning/Planning_and_Research/Mobility_Plan_for_Older_Adults_and_People_with_Disabilities.html

¹⁸ <https://mtc.ca.gov/planning/transportation/access-equity-mobility/clipper-startsm>

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Figure III-910.
Transit Access



HCD	Response
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The following has been added analyzing local and regional disparities of environmental access to opportunity (p.H-39 to H-40):

CalEnviroScreen (CES) was developed by the California Environmental Protection Agency (CalEPA) to evaluate pollution sources in a community while also accounting for a community's vulnerability to the adverse effects of pollution. It is a composite score of 13 pollution indicators and eight population characteristics (such as rates in chronic diseases, housing cost burden, educational attainment, poverty, linguistic isolation, and poverty). The analysis produces a percentile ranking of census tracts based on the average scores for the pollution and population indicators. The percentile ranking for each census tract demonstrates the degree of burdens present and how vulnerable people are to the pollution's effects in that tract, relative to the rest of the State's census tracts.

TCAC's opportunity areas mapping also produces environmental scores that are based solely on the CalEnviroScreen 3.0 indicators, which identify areas disproportionately vulnerable to pollution sources pollution indicators and values. These include variables such as ozone, PM_{2.5}, particulate matter 2.5, diesel PM, pesticides, particulate matter, toxic release from facilities, traffic, cleanup sites, impacts, pesticide use, drinking water contaminants, lead exposure, groundwater threats, cleanup sites, hazardous waste, solid waste, and impaired water bodies, and solid waste sites. These scores are then assigned to a scale between 0 and 1, where 1 means more positive environmental outcomes and 0 means less positive environmental outcomes.

Generally, Figure III-11 shows the TCAC environmental scores and that census tracts around Highway 101 have the worse scores, while census tracts further west have better environmental scores. However, in comparison to surrounding jurisdictions, areas along the bay have less positive environmental outcomes, such as the bay shore along Menlo Park and East Palo Alto. Figure III-12 illustrates the CalEnviroScreen 3.0 scores by census tracts for Redwood City. This data demonstrates that census tracts in Downtown, near the port, and in Central Redwood City neighborhoods are disproportionately exposed to pollution and experience socioeconomic burdens than those neighborhoods that are in the southwest region of the City. Residents in close proximity to the Downtown and Central Redwood City are more likely to be non-White (Figure II-6), and are also likely to be of low- or moderate-income levels (Figure II-27). Residents of these tracts are in close proximity to the Port and other industrial sites, which can be found in the northeast part of the City. This area has a long history of industrial uses; industrial uses can create an increased potential for pollution exposure. At a regional level, Redwood City has a much lower CalEnviroScreen score compared to other cities in the region; the only other city that has similar levels of pollution and population burdens, is South San Francisco. Neighboring cities like San Carlos and Menlo Park have much lower scores, indicating much better environmental conditions, compared to Redwood City. This can largely be attributed to the City's historic development pattern as a center for industrial with the Port of Redwood City while surrounding jurisdictions developed as largely suburban bedroom communities.

Despite these less favorable environmental conditions, the City scores relatively high on the California Healthy Places Index (HPI). The Healthy Places Index (HPI) is a new tool that allows local officials to diagnose and change community conditions that affect health outcomes and the wellbeing of residents. The HPI tool was developed by the Public Health Alliance of Southern California (PHASC).

The HPI includes to assist in comparing community conditions across the state and combined 25 community characteristics in eight categories including such as housing, education, economic, and social, education, transportation, neighborhood, housing, clean environment, and healthcare factors into a

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	<p>single indexed HPI Percentile Score, where lower percentiles indicate less healthy conditions.¹⁹ The central area west of Highway 101 in Redwood City scores the lowest on the HPI.</p>
<p>Disproportionate Housing Need, Including Displacement Risk:</p> <p>While the element included some data, some additional data and analysis for cost burden, overcrowding, substandard housing, homelessness and displacement are needed.</p> <p>The element must describe and analyze cost burden geographically at a local and regional level.</p> <p>In addition, the element must describe the concentrated area of overcrowding within the City as well as provide a regional analysis.</p> <p>The element must describe any concentrations of substandard housing.</p>	<p>Additional information has been added in the discussion for cost burden, overcrowding, substandard housing, homelessness and displacement. See below for details.</p> <p>The following has been added analyzing cost burden geographically at a local and regional level (p. H4-45 to H4-46):</p> <p>State and federal programs define whether a household experiences a housing cost burden (or is considered overpaying) as any household spending more than 30 percent of its gross annual income on housing. When a household spends more than 30 percent of its income on housing costs, it has less disposable income for other necessities such as health care or education. In the event of unexpected circumstances such as loss of employment or health problems, lower-income households with a housing cost burden are more likely to become homeless or double up with other households. Cost burden is an issue that is seen throughout the region and county to a degree.</p> <p>Over 50 percent of all renter households in Redwood City are cost burdened—spending more than 30 percent of their gross income on housing costs—and close to one third are severely cost burdened—spending more than 50 percent 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. Severely cost burdened households are considered at risk for homelessness.</p> <p>The rates of cost burden in Redwood City are slightly higher than the county overall. Lower income households are more likely to experience housing cost burden. Three fourths of households earning less than 30 percent AMI—considered extremely low income households—are severely cost burdened, compared to only one percent of households earning more than 100 percent of AMI.</p> <p>There are disparities in housing cost burden in Redwood City by race and ethnicity and family size. Hispanic (61 percent) households experience the highest rates of cost burden in the City. Non-Hispanic White (34 percent) and other or multi-racial households (16 percent) experience the lowest cost burden.</p>

¹⁹ <https://healthyplacesindex.org/about/>

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The element must also provide demographic information on the homeless population and evaluate impacts on protected characteristics and disparities in access to opportunity (e.g., access to services).

Lastly, the element must describe displacement due to disinvestment and disaster.

Figure IV-13 demonstrates the distribution of overpayment by renters for tracts throughout Redwood City. Renters throughout the city experience housing cost burden; however, overpayment by renters is more severe in the Central and Downtown region of the City, where in most tracts 40 to over 80 percent of households pay more than 30 percent of their income toward housing costs. As noted previously, this area is also an area of higher pollution burden (Figure III-12), higher proportion of non-White residents (Figure II-6) and lower income residents (Figure II-27). On the southwest side of the city, where there is less housing density and more single family homes, housing cost burden is lower. Residents in this area are more likely to be homeowners, and in these tracts the percentage of renters experiencing housing cost burden is much lower (less than 20 percent in most tracts). Compared to neighboring cities in the County, renter occupants in Redwood City experience housing cost burden at a relatively similar rate compared to areas with similar demographics in cities such as Pacifica, San Mateo, Menlo Park, and East Palo Alto.

Figure IV-14 shows the distribution of homeowners in Redwood City paying more than 30 percent of their income on housing. The intensity of housing cost burdens for homeowners (while still there) is not as significant as that of renter occupants. Generally, only 20 to 40 percent of households throughout the tracts are cost burdened, there is one particular tract where there is a slight uptick and the rate of cost burden is 40 to 60 percent, this same tract was previously identified as having relatively more female-headed households and having lower to moderate income levels. It should also be mentioned that even in areas previously identified as being of higher income levels (upwards of \$125,000), residents throughout the City still experience cost burdens regardless of occupancy type and income. Cost burden by homeownership is more apparent in Redwood City compared to neighboring cities such as San Carlos, Menlo Park, and East Palo Alto.

The following has been added describing the concentrated area of overcrowding within the City as well as a regional analysis (p. H4-47 to H4-48):

In response to a mismatch between household income and housing costs in a community, some households may not be able to buy or rent housing that provides a reasonable level of privacy and space. According to both California and federal standards, a housing unit is considered overcrowded if it is occupied by more than one person per room (excluding kitchens, bathrooms, and halls).

The vast majority of households (91 percent) in Redwood City are not overcrowded—indicated by more than one occupant per room. This compares to 92 percent in San Mateo County and 93 percent in the Bay Area overall, are not overcrowded, meaning that Redwood City households are slightly more likely to be living in overcrowded conditions than residents in the County and Bay Area overall (Figure IV-15). However, renter households are significantly more likely to be overcrowded with 15.5 percent of households having more than one occupant per room compared to 2.2 percent of owner households. Lower income households are also significantly more likely to experience overcrowding (Figure IV-18).

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Questions/Comments from July 8, 2022 Letter	<p>Severe overcrowding occurs when 1.5 people or more live in a room. Of the 9% of Redwood City households who are overcrowded, 1,407 are severely overcrowded. This is 5 percent of all households in the City. Redwood City households are slightly more likely to be living in severe overcrowded households compared to the County (3 percent) and Bay Area (3 percent) overall (Figure IV-15).</p> <p>The resident survey shows higher needs: 30 percent of respondents said that their house or apartment isn't big enough for their family members.</p> <p>As demonstrated in Figure IV-19, tracts in the downtown/central region are more overcrowded than other areas of the City. In these tracts, 12 to over 20 percent of households' experience overcrowding. Once again, these areas have been demonstrated to have more lower income (Figure II-27) and predominantly non-White residents (Figure II-6). These areas also experience higher levels of housing cost burden (Figure IV-13) for renters, and are confronted with socio-economic and pollution burdens as highlighted in the CalEnviroScreen analysis (Figure III-12). Residents in these areas are likely to reside in these areas given that the cost of housing is relatively low compared to other parts of the region, where median rent costs are generally in the \$1,500 to \$2,000 range (see Figure IV-29).</p> <p>Regionally, Redwood City as well as other cities such as San Mateo, Daly City, and East Palo Alto have a relatively higher percentages of overcrowded households in comparison to the County as a whole.</p> <p>It is also worth considering that in some instances the data for overcrowded housings conducted may be undercounted. Often times some households, such as those with undocumented status occupants, are overcrowded and undercounted, which can imply that these rates may possibly be higher than indicated.</p> <p>Racial and ethnic minorities are more likely than non-Hispanic White households to experience overcrowding. (Figure IV-17). Hispanic households (28 percent), other race households (34 percent), and Black or Asian households (seven percent) experience the highest rates of overcrowding. Low and moderate income households are also more likely to be overcrowded.</p> <p>Geographically, overcrowded households are concentrated in the same areas as cost burdened households, in the central part of the city, meaning that the greatest needs of overcrowded households is in finding affordable housing and reducing cost burden.</p> <p>The following discusses the location of code enforcement cases regarding substandard housing (p. H4-48):</p>

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[Substandard housing is housing that poses a risk to the health, safety, and/or physical well-being of residents. Of the approximately 35 housing units per year that Code Enforcement staff inspects, an estimated five to 10 residential properties per year that could be considered substandard; staff then works with property owners to bring units up to Code and address substandard housing issues. All such issues were resolved in recent years. There is no concentration of substandard housing issues; these code enforcement cases have been located in Downtown, surrounding neighborhoods, and along corridors, in both multi-family and single family homes.](#)

[In addition to overcrowding, 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, 1.2 percent are lacking kitchen facilities while 0.6 percent are lacking plumbing. For owners, 0.3 percent and 0.4 percent are lacking kitchen or plumbing facilities respectively. The City's share of households living in substandard units \(lacking kitchen or plumbing facilities\) is similar to the County overall \(1.2 percent lacking kitchen and .4 lacking plumbing facilities\).](#)

The following has been added regarding demographic information on the homeless population. This also includes an evaluation on the impacts on protected characteristics and disparities in access to opportunity (e.g., access to services) (p. H4-48 to H4-49). In 2019, 1,512 people were experiencing homelessness countywide, 40 percent of people were in emergency or transitional shelter while the remaining 60 percent 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 percent homeless, less than one percent of the general population), Black (13 percent, 2 percent), White (67 percent, 51 percent), and Hispanic (38 percent, 28 percent) 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.

[In Redwood City in 2019, an estimated 221 persons were experiencing homelessness and in 2022, an estimated 245 persons were experiencing homelessness, an increase of 9 percent. Demographic information is not available at the city level; however, it is reasonable to conclude that persons experiencing homelessness share similar demographics to those who are living in poverty and/or face severe levels of cost burden. In Redwood City, the highest rates of poverty are for American Indian residents \(36.5 percent live in poverty\) and Black residents \(23 percent live in poverty\) and these individuals are likely to be over-represented in the city's homeless population.](#)

[In 2021, Redwood City conducted an unofficial homeless census, with surveys gathered at over 25 homeless encampment locations. A total of 101 surveys were completed at that time. Most persons experiencing homelessness in Redwood City are male \(77 percent\) and approximately half of](#)

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[respondents identified as having a disability, either mental health disability, a physical disability, developmental disability, or chronic health condition.](#) Thirteen percent are Veterans. Nearly half (43 percent) speak Spanish as their primary language. Most persons experiencing homelessness are between the ages of 25 and 54 (77 percent). Five percent are over 62 years old, 14 percent are between 55 and 61 years old, and three percent are between 18 and 24. [Encampments were located generally near Highways 101 and 84 \(and the extension of Highway 84\), in Downtown, or in vacant/underutilized commercial spaces, but were not concentrated in one location.](#)

[In Redwood City, the City Council has a long-standing commitment to support our unhoused and housing insecure residents to provide services and emergency housing, while addressing concerns about public health, environmental impacts, and public safety. The City's inter-departmental Housing and Homeless Innovation Team continues to look at ways to pro-actively address these impacts. The Fair Oaks Community Center is a multi-service facility offering a variety of services to the broader Redwood City Community. The Fair Oaks Community Center is located at 2600 Middlefield Road, Redwood City and provides information and referrals, as well as mobile shower and laundry service, a homeless help desk provided by S. Vincent de Paul, and services for older adults, child care, tenant's rights clinic, and immigration/citizenship services. Fair Oaks Community Center is also the entry point into the Countywide Coordinated Entry System \(CES\) which is the Housing Crisis Resolution System of the Continuum of Care for the homeless in San Mateo County.](#)

The following has been added describing displacement due to disinvestment and disaster:

[To address displacement pressures in the community, the City has recently adopted an Anti-Displacement Strategy that includes recommendations for preserving unsubsidized affordable housing units and mobile home parks and amending and improving tenant protection measures to help ensure lower income residents can remain living in the City \(see Program H6-1 for more information\).](#)

According to the Urban Displacement Project, renters living in census tracts in the central part of the City and east of Highway 101 are vulnerable to displacement²⁰—these same Tracts have high shares of renter households. In these areas, an estimated 1,721 owner and 5,221 renter households are susceptible to or experiencing displacement. Additionally, areas of the city with the highest cost burden and overcrowding—along the waterfront—are included in the Special Flood Hazard Areas.

²⁰ Categories are combined as follows for simplicity, for detailed criteria visit <https://www.urbandisplacement.org/maps/sf-bay-area-gentrification-and-displacement/>:

--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

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[The Multijurisdictional Local Hazard Mitigation Plan \(2021\) reports past occurrences of natural hazards for which specific damage was recorded since 1954. Hazards in Redwood City include flood, fire, severe storms, and earthquakes. The report provides a hazard risk ranking, with sea level rise/climate change, flooding, earthquake, landslide/mass movements, and dam failure all ranked "high"; wildfire and severe weather were ranked "medium"; and tsunami and drought were ranked "low". There have been no repetitive loss properties that were identified. The following specific issues that could affect existing housing have been identified based on a review of the results of the risk assessment, public involvement strategy, and other available resources:](#)

- [• Redwood Shores – The Redwood Shores Community was built upon reclaimed land in the San Francisco Bay marshes. The soft ground that supports the community, known as bay mud, poses serious liquefaction concerns for a moderate to large earthquake. Additionally, Redwood Shores is vulnerable to sea-level rise due to the large levee system that currently shields the community from the bay.](#)
- [• US 101/Bayshore Road – A series of mobile home parks along US 101 and Bayshore Road are identified at-risk areas for flooding. However, the Bayfront Canal & Atherton Channel project is currently construction and will reduce flooding in this area by diverting storm water into managed ponds. Additionally, the City annually undertakes weed abatement and debris removal to improve stormwater flow and reduce flooding risks in this area.](#)

[As mitigation actions addressing these issues are included in the Hazard Mitigation Plan's action plan, the risk of displacement due to disaster is expected to be minimal. The risks of displacement due to disinvestment are also anticipated to be minimal or nonexistent. Redwood City is experiencing demand for nonresidential and residential development throughout the city, with no significant areas of disinvestment or concern.](#)

[Additional information has also been added regarding subsidized rental housing p. H4-3 and H4-17:](#)

- [➤ Redwood City has a significantly larger number of subsidized rental housing compared to neighboring communities and provides a greater share of the County's affordable housing stock compared to the City's share of the County population. Figures I-8 and I-9 show the number of estimated rental homes assisted by Section 8 contracts according to the National Housing Preservation Database and Figures I-10 and I-11 shows the number of affordable housing properties assisted with Low Income Housing Tax Credits \(LIHTC\) and other State and Federal funding sources.](#)

[... According to the California Department of Housing and Community Development AFFH Data Viewer \(HCD data viewer\), Redwood City does not have any public housing buildings. However, the City does have over 1,000 units of deed-restricted affordable housing, as well as an area with a moderate \(5 percent to 15 percent\) share of households using housing vouchers. \(Figure I-7\). The area with a moderate share is located east of Highway 101 on the border with Menlo Park. Figures I-8 and I-9 show the number of estimated rental homes assisted by Section 8 contracts in Redwood City and countywide according to](#)

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	<p>the National Housing Preservation Database. Redwood City makes up approximately 18 percent of all rental homes assisted by Section 8 contracts in the County – which is greater than the City's 11 percent share of the County population. Figures I-10 and I-11 shows the number of affordable housing properties assisted with Low Income Housing Tax Credits (LIHTC) and other State and Federal funding sources according to the California Housing Partnership. Redwood City makes up 14 percent (833 units) of all subsidized affordable housing units in the County. In addition to the over 800 of subsidized affordable units shown in Figure I-10, the City also has approximately 200 affordable units created through its inclusionary requirements and other development incentives. Several of the neighboring cities (Woodside and Atherton) have zero subsidized affordable housing units. Compared to neighboring jurisdictions, except East Palo Alto, Redwood City appears more accommodating to renters with housing vouchers, and is providing more subsidized affordable housing. The City continues to promote the development of affordable housing through its Affordable Housing Ordinance and affordable housing funding.</p> <p>Additional information has also been provided explaining the TCAC/HCD Opportunity Maps (H4-31): The California Tax Credit Allocation Committee (TCAC), in collaboration with HCD, developed a series of opportunity maps that help to identify areas of the community with good or poor access to opportunity for residents. The opportunity maps highlight areas of highest resource, high resource, moderate resource, moderate resource (rapidly changing), and low resource.²¹ TCAC provides opportunity maps for access to opportunity in quality education, employment, transportation, and environment. The TCAC/HCD Opportunity Maps are intended to display the areas that offer low-income children and adults the best chance at economic advancement, high educational attainment, and good physical and mental health. The primary function of TCAC is to oversee the Low-Income Housing Tax Credit (LIHTC) Program, which provides funding to developers of affordable rental housing. The opportunity maps play a critical role in shaping the future distribution of affordable housing in areas with the highest opportunity. Shown below and on Figure III-16, low resources are located predominately east of U.S. 101 in the industrial areas of the City and around the port, as well as the Friendly Acres, Stambaugh Heller, and Redwood Village neighborhoods. Areas of moderate to high resources are concentrated in the north-western portions of the City. Highest resource areas are located in Redwood Shores and areas bordering San Carlos/Emerald Hills.</p>
Sites Inventory: While the element included some data on identified	An analysis regarding whether sites improve or exacerbate AFFH conditions is included on p. H3-43 to H3-47 of the TBR Housing Resources Chapter. The analysis addresses the income categories of identified sites with respect to location, the number of sites and units

²¹ TCAC and HCD created the Opportunity Map using reliable and publicly available data sources to identify areas in the state whose characteristics have been shown by research to support positive economic, educational, and health outcomes for low-income families and their children. The TCAC/HCD Opportunity Map uses 21 indicators to calculate opportunity index scores for census tracts in each region in California. For more information on these indicators, see the Opportunity Map methodology document <https://belonging.berkeley.edu/2021-tcac-opportunity-map>

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sites and AFFH, it must evaluate whether sites improve or exacerbate conditions and whether sites are isolated by income group.

A full analysis should address the income categories of identified sites with respect to location, the number of sites and units by all income groups and how that affects the existing patterns for all components of the assessment of fair housing (e.g., segregation and integration, access to opportunity).

Almost all sites are identified in moderate or low resource areas, the element must discuss whether the distribution of sites improves or exacerbates conditions.

If sites exacerbate conditions, the element should identify further program actions that will be taken to promote equitable quality of life throughout the community (e.g., anti-displacement and place-based community revitalization strategies).

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by all income groups and how that affects the existing patterns for all components of the assessment of fair housing (e.g., segregation and integration, access to opportunity) see Table H3-17 of this section.

The distribution of identified sites improves fair housing and equal opportunity conditions in Redwood City because sites are mostly distributed in moderate resources areas. This is positive, considering that these represent locations where new higher-density housing can be provided and residents will have access to good schools, diverse jobs, and distant from industrial uses. [Projects and sites located in low resource areas include a mix of incomes and as such are not exacerbating an existing concentration of poverty](#). Additional opportunities for more affordable housing are presented through the City's efforts to ~~remove barriers to missing middle housing in residential zones and~~ encourage accessory dwelling [and SB 9](#) units in high resource areas. [A thorough AFFH analysis is included](#)

[Table H3-17 shows the breakdown of active projects, proposed projects, and opportunity sites by income category and TCAC opportunity area score. The majority of projects and opportunity sites are located in the Housing Constraints section of moderate resource areas \(58.6 percent\). Nearly a third are located in low resource areas \(32.4 percent\); however, the vast majority \(90 percent\) of these are approved and proposed projects. As a result, the City has been keenly aware and focused on anti-displacement strategies to support existing lower income households who currently reside in these areas \(Program H6-1\).](#)

[Table H3-17: Housing Projects and Opportunity Sites in TCAC Areas](#)

	Project Sites	Extremely/Very Low-Income (0-50% AMI)	Low-Income (50-80% AMI)	Moderate-Income (80-120% AMI)	Above Moderate-Income (+120%)	Total
TCAC – Low Resource						
Approved	1601 El Camino "ELCO Yards formerly South Main Mixed-Use"	39	67	41	393	540
Proposed	1401 Broadway St & 2201 Bay Rd "Broadway Plaza"	24	95	-	399	518
Planned	1548 Maple Street	-	-	-	131	131
Pending	1201 Main St	1	1	2	24	28

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Opportunity	1201 Main St Mixed Use"					
	1818 El Camino Real "Comfort Inn"	<u>26</u>	<u>25</u>	<u>-</u>	<u>-</u>	<u>51</u>
	1330 El Camino Real "Redwood City Discovery"	<u>7</u>	<u>6</u>	<u>13</u>	<u>104</u>	<u>130</u>
	557 E. Bayshore Rd "Syufy Site"	<u>21</u>	<u>21</u>	<u>43</u>	<u>395</u>	<u>480</u>
	901 El Camino Real/ 920 Shasta St	<u>48</u>	<u>51</u>	<u>1</u>	<u>-</u>	<u>100</u>
	1304-1324 Middlefield Road	<u>-</u>	<u>93</u>	<u>-</u>	<u>-</u>	<u>93</u>
	1580 Maple St	<u>108</u>	<u>-</u>	<u>-</u>	<u>2</u>	<u>110</u>
	1950 El Camino Real	<u>53</u>	<u>31</u>	<u>38</u>	<u>-</u>	<u>122</u>
	301 Spruce	<u>-</u>	<u>-</u>	<u>7</u>	<u>-</u>	<u>7</u>
	519 Spruce	<u>-</u>	<u>-</u>	<u>1</u>	<u>-</u>	<u>1</u>
	611 Heller	<u>1</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>1</u>
Subtotal Low Resource		<u>328</u>	<u>390</u>	<u>146</u>	<u>1,448</u>	<u>2,312</u>
TCAC – Moderate Resource						
Approved	150 Charter Street	<u>-</u>	<u>-</u>	<u>11</u>	<u>61</u>	<u>72</u>
	239 Vera Ave	<u>-</u>	<u>-</u>	<u>-</u>	<u>5</u>	<u>5</u>
	31 Center St	<u>-</u>	<u>-</u>	<u>-</u>	<u>7</u>	<u>7</u>
	353 Main St	<u>63</u>	<u>61</u>	<u>-</u>	<u>1</u>	<u>125</u>
	955 Woodside Rd Townhomes	<u>-</u>	<u>-</u>	<u>-</u>	<u>8</u>	<u>8</u>
Proposed	2336 El Camino Real "Redwood Square"	<u>-</u>	<u>-</u>	<u>-</u>	<u>16</u>	<u>16</u>
	847 Woodside Rd	<u>-</u>	<u>-</u>	<u>6</u>	<u>38</u>	<u>44</u>
	590 Veterans Blvd /91 Winslow St	<u>5</u>	<u>5</u>	<u>9</u>	<u>76</u>	<u>95</u>

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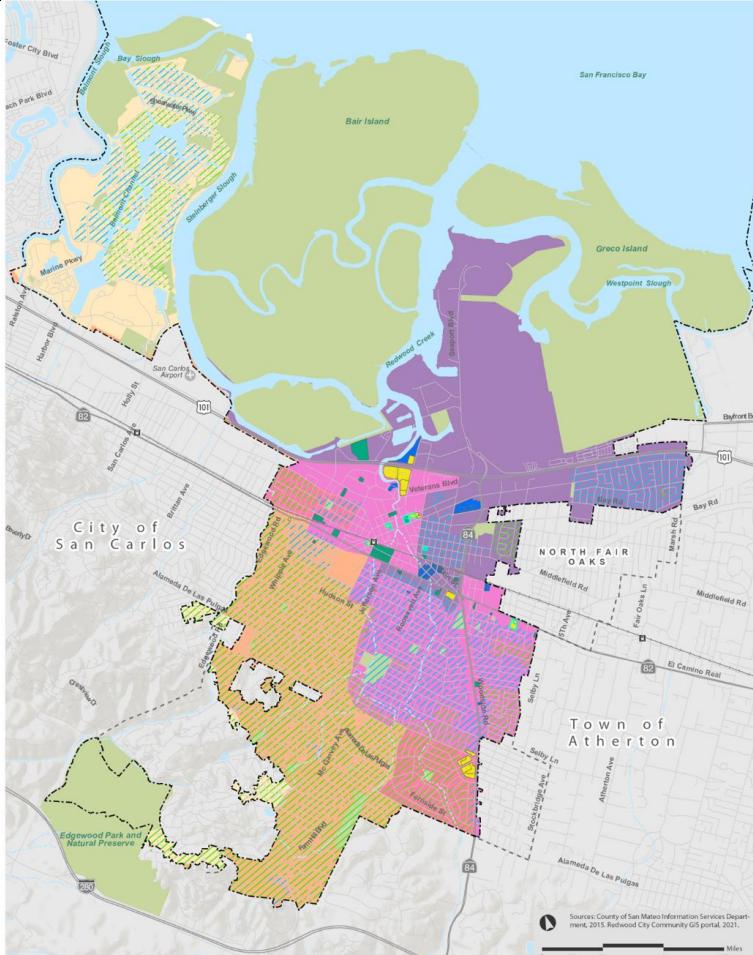
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Opportunity	1125 Arguello St "Arguello Street Mixed-Use"	6	15	12	-	33
	651 El Camino Real "American Legion"	5	5	10	79	99
	1900 Broadway St	-	70	1	-	71
	750 Bradford St "Bradford /RCSD"	5	6	10	81	102
	35-51 Renato Court	-	-	-	13	13
	1057 El Camino Real "Sequoia Station"	102	130	22	377	631
	609 Price Ave	32	49	2	-	83
	700 Jefferson "Bank of America"	52	29	36	-	117
	Caltrain Lot	40	23	29	-	92
	Iris	-	-	1	-	1
	1440 Jefferson	-	-	1	-	1
	910 Marshall "Kaiser Trapezoid"/1000 Marshall/1800 Broadway	127	74	90	-	291
	250 Walnut "Kohl's"	154	89	108	-	351
	202-300 Walnut "Peninsula Boardwalk"	-	-	308	308	616
	2650-2700 El Camino Real	25	15	18	-	58
	1875 Virginia "Woodside Plaza"	22	13	16	-	51
Subtotal Moderate Resource		638	584	690	1,070	2,982

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TCAC – Moderate Resource (Rapidly Changing)						
Proposed	77 Birch St Townhomes	-	-	-	9	9
Opportunity	50-340 "Woodside Plaza"	177	100	124	0	401
Subtotal Moderate Resource (Rapidly Changing)		177	100	124	9	410
TCAC – High Resource						
Opportunity	234 El Camino Real "Avondale"	-	-	12	-	12
Subtotal High Resource		0	0	12	0	12
Total		1,143	1,074	972	2,527	5,716



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Of note, the sites inventory (include both projects and opportunity sites) focus on a mix of incomes. Due to the City's inclusionary housing policy, all large developments provide affordable housing on site. The mix presented helps support a diversity of income levels in each development and throughout the neighborhood.

In addition to those sites itemized in Table 3-17, the sites inventory also assumes strong development in high opportunity areas through construction of new ADUs and SB 9 units. In 2021, Redwood City issued permits for 81 ADUs and demand for this housing type is anticipated to continue to grow, providing opportunities for more housing choice in high opportunity areas. Similarly, development under SB 9 will help to affirmatively further fair housing (AFFH) in Redwood City by providing the opportunity to integrate smaller-scale housing within higher resource, single-family neighborhoods. In addition, the ability to convey new units under separate ownership affords a wider range of financing options for property owners than are available for ADU construction. According to the Terner Center study, there are few loan products available to finance the construction of ADUs, and those that are available often do not cover the entire cost of development. Development under SB 9 will expand homeownership opportunities for modest income households who will be able to apply for a traditional mortgage to purchase the home. The Housing Plan includes Programs H4-5 and H1-5 to support SB 9 and ADU development (respectively) in low density zones. Furthermore, Program H1-4 is included in the Housing Element to study changes to low density (R-1 and RH) neighborhoods that could increase the density allowed, such as including additional density for corner lots. Program H4-3 reduces barriers to middle income housing in R-2, R-3, R-4, and R-5 zones, which also include High Resource Areas.

Overall, the sites inventory helps to expand housing options and promotes a pattern of interspersed multi-family residential uses rather than in concentrated locations, by including a variety of high-density housing development for several income brackets. The Redwood City's sites inventory: (1) improves integration; (2) improves access to areas of opportunity for Redwood City residents; (3) indicates development (and proposed development) patterns coincide with areas that are of low and moderately resourced areas; and (4) does not exacerbate displacement risks for lower- to moderate-income residents.

Segregation and Integration

- The sites are well dispersed throughout low, moderate, and highly resourced regions, per the TCAC Opportunity area map.
- Many of the sites located in low and moderate resource areas are also in close proximity to Downtown Redwood City, where there is a balanced mix of racial/ethnic diversity, great access to transit and services, and good jobs proximity.
- Many of the sites coincide with tracts that have a higher disability rate, relative to the rest of the City. The current and future housing development projects will support people living with disabilities by providing affordable housing and furthering housing mobility.

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- [Housing sites development will also support tracts that have been identified as having a larger percentage of female-headed household compared to the rest of the City. Namely, the 1601 El Camino “ELCO Yards formerly South Main Mixed-Use” site, where roughly 20 to 40 percent of children live in female-headed households.](#)
- [Sites located in the census tracts with low- and moderate-income households will provide needed affordable housing to residents in the downtown area of the City.](#)
- [The housing sites provide opportunities for multi-family development and will include housing for a variety of income levels, fostering mobility of households in the City and expanding housing choice.](#)
- [ADUs and SB 9 units will allow for housing mobility throughout Redwood City and provide opportunities for further neighborhood integration and housing in high resource areas.](#)
- [The City will further encourage and facilitate production of affordable units through regulatory and financial incentives, including the Affordable Housing Ordinance and density bonus incentives.](#)
- [The City recognizes the potential for displacement associated with investment in low opportunity areas. The City has developed a multi-pronged and detailed Anti-Displacement Strategy \(Program H6-1\) to address this concern.](#)

Racially or Ethnically Concentrated Areas of Affluence and Areas of Opportunity

- [Figure II-31 \(in the Fair Housing Chapter of this report\), demonstrates the Racially Concentrated Areas of Affluence \(RCAs\) within Redwood City; there are six tracts wholly within the City boundary that are classified as RCAs. These tracts are largely concentrated in the southwest region of the City. As identified in maps such as the median income \(Figure II-26\) and white majority \(Figure II-7\) maps, the RCAs coincide with tracts that have higher incomes and are less racially and ethnically diverse than other regions of the City such as the Downtown and central area. The sites inventory includes an estimated projection for 506 new ADUs and 275 new SB 9 units which are largely anticipated to occur in these areas.](#)
- [The majority of the City is identified as a moderate resource opportunity area; and this is where the majority of sites are identified. The City proactively supports high resource opportunity in these areas, including access to transit, services, jobs, and environmental quality. Given the proposed projects and sites identified, many future households will benefit from these long-term investments.](#)

Disproportionate Housing Needs

- [The sites approved and proposed in tracts 6102.02 and 6102.03 will permit that the area continue to be affordable to extremely low- and low-income households, as even projects that are proposed with market rate units will also include affordable units as part of the construction, significantly increasing housing options for these income levels.](#)

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	<ul style="list-style-type: none"> As indicated in Figure IV-13 of the Fair Housing Assessment portion of this report, cost burden for renters is concentrated in Central Redwood City and along El Camino Real. Adding additional affordable housing options to these areas supports alleviating the cost burden currently experienced by households in the area but increasing housing supply. Approved and proposed sites in census tracts 6102.03 and 6102.01 provide an increased number of affordable units where there is currently a higher percentage of overcrowded households in the City.
<p>Contributing Factors to Fair Housing Issues: While the element identifies many contributing factors to fair housing issues, it should prioritize these factors to better formulate policies and programs and carry out meaningful actions to AFFH.</p>	<p>The contributing factors have been prioritized as follows on p. H4-7 to H4-10 in the TBR Fair Housing Assessment Chapter:</p> <p>Contributing Factors and Fair Housing Action Plan</p> <p>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, concentrations of low-income populations within Redwood City, regional barriers to open housing choice, and, until recently, very limited resources to respond to needs. Four fair housing issues have been identified in Redwood City. The contributing factors to each is are discussed below.</p> <p><u>In prioritizing contributing factors, Redwood City gave highest priority to factors that:</u></p> <ul style="list-style-type: none"> Limit or deny fair housing choice, Limit or deny access to opportunity, or Negatively impact fair housing or civil rights compliance. <p><u>The City also considered how much influence/ability to change a factor the City has in order to identify priorities that are feasible and meaningful. As such, the following contributing factor priorities are established:</u></p> <p>Fair housing issue: Disproportionate housing needs due to lack of affordable housing exist among Hispanic and Black households. Evidence is in higher rates of cost burden for Hispanic and Black (severe burden) households and overcrowding for Hispanic households.</p> <p>➤ Higher poverty rates among Redwood City's Black and Hispanic residents stem from decades of discrimination in employment, education, and housing markets. Black and Hispanic have faced greater challenges building wealth through economic mobility and homeownership.</p> <p><u>Contributing factors:</u></p>

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	<ul style="list-style-type: none">➤ Historical Discrimination - It is well documented that persons of color—particularly African American residents—were denied loans to purchase homes, were not allowed to buy in many neighborhoods because of restrictive covenants, and were harassed if they managed to purchase a home in a predominantly White neighborhood. These historical actions have led to a significant homeownership gap among racial and ethnic minorities except for Asians. [High Priority]➤ Mortgage application rates remain high for American Indian and Hispanic households.<ul style="list-style-type: none">➤ Placement of Housing - Redwood City offers relatively more affordable housing opportunities than surrounding cities—except for East Palo Alto. Redwood City also allows more multifamily housing, which is disproportionately occupied by residents of color. The limited opportunity of residents to reside in surrounding areas leads to higher shares of poverty-level and low income households in Redwood City. [Moderate Priority]➤ Mortgage Disparities - Mortgage application denial rates remain high for American Indian and Hispanic households. [Low Priority]➤ Poverty - Higher poverty rates among Redwood City's Black and Hispanic residents stem from decades of discrimination in employment, education, and housing markets. Black and Hispanic have faced greater challenges building wealth through economic mobility and homeownership. [Low Priority]➤ Wage Disparities - Redwood City's Black and Hispanic residents are more likely than others to work low wage jobs that do not support the City's housing prices, resulting in cost burden and overcrowding. Their future employment opportunities are further constrained by K-12 achievement gaps and being less likely to meet university admission standards. [Low Priority] <p>Fair housing issue: Concentrations of Black or African American and Hispanic residents in low resource areas, especially areas with environmental hazards.</p> <p>Contributing factors:</p> <ul style="list-style-type: none">➤ Placement of Housing - Concentration of affordable housing and housing density in central Redwood City. Lack of affordable housing opportunities in higher resourced, predominantly single family detached areas of the city. [Moderate Priority]➤ Placement of Housing - While the central area of Redwood City—with the most affordable housing density—is the part of the city with lower environmental ratings, higher social vulnerability ratings, and is within flood hazard zones, it is also the area with the best access to employment opportunities, services and public transit options. [Moderate Priority] <p>Fair housing issue: Higher unemployment rate for persons with disabilities.</p> <p>Contributing factor:</p>
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	<p>➤ Unemployment Disparities- The unemployment rate for Redwood City's residents with disabilities is three times that of persons without a disability. The exact reasons for this disparity are unclear and are likely related to limited job opportunities, access to employment, and market discrimination. [Low Priority]</p> <p>Fair housing issue: Loss of affordable housing and displacement of residents due to high housing costs.</p> <p>Contributing factors:</p> <p>➤ Expiring Affordability Covenants - In Redwood City, of the 29 rental apartment developments with 1,203 affordable units, five complexes with a total of 239 units have expiring affordability covenants in Redwood City during the next ten years (2022-2032). [High Priority]</p> <p>➤ Housing Cost Burden - Over 50 percent of all renter households in Redwood City are cost burdened—spending more than 30 percent of their gross income on housing costs—and close to one third are severely cost burdened—spending more than 50 percent of their gross income on housing costs. [High Priority]</p> <p>➤ Housing Cost Burden - There are disparities in housing cost burden in Redwood City by race and ethnicity and family size. Hispanic (61 percent) households experience the highest rates of cost burden in the city. Non-Hispanic White (34 percent) and other or multi-racial households (16 percent) experience the lowest cost burden. [High Priority]</p> <p>➤ Overcrowding - Racial and ethnic minorities are more likely than non-Hispanic White households to experience overcrowding. Hispanic households (28 percent), other race households (34 percent), and Black or Asian households (7 percent) experience the highest rates of overcrowding. [High Priority]</p> <p>A discussion is also included regarding how the Housing Plan responds to the contributing factors on p. H4-9 to H4-10 in the TBR Fair Housing Assessment Chapter. Changes to the Housing Plan (Goals and Policies Chapter) are outlined in the cell immediately below. The Housing Plan includes goals, policies, and programs to detail how Redwood City proposes to respond to the factors contributing to the fair housing challenges identified in this analysis.</p> <p>High Priority</p> <p>High priority items will be prioritized for more near-term investments and City policy changes. High priority contributing factors include:</p> <ol style="list-style-type: none">1. Historical Discrimination2. Housing Cost Burden and Overcrowding- are disproportionately high for Hispanic households3. Expiring Affordability Covenants

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	<p><u>In order to address these high priority contributing factors, the City is focused on policies that do the following:</u></p> <ul style="list-style-type: none">• <u>Expand homeownership opportunities, especially for racial and ethnic groups with the largest homeownership gaps</u>• <u>Reduce homeownership gaps</u>• <u>Expand affordable housing opportunities for both rental and ownership</u>• <u>Reduce cost burden by increasing the number of affordable homes and affirmatively marketed to Hispanic households</u>• <u>Extend affordability covenants to mitigate displacement of low- and moderate-income households</u> <p><u><i>Moderate Priority</i></u></p> <p><u>Moderate Priority items are generally issues of concern but where conditions are nuanced. In particular, in Redwood City, concentrations of nonwhite residents occur in Downtown and Central Redwood City. However, this area has the best access to employment opportunities, transit, and is the location with the most potential for increasing housing production. Items of concern arise if environmental justice conditions occur, and priorities should be tailored to have that focus.</u></p> <p><u>Contributing factors that will receive moderate priority:</u></p> <p class="list-item-l1">4. <u>Placement of Housing - Placement of affordable housing in central Redwood City and historical segregation in the region that has led to concentrations of Black and Hispanic residents</u></p> <p><u><i>Low Priority</i></u></p> <p><u>Low priority items remain issues of concern, but over which the City has limited power to address directly. Items in the high priority and moderate priority categories are intended to address these items as well, although indirectly.</u></p> <p><u>Contributing factors that are difficult for the City to influence or change which are Low Priority include:</u></p> <p class="list-item-l1">5. <u>Mortgage Disparities – high mortgage denial rates for American Indian and Hispanic households</u></p> <p class="list-item-l1">6. <u>Poverty - High poverty rate for Black and Hispanic residents</u></p> <p class="list-item-l1">7. <u>Wage Disparities – lower wage jobs are occupied by Black and Hispanic residents</u></p> <p class="list-item-l1">8. <u>Unemployment - Higher unemployment rate for persons with disabilities</u></p>
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	<p><u>This Low prioritization in no way suggests that these issues should go unaddressed; this is largely an acknowledgement of the limited power within the City to effect change in this area.</u></p>										
<p>Goals, Priorities, Metrics, and Milestones: The element must be revised to add or modify goals and actions based on the outcomes of a complete analysis.</p> <p>Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends.</p> <p>Actions must have specific commitment, metrics, milestones and geographic targeting and must address housing mobility enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for community preservation and revitalization and displacement protection.</p>	<p>Goals and actions have been revised to more specifically respond to the AFFH analysis and prioritized contributing factors. Specific commitments, metrics, milestones, and geographic targeting is now included. See p. H-51 to H-55 of the Goals and Policies Chapter.</p> <p> Program H6-5: EJ Focus Affirmatively Furthering Fair Housing. Federal and State fair housing laws prohibit discrimination in home sales, financing, and rentals based on race, color, religion, sex, or national origin. Redwood City supports and promotes a diverse community of unique neighborhoods where all residents are included and valued, no group is privileged above any other group, and all have opportunity to live in neighborhoods of their choosing. The City has identified the following objectives/meaningful actions to implement:</p> <table border="1"> <thead> <tr> <th>Identified Fair Housing Issue</th> <th>Contributing Factors</th> <th>Priority Level</th> <th>Meaningful Actions</th> <th>Targets and Timeframe</th> </tr> </thead> <tbody> <tr> <td>Disproportionate housing needs among households of color, especially Black or African American and Hispanic households</td> <td>Historical actions that limited economic opportunity and homeownership; limited affordable housing; regional lack of affordable housing supply; high housing costs relative to wages</td> <td>High</td> <td> <p>Increase the supply of affordable housing through Implementing Programs:</p> <ul style="list-style-type: none"> • Program H1-4: Densities in High Opportunity Areas. • Program H2-4: Affordable Housing Development/Inclusionary Housing • Program H2-5: First-Time Homebuyer Opportunities • Program H2-8: Acquisition and Rehabilitation of Existing Housing • Program H4-3: Middle Housing Development • Program H4-5: SB-9 Zoning and Subdivision Ordinance Amendments • Program H5-1: Equity and Outreach Plan • Program H5-3: Affirmative Marketing of Accessible and Affordable Housing Units • Program H6-1: Anti-Displacement Strategy </td> <td> <p><u>Increase the supply of affordable housing through Implementing Programs:</u></p> <p><u>Program H1-4: Densities</u> <u>Choice and Affordability in High Opportunity Areas</u> :-</p> <ul style="list-style-type: none"> — Program H2-4: Affordable Housing Development/Inclusionary Housing — Program H2-5: First-Time Homebuyer Opportunities — Program H2-8: Acquisition and Rehabilitation of Existing Housing — Program H4-3: Middle Housing Development — Program H4-5: SB-9 Zoning and Subdivision Ordinance Amendments — Program H5-1: Equity and Outreach Plan — Program H5-3: Affirmative Marketing of Accessible and Affordable Housing Units — Program H6-1: Anti-Displacement Strategy </td></tr> </tbody> </table>	Identified Fair Housing Issue	Contributing Factors	Priority Level	Meaningful Actions	Targets and Timeframe	Disproportionate housing needs among households of color, especially Black or African American and Hispanic households	Historical actions that limited economic opportunity and homeownership; limited affordable housing; regional lack of affordable housing supply; high housing costs relative to wages	High	<p>Increase the supply of affordable housing through Implementing Programs:</p> <ul style="list-style-type: none"> • Program H1-4: Densities in High Opportunity Areas. • Program H2-4: Affordable Housing Development/Inclusionary Housing • Program H2-5: First-Time Homebuyer Opportunities • Program H2-8: Acquisition and Rehabilitation of Existing Housing • Program H4-3: Middle Housing Development • Program H4-5: SB-9 Zoning and Subdivision Ordinance Amendments • Program H5-1: Equity and Outreach Plan • Program H5-3: Affirmative Marketing of Accessible and Affordable Housing Units • Program H6-1: Anti-Displacement Strategy 	<p><u>Increase the supply of affordable housing through Implementing Programs:</u></p> <p><u>Program H1-4: Densities</u> <u>Choice and Affordability in High Opportunity Areas</u> :-</p> <ul style="list-style-type: none"> — Program H2-4: Affordable Housing Development/Inclusionary Housing — Program H2-5: First-Time Homebuyer Opportunities — Program H2-8: Acquisition and Rehabilitation of Existing Housing — Program H4-3: Middle Housing Development — Program H4-5: SB-9 Zoning and Subdivision Ordinance Amendments — Program H5-1: Equity and Outreach Plan — Program H5-3: Affirmative Marketing of Accessible and Affordable Housing Units — Program H6-1: Anti-Displacement Strategy
Identified Fair Housing Issue	Contributing Factors	Priority Level	Meaningful Actions	Targets and Timeframe							
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	<ul style="list-style-type: none"> • Program H4-3: Middle Housing Development • Program H4-5: SB 9 Zoning and Subdivision Ordinance Amendments • Program H5-1: Equity and Outreach Plan • Program H5-2: Consult with Public Agencies • Program H5-3: Affirmative Marketing of Accessible and Affordable Housing Units • Program H6-1: Anti-Displacement Strategy <p>Action Outcomes: Increased public and private investment in low and moderate resource areas and neighborhoods with higher percentages of special needs groups. Through implementation of the City's SB 9 and ADU ordinances, the City seeks to increase affordable housing in high resource single-family districts. The City will seek to collect rental rate information on SB 9 units and ADUs through its permitting process.</p> <ul style="list-style-type: none"> • <u>(from Program H1-4): Study changes to R-1 and/or RH neighborhoods that could increase the density allowed (beyond SB 9 requirements), such as including additional density for corner lots. Complete community engagement and technical study by December 2026; hold hearing with City Council regarding study recommendations by December 2026.</u> • <u>(from Program H2-5): Continue implementing the Affordable Housing Ordinance including below-market-rate (BMR) requirements for ownership development; Continue to provide homeownership assistance to eligible first-time homebuyers at Wyndham Place; Continue to advertise available homeownership financing opportunities with San Mateo County, such as HEART and MCC; Hold a hearing with the City Council regarding Municipal Code amendments to allow smaller subdivisions (fewer than five units per project) in existing neighborhoods to facilitate homeownership opportunities; Proactively contact owners with expiring affordability covenants annually, starting three years prior to the affordability expiration date; Continue maintaining an affordable housing interest list and promote new affordable housing opportunities to that list, with updates as new opportunities arise.</u> • <u>(from Program H4-3): Complete zoning text amendments to encourage middle housing, including revisions to minimum lot size, lot width, lot frontage, parking requirements, and open space by May 31, 2023; Analyze additional changes to the R-2 through R-5 Zoning Districts to further encourage middle housing, such as establishing</u>
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a minimum density of no less than 75 percent of the maximum allowable density or one dwelling unit, whichever is greater (Phase 2) by December 2026

- (from Program H4-5): Review the City's Zoning Ordinance and Subdivision Ordinance and implement updates as needed to provide clarity and facilitate housing development under SB 9 by May 31, 2023; In coordination with research being conducted at the State level, pursue opportunities to incentivize and provide funding assistance for homeowners to provide affordable units under SB 9 to further housing opportunities and more affordable homeownership options in high opportunity areas.

Housing Mobility Enhancement:

- (from Program 2-4): Continue to provide subsidies, as funds are available, to assist in the development of affordable housing units, acquisition of land for affordable housing construction, and preservation of existing affordable housing; Continue implementing the Affordable Housing Ordinance including below-market-rate (BMR) requirements for rental and ownership development; update the affordable housing impact fee nexus study by 2030.

- (from Program H5-2): Support the San Mateo County Housing Authority's outreach efforts to property owners related to acceptance of Housing Choice Vouchers, including help with outreach to property owners with units in high and moderate opportunity areas; Work with the County to contact landlords of multi-family complexes in moderate and high opportunity areas every two years

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	<p><u>and provide fair housing information and assistance (proactively outreach to public agencies annually)</u></p> <ul style="list-style-type: none">• <u>(from Program H5-3): Annually update list of community service providers to provide to affordable housing developers; on an ongoing basis coordinate with developers of proposed projects in Redwood City to ensure organizations are notified when new affordable housing opportunities become available; perform proactive outreach to those developers during the entitlement and building permit process to ensure developers are conducting appropriate marketing about local affordable and accessible housing units</u> <p><u>Place-Based Strategies for Community Preservation and Revitalization:</u></p> <ul style="list-style-type: none">• <u>(from Program H3-4): Continue to improve access to persons with disabilities through the implementation of the City's ADA Transition Plan (slated for completion citywide by 2052) that includes ADA improvement to streets, sidewalks, and public facilities; Annually seek funding, including annual Capital Improvement Program (CIP) and/or CDBG allocations, to prioritize infrastructure and accessibility improvements in the low resource opportunity areas.</u>• <u>(from Program H5-1): Partner with housing advocates and other community organizations to provide information to hard-to-reach populations on housing topics and city initiatives at least annually</u> <p><u>Displacement Protection:</u></p>

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[and provide fair housing information and assistance \(proactively outreach to public agencies annually\)](#)

- [\(from Program H5-3\): Annually update list of community service providers to provide to affordable housing developers; on an ongoing basis coordinate with developers of proposed projects in Redwood City to ensure organizations are notified when new affordable housing opportunities become available; perform proactive outreach to those developers during the entitlement and building permit process to ensure developers are conducting appropriate marketing about local affordable and accessible housing units](#)

[Place-Based Strategies for Community Preservation and Revitalization:](#)

- [\(from Program H3-4\): Continue to improve access to persons with disabilities through the implementation of the City's ADA Transition Plan \(slated for completion citywide by 2052\) that includes ADA improvement to streets, sidewalks, and public facilities; Annually seek funding, including annual Capital Improvement Program \(CIP\) and/or CDBG allocations, to prioritize infrastructure and accessibility improvements in the low resource opportunity areas.](#)
- [\(from Program H5-1\): Partner with housing advocates and other community organizations to provide information to hard-to-reach populations on housing topics and city initiatives at least annually](#)

[Displacement Protection:](#)

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					<ul style="list-style-type: none"> ● (from Program H2-8): Begin implementing the preservation recommendations from the adopted Anti-Displacement Strategy in 2022, establish a housing preservation fund by December 2023, and start recommendations #3-5 of the Anti-Displacement Strategy in 2023; Engage with nonprofit housing providers regarding the City's interest in establishing partnerships in the acquisition and rehabilitation of for-sale rental properties, with the goal of completing at least one project during the planning period. ● (from Program H6-1): Begin implementing Anti-Displacement Strategy recommendations in 2022; Complete Tenant Protection Ordinance Amendments by December 2024, establish a housing preservation fund by December 2023; Start other ongoing preservation efforts in 2023 including supporting community land trusts (Ongoing), bring proposed amendments for mobile home park rezoning to City Council for hearing in conjunction with the Housing Element (by May 31, 2023)
	Concentrations of Black or African American and Hispanic residents in low resource areas	Concentration of affordable housing and housing density in central areas of the city with low environmental health and high social	Moderate	Add affordable housing in moderate to high resource areas and address contributing factors through Implementing Programs: <ul style="list-style-type: none"> ● Program H1-4: Densities in High Opportunity Areas ● Program H1-5: Accessory Dwelling Units 	<p>Add affordable housing in moderate to high resource areas Choice and address contributing factors through Implementing Programs:</p> <p>Program H1-4: Densities <u>Affordability</u> in High Opportunity Areas:</p> <ul style="list-style-type: none"> — Program H1-5: Accessory Dwelling Units — Program H2-4: Affordable Housing Development/Inclusionary Housing — Program H2-5: First-Time Homebuyer Opportunities — Program H4-3: Middle Housing Development

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		vulnerability; lack of affordable housing in higher resourced neighborhoods.	<ul style="list-style-type: none"> • Program H2-4: Affordable Housing Development/Inclusionary Housing • Program H2-5: First-Time Homebuyer Opportunities • Program H4-3: Middle Housing Development • Program H4-5: SB 9 Zoning and Subdivision Ordinance Amendments • Program H5-2: Consult with Public Agencies • Program H5-3: Affirmative Marketing of Accessible and Affordable Housing Units <p>Action Outcomes: An increased variety of housing options available to Redwood City residents throughout the city, including areas that have in the recent past only allowed single-family (largely ownership) housing. Provide adequate sites for over 1,800 very low-income households, over 1,300 low-income households, over 1,700 moderate-income households, and over 1,600 above moderate income households, exceeding</p>	<p>— Program H4-5: SB 9 Zoning and Subdivision Ordinance Amendments</p> <p>• Program H5-3: Affirmative Marketing of Accessible and Affordable Housing Units (from Program H1-4): Study changes to R-1 and/or RH neighborhoods that could increase the density allowed (beyond SB 9 requirements), such as including additional density for corner lots. Complete community engagement and technical study by December 2026; hold hearing with City Council regarding study recommendations by December 2026.</p> <p>• (from Program H1-5): Continue to offer pre-approved plans, which support streamlining the permit review process and flat fees for building permits for ADUs; Promote additional pre-approved plans on the City's website; Provide homeowner/ applicant assistant tools by including and promoting State funding resources including the CalHFA ADU grant program and Casita Coalition financing guide on the City's website, and by promoting home sharing programs to connect ADU owners and renters, and offering counseling with a City staff-ADU specialist; Explore and pursue funding options to support ADU construction for lower-income homeowners; Continue to provide square footage bonuses for ADA accessible ADUs; Analyze the feasibility of eliminating or reducing permit fees or development impact fees for ADA-accessible ADUs that exceed the minimum square footage thresholds for fee waivers (If biannual monitoring shows that ADU production is falling below the Housing Element projections, then within one year implement appropriate action to increase production.)</p>
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the City's RHNA requirements by more than 150%.

- [\(from Program 2-4\): Continue to provide subsidies, as funds are available, to assist in the development of affordable housing units, acquisition of land for affordable housing construction, and preservation of existing affordable housing; Continue implementing the Affordable Housing Ordinance including below-market-rate \(BMR\) requirements for rental and ownership development; update the affordable housing impact fee nexus study by 2030.](#)
- [\(from Program H2-5\): Continue implementing the Affordable Housing Ordinance including below-market-rate \(BMR\) requirements for ownership development; Continue to provide homeownership assistance to eligible first-time homebuyers at Wyndham Place; Continue to advertise available homeownership financing opportunities with San Mateo County, such as HEART and MCC; Hold a hearing with the City Council regarding Municipal Code amendments to allow smaller subdivisions \(fewer than five units per project\) in existing neighborhoods to facilitate homeownership opportunities; Proactively contact owners with expiring affordability covenants annually, starting three years prior to the affordability expiration date; Continue maintaining an affordable housing interest list and promote new affordable housing opportunities to that list, with updates as new opportunities arise.](#)
- [\(from Program H4-3\): Complete zoning text amendments to encourage middle housing, including revisions to minimum lot size, lot width, lot frontage, parking requirements, and open space by May 31, 2023; Analyze](#)

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additional changes to the R-2 through R-5 Zoning Districts to further encourage middle housing, such as establishing a minimum density of no less than 75 percent of the maximum allowable density or one dwelling unit, whichever is greater (Phase 2) by December 2026

- (from Program H4-5): Review the City's Zoning Ordinance and Subdivision Ordinance and implement updates as needed to provide clarity and facilitate housing development under SB 9 by May 31, 2023; In coordination with research being conducted at the State level, pursue opportunities to incentivize and provide funding assistance for homeowners to provide affordable units under SB 9 to further housing opportunities and more affordable homeownership options in high opportunity areas.

Housing Mobility Enhancement:

- (from Program H5-2): Support the San Mateo County Housing Authority's outreach efforts to property owners related to acceptance of Housing Choice Vouchers, including help with outreach to property owners with units in high and moderate opportunity areas; Work with the County to contact landlords of multi-family complexes in moderate and high opportunity areas every two years and provide fair housing information and assistance (proactively outreach to public agencies annually)
- (from Program H5-3): Annually update list of community service providers to provide to affordable housing developers; on an ongoing basis coordinate with developers of proposed projects in Redwood City to ensure organizations are notified when new affordable

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					<u>housing opportunities become available; perform proactive outreach to those developers during the entitlement and building permit process to ensure developers are conducting appropriate marketing about local affordable and accessible housing units</u>
	Concentrations of Black or African American and Hispanic residents in environmental hazard areas	Housing density most supported and appropriate among transportation nodes; residents resistant to added density in single family detached neighborhoods.	Moderate	Reduce environmental hazards and implement environmental justice measures adopted into the General Plan in <u>2022-2023</u> . <u>Implement the Redwood City Equity Plan's Equity Lens, Geographic Equity Index, and Equity Review policies</u> . Provide additional housing opportunities in low environmental hazard areas through Implementing Programs: <ul style="list-style-type: none"> • Program H1-4: Densities in High Opportunity Areas • Program H1-5: Accessory Dwelling Units • Program H1-6: Densities in Mixed Use Zoning Districts • Program H2-4: Affordable Housing Development/ Inclusionary Housing • Program H2-5: First-Time Homebuyer Opportunities 	<p><u>Place-Based Strategies for Community Preservation and Revitalization:</u></p> <ul style="list-style-type: none"> • <u>Reduce environmental hazards and implement environmental justice and air quality measures adopted into the General Plan in 2023, including the prioritization of funding for parks and recreational facilities, pedestrian and bicycle infrastructure, and outreach in environmental justice communities.</u> • <u>Implement the Redwood City Equity Plan. The City has committed to apply an Equity Lens to the implementation of projects, programs, and decisions, weighing burdens and benefits of affected parties, engagement of those most impacted by inequities, and considering potential unintended consequences. The City also commits to considering the Geographic Equity Index as part of identifying potential benefits and burdens, as well as to identify communities in which to focus engagement efforts. The City also committed to an Equity Review of City Policies, including best practices such as inclusive hiring, inclusive sourcing or procurement, and economic mobility/financial empowerment.</u> • <u>(from Program H3-4): Continue to improve access to persons with disabilities through the implementation of the City's ADA Transition Plan (slated for completion citywide by 2052) that includes ADA improvement to</u>

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			<ul style="list-style-type: none"> • Program H3-4: Public Investment in Infrastructure and Accessibility • Program H5-1: Equity and Outreach Plan • Program H4-3: Middle Housing Development • Program H4-5: SB 9 Zoning and Subdivision Ordinance Amendments <p>Action Outcomes: The City is taking an active role to curb displacement of current lower-income residents while also supporting new development where it makes sense, near transit, services, and jobs and in High Resource areas. The City's Anti-Displacement Strategy has established policies to preserving existing affordable housing. In addition, through the City's Equity Plan and proposed environmental justice policies in the General Plan, the City has identified Equity Lens, Geographic Equity Index, and Equity Review policies to improve environmental conditions, and support the</p> <ul style="list-style-type: none"> streets, sidewalks, and public facilities; Annually seek funding, including annual Capital Improvement Program (CIP) and/or CDBG allocations, to prioritize infrastructure and accessibility improvements in the low resource opportunity areas. (from Program H5-1): Partner with housing advocates and other community organizations to provide information to hard-to-reach populations on housing topics and city initiatives at least annually <p>Choice and Affordability in High Opportunity Areas (and Low Environmental Risk Areas):</p> <ul style="list-style-type: none"> (from Program H1-4): Study changes to R-1 and/or RH neighborhoods that could increase the density allowed (beyond SB 9 requirements), such as including additional density for corner lots. Complete community engagement and technical study by December 2026; hold hearing with City Council regarding study recommendations by December 2026. (from Program H1-5): Continue to offer pre-approved plans, which support streamlining the permit review process and flat fees for building permits for ADUs; Promote additional pre-approved plans on the City's website; Provide homeowner/ applicant assistant tools by including and promoting State funding resources including the CalHFA ADU grant program and Casita Coalition financing guide on the City's website, and by promoting home sharing programs to connect ADU owners and renters, and offering counseling with a City staff-ADU specialist; Explore and pursue funding options to support ADU construction for lower-income homeowners;
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[needs of lower income residents in environmental justice areas.](#)

[Continue to provide square footage bonuses for ADA accessible ADUs; Analyze the feasibility of eliminating or reducing permit fees or development impact fees for ADA-accessible ADUs that exceed the minimum square footage thresholds for fee waivers \(If biannual monitoring shows that ADU production is falling below the Housing Element projections, then within one year implement appropriate action to increase production.\)](#)

- [• \(from Program H1-6\): Complete a zoning text amendment to increase densities by 20 du/ac in the mixed use zoning districts by May 31, 2023](#)
- [• \(from Program H4-3\): Complete zoning text amendments to encourage middle housing, including revisions to minimum lot size, lot width, lot frontage, parking requirements, and open space by May 31, 2023; Analyze additional changes to the R-2 through R-5 Zoning Districts to further encourage middle housing, such as establishing a minimum density of no less than 75 percent of the maximum allowable density or one dwelling unit, whichever is greater \(Phase 2\) by December 2026](#)
- [• \(from Program H4-5\): Review the City's Zoning Ordinance and Subdivision Ordinance and implement updates as needed to provide clarity and facilitate housing development under SB 9 by May 31, 2023; In coordination with research being conducted at the State level, pursue opportunities to incentivize and provide funding assistance for homeowners to provide affordable units under SB 9 to further housing opportunities and more affordable homeownership options in high opportunity areas.](#)

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					Housing Mobility Enhancement: <ul style="list-style-type: none"> • (from Program 2-4): Continue to provide subsidies, as funds are available, to assist in the development of affordable housing units, acquisition of land for affordable housing construction, and preservation of existing affordable housing; Continue implementing the Affordable Housing Ordinance including below-market-rate (BMR) requirements for rental and ownership development; update the affordable housing impact fee nexus study by 2030. • (from Program H5-2): Support the San Mateo County Housing Authority's outreach efforts to property owners related to acceptance of Housing Choice Vouchers, including help with outreach to property owners with units in high and moderate opportunity areas; Work with the County to contact landlords of multi-family complexes in moderate and high opportunity areas every two years and provide fair housing information and assistance (proactively outreach to public agencies annually)
	Loss of affordable housing; Displacement of residents	Limited affordable housing; regional lack of affordable housing supply; high housing costs relative to wages	High	Support anti-displacement efforts and retention of affordable housing through Implementing Programs that protect residents from displacement and create more affordable housing to address lack of supply and high costs:	Displacement Protection: <ul style="list-style-type: none"> • (from Program H1-3): The City shall not approve a housing development project that will require the demolition of residential dwelling units regardless of whether the parcel was listed in the inventory unless a) the project will create at least as many residential dwelling units as will be demolished, and b) certain affordability criteria are met.

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			<ul style="list-style-type: none"> • Program H1-3: Replacement Unit Requirements • Program H2-3: Preservation of At-Risk, Affordable Housing • Program H2-4: Affordable Housing Development/ Inclusionary Housing • Program H2-5: First-Time Homebuyer Opportunities • Program H2-8: Acquisition and Rehabilitation of Existing Housing <ul style="list-style-type: none"> — Program H2-4: Affordable Housing Development/Inclusionary Housing — Program H2-5: First-Time Homebuyer Opportunities • Program H3-3: Housing Options for Special Needs and Extremely-Low Income Households • Program H5-1: Equity and Outreach Plan • Program H5-3: Affirmative Marketing of Accessible and Affordable Housing Units • Program H6-1: Anti-Displacement Strategy 	<ul style="list-style-type: none"> • (from Program H2-3): Continue to work with non-profit organizations to preserve existing affordable housing in the City; As needed, support funding applications to preserve at-risk units; Conduct proactive outreach to owners of housing with expiring affordability covenants annually, starting three years prior to the affordability expiration date. • (from Program H2-8): Begin implementing the preservation recommendations from the adopted Anti-Displacement Strategy in 2022, establish a housing preservation fund by December 2023, and start recommendations #3-5 of the Anti-Displacement Strategy in 2023; Engage with nonprofit housing providers regarding the City's interest in establishing partnerships in the acquisition and rehabilitation of for-sale rental properties, with the goal of completing at least one project during the planning period. • (from Program H6-1): Begin implementing Anti-Displacement Strategy recommendations in 2022; Complete Tenant Protection Ordinance Amendments by December 2024, establish a housing preservation fund by December 2023; Start other ongoing preservation efforts in 2023 including supporting community land trusts (Ongoing), bring proposed amendments for mobile home park rezoning to City Council for hearing in conjunction with the Housing Element (by May 31, 2023) • (from Program H6-4): Continue to provide funding assistance to very-low income households in need of help with their water and sewer bills in order to reduce
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<ul style="list-style-type: none">Program H6-4: Water and Sewer Rate Assistance Program Action Outcomes: Strategic tenant protection policy recommendations will slow the pace and mitigate the impacts of displacement, and development of partnerships and strategies will preserve unsubsidized affordable housing (non-deed restricted). The Anti-Displacement Strategy provides a framework to meaningfully address displacement and serve the City's most vulnerable residents.	<p>displacement risk of very low-income households due to utility costs.</p> <p>Place-Based Strategies for Community Preservation and Revitalization:</p> <ul style="list-style-type: none">(from Program H5-1): Partner with housing advocates and other community organizations to provide information to hard-to-reach populations on housing topics and city initiatives at least annually <p>Housing Mobility Enhancement:</p> <ul style="list-style-type: none">(from Program 2-4): Continue to provide subsidies, as funds are available, to assist in the development of affordable housing units, acquisition of land for affordable housing construction, and preservation of existing affordable housing; Continue implementing the Affordable Housing Ordinance including below-market-rate (BMR) requirements for rental and ownership development; update the affordable housing impact fee nexus study by 2030.(from Program H5-2): Support the San Mateo County Housing Authority's outreach efforts to property owners related to acceptance of Housing Choice Vouchers, including help with outreach to property owners with units in high and moderate opportunity areas; Work with the County to contact landlords of multi-family complexes in moderate and high opportunity areas every two years and provide fair housing information and assistance (proactively outreach to public agencies annually)
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				<ul style="list-style-type: none"> • <u>(from Program 3-3): By December 2024, conduct Zoning Ordinance amendments to allow supportive housing consistent with AB 2162, explicitly allow housing targeted to extremely low-income households, including SROs and group homes for these income groups, to allow low-barrier navigation centers in the CG-R zoning district, DTPP, and North Main Precise Plan, and prioritize funding to assist extremely low-income housing development.</u> • <u>(from Program H5-3): Annually update list of community service providers to provide to affordable housing developers; on an ongoing basis coordinate with developers of proposed projects in Redwood City to ensure organizations are notified when new affordable housing opportunities become available; perform proactive outreach to those developers during the entitlement and building permit process to ensure developers are conducting appropriate marketing about local affordable and accessible housing units</u>
<p><i>2. Include an analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition. (Gov. Code, § 65583, subd. (a)(2).)</i></p>				
Overcrowding: The element should include the rate of severe overcrowding, as well as analyze and address the need of overcrowded households.	<p>The following has been added discussing the rate of severe overcrowding and analyzes and addresses the needs of overcrowded households on p.H1-8 to H1-9 in the TBR Needs Assessment Chapter:</p> <p>Overcrowding occurs when the relatively high cost of housing either forces a household to double-up with another household or live in a smaller housing unit to afford food and other basic needs. <u>The current housing crisis resulting from an inventory shortage and high costs of housing also necessitates many families or individuals to share housing arrangements, leading to potential overcrowding.</u> According to both California and federal</p>			

	<p>standards, a housing unit is considered overcrowded if it is occupied by more than one person per room (excluding kitchens, bathrooms, and halls). A standard of one person per room considers occupancy of the rooms that are generally not intended to be used as sleeping quarters, including living rooms and otherwise common areas.</p> <p>In Redwood City, nine percent of housing units are overcrowded. Overcrowding is more prevalent in rental households than owner households and among very low-income households. Redwood City experiences slightly more overcrowding than San Mateo County at large, where eight percent of households are overcrowded. The Census Bureau considers units with more than 1.5 occupants per room to be severely overcrowded. More than half of the overcrowded units are considered severely overcrowded (51 percent; 1,407 of the 2,762 overcrowded units). Severe overcrowding is more likely to be experienced by renter households than it is for homeowner households. Overcrowding also disproportionately impacts low-income households:</p> <ul style="list-style-type: none"> • 0%-30% of AMI: 8.7% overcrowded and 9.8% severely overcrowded • 31%-50% of AMI: 10.7% overcrowded and 9.5% severely overcrowded • 51%-80% of AMI: 6.2% overcrowded and 5.4% severely overcrowded • 81%-100% of AMI: 3.9% overcrowded and 2.7% severely overcrowded • Greater than 100% of AMI: 2.4% overcrowded and 0.7% severely overcrowded <p>Overcrowding is more likely to affect Hispanic/Latinx and residents that identify as “other race” or multiple races (combined these two groups comprise 59 percent of overcrowded households but only 42 percent of the total population in the City). The desire for multi-generational living or living with extended family members can also create overcrowded conditions due to a lack of affordable larger units within the City. Multi-generational living tends to be most common in Hispanic and Asian cultures, indicating that it may be a contributing factor in higher rates of overcrowding for these groups. Coupled with lower income levels, constraints related to immigration status, and discrimination can also make it difficult for multi-generational households to find appropriately sized, affordable housing.</p> <p>The City is responding to the rates of overcrowding through significant efforts to remove constraints to housing production and by increasing the capacity for new housing throughout the City, including identifying sites to meet 150 percent of the Regional Housing Needs Allocation (RHNA), efforts to rezone Commercial Office parcels to Mixed Use Corridor (Program H2-6), increasing densities and building heights in existing Mixed Use zoning districts (Program H1-6), removing the residential cap in Downtown (Program H1-7), and increasing the ability for middle housing (duplexes, triplexes and small apartments) to be built in established multifamily residential zoning districts (Program H4-3).</p>
Housing Conditions: The element must include an analysis of the condition of the existing housing	The following has been added analyzing the condition of existing housing stock and the estimated number of units in need of rehabilitation and replacement based on information from Code Enforcement staff:

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stock and estimate the number of units in need of rehabilitation and replacement.	The age and condition of Redwood City's housing stock is an indicator of potential rehabilitation needs. Commonly, housing over 30 years of age needs some form of major rehabilitation, such as a new roof, foundation work, plumbing, etc. The housing stock in the City is aging, since a majority of the housing stock was built between 1940 and 1980 (61 percent). Only 30 percent of the City's housing stock has been built since 1980.
For example, the analysis could include estimates from a recent windshield survey or sampling, estimates from the code enforcement agency, or information from knowledgeable builders/developers, including non-profit housing developers or organizations.	<p><u>On average</u>, Code Enforcement staff inspects <u>approximately 35</u> five to 10 residential properties per year. <u>Of these, Code Enforcement staff estimate</u> that five to 10 (14 to 29 percent) of these are <u>could be</u> considered substandard <u>each year</u>; staff then works with property owners to bring units up to Code and address substandard housing issues. All such issues were resolved in recent years, <u>so no ongoing substandard housing conditions exist beyond those estimated by the Census</u>. The Census identifies units with substandard housing issues based on kitchen and plumbing issues. <u>Very few households are impacted by a lack of complete plumbing or kitchen facilities</u>. In 2019, one percent of units lacked complete kitchen facilities and one percent of units lacked plumbing facilities. Substandard housing issues are <u>slightly</u> more prevalent in renter-occupied units; 1.2 percent of rental units lack complete kitchen facilities compared to only 0.3 percent of owner-occupied units. Likewise, 0.6 percent of renter-occupied units lacked plumbing facilities compared to 0.4 percent of owner-occupied units.</p> <p>Redwood City residents with housing issues are referred to the City's Housing Division, which facilitates applications for minor home repair grants and grants to provide accessibility modifications for disabled residents.</p>
<p><i>3. An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)</i></p>	<p>Progress in Meeting the Regional Housing Need Allocation (RHNA): The element lists various approved and proposed projects by affordability.</p> <p>But in some cases, the element must still discuss how affordability was determined based on actual or anticipated sales prices and rents or other mechanisms ensuring</p> <p>More information has been regarding how affordability was determined for approved and proposed projects in the TBR Housing Resources Chapter.</p> <p>For approved projects, a footnote has been added to Table H3-2 on p. H3-3 stating all below market rate units are deed-restricted.</p>

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affordability (e.g., deed-restrictions, inclusionary requirements).

Namely, the element should include additional affordability information for 1601 El Camino, 1057 El Camino Real, 901 El Camino Real, 1900 Broadway and 2300 Broadway. In addition, the element lists several projects utilizing the “Gatekeeper” process. Given the pending complexity of entitlements potentially associated with these projects, the element should include discussion of their availability in the planning period such as an anticipated schedule for development.

Lastly, the element should modify Program H1-1 to monitor approved and proposed projects and commit to alternative actions within a reasonable time (e.g., within one year) of projects are not moving toward completion as anticipated.

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Table H3-2: Approved Projects

Project	Project Status	Extremely/ Very Low- Income (0-50% AMI)	Low- Income (50-80% AMI)	Moderate- Income (80-120% AMI)	Above Moderate- Income (+120%)	Total
31 Center St	Under Construction	-	-	-	7	7
150 Charter Street	Approved	-	-	11	61	72
239 Vera Ave	Under Construction	-	-	-	5	5
353 Main St*	Under Construction	63	61	-	1	125
955 Woodside Rd Townhomes	Approved	-	-	-	8	8
1401 Broadway St & 2201 Bay Rd “Broadway Plaza”*	Approved	24	95	-	399	518
1548 Maple Street	Approved	-	-	-	131	131
1601 El Camino “Elco Yards formerly South Main Mixed-Use”*	Under Construction	39	67	41	393	540
Approved Projects Total		126	223	52	1,005	1,406

**Note: All below market rate units indicated in the table are deed restricted.*

Significant information has been added for proposed projects discussing affordability and availability of these projects during the planning period on p. H3-5 to H3-12:

As of ~~December 2021~~August 2022, the City is in the process of reviewing applications and preliminary plans for ~~2,970~~078 new units in Redwood City (Table H3-3). Some proposed projects have a straight-forward review process; others have a review process that is more complicated due to the fact that ~~the commercial portions of the~~ proposed mixed-use project may not be compliant with either the existing zoning or provisions of the General Plan.

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Projects that have been proposed and where an applicant has submitted either a pre-application or a formal application are described in more detail below, [and are identified as sites to meet the RHNA](#). In addition to projects that are proposed and being processed independently, certain projects have been consolidated to be reviewed comprehensively by the City Council through the "Gatekeeper" process, described in more detail below.

[Sites identified with proposed projects have a high likelihood of redevelopment with housing within the planning period, given the existing level of property owner and developer interest. All of these projects have committed significant time and resources into developing applications for entitlement, including architectural plans. Proposed projects listed in Table H3-34 are still in review with the City. City staff is coordinating with applicants for additional information or corrections on submitted plans. Affordability levels on these sites was determined based on proposed/anticipated sales prices and rents, which will be coupled with deed restrictions, in compliance with the City's inclusionary housing requirements.](#)

Table H3-3: Proposed Projects

Project	Project Status	Application Submitted Date	Extremely/Very Low-Income (0-50% AMI)	Low-Income (50-80% AMI)	Moderate-Income (80-120% AMI)	Above Moderate-Income (+120%)	Total
Proposed Projects (Non-Gatekeeper)							
35-51 Renato Court	Proposed	December 2021	-	-	—	13	13
77 Birch St Townhomes	Proposed	Aug 31, 2020	-	-	—	9	9
557 E. Bayshore Rd "Syufy Site"	Proposed	Oct 23, 2015	21	21	43	395	480
590 Veterans Blvd /91 Winslow St	Proposed	December 2021	5	5	9	76	95

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	847 Woodside Rd	Proposed	<u>Aug 7, 2020</u>	-	<u>2</u>	6	38	44
	1057 El Camino Real "Sequoia Station"	Proposed	<u>May 25, 2021</u>	102	130	22	377	631
	1125 Arguello St "Arguello Street Mixed-Use"	Proposed	<u>Nov 16, 2020</u>	6	15	12	-	33
	1201 Main St "1201 Main St Mixed Use"	Proposed	<u>Oct 18, 2021</u>	1	<u>1-</u>	2	<u>245</u>	28
	1330 El Camino Real "Redwood City Discovery"	Proposed	<u>May 11, 2021</u>	7	6	13	104	130
	1818 El Camino Real "Comfort Inn"	Proposed	<u>County review process</u>	26	25	-	-	51
	2336 El Camino Real "Redwood Square"	Proposed	<u>-Dec 4, 2020</u>	-	-	<u>2</u>	16	16
	<u>1304 Middlefield</u>	<u>Proposed</u>	<u>July 25, 2022</u>	<u>2</u>	<u>93</u>	<u>2</u>	<u>2</u>	<u>93</u>
	Subtotal:		168	296	107	1,052	1,623	
	Proposed Projects (Gatekeeper)							
	651 El Camino Real "American Legion"	Proposed	<u>Apr 12, 2021</u>	5	5	10	79	99
	750 Bradford St "Bradford / RCSD"**	Proposed	<u>May 25, 2021</u>	<u>4-5</u>	<u>46</u>	<u>810</u>	<u>- 71</u> <u>81</u>	<u>87</u> <u>102</u>
	901 El Camino Real/ 920 Shasta St	Proposed	<u>Mar 30, 2021</u>	48	51	1	-	100
	1900 Broadway St	Proposed	<u>Nov 12, 2021</u>	<u>35-</u>	<u>3570</u>	1	-	71

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<i>2300 Broadway St "Chase Bank"/609 Price Ave</i>	Proposed	<u>Jan 12, 2021</u>	32	49	2	-	83
		Subtotal:	<u>90</u>	<u>181</u>	<u>24</u>	<u>160</u>	<u>455</u>
		<i>Proposed Projects Total</i>	<u>258</u>	<u>477</u>	<u>131</u>	<u>1,212</u>	<u>2,078</u>

** Note: Designated as teacher and workforce housing. The applicant has provided the City with a draft affordable housing plan.*

Proposed Projects (Non-Gatekeeper)

35-51 Renato Court

This project, located on two adjacent parcels totaling 0.57 acres, is currently zoned Professional Office (PO); however, the General Plan designation is High Density Residential (HDR). The City initiated a zone change to achieve consistency between the General Plan and zoning, which is proposed in conjunction with the Housing Element. The parcel will be rezoned R-4-O (Environmental review for this zone change will occur as part of the Housing Element “project” analyzed for CEQA purposes). An application was initiated in December 2021 by the property owner for this project and is ~~current~~currently (as of early 2022) under review with the City. The applicant is proposing 13 market-rate units. [This proposed project indicates developer and property owner interest; this site is likely to redevelop within the planning period.](#)

77 Birch St Townhomes

The townhome project at 77 Birch (0.38 acres) would provide nine for-sale, market-rate units within the R-5-O zoning district. The application was deemed incomplete; additional information is needed from the applicant. This project would replace an existing medical office building. [This proposed project indicates developer and property owner interest; this site is likely to redevelop within the planning period.](#)

557 E. Bayshore Rd “Syufy Site”

The Syufy project proposes to redevelop ~~a former~~a former movie theater site, which has been vacant for many years (14.6 acres), with a 480-unit multi-family development and 97,101 square foot sport club. Consistent with the City’s inclusionary housing requirements, 85 affordable units would be provided to very low-, low-, and moderate-income households. [\(21 very low-, 21 low-, and 43 moderate-income units, all deed restricted to ensure long-term affordability consistent with the City’s inclusionary housing requirements\)](#). While the zoning for the site is General Commercial (CG zoning district), half of the parcel has a General Plan designation of Mixed-Use Waterfront and would be permitted to develop with residential uses within that portion of the site. The project as proposed is requesting a zoning change on the CG-zoned parcel to Mixed-Use Waterfront to be consistent with the General Plan and produce a more cohesive site plan. The application has been deemed complete and is in the environmental review phase, with estimated

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completion prior to Housing Element adoption. [This proposed project indicates developer and property owner interest; this site is likely to redevelop within the planning period.](#)



590 Veterans/91 Winslow

590 Veterans Blvd /91 Winslow St Apartments

Comprised of two parcels, one zoned Mixed Use – Veterans Boulevard (MU-VB) and one zoned Mixed Use – Transitional (MU-T), together totaling 1.2 acres, the Veterans + Winslow project proposes 95 rental units at a density of 79 units per acre. Currently, 590 Veterans Boulevard contains a retail building, and 91 Winslow contains a vacant one-story building. While the application has not yet determined the affordability of units, consistent with the City's inclusionary housing requirements, for purposes of the Housing Element it is anticipated that five percent will be affordable to very low-income households, five percent to low-income households, and 10 percent to moderate-income households. [All affordable units will be deed restricted to ensure long-term affordability consistent with the City's inclusionary housing requirements.](#) The application was submitted in December 2021 and is

under review by the Planning Department. [This proposed project indicates developer and property owner interest; this site is likely to redevelop within the planning period.](#)

847 Woodside Road Condominiums

This project, located in the Mixed Use – demolish a one-story cemetery/mortuary on a residential units and 2,500 square feet of percent of the proposed units, would be The application was deemed incomplete; applicant. [This proposed project indicates site is likely to redevelop within the planning](#)



Neighborhood (MU-N) zoning district, would 0.94 acre site, to be replaced with 44 for-sale commercial. Seven units, equivalent to 15 reserved for households of moderate income. additional information is needed from the [developer and property owner interest; this period.](#)

1057 El Camino Real “Sequoia Station”

Sequoia Station is proposed as a transit-oriented, acres) with 631 rental residential units (including 254 affordable units: [102 very low-, 130 low-, and 22 moderate-income units, all of which will be deed restricted to ensure long-term affordability consistent with the City's inclusionary housing requirements](#)), 1,230,000 square feet of office, 166,600 square feet of retail, a 10,000 square foot child care facility, and 86,000 square feet of public open space, generally located between El Camino Real, Jefferson, James, and the Caltrain tracks within the Downtown Precise Plan (DTPP) area. [An application has been submitted to the City and is currently under review. In addition to this application, t](#)The City is currently undertaking a comprehensive planning process for the Transit District, including engaging with the community to define the vision for the district and working with Caltrain to study how a new, elevated station would fit in downtown, where future bus operations would happen and how to get people to and from the transit center without needing to drive. The existing Sequoia Station development will need to be redeveloped to accommodate the addition of more tracks, as proposed by Caltrain. The preliminary concept for the site has been refined with input from the City, to lower the height and increase residential development. Future project revisions will incorporate feedback from the community on benefits and priorities for the site and requirements of the Transit District Plan. The City will consider amendments to the General Plan, Downtown Precise Plan, and the associated environmental review of the Transit District through preparation of a Subsequent EIR (SEIR) to the Redwood City Downtown Precise Plan Final Environmental Impact Report (DTPP Final EIR). The EIR is scheduled to be completed by the end of 2022. [A decision by the City Council regarding the Transit District amendments is anticipated in late 2022. This proposed project indicates developer and property owner interest; this site is likely to redevelop within the planning period.](#)

Mixed Use Project

mixed-use development on six blocks (12

1125 Arguello Street Mixed Use Project

The Arguello Street Mixed Use project is a proposal to demolish existing commercial buildings on-site (office, automobile repair, parking, and storage) and to construct a new four-story (60-foot tall) office building, a four-story (46-foot tall) affordable housing development of 33 condominiums, [\(including 6 very low-, 15 low, and 12 moderate-income units, all of which will be deed restricted to ensure long-term affordability consistent with the](#)

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[City's inclusionary housing requirements](#), and a child care facility for up to 30 children in the Mixed Use – Transitional (MU-T) zoning district. The project contains three designated historic homes within the Mezesville Historic District. One of the structures is proposed to be demolished to allow for the construction of the child care center and the remaining two structures would be utilized as part of the child care center. This for-sale affordable housing development would offer 2-bedroom, 3-bedroom and 4-bedroom units in partnership with Habitat for Humanity for very low-, low-, and moderate-income households. [Plans call for a vacant lot at the corner of Arguello and Brewster to be redeveloped into a public park and dedicated to the City.](#) The application was deemed incomplete and the City is awaiting additional information from the applicant. [This proposed project indicates developer and property owner interest; this site is likely to redevelop within the planning period.](#)

1201 Main St. Mixed Use Project
The project proposes the construction of a five-story mixed use building. [Currently the site is occupied by a low-scale light industrial style complex.](#) The lower three floors would contain all office uses and the fourth level would have a small office component and residential uses, and the fifth level would be an all-residential level including 28 rental units (8 studios and 20 one-bedroom units). The project would include affordable units in accordance with the City's inclusionary housing requirements ([1 very low-income unit, and 2 moderate-income units, which will be deed restricted to ensure long-term affordability consistent with the City's inclusionary housing requirements](#)) and is requesting the use of State Density Bonus concessions and waivers. [This proposed project indicates developer and property owner interest; this site is likely to redevelop within the planning period.](#)

1330 El Camino Real "Redwood City Discovery" Apartments
Redwood City Discovery, located at 1330 El Camino Real, is proposed as a six-story, 130-unit rental project with a variety of unit sizes. Of these, 26 will be reserved as affordable housing. ([7 very low-, 6 low-, and 13 moderate-income units, all of which will be deed restricted to ensure long-term affordability consistent with the City's inclusionary housing requirements](#)). Located within the Downtown Precise Plan, there is no limit on density. Currently a retail building and a residential four-plex occupies the parcel. The planning application has been submitted and is being reviewed by Planning Department staff for compliance with the Downtown Precise Plan requirements. [This proposed project indicates developer and property owner interest; this site is likely to redevelop within the planning period.](#)

1818 El Camino Real "Comfort Inn"
The County [is in the process of purchasing](#) a 51-room hotel (Comfort Inn & Suites Hotel at 1818 El Camino Real) and [is in the process of](#) converting these into 51 permanent affordable units for homeless individuals; 25 units will be 30 percent of area median income (AMI) and 25 units will be 60 percent AMI. The purchase agreement was approved by the Board of Supervisors in January 2022 and the project has been awarded \$16 million in State Homekey funds and \$1 [.3](#) million from the City in HOME Investment Partnerships [American Rescue Plan](#) (HOME-ARP) funds. It is anticipated that

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the rehabilitation efforts (adding kitchens to each unit) and lease-up would be complete by [late 2022/early 2023. This proposed project indicates developer and property owner interest; this site is likely to redevelop within the planning period.](#)

2336 El Camino Real “Redwood Square”

This proposed project consists of a four-story residential building with 16 for-sale units, located at 2336 El Camino Real. The property is zoned Mixed-Use Corridor El Camino Real (MUC-ECR) and it is currently developed with an existing [Day Care](#)[childcare](#) center that will remain on the site. The application is under review by the Planning Department. [This proposed project indicates developer and property owner interest; this site is likely to redevelop within the planning period.](#)

[1304 – 1324 Middlefield Road “Rise City Church Affordable Housing”](#)

[This proposed project consists of 93 rental apartment units affordable to low-income households. The project would be seven stories tall \(five stories residential over a two-story parking podium\) consisting of studio, one-bedroom, and two-bedroom units. The site is located immediately outside the Downtown’s borders. Currently, the site is vacant and used for seasonal events. The planning application has been submitted for a streamlined ministerial permit under SB 35 and would be exempt from CEQA and is being reviewed by Planning Department staff for compliance with SB 35. This proposed project indicates developer and property owner interest; this site is likely to redevelop within the planning period.](#)

Proposed Projects – Gatekeeper Projects

The City Council directed staff to initiate a one-time “Gatekeeper” process to evaluate multiple pending General Plan Amendment and Downtown Precise Plan (DTPP) Amendment requests. Throughout 2020-2021, the City Council considered, at a high level, multiple potential projects at one time to decide which projects should be reviewed and considered for General Plan/DTPP amendments. Consideration of these projects was based on basic submittal requirements and a detailed project narrative that were analyzed against the City Council’s Strategic Plan and Priorities.

[As part of this process, DTPP Amendments will amend the City’s General Plan and Downtown Precise Plan to: 1\) increase the maximum allowable office development caps to potentially accommodate additional development capacity from the Gatekeeper Projects \(described below\) located in the DTPP collectively, 2\) extend the DTPP boundary approximately 0.1 miles northward between El Camino Real and the Caltrain tracks \(to accommodate the 651 El Camino Real parcel, APN: 052-271-030, as well as four additional parcels: APNs 052-271-040, -050, -080, and -090\) and facilitating additional residential units at 651 El Camino Real “American Legion” discussed below, and 3\) change certain DTPP development standards.](#)

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Questions/Comments from July 8, 2022 Letter	<p>The DTPP sets maximum allowable development caps for office, residential, retail, and hotel development in the Downtown. The cap for residential uses is almost met and will be removed as part of the Housing Element update. The cap for office space is almost met as well. Any project proposing to exceed the office cap must request both a General Plan and DTPP amendment to increase the cap. The DTPP amendments are informed by the City Council's direction, given in October 2020 and May 2021, to review and recommend an appropriate maximum allowable development cap to accommodate the Gatekeeper Projects and additional anticipated development capacity for the parcels to be added into the DTPP boundary. A program level Subsequent Environmental Impact Report (SEIR) will evaluate the environmental impacts of the DTPP Amendments.</p> <p>As part of this Gatekeeper process, certain DTPP amendments are currently undergoing environmental review (a program-level Subsequent Environmental Impact Report is being prepared). The amendments being studied include amending the Downtown Precise Plan to: 1) increase the maximum allowable office development caps to potentially accommodate additional development capacity from the Gatekeeper Projects (described below) located in the DTPP collectively, 2) amend DTPP to extend the DTPP boundary approximately 0.1 miles northward between El Camino Real and the Caltrain tracks (to accommodate the 651 El Camino Real parcel, APN: 052-271-030, as well as four additional parcels: APNs 052-271-040, -050, -080, and -090) and facilitating additional residential units as part of the 651 El Camino Real "American Legion" development project discussed below, and 3) change certain DTPP development standards. The General Plan will also be amended accordingly.</p> <p>The environmental review for the proposed DTPP amendments is scheduled to be completed in late 2022. Individual Gatekeeper project processing (including project-level environmental review and approval) is expected to follow adoption of the amendments. Five Four of the eight Gatekeeper projects are identified as sites to meet the RHNA and discussed below; additional Gatekeeper projects have been proposed but would also require additional offsite (outside of the DTPP) rezoning and General Plan amendments to allow residential development. Since the underlying use allowance in place is not residential, these other projects are not included as sites to meet the RHNA but represent additional housing opportunities in Redwood City.</p> <p>651 El Camino Real "American Legion" Mixed Use Project This proposed project, located at 651 El Camino Real (1.68 acres), would replace the existing American Legion building with an eight-story mixed-use development including 300 rental units and a 12,000 square foot space for the American Legion. Currently zoned MUC-ECR, the project application includes a rezone to incorporate this Downtown Precise Plan-adjacent parcel into the Downtown Precise Plan, allowing for increased density and height. For the purposes of this Housing Element, the project includes a reduced number of housing units, which would be allowed under the current zoning (MUC-ECR), 99 units, with affordability levels as prescribed in the City's inclusionary housing requirements. (5 very low-, 5 low, and 10 moderate-income units, all of which will be deed restricted to ensure long-term affordability consistent with the City's inclusionary housing requirements). This proposed project indicates developer and property owner interest; this site is likely to redevelop within the planning period.</p>

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750 Bradford St “Bradford/RCSD” Mixed Use Project

[The applicant is partnering with the Redwood City School District \(RCSD\) on this proposal.](#) This project application is for a mixed-use development including a 170,000 square foot office building and 87 housing units for Redwood City School District (RCSD) staff, located at 750 Bradford Street within the Downtown Precise Plan. Affordability of units is [assumed consistent with based on](#) the [City's inclusionary applicant's draft affordable](#) housing [requirements. The applicant is partnering with](#) [plan \(5 very low, 6 low, and 10 moderate-income units\)](#) and the [Redwood City School District \(RCSD\) on this proposal.](#) [Project's designation as teacher and workforce housing. The site is currently occupied by a two-story office building and surface parking.](#) [This proposed project indicates developer and property owner interest; this site is likely to redevelop within the planning period.](#)

901 El Camino Real/920 Shasta St

This proposed project includes a six-story 259,000 square foot office building, 8,000 square foot teen center, and 15,242 square foot public open space (Chrysanthemum Plaza) at 901 El Camino Real (within the Downtown Precise Plan) and 100 off-site affordable units ([48](#) very low- and [51](#) low-income, and one manager's unit) at 920 Shasta Street, which is in the Mixed Use – Transitional (MU-T) zoning district. [The existing use at 920 Shasta Street is personal storage. All affordable units will be deed restricted to ensure long-term affordability consistent with the City's inclusionary housing requirements.](#) The office portion of the project will require a General Plan amendment, as part of the Gatekeeper process, to exceed the existing office development cap. [This proposed project indicates developer and property owner interest; this site \(920 Shasta\) is likely to redevelop within the planning period.](#)

1900 Broadway St. Mixed Use Project

[The site is currently occupied by a bank.](#) This project [is proposes](#) for a seven-story (100 foot) mixed-use building consisting of 228,000 sq. ft. of office, 71 rental residential units [offered at \(70 low-, and one moderate levels income unit, all of which will be deed restricted to ensure long-term](#) affordability, [consistent with the City's inclusionary housing requirements\).](#) 10,000 square feet of ground floor retail and a 12,000 square foot public open space plaza at the corner of Broadway and Main Street within the Downtown Precise Plan. [- This proposed project indicates developer and property owner interest; this site is likely to redevelop within the planning period.](#)

2300 Broadway St “Chase Bank”/609 Price Ave

[The application for a DTPP gatekeeper project at 2300 Broadway includes 83 off-site affordable units at 609 Price Street \(32 very low-, 49 low-income, and 2 units for onsite property management staff at moderate-income levels, all of which will be deed restricted to ensure long-term affordability consistent with the City's inclusionary housing requirements\).](#) The offsite affordable housing site (609 Price) is currently zoned Commercial Office (CO),

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which will be rezoned concurrently with the Housing Element to Mixed Use – Corridor, Veterans Boulevard (MUC-VB). This proposed project would replace an existing bank building within the Downtown Precise Plan with 200,000 square feet of office, 15,000 square feet of retail space, and 5,000 square feet of open space ('Redwood Grove') on the corner of Broadway and Hamilton. In addition to the onsite open space, the project requests utilizing a portion of Hamilton Street adjacent to the subject property, and Courthouse Square, to create a 15,000 square foot plaza. The application also includes 83 off site affordable units at 609 Price Street (32 very low, 49 low income, and 2 units for onsite property management staff at moderate-income levels). The office component of the project is included in the Gatekeeper process to increase the office development cap in Downtown. The offsite affordable housing site (609 Price) is currently zoned Commercial Office (CO), which will be rezoned concurrently with the Housing Element to Mixed Use—Corridor, Veterans Boulevard (MUC-VB).

Program H1-1 on p.20 in the Goals and Policies Chapter has been modified to monitor approved and proposed projects and commit to alternative actions within a reasonable time (e.g., within one year) of projects are not moving toward completion as anticipated.

Program H1-1: Adequate Sites to Accommodate Regional Fair Share of Housing Growth. The City has a Regional Housing Needs Allocation (RHNA) of 1,115 extremely low/very low-income, 643 low-income, 789 moderate-income, and 2,041 above moderate-income units for the 2023-~~2030~~2031 RHNA planning period (4,588 units total). A significant portion of this target will be achieved with credits for approved and proposed projects. The sites inventory identifies vacant and underutilized land in residential and mixed-use zones, as well as projections about accessory dwelling units (ADUs) and missing middle housing and shows that the City can adequately accommodate the remaining RHNA under existing General Plan and Zoning standards.

Objective:

- Continue to track new housing projects and progress toward meeting the City's RHNA and post the sites inventory on the City's webpage.

Timeframe: Ongoing

Timeframe: Track housing development and progress toward the RHNA on an ongoing basis, with an annual Housing Element Report to HCD. Annually track approved and proposed housing projects identified to meet the RHNA and implement alternative actions (i.e., incentives) within a reasonable time (e.g., within one year) if projects are not moving toward completion as anticipated.

The lead department responsible for implementation is indicated in **bold** font.

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Responsible Party: Community Development and Transportation

Funding Sources: Departmental Budget

Realistic Capacity: The element provides various assumptions for calculating residential capacity on identified sites and describes the assumptions are based on recent projects. However, the element should list projects to support these assumptions. Similar to the listing of recent projects in the Downtown Precise Plan (Table H3-12), the listing should address acreage, zone, number of units built, maximum allowable density, built density and percent of maximum allowable densities.

The City has used existing zoning densities to calculate the realistic capacity of identified sites. The City's planned rezoning effort to increase the densities in Mixed Use districts has been used to identify future additional housing capacity beyond what has been identified to meet the RHNA. Pages H3-21 to H3-25 and H3-25 to H3-28 of the TBR Housing Resources Chapter have been revised as follows:

The following information has been added regarding realistic capacity based on development trends for residential sites (p. H3-21 to H3-25): Vacant, uncommitted land in residential designated areas throughout the City was identified, totaling 1.160.52 acres on ~~seven~~four parcels. A review of recent housing development in Redwood City (2016-2021) shows that developments located on residential designated land developed at an average of 40 – 55 percent of the maximum allowable density. Table H-3-97 lists the realistic capacity assumed based on development trends for these zones. This resulted in an estimated capacity of 114 new dwelling units on vacant residential lots (Table H3-8).

Table H3-87: Vacant Residential Land Inventory

General Plan Designation	Zoning	Maximum Density	Assumed Density	Vacant Acres	Potential Dwelling Units	Affordability Level
Medium Density Residential	R-2 R-3	20 du/acre	11 du/acre	0.29	2	Moderate
Medium High Density Residential	R-4	30 du/acre	12 du/acre	<u>0.7523</u>	<u>92</u>	Extremely/Very Low/ Low / Moderate
Total				<u>1.160.52</u>	<u>114</u>	

Note: Potential dwelling units do not reflect the straight application of maximum density to vacant land. The number of potential dwelling units in residential areas has been reduced based on local development trends.

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The estimated realistic capacity for sites in residentially zoned land is based on recent or active projects in these areas, which resulted in 40 – 55 percent of maximum density, depending on the zone. Table H3-9 lists the projects used to calculate the realistic capacity.

Table H3-9: Recent/Active Projects in R-2, R-3, R-4, and R-5 (since 2016)

Project Name	Project Description	Acres	# of units	Actual Density (du/acre)	Zone	Affordability Level
1024 10 th Ave	Two new duplexes	0.49	2	4	R-2	Above Moderate
620 Redwood Ave	New unit (Duplex) – 2,650 SF add	0.32	2	6	R-2	Above Moderate
245 Roble Ave	Add 1 unit to make duplex	0.30	2	7	R-2	Above Moderate
1410 Valota Rd	5 single family unit sub-division.	0.68	5	7	R-2	Above Moderate
1460 Kentfield Ave	New duplex	0.26	2	8	R-2	Above Moderate
264 W Oakwood Blvd	2nd story addition to existing triplex	0.34	3	9	R-2	Above Moderate
1030 Haven Ave	Demo existing SFH and construct new 2-story 6,199 sf Duplex	0.23	2	9	R-2	Above Moderate
1104 Madison Ave	Add new 2nd unit on top of garage (duplex)	0.25	2	9	R-2	Above Moderate
1013 Hudson St	1013 A, B, C for Duplex & ADU	0.20	2	10	R-2	Above Moderate
1436 Kentfield Ave	Addition to existing duplex	0.20	2	10	R-2	Above Moderate
1168 17 th Ave	Second unit to create a duplex	0.20	2	10	R-2	Above Moderate
1222 Saint Francis St	New Duplex	0.20	2	10	R-2	Above Moderate
1033 8 th Ave	Additional for Duplex	0.20	2	10	R-2	Above Moderate
1317 Saint Francis St	New Residential Duplex	0.18	2	11	R-2	Above Moderate

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	1128 McKinley St	New duplex to replace existing duplex	0.18	2	11	R-2	Above Moderate
	1006 16 th Ave	Additional Address for Duplex	0.18	2	11	R-2	Above Moderate
	285 Wheeler Ave	Address Assign New Duplex 285-287 Wheeler	0.17	2	12	R-2	Above Moderate
	1136 Palm Ave	Reasonable Accommodation for Addition to Duplex	0.17	2	12	R-2	Above Moderate
	1675 Kentfield Ave	Demolish three existing homes on three individual lots, merge the three lots into one, and subdivide the parcel into 13 parcels for the development of 12 2-story single-family residences ranging in size from 1,700 square feet to 1,900 square feet and each with a 2-car garage.	0.17	2	12	R-2	Above Moderate
	1193 Sanchez Way	Secondary Add for Duplex 1191-1193 Sanchez	0.15	2	13	R-2	Above Moderate
	35 Central Ave	Expansion of Duplex with nonconforming lot size	0.15	2	13	R-2	Above Moderate
	972 Haven Ave	Verification of Duplex	0.14	2	14	R-2	Above Moderate
	3460 Michael Dr	Add 2nd Address for Duplex	0.14	2	14	R-2	Above Moderate
	1172 Valota Rd	Clarify 2nd Address for existing Duplex	0.14	2	14	R-2	Above Moderate
	931 7 th Ave	Expansion of duplex with substandard lot + add second-story	0.13	2	15	R-2	Above Moderate
	1215 Gordon St	Secondary Address For Duplex	0.09	2	21	R-2	Above Moderate

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	1447 Gordon St	New duplex for total of 4 units on prop.	0.28	2	7	R-3	Above Moderate
	936 Palm Ave	Address for New Duplex	0.18	2	11	R-3	Above Moderate
	4200 Farm Hill Rd	60 unit faculty apartment complex	3.68	60	16	R-3	Above Moderate
	1417 Middlefield Rd	Convert Existing Home to Duplex	0.33	2	6	R-4	Above Moderate
	1629 Main St	Development of a new four-story 23,170 square foot office building with two apartment units	0.26	2	8	R-4	Above Moderate
	218 Lincoln Ave	Create Duplex from SFD Remodel Existing	0.24	2	8	R-4	Above Moderate
	408 Harrison St	408 and 410 Harrison on New Duplex	0.24	2	8	R-4	Above Moderate
	491 Oak Ave	Duplex on 45' wide lot in R-4	0.20	2	10	R-4	Above Moderate
	435 Redwood Ave	New Duplex – demo existing homes	0.18	2	11	R-4	Above Moderate
	840 Adams St	840-8464 plex and 854-858 Triplex	0.26	3	11	R-4	Above Moderate
	640 Elm St	640 & 650 ELM ST for new Duplex	0.16	2	12	R-4	Above Moderate
	402 Harrison	New Duplex	0.16	2	12	R-4	Above Moderate
	402 Harrison St	408 and 410 Harrison on New Duplex	0.16	2	12	R-4	Above Moderate
	1223 Ebener St	Add 2nd Address for Duplex	0.15	2	14	R-4	Above Moderate
	211 – 217 Vera Ave	Ten three-story townhouses with access from Adams Street in the R-4 Zoning	0.49	10	20	R-4	Above Moderate

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	District. Existing structures on the lot demolished					
239 Vera Avenue	3-story, five unit residential building	0.24	5	21	R-4	Above Moderate
515 Cleveland St	Demolition of 7-single-family homes and one-Accessory Dwelling Unit. Construction of 17 new for-sale townhomes	0.72	17	24	R-4	Above Moderate
95 Clinton St	Demolition and rebuild ½ of duplex	0.20	2	10	R-5	Above Moderate

The following information has been added regarding realistic capacity based on development trends for Mixed Use sites (p. H3-25 to H3-28):

Mixed-use areas allow residential development at maximum densities that range between 20 and 60 dwelling units per acre. *As part of this Housing Element update, the City proposes amending the Zoning Ordinance to allow higher densities in mixed-use designations as shown in Table H3-9 and indicated in Program H1-6 in the Housing Plan.*

Table H3-9¹⁰: Mixed Use Designations Maximum Densities

General Plan Designation	Zoning	Maximum Density
Mixed Use – Corridor	MUC	60 du/acre
Mixed Use – Neighborhood	MUN	40 du/acre
Mixed Use – Live/Work	MUT	20 du/ac; 40 du/ac with community benefits
Mixed Use – Waterfront Neighborhood	MUW	40 du/ac

Development trends in Redwood City indicate that most projects in mixed-use zoning districts realistically occur at a range of *35⁷⁵* to 98 percent of the maximum capacity, depending on the zoning district. Realistic capacity in each zoning district varied; as such the average for each district was applied to the allowed density to calculate the estimated realistic capacity of sites identified in the mixed-use areas. *In MU-C, MU-N, and MU-T, the increased density*

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~~Limits indicated in Table H3-9 were incorporated into the development assumptions~~ Table H3-11 summarizes the realistic capacity assumptions for each zoning district. The realistic capacity assumptions also account for water, sewer, dry utilities, and all other development standards.

Table H3-11: Recent/Active Project in Mixed Use Districts

<u>Project Name</u>	<u>Acres</u>	<u># of units</u>	<u>Actual Density (du/acre)</u>	<u>Zone</u>	<u>Maximum Density (du/acre)</u>	<u>Prior Use</u>	<u>Affordability Level</u>
31 Center St	0.22	7	31	MUC-ECR	60	Single-family unit	Above Moderate
2336 El Camino Real "Redwood Square"	0.51	16	31	MUC-ECR	60	Childcare Center	Above Moderate
601 El Camino Real	1.11	33	30	MUC-ECR	60	Auto Sales	Above Moderate
Charter Street	1.76	72	41	MUC-ECR	60	Grocery store	11 Moderate
2580 El Camino Real	2.47	141	57	MUC-ECR	60	Bowling Alley	5 Low
849 Veterans Blvd	1.14	90	79	MUC-VB	60	Retail	7 Very Low
640 Veterans Blvd	3.60	264	83	MUC-VB	60	Auto Sales	22 Low (Rent)
910 Woodside	0.31	10	32	MUN	40	Restaurant	
150 El Camino Real	0.43	12	28	MUN	40	Vacant	
120 El Camino Real	0.44	12	27	MUN	40	Restaurant	
885 Woodside Road - Woodside Villas	0.69	43	62	MUN	40	Vacant	6 Low

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847 Woodside	0.94	44	47	MUN	40	Mortuary	6 Moderate
Arguello Street Mixed-Use	3.22	33	10	MUT	20/ 40 w/bonus	Equipment Rental	6 Very Low
104 & 112 Cedar St	0.29	51	15	MUT-S	20/ 40 w/bonus	Vacant	15 Very Low

Note: Based on average of the actual density of past projects under existing densities, the assumed density is as follows for each zoning district:

MUC = 89% of maximum density

MUN = 98% of maximum density

MUT = 75% of maximum density

Source: City of Redwood City, 2022

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Tables H3-20, H3-21, H3-22, and H3-23 contain a summary of each site's characteristics, which are also summarized in narrative form below. A total of [46.60](#)[36.90](#) acres of underutilized parcels in mixed-use zones were identified, with a potential to yield [2,911](#)[1,728](#) new dwelling units (Table H3-120). Additionally, ~~three sites were~~[one parcel was](#) identified in the General Commercial – Residential (CG-R) zone, which is a combining district that allows for mixed use. The Combining District allows residential uses consistent with the development standards of the R-5 Zoning district, which has a maximum density of 40 units per acre. A review of recent development found that the average density of project in CG-R zones was 28 units per acre, which is the equivalent to 70 percent of the maximum density.

Table H3-120: Underutilized Mixed Use Land Inventory

General Plan Designation	Zoning	Maximum Density	Assumed Density	Acres	Potential Dwelling Units	Affordability Level			
						EL	VL	L	M
Mixed Use – Corridor	MUC	80.60 du/acre ²	74.53 du/acre	29.64 20.39	2,100 1,089	207	120	455	307

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Mixed Use – Neighborhood	MUN	60 ⁴⁰ du/acre ²	59 ³⁹ du/acre	12.29	722 ⁴⁸³	<u>207</u>	<u>118</u>	<u>158</u>	<u>—</u>
Mixed Use – Live/Work	MUT	<u>20 du/ac²</u> 40 du/ae ² 60 du/ac	<u>16 du/acre</u> 31 du/acre 46 du/acre	0.24	14 ⁷	<u>—</u>	<u>—</u>	<u>7</u>	<u>—</u>
Mixed Use – Waterfront Neighborhood	MUW	40 du/ac	14 du/acre	2.02	28 ¹¹⁰	<u>108</u>	<u>—</u>	<u>—</u>	<u>2</u>
High Density Residential	CG-R	40 du/ac	28 du acre	2.41 ^{1.96}	50 ³⁹	<u>17</u>	<u>10</u>	<u>12</u>	<u>—</u>
Total				<u>46,6036.90</u>	<u>2,911,728</u>	<u>539</u>	<u>248</u>	<u>632</u>	<u>309</u>

Note:

1. Potential dwelling units do not reflect the straight application of the maximum density. The number of potential dwelling units in residential areas has been reduced based on local development trends in each zoning district.
2. The MU-T zoning district allows increased density limits if projects include community benefits as described in the ordinance.

Tables H3-16 and Figure H3-1 on p. H3-40 to H3-41 summarizing the estimated capacity of the site inventory has also been updated accordingly.

Comparison of Sites Inventory and RHNA

Combined, the vacant and underutilized opportunity sites identified have the potential to accommodate ~~3,425~~^{2,232} residential units. As Table H3-1~~6~~⁴ indicates, these sites and the densities allowed will provide opportunities to achieve remaining RHNA goals for all income categories as well as provide surplus of ~~3,500~~^{2,415} units, which help support no net loss provisions consistent with State law ~~and contribute to efforts by the City to achieve a Pre-Housing designation from HCD~~. Table H3-~~15~~²⁰, H3-~~16~~²¹, ~~and H3-17~~²², ~~and H3-23~~ provide site-specific detail for each site identified in the inventory.

The opportunity areas identified involve sites that can realistically be redeveloped with residential units during the planning period. These areas are considered highly likely to experience recycling for two key reasons: 1) the high demand for more affordable housing throughout San Mateo County, and 2) the availability of underutilized land in areas designated for mixed-use, with the potential for high-density residential development. The sites chosen are significantly underutilized given their size and location and recent development trends. Interest is especially high in areas identified in this Housing Element, including Downtown and mixed-use areas. Redwood City makes every effort to support development that contributes to the city and

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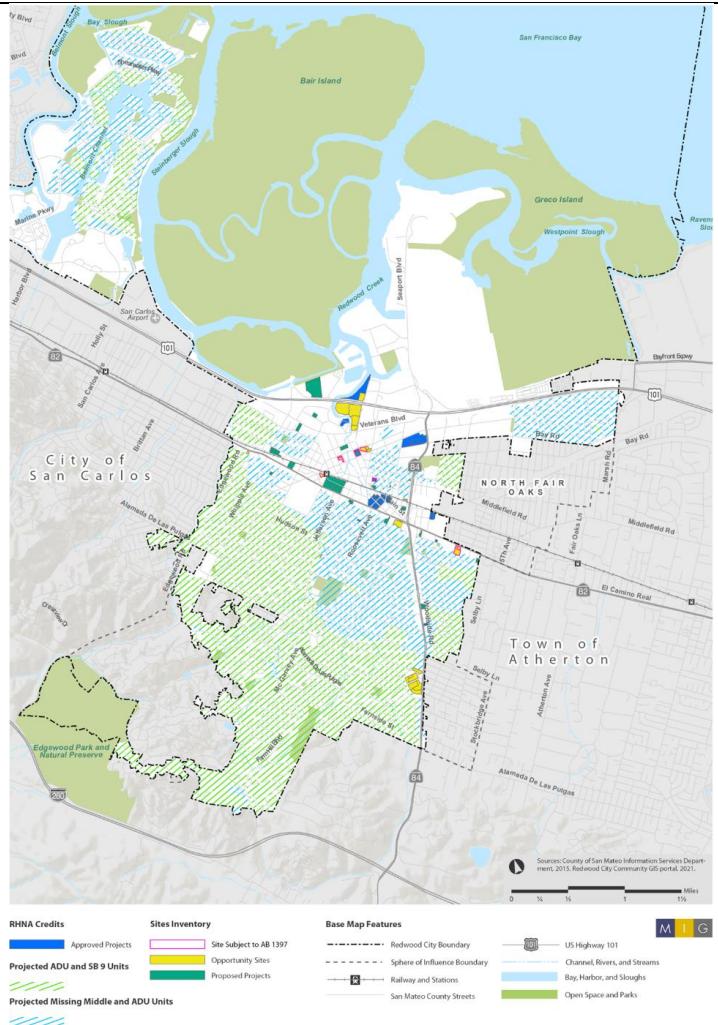
facilitates a walkable, pedestrian-oriented community, consistent with land use policy. Developers continue bring forward new projects in Redwood City, due to the city's convenient location, available transit, maximum allowable densities, and livable community.

Table H3-164: Comparison of Credits, Sites, and RNHA

Project	Extremely/ Very Low- Income (0- 50% AMI)	Low- Income (50-80% AMI)	Moderate- Income (80-120% AMI)	Above Moderate- Income (+120%)	Total
RHNA	1,115	643	789	2,041	4,588
RHNA Credits					
Approved Projects	126	223	52	1,005	1,406
Sites Inventory					
Proposed Projects	<u>258</u> 292	<u>477</u> 346	<u>131</u> 129	<u>121</u> 124 203	<u>2,078</u> 1,970
Projected ADU construction	152	152	152	50	506
Projected SB 9 construction	--	--	137	138	275
Projected Middle R2-R5 Zone Changes	--	--	253	253	506
Residential Sites	<u>1</u> 3	<u>0</u> 3	<u>3</u> 7	<u>0</u> —	<u>4</u> 13
Mixed Use Sites	<u>539</u> 1,257	<u>248</u> 725	<u>632</u> 929	<u>309</u> —	<u>1,728</u> 2,911
Downtown Precise Plan Sites	<u>219</u> 219	<u>126</u> 126	<u>155</u> 156	--	<u>500</u> 501
<i>Subtotal Sites Inventory</i>	<u>1,169</u> 1,923	<u>1,003</u> 1,352	<u>1,463</u> 1,763	<u>1,962</u> 1,644	<u>5,597</u> 6,682
Total	<u>1,295</u>2,049	<u>1,226</u>1,575	<u>1,515</u>1,815	<u>2,967</u>2,649	<u>7,003</u>8,088
Surplus RHNA Sites	<u>180</u>934	<u>583</u>922	<u>726</u>1,026	<u>926</u>608	<u>2,415</u>3,500
			% Surplus		<u>53%</u>

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Figure H3-1: Sites Inventory



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The City's planned rezoning efforts have been analyzed to illustrate how this effort will increase development capacity and further encourage housing options in the City (p. H3-49 to H3-51 of the TBR Housing Resources Chapter).

Additional Housing Capacity

Beyond the sites identified to meet the RHNA, the City has a planned rezoning effort to increase development capacity within mixed-use zoning districts to further encourage housing options in the City. This includes rezoning to address existing General Plan and Zone inconsistencies (Program H4-2), rezone all Commercial Office (CO) zoned parcels to MUC to allow housing (Program H2-6), and increasing densities in Mixed Use districts (Program H1-6). As described in Program H1-6, the City proposes to increase densities in the MUC, MUN, and MUT zones (Table H3-18).

Table H3-18: Mixed Use Designations Maximum Densities

<u>General Plan Designation</u>	<u>Zoning</u>	<u>Existing Maximum Density</u>	<u>Increased Density Limit</u>
<u>Mixed Use – Corridor</u>	<u>MUC</u>	<u>60 du/acre</u>	<u>80 du/acre</u>
<u>Mixed Use – Neighborhood</u>	<u>MUN</u>	<u>40 du/acre</u>	<u>60 du/acre</u>
<u>Mixed Use – Live/Work</u>	<u>MUT</u>	<u>20 du/ac; 40 du/ac with community benefits</u>	<u>40 du/ac; 60 du/ac with community benefits</u>
<u>Mixed Use – Waterfront Neighborhood</u>	<u>MUW</u>	<u>40 du/ac</u>	<u>=</u>

The City does not need to make these zoning amendments prior to the beginning of the new planning period (i.e., prior to January 31, 2023) in order to meet its RHNA for the previous planning period. However, this additional upzoning will allow for the City to identify sites to meet 166% of the RHNA, to better support housing to meet the needs of the community. Table H3-19 summarizes the realistic capacity of the same sites identified in sites inventory above (and summarized in Table H3-16⁷) after the zoning amendments are in effect. The zoning amendments are scheduled to be considered by the City Council in conjunction with Housing Element adoption.

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[Table H3-19: Comparison of Sites \(with Planned Rezoning\), Pipeline Projects, and RNHA](#)

<u>Project</u>	<u>Extremely/ Very Low- Income (0- 50% AMI)</u>	<u>Low- Income (50- 80% AMI)</u>	<u>Moderate-Income (80-120% AMI)</u>	<u>Above Moderate-Income (+120%)</u>	<u>Total</u>
<u>2021-2029 RHNA</u>	<u>1,115</u>	<u>643</u>	<u>789</u>	<u>2,041</u>	<u>4,588</u>
<u>RHNA Credits</u>					
<u>Approved Projects</u>	<u>126</u>	<u>223</u>	<u>52</u>	<u>1005</u>	<u>1,406</u>
<u>Sites Inventory</u>					
<u>Proposed Projects</u>	<u>258</u>	<u>477</u>	<u>131</u>	<u>1212</u>	<u>2,078</u>
<u>Projected ADU construction</u>	<u>152</u>	<u>152</u>	<u>152</u>	<u>50</u>	<u>506</u>
<u>Projected SB 9 construction</u>	<u>--</u>	<u>--</u>	<u>137</u>	<u>138</u>	<u>275</u>
<u>Projected Middle R2-R5 Zone Changes</u>	<u>--</u>	<u>--</u>	<u>253</u>	<u>253</u>	<u>506</u>
<u>Residential Sites</u>	<u>1</u>	<u>0</u>	<u>3</u>	<u>0</u>	<u>4</u>
<u>Mixed Use Sites</u>	<u>709</u>	<u>348</u>	<u>864</u>	<u>412</u>	<u>2,333</u>

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	<table border="1"> <thead> <tr> <th data-bbox="567 434 809 491">Downtown Precise Plan Sites</th><th data-bbox="809 434 943 491">219</th><th data-bbox="943 434 1064 491">126</th><th data-bbox="1064 434 1239 491">155</th><th data-bbox="1239 434 1507 491">0</th><th data-bbox="1507 434 2083 491">500</th></tr> </thead> <tbody> <tr> <td data-bbox="567 499 809 540"><u>Subtotal Sites Inventory</u></td><td data-bbox="809 499 943 540"><u>1,339</u></td><td data-bbox="943 499 1064 540"><u>1,103</u></td><td data-bbox="1064 499 1239 540"><u>1,695</u></td><td data-bbox="1239 499 1507 540"><u>2,065</u></td><td data-bbox="1507 499 2083 540"><u>6,202</u></td></tr> <tr> <td data-bbox="567 548 809 589"><u>Total</u></td><td data-bbox="809 548 943 589"><u>1,465</u></td><td data-bbox="943 548 1064 589"><u>1,326</u></td><td data-bbox="1064 548 1239 589"><u>1,747</u></td><td data-bbox="1239 548 1507 589"><u>3,070</u></td><td data-bbox="1507 548 2083 589"><u>7,608</u></td></tr> <tr> <td data-bbox="567 597 809 638"><u>Surplus RHNA Sites</u></td><td data-bbox="809 597 943 638"><u>350</u></td><td data-bbox="943 597 1064 638"><u>683</u></td><td data-bbox="1064 597 1239 638"><u>958</u></td><td data-bbox="1239 597 1507 638"><u>1,029</u></td><td data-bbox="1507 597 2083 638"><u>3,020</u></td></tr> <tr> <td data-bbox="567 646 809 687"></td><td data-bbox="809 646 943 687"></td><td data-bbox="943 646 1064 687"></td><td data-bbox="1064 646 1239 687"></td><td data-bbox="1239 646 1507 687"><u>% Surplus</u></td><td data-bbox="1507 646 2083 687"><u>66%</u></td></tr> </tbody> </table>	Downtown Precise Plan Sites	219	126	155	0	500	<u>Subtotal Sites Inventory</u>	<u>1,339</u>	<u>1,103</u>	<u>1,695</u>	<u>2,065</u>	<u>6,202</u>	<u>Total</u>	<u>1,465</u>	<u>1,326</u>	<u>1,747</u>	<u>3,070</u>	<u>7,608</u>	<u>Surplus RHNA Sites</u>	<u>350</u>	<u>683</u>	<u>958</u>	<u>1,029</u>	<u>3,020</u>					<u>% Surplus</u>	<u>66%</u>
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<p>Suitability of Nonvacant Sites: The element must include an analysis demonstrating the potential for redevelopment of nonvacant sites.</p> <p>To address this requirement, the sites inventory includes a generic description of existing uses such as “restaurant” or “shopping center”. However, the description of existing uses should be sufficiently detailed to facilitate an analysis demonstrating the potential for additional development in the planning period.</p> <p>For example, the inventory could list which sites have expressed interest</p>	<p>A detailed description discussing the redevelopment potential has been added for each nonvacant site as well as examples of recent projects with similar characteristics to sites identified in the inventory. Additional details about the sites have also been added to Tables H3-20 to H3-23 of the TBR Housing Resources Chapter, which list out criteria such as property owner interest, degree of underutilization, and the City’s experience in redeveloping sites with similar uses.</p> <p>The following has been revised regarding residential sites. Further analysis showed the one identified nonvacant site in the multifamily zoning districts (estimated capacity of 2 units) was not suitable to additional housing capacity (p.H3-22): In addition to vacant sites, one underutilized (nonvacant) residential lot that is 0.22 acres in size was also identified, which has the capacity for at least two units (see Table H3-8). Based on recent development trends, 40–55 percent of maximum density was utilized to calculate realistic capacity for nonvacant residential sites. Given the scarcity of developable land in Redwood City and the continuing demand for housing in the Bay Area, nearly all of the recent residential construction in the City has involved infill development on underutilized properties.</p>																														

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from developers or owners, age of structure and degree of underutilization. In addition, the element should analyze recent experience in redevelopment and the extent that existing uses may impede additional residential development.

For example, the element includes sites identified as single-family residents, restaurants, parks, open storage, service station, and shopping center, but should discuss how these uses will discontinue or be redeveloped in the planning period.

The element should also expand the discussion of existing uses in recent projects (including approved and proposed projects) and relate those characteristics to sites identified. For example, many identified sites appear with shopping and retail. The element could discuss how some recent, approved or pending development had existing uses with similar characteristics (e.g., use, age of structure, degree of

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Table H3-8: Underutilized Residential Land Inventory

General Plan Designation	Zoning	Maximum Density	Assumed Density	Acres	Potential Dwelling Units	Affordability Level
Medium Density Residential	R-3	20 du/acre	11 du/acre	0.22	2	Moderate
Total				0.22	2	

Note: Potential dwelling units do not reflect the straight application of maximum density to underutilized land. The number of potential dwelling units in residential areas has been reduced based on local development trends.

Residential Zones – Density and Affordability Assumptions

Due to the predominantly built-out nature of Redwood City, most development will occur as infill on underutilized sites. The parcel identified in Table H3-8 can double the number of existing units on the site (currently it is occupied by one single-family unit). Program H1-3 is included in the Housing Plan requiring the replacement of units affordable to the same or lower income level as a condition of any development on a nonvacant site consistent with those requirements set forth in Government Code Section 66300(d)). The vacant and underutilized identified sites in the R-2, R-3, and R-4 zoning districts are appropriate for accommodating a range of affordability levels as indicated in Table H3-815.

The following has been added to sites in Mixed Use districts describing criteria such as property owner interest, degree of underutilization, and the City's experience in redeveloping sites with similar uses H3-27 and H3-28 to H3-33:

Due to the built-out nature of Redwood City, no vacant land is available in mixed-use areas. However, the City identified several underutilized properties that are ripe for redevelopment. The sites chosen are significantly underutilized given their size, age ofcontain large surface parking lots, aging buildings, marginal uses, aged structures on site, and given the development potential under the mixed-use development standards are highly likely to redevelop. Demand for housing in these areas is already strong; the higher density limits are further anticipated to facilitate housing construction. Other criteria that were applied to identify underutilized sites within mixed-use zoning districts are:

- Developers and/or property owners have expressed interest in redeveloping the site, the property has recently been purchased or is for sale, and/or the existing business on site has closed;
- The area chosen is significantly underutilized and the surrounding area has experienced recent production of new housing;
- The specific sites do not have infrastructure constraints, environmental constraints, or other constraints that would prohibit or delay site development; and

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underutilization, ample parking, vacancy, expiring leases).

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- The sites have appropriate General Plan ~~or~~ zoning designations in place ~~(or will have these in place in conjunction with Housing Element adoption)~~ and require minimal lot consolidation.

[Mixed Use Site Descriptions](#)

1580 Maple St

[This site consists of one 2.02 acre parcel in the MU-WF zoning district. It is adjacent to a recently approved townhome residential development that borders the creek. In 2021, Redwood City negotiated a land swap of a 2.5-acre parcel at 1469 Maple Street for 2.02 acres of County-owned land at 1580 Maple Street, currently the site of a 145-bed homeless shelter and a decommissioned jail. The County is constructing a new shelter on the 1469 Maple Street site, with 240 individual sleeping units. As part of the property exchange, the County has a 5-year option period to ground lease from the City the portion of the 1580 Maple Street Parcel not needed for the Blomquist roadway extension. This allows the City to construct the Blomquist Extension, and leaves 1.5 acres that could be used for other uses including potential additional affordable housing or permanent supportive affordable housing. The County issued a request for proposals in July 2022 and selected MidPen Housing to develop the site in August 2022. MidPen's proposed development for the site includes 108 extremely low-income units plus two manager's units for a total of 110 units. All 108 units are proposed as permanent supportive housing units for people experiencing homelessness.](#)



301 Spruce

[This site consists of two parcels with very limited improvements. The site is currently used as open storage space that is incompatible with the neighborhood. The only improvements are exterior fencing and carport-like structures \(without walls\). The site totals 0.24 acres and is under common](#)

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[ownership. Redevelopment into residential uses make it compatible with the existing home daycare across the street and the surrounding residential neighborhood. Residents living in the adjacent areas have expressed they would like to see the site used for housing. The site has a capacity for 7 new units and is in close proximity to major thoroughfares with easy access to freeways. The zoning at the site was updated in 2020 when the Mixed-Use Live Work \(MULW\) zoning district was replaced by the Mixed-Use Transitional \(MUT-S\) zoning district, in order to now allow multifamily residential. The site also contains a "Shelter" overlay that would allow an emergency shelter at the site.](#)



[**234 El Camino Real "Avondale"**](#)

[The site consists of one 0.30-acre parcel in the MUN zoning district. The current use is a service station and is significantly underutilized given the limited improvements located on the site. The City has had several inquiries for redevelopment of service stations across all areas of the City. The site is one block away from two recent separate townhome developments at 120 and 150 El Camino Real, respectively, that were developed on similar sized parcels. El Camino Real is a high-quality transit area and a major commercial corridor.](#)

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250 Walnut "Kohl's" and Peninsula Boardwalk

These two sites are adjacent to one another in the MUC-RC district. The "Kohl's" site is comprised of one large 6.57 acres in size and the Peninsula Boardwalk site is comprised of three large parcels totaling 11.54 acres. These sites are located on Redwood Creek, providing excellent potential for development due to the creek front amenity. In addition, this site is located directly across the creek from the North Main Precise Plan and Township Apartments catalyst project. There is developer interest in redevelopment of the properties on this site, likely as a phased development. The property that fronts on Veterans Boulevard is occupied by a collection of smaller retail uses that have experienced a number of vacancies over time. Existing uses include small restaurants, discount retailers, and a large surface parking lot along the perimeter of the shopping center. This property has extensive creek frontage that would likely redevelop first. The southwestern portion of the parcel is occupied by an aging commercial center built in the 1960s. Current tenants include Dollar Tree, Joann Fabric and Crafts, Footlocker, Kohl's, and Sports Basement. The Kohl's site has the capacity for 351 units and Peninsula Boardwalk for 616 units. The site is walking distance to Downtown and portions of the site are a little over a half mile from the Caltrain station.

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2650-2700 El Camino Real

The site is comprised of two parcels with a common owner and is currently occupied by a motel. The motel is in operation; however, a history of developer interest in this site demonstrates its potential. Despite some improvements in the past decade, including a new breakfast area for the motel, this site remains a viable opportunity site given its location along El Camino Real, allowable density, and proximity to other catalyst projects, including The Lane on the Boulevard Apartments, an assisted living facility, a major remodel of the 707 Leahy Apartments, all approximately one block from the site. The site provides opportunities for development of an estimated 58 new residential units. El Camino Real is a high-quality transit area and a major commercial corridor. The site is a quarter-mile away from a shopping mall.

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1875 Virginia and 50-340 "Woodside Plaza"

This site consists of seven parcels in the MUN zoning district totaling 11.52 acres. The site contains several small retail uses, existing tenants include Ace Hardware, Ross Dress for Less, Michael's, along with other small restaurants and retailers. The site is overparked and underutilized with a large surface parking lot along the perimeter of the shopping center and older onsite buildings. The site is located on a major thoroughfare with direct access to both a bus line and vehicular access to the freeway. There is developer interest in the site, which has been recently purchased by a new owner that has a

[history of developing residential properties in Redwood City, including multifamily residential along Woodside Road. The site has a capacity for 452 units.](#)



[1950 El Camino Real](#)

[The site is comprised of one 2.28 acre parcel in the MUC-ECR zoning district. Existing uses include a Bed Bath and Beyond. There has been a history of developer interest in redeveloping this site with residential uses and it is currently owned by a developer that has a history of developing multi-family residential properties along Woodside Road. The "Five Points" shopping center was given its name, since it is located at the intersection of multiple major streets, including El Camino Real, Woodside Road, and Main Street. El Camino Real is a high-quality transit area. The site has the capacity for 122 new units.](#)

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Mixed-Use Zones - Density and Affordability Assumptions

The potential for development of residential units in mixed-use areas is predicated on the interest from developers and on the limited opportunities for higher-density development elsewhere in the immediate surrounding areas. Most projects in mixed use areas occur at or near maximum density and several have utilized density bonuses to exceed maximum densities. Based on a review of approved projects from 2016 to 2020 in mixed use areas, the realistic capacity for each zoning district was determined. During this period, 25 projects were approved in mixed use areas; of these ten were all residential, nine were all commercial, and six were a combination of residential and commercial. [As such, 76 percent of recent projects in mixed use zoning districts were either 100% residential or mixed use while only 24 percent were fully commercial. Furthermore,](#) six of the 16 projects with residential uses utilized a density bonus. [To account for the possibility of commercial development on mixed-use sites,](#) a significant surplus of sites has been identified well beyond the City's required RHNA—[to account for the possibility of commercial development on mixed-use sites. This surplus equates to 40 percent over the required RHNA, which is just under two times the trend for 100% commercial projects in recent years and will be more than sufficient to cover the potential for a portion of identified sites to have proposals for 100-percent commercial development. In addition, the City](#)

[has clear policies that encourage housing development throughout the community. Commercial development that creates a need for housing is encouraged, through existing community benefits programs and mixed-use bonuses, to build housing in conjunction with the commercial project.](#)

Previous and proposed projects in mixed use areas, including CG-R zones, accommodate a mix of incomes. For example, Elco Yards Mixed Use (1601 Camino Real), provides 15 extremely low-income, 24 very low-income units, 67 low-income units, and 41 moderate-income units. Arguello Street Mixed Use (1125 Arguello Street) includes 6 very low-income units, 15 low-income, and 12 moderate-income units. These trends indicate that sites in mixed use areas are appropriate for accommodating the very low-, low-, and moderate-income RHNA. [The City's inclusionary affordable housing ordinance also requires affordable housing in conjunction with new residential projects, including mixed-use projects, and provides a process for nonresidential developers to provide affordable units rather than paying the required affordable housing impact fee.](#)

The following has been added to sites in Downtown Precise Plan describing criteria such as property owner interest, degree of underutilization, and the City's experience in redeveloping sites with similar uses (p. H3-34 to H3-35):

Other criteria that were applied to further identify underutilized sites within the Downtown Precise Plan include:

- Developers and/or property owners have expressed interest in redeveloping the site.
- The area chosen is significantly underutilized and the surrounding area has experienced recent production of new housing.
- The specific sites do not have infrastructure constraints, environmental constraints, or other constraints that would prohibit or delay site development; and
- The sites have appropriate General Plan or zoning designations in place and require minimal lot consolidation (sites smaller than 0.5 acres have common ownership on all parcels and thus function as one contiguous site).

[Appendix B also provides more detail on the sites included in the inventory including the criteria used in identifying underutilized sites. Downtown Precise Plan Site Descriptions](#)

700 Jefferson "Bank of America"

This site is located on Broadway in the heart of Redwood City, next to Courthouse Square. Comprised of two parcels, the current structure was built in the 1960s and contains a bank. The property is owned by a local family that has indicated interest in redevelopment of the property with residential uses. There is also a history of developers approaching the property owners regarding redevelopment. The site provides opportunities for development of an estimated 117 new units.

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Caltrain Lot

This site is located adjacent to the Redwood City Caltrain station. This site's location makes it a prime opportunity site for new residential development. There are no structures of significance on the site; it functions as a bus depot and park-and-ride lot. The property is owned by a transit district which has expressed interest in redeveloping the site as a transit-oriented development. The site would be subject to the Surplus Land Act, which requires the agency to consider prioritizing the site for affordable housing development. The City's analysis estimates a potential for at least 92 new residential units on this site. Although not yet completed, an adjacent proposed development project at 901 El Camino is in negotiations with Caltrain and another private property owner to perform a land swap, which would increase the developable size of the Caltrain lot. The site will also be adjacent to the future Sequoia Station development, which is proposing to redevelop a shopping center into over 600 residential units as well as retail and office space.



910 Marshall "Kaiser Trapezoid", 1800 Broadway, and 1000 Marshall

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	<p>The site contains multiple parcels under one ownership located near the Kaiser Permanente hospital campus, which is occupied by one-story buildings containing medical offices. Approximately half of the property is occupied by surface parking. Current structures on the property are approximately 40 years old. Given the desirable location and low scale of the existing building and abundant surface parking, this site is significantly underutilized. The City's analysis estimates a potential for at least 291 new residential units on this large site. The property owner has indicated interest regarding potential redevelopment of the site, including the potential for new housing. The site is located along Broadway adjacent to the iconic Redwood City sign, welcoming people to the entrance of downtown.</p> 
In addition, as noted in the housing element, the housing element relies upon nonvacant sites to accommodate more than 50 percent of the regional housing needs allocation (RHNA) for lower-income households. For your information, the housing element must demonstrate existing uses are not an impediment to additional	See detailed description for each site as shown above.

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<p>residential development and will likely discontinue in the planning period (Gov. Code, § 65583.2, subd. (g)(2)). Absent findings (e.g., adoption resolution) based on substantial evidence, the existing uses will be presumed to impede additional residential development and will not be utilized toward demonstrating adequate sites to accommodate the regional housing need allocation.</p>	
<p>SB 9 and Missing Middle Sites: The element identifies SB 9 and Missing Middle as strategies to accommodate the part of the City's need of moderate and above-moderate RHNA.</p> <p>To support these assumptions, the analysis must include experience, trends and market conditions that allow lot splits and missing middle uses.</p> <p>The analysis must also include a nonvacant sites analysis</p>	<p>Significant information and analysis has been added regarding SB 9 and Missing Middle sites on p. H3-14 to H3-21 of the TBR Housing Resources Chapter.</p> <p>A nonvacant sites analysis demonstrating the likelihood of redevelopment, experience, trends, and market conditions for SB 9 identified sites as follows (p. H3-14 to H3-16):</p> <p>Senate Bill (SB) 9 Projections</p> <p>In September 2021, Governor Newsom signed Senate Bill (SB) 9 into law, with an effective date of January 1, 2022. SB 9 (1) mandates ministerial approval of duplexes on lots zoned for a single-family residence and (2) requires ministerial approval of subdivisions of a single-family lot into two lots, creating the theoretical possibility of four units on each single-family parcel in the state (with some exceptions). The Terner Center for Housing Innovation at UC Berkeley conducted extensive analysis statewide to determine how many parcels could feasibly utilize the provisions of SB 9²² and found that approximately seven percent of single-family parcels throughout the State may redevelop in this way. In Redwood City, the Terner Center identified 12,000 single-family parcels, of which 10,900 are eligible for SB 9 development pursuant to the SB 9 requirements such as the single-family parcel must be within single-family zoning, the site cannot be located in sensitive habitats identified in the state statute, and the site must be larger than 2,400 square feet. The Terner Center eliminated parcels where market feasibility would deter SB 9 use and concluded that 1,100 new</p>

²² Ben Metcalf, David Garcia, Ian Carlton, Kate MacFarlane. "Will Allowing Duplexes and Lot Splits on Parcels Zoned for Single-Family Create New Homes? Assessing the Viability of New Housing Supply Under California's Senate Bill 9." A Terner Center Report, July 2021.

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demonstrating the likelihood of redevelopment and the existing use will not constitute as an impediment for additional residential use.

The analysis should describe how the Terner Center study determined eligible properties, whether the assumed lots will have turnover, if the properties are easy to subdivide, and the condition of the existing structures.

The analysis should also describe interest from property owners as well as experience. The analysis should provide support for the assumption of 25 percent of eligible properties being developed within the planning period.

Based on the outcomes of this analysis, the element should modify Programs H4-5 (SB 9 Zoning) and H4-3 (Middle Housing) to establish zoning and development standards early in the planning period and implement incentives to encourage and facilitate development as well as monitor development every two

units were market feasible under SB 9 regulations (rounded to nearest 100). The Terner Center analysis does not set a horizon year for this buildout. Conservatively estimating that 25 percent of this ultimate projection could occur in the next eight years, a projection for an additional 275 housing units through SB 9 lot splits and duplex provisions are assumed for the next planning period. Because the affordability of such units is unknown at this time, they are allocated to the moderate- and above-moderate income category, pending guidance from HCD. [To further support these estimates, the City prepared a GIS analysis of R1 and RH zones \(single family zoning districts where SB 9 is applicable\), and identified a total 9,914 lots that are located in single-family zoning districts. Although over 1,300 lots located in Redwood Shores are subject to Homeowner Association \(HOA\) Covenants, Conditions and Restrictions \(CC&Rs\) that would prohibit duplexes and lot splits, SB 9 would apply to the majority of the remaining single-family lots. There are no historic districts within single-family zoning districts and a small number of historic properties are scattered throughout the single-family zoning districts, primarily surrounding the Edgewood neighborhood. Staff has not identified any lots that would be eliminated due to sensitive habitats and State law allows homes within very high fire areas to be built using mitigated measures within the building code. The City does have a limited number of deed-restricted single family affordable units, but the City does not have a rent control ordinance or any housing that has been subject to Ellis Act evictions. The number of lots affected by HOA CC&Rs, historic districts, sensitive habitat areas, and deed-restrictions have been accounted for in the projections below.](#)

[An SB 9 project and an urban lot split could still be allowed on a lot with a tenant if the project does not alter or demolish the existing rented homes. At this time, it is not known how many single-family homes are being rented and applicants will be required to sign an affidavit verifying whether the home is being rented. However, the GIS analysis assumes that 14 percent of single-family homes in R-1/RH areas are being rented based on data from the 2020 American Community Survey five-year estimates.](#)

[The City held a study session with the Planning Commission in June 2022 to review potential changes to the Zoning Ordinance, including development standards and review processes, to implement SB 9 requirements. Zoning amendments to implement SB 9 will be adopted in conjunction with the Housing Element adoption. The standards will comply with State law and will reiterate State law requirements, including reduced setbacks \(four feet in rear and side yards\), ministerial review, reduced parking, and other parameters as allowed by State law.](#)

[Corner parcels in these zones are ideal for lot splits since they typically have larger yards and easy ingress/egress access for units built on the rear of the lot. The parameters used to identify the viable sites are similar to those used by the Terner analysis but included additional parameters. The analysis used the following criteria to identify sites most likely to utilize SB 9:](#)

- [Corner parcels;](#)
- [Parcels with existing single family uses;](#)

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years with and identify additional sites within six months if assumptions are not being met. The element should support this analysis with local information such as local developer or owner interest to utilize zoning and incentives established through SB 9.

A similar analysis should also be completed for sites identified as accommodating missing middle and clarify whether the sites identified under SB 9 overlap with the sites identified to accommodate missing middle.

- [Parcels with a lot size greater than 7,000 square feet;](#)
- [Parcels where no ADU currently exists on the property based on City permit data \(eliminating parcels that have already invested in increasing density\);](#)
- [Parcels with over a 15 percent slope were eliminated.](#)

[The analysis found there are 454 properties in Redwood City that are most viable for SB 9 projects, which could produce more than twice the amount of housing units conservatively estimated and applied to the City's RHNA. Of note, many additional interior \(non-corner\) parcels are also eligible for SB 9 provisions. As such, the projection of 275 housing units through lot splits and SB 9 duplex provisions is a conservative estimate for the planning period.](#)

[In the first half of 2022 \(SB 9 became effective on January 1, 2022\), the City received nine serious inquiries to date for either a lot split or a duplex indicating high development interest. Recent ADU laws have been one of the state's most effective solutions to increasing housing production. ADU laws and SB 9 allow cities to gently add density citywide. Local property owner interest in SB 9 lot splits is likely to correlate to the significant yearly increase in ADU applications submitted and building permits issued, where between 2018 and 2021, there was more than a 250 percent increase in ADU permits issued.](#)

[It has also been clarified that sites identified under SB9 do no overlap sites identified to accommodate missing middle \(p. H3-16\). The assumptions for SB 9 projections do not overlap with areas for missing middle housing potential, discussed below; SB 9 projections are applicable only to single family R-1 and R-H zoning districts. Missing middle housing potential applies to higher density residential zoning districts \(R-2, R-3, R-4, and R-5\).](#)

A nonvacant sites analysis demonstrating the likelihood of redevelopment, experience, trends, and market conditions has been provided for Missing Middle identified sites as follows(p.H3-16 to H3-21):

Missing Middle Housing Projections

Missing Middle Housing is a term used to describe duplexes, triplexes, and ~~fourplexes~~[four or more unit apartments](#) that are compatible in scale with detached single-family homes and are often described as house-scale buildings with multiple units in walkable neighborhoods. It is described as "missing middle" for two reasons:

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- It is rarely constructed – while single-family homes and mid-rise apartments have been commonly constructed in the last 40 or 50 years, duplexes, triplexes, and ~~fourplexes~~[four or more unit apartments](#) have not. They have been “missing” from new construction.
- Income Level – Missing Middle Housing is more affordable than single-family homes, and can be a valuable form of housing for moderate, or middle-income, families.

Missing Middle Housing is located throughout Redwood City’s older neighborhoods. Rather than being built in larger tracts, which was common in the 1960s and 1970s, duplexes, triplexes, and ~~fourplexes~~[four or more unit apartments](#) were interspersed with single family homes in neighborhoods with dense grids of streets and near transit. Most of these neighborhoods are zoned R-2, R-3, R-4, or R-5, which allow for multi-family housing. [Missing middle housing does not overlap with SB 9 housing projections, since SB 9 affects housing in R-1 and RH single family zones.](#)

Existing Zoning Requirements and Revisions

Existing zoning requirements implemented in the 1960s can create barriers towards renovating or building new examples of Missing Middle Housing. The existing Zoning Ordinance was written with an intent to encourage lot consolidation, establishing a minimum lot size threshold and minimum lot width for duplexes, triplexes, and ~~fourplexes~~[four or more unit apartments](#).

Minimum Lot Size

The majority of lots in the R-2, R-3, R-4, and R-5 zones contain single-family homes, with duplexes and triplexes making up 31 percent (1,585 lots). Planned Developments and lots with more than three units make up only four percent (208) of the lots in the study area.

Table H3-44-16: R-2, R-3, R-4, and R-5 Housing Characteristics

Type of Housing	Number of Lots	Percentage
Single-Family	3,123	63%
Single Family + ADU	40	1%
Duplex	1,383	28%
Triplex	202	3%
Four or More Units/Planned Development	208	4%
Total	4,956	

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Under existing zoning regulations, over 75 percent of existing lots are too small to accommodate a duplex or triplex. Currently, all multifamily residential districts require a 7,500 square foot lot to build a duplex and a 10,000 square foot lot to build a triplex. This restriction limits the density allowed, creating a gap between the envisioned General Plan density and the allowed Zoning District density. [As part of the zoning text amendment to occur in conjunction with the Housing Element, the minimum lot size requirements will be revised to 5,000 square feet for all building types, removing the 7,500 minimum square feet for duplexes, 10,000 square feet for triplexes, and 1,000 to 2,000 square feet for each additional unit in excess of three units on the same lot, depending on the zoning district.](#)

Table H3-~~55~~¹⁷: R-2, R-3, R-4, and R-5 Housing Characteristics

Lot Size (Square Feet)	Number of Lots	Percentage of Total Lots	Max. Allowed Housing Type
Less than 7,500	3,827	77%	Single-Family
7,500 to 10,000	742	15%	Duplex
Greater than 10,000	418	8%	Triplex or more, depending on zoning district

Minimum Lot Width

Multifamily districts also currently require minimum lot widths for duplex or triplex development, with a minimum lot width requirement of 50 feet for duplexes and 75 feet for triplexes. Lots in older neighborhoods are rarely built with these types of dimensions. Only four percent of R-2 lots are wide enough for a triplex, and only six percent of R-4 or R-5 lots have the necessary width. [As part of the zoning text amendment to occur in conjunction with the Housing Element, the minimum lot width requirement will be revised to 50 feet for all building types, which is a reduction from 75 feet for a triplex or larger development.](#)

Minimum Lot Frontage

Multifamily districts require a minimum lot frontage of 50 feet for developments with two dwelling units or more. [As part of the zoning text amendment to occur in conjunction with the Housing Element, the minimum lot width requirement will be revised to 35 feet for all building types, which is a reduction from 50 feet for a duplex, triplex, or larger development.](#)

Parking

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Two parking spaces per unit are required for duplexes, triplexes, and multifamily units outside of the downtown. Multi-family units require at least one covered parking space per unit, which is more expensive to construct and requires more surface area than uncovered parking. Currently, uncovered parking is required to be set back from property lines with the same setbacks as the multifamily unit. Covered parking includes both garages and carports. As part of the zoning text amendment to occur in conjunction with the Housing Element, the requirement for covered parking for multi-family units in multi-family zones will be removed, [parking will be reduced to one space per unit, guest parking will no longer be required](#), and parking will be allowed within all setbacks.

Open Space

Multifamily districts have open space requirements for missing middle development based on bedroom count, with a minimum of 300 square feet of open space required for a one-bedroom unit and an additional 100 square feet required for each additional bedroom. Comparatively, mixed use zoning districts, which allow higher densities, have less intensive fixed open spaces requirement (125 square feet per unit). Existing missing middle housing in older neighborhoods are rarely built with these open space requirements and could be considered nonconforming. As part of the zoning text amendment to occur in conjunction with the Housing Element, the open space requirements will be reduced to [150300](#) square feet per unit.

Proposed Changes to Zoning Regulations for Middle Housing

The Redwood City Housing and Human Concerns Committee initiated an effort to analyze and amend the City's Zoning Ordinance to remove these barriers in a variety of zoning districts (R-2, R-3, R-4, and R-5). The largest impact of these changes is anticipated to occur in the R-2 and R-3 zones, where previous zoning regulations limited many individual parcel's ability to achieve maximum densities. These zone text amendments will be proposed in conjunction with adoption of the Housing Element and include revisions to:

- Minimum Lot Size: Revised to 5,000 square feet for all building types (removing 7,500 minimum square feet for duplexes, 10,000 square feet for triplexes, and 1,000 to [2,000500](#) square feet for each additional unit in excess of three units on the same lot, depending on the zoning district).
- Minimum Lot Width: Revised to [35 feet, or 20 feet wider than the driveway approach width, whichever is greater,50 feet for all building types](#). This is revised down from [50 feet for a single family dwelling or duplex and](#) 75 feet for a triplex or larger development.
- [Minimum Lot Frontage: Revised to 35 for all building types. This is a reduction from 50 feet for a duplex or multifamily development.](#)
- Parking Requirements: [Reduced parking requirement to 1 space per unit, removed requirement for covered parking spaces and allow, removed guest parking requirement, and allowed](#) parking to be located within required setbacks.
- Minimum Open Space: Reduced requirement from 300 square feet of open space [plus 100 square feet](#) per bedroom to [150300](#) square feet of open space per unit.

Anticipated Increase in Housing Production

Redwood City collaborated with 21 Elements to analyze strategies to expand housing opportunities and meet projected housing needs associated with the RHNA. The purpose of the analysis was to provide an initial assessment of potential strategies to meet the RHNA and indicate the market feasibility of policy changes and the potential for adding housing capacity. The analysis quantified, where feasible, the net new unit capacity that would result from the changes in policy. The strategies were tested with zoning-sensitive pro forma models to evaluate development feasibility. The analysis concluded that removing barriers to missing middle housing in multi-family zoning districts would have a “substantial” net new housing capacity result. The modeling suggested that the zoning text amendments proposed could have a major influence on development projects, resulting in the largest change in market-feasible units among all strategies tested.

Similar to ADU construction, it is impossible to predict with certainty the particular individual parcels within the R-2, R-3, R-4, and R-5 zoning districts will redevelop with missing middle housing products. However, the City estimates a similar level of demand and resulting increase in housing production to parallel the increase in ADU construction in Redwood City. Using the ADU projections as a benchmark, missing middle housing ~~is could be~~ anticipated at the same level (506 units during the planning period). While missing middle housing is intended to be more affordable by design, the affordability levels of such units are unknown at this time and ~~are could be~~ conservatively estimated to be equally divided between moderate-~~—~~ and above moderate-income levels. [The City also undertook a GIS site analysis of properties that could redevelop into middle housing using the following criteria:](#)

- [Parcels in R2, R3, R4, and R5 zones,](#)
- [Parcels with one single family residence as an existing use \(eliminating parcels with higher density or other types of uses less likely to convert to multi-family housing\), and](#)
- [Parcels where no ADU currently exists on the property based on City permit data \(eliminating parcels that have already invested in increasing density\).](#)

[The analysis found that there are 3,640 properties within these parameters. The City then applied another criteria to the query: lot coverage. This piece is critical because it identifies areas where the existing footprint is small compared to the lot size. The analysis concluded that of the 3,640 properties originally identified, 872 properties have lot coverage of 35 percent or less, with significant residual land area for development available.](#)

[In recent years, middle housing has become an emerging trend in multifamily development not just in California, but in cities across the country. Middle housing can provide both rentals and homeownership opportunities across a broad range of unit sizes and price-points, especially for those seeking more affordable housing in desirable areas. Housing production stagnated in Redwood City and throughout the State in the 1990s and early 2000s, limiting the supply of housing. High demand and short supply have driven property values to levels that have shut many families and individuals out of the ownership market as well as affordable rental housing.](#)

[According to the Association of Bay Area Governments \(ABAG\) report on middle housing in the region, in 2021 the median sales prices of single family detached houses and townhouses were both over \\$1 million in several Bay Areas counties, including San Mateo County.²³ However, the median sale price of single family detached units are consistently higher than the median sale prices of townhouses across all counties in the ABAG region. The](#)

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median sale price of a single family home also exceeds 120 percent of area median income (AMI) in many counties, as compared to townhouses which are affordable to close to 100 percent of AMI. The study found that while the pricing of new construction is volatile, it is more expensive than existing housing and new single family detached home prices are escalating faster than that of new townhouses. Newer and smaller-scale multifamily buildings also tend to be less expensive than other, larger multifamily buildings, likely due to differences in the cost of construction at different scales and the number and type of amenities that are provided in the building. Two-bedroom rents of newer small multifamily buildings are generally affordable at 70-110 percent of AMI for a three-person household, while those for larger new multifamily buildings tend to be affordable for households earning 100-140 percent of AMI for a three-person household. Furthermore, since missing middle housing can occur in a range of contexts, it can be built by different types of developers. This could include the typical large professional developer, home remodelers, small companies that buy older homes with cash, and local entrepreneurs with limited financing. Broadening the pool of developer types also increases the potential of middle housing development. These conditions demonstrate there is market demand and significant development potential for middle housing development in Redwood City.

Existing uses are not anticipated to be an impediment to new housing as evidenced by current trends in projects in these zones, where applicants add additional units without demolishing existing structures (see Tables H3-6 and H3-9). Many of the properties in these zones are developed with single family structures (3,640 parcels) but have residual capacity for additional units, often in the rear of lots. The City's proactive revisions to zoning regulations (Program H4-3) will facilitate this construction and remove existing barriers to middle housing development.

Sites redeveloping to higher-intensity uses is likely to occur in Redwood City. Most development in Redwood City occurs as infill development and replaces less intense uses. The scarcity of land makes higher-density development most cost-effective and development often occurs on small lots. Recently completed and entitled housing projects on small lots are summarized in Table H3-6.

In addition, two recent 100-percent affordable projects were on very small sites: 612 Jefferson Ave and 1304 El Camino Real.

[Table H3-6: Small Lot Trends \(since 2016\)](#)

Address	Acres	# Units	Zone	Lot Consolidation (Y/N and how many lots)	Prior Use (Before Redeveloping)
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²³ The Bay Area's Middle Housing Market. Association of Bay Area Governments. September 17, 2021.

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31 Center St	0.18	7	MUC-ERC	N	Single family unit
77 Birch St	0.37	9	R-5-O	N	Office
211-217 Vera Ave	0.49	10	R-4	2	Duplex & four-plex
239 Vera Ave	0.26	5	R-4	N	Single family unit
420 Cedar St	0.11	2	R-4	N	Duplex
491 Oak Ave	0.19	2	R-4	N	Single family unit
612 Jefferson Ave	0.11	20 (affordable)	DTPP	N	Vacant
955 Woodside Rd	0.42	8	CG-R	N	Animal hospital
1013 Hudson St	0.21	2	R-2	N	Single family unit
1030 Haven Ave	0.22	2	R-2	N	Single family unit
1128 McKinley St	0.18	2	R-2	N	Duplex
1304 El Camino Real	0.21	39 (affordable)	DTTP	N	Auto sales/ repair
1460 Kentfield Ave	0.12	2	R-2	N	Single family unit
2336 El Camino Real	0.51	16	MUC-ERC	N	Daycare

Table H3-76: ADU, SB 9 and Middle Housing Projections to Meet the RHNA

Project	Extremely/ Very Low- Income (0- 50% AMI)	Low- Income (50-80% AMI)	Moderate- Income (80- 120% AMI)	Above Moderate- Income (+120%)	Total
Projected ADU construction	152	152	152	50	506
Projected SB 9 duplex construction	--	--	137	138	275
Projected Missing Middle (R2-R5 ZTAs)	--	--	253	253	506
Total	152	152	542	441	1,287

Notes: Estimated ADU production is credited toward the RHNA consistent with HCD guidelines and ABAG Housing Technical Assistance Team ADU affordability assumptions (Affordability of Accessory Dwelling Units: A Report and Recommendations for RHNA 6; September 8, 2021).

Sites allowing the State-designated default density standard (at least 30 du/ac) are credited toward the lower income RHNA. Small sites meeting the default density standard are credited toward the moderate- and above moderate-income category, as are sites with lower densities.

Programs H4-5 (SB 9 Zoning) and H4-3 (Middle Housing) on p. H-40 to H-41 in the Goals and Policies Chapter have been modified to establish zoning and development standards early in the planning period and implement incentives to encourage and facilitate development as well as monitor development every two years with and identify additional sites within six months if assumptions are not being met.

Program H4-3: Middle Housing Development. Duplexes, triplexes, and smaller [multi-family](#)[multifamily](#) developments can provide affordable housing options to renters and owners, increasing the supply of housing and assisting Redwood City in meeting its regional share of housing growth. To remove constraints and better encourage small multi-family developments in the R-2, R-3, R-4, and R-5 zoning districts, zoning text amendments will be pursued.

Objectives:

- Phase 1: Complete zoning text amendments to encourage middle housing as follows:
 - Minimum Lot Size: Revise to 5,000 square feet for all building types (removing 7,500 minimum square feet for duplexes, 10,000 square feet for triplexes, and 1,000 to 2,000 square feet for each additional unit in excess of three units on the same lot, depending on the zoning district).

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	<p><i>Timeframe:</i> <u>Complete Phase 1 zone text</u>Bring proposed amendments <u>to City Council for hearing</u> in conjunction with <u>the</u> Housing Element adoption (Short Rangeby May 31, 2023); Study <u>and hold a City Council hearing for</u> Phase 2 zone text amendments <u>within three</u>by December 2026; <u>Monitor production and affordability every two years</u> of Housing Element adoption (Mid Range)<u>and identify/implement alternative actions, if necessary, to</u> <u>meet the RHNA (Ongoing).</u></p>
	<p><i>Responsible Party:</i> Community Development</p>
	<p><i>Funding Sources:</i> Departmental Budget</p>

- Minimum Lot Width: Revise to ~~35 feet, or 20 feet wider than the driveway approach width, whichever is greater. This is revised down from~~ 50 feet for all building types. This is a single family dwelling or duplex and reduction from 75 feet for a triplex or larger development.
- Parking Requirements: Minimum Lot Frontage: Revise to 35 feet for all building types. This is a reduction from 50 feet for a duplex, triplex, or larger development.
- Parking Requirements: Revise to a minimum of 1 space per unit for a multifamily dwelling outside the downtown and mixed-use zones. This is a reduction of 1 space per unit. Remove requirement for covered parking spaces and allow parking to be located within required setbacks. Remove guest parking requirements. Remove minimum parking requirements for most commercial and all residential in all areas within ½ mile of high frequency transit.
- Minimum Open Space: Reduce requirement from 300 square feet of open space plus 100 additional square feet per bedroom to 150~~300~~ square feet of open space per unit.

▪ Phase 2: Consider~~Analyze~~ additional changes to the R-2 through R-5 Zoning Districts to further encourage middle housing, such as establishing a minimum density of no less than 75 percent of the maximum allowable density or one dwelling unit, whichever is greater.

Timeframe: Complete Phase 1 zone text~~Bring proposed~~ amendments to City Council for hearing in conjunction with the Housing Element adoption (Short Range~~by May 31, 2023~~); Study and hold a City Council hearing for Phase 2 zone text amendments within three~~by~~ December 2026; Monitor production and affordability every two years ~~of Housing Element adoption (Mid Range)~~and identify/implement alternative actions, if necessary, to meet the RHNA (Ongoing).

Responsible Party: Community Development

Funding Sources: Departmental Budget

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	<p>Program H4-5: SB 9 Zoning and Subdivision Ordinance Amendments. SB 9 requires ministerial approval of housing developments containing no more than two residential units in the R-1 and R-H zones. In response, definitions, use regulations, and development standards may need revising.</p> <p>Objective:</p> <ul style="list-style-type: none"> Review the City's Zoning Ordinance and Subdivision Ordinance and consider implement updates as needed to provide clarity and facilitate housing development under SB 9. These include adopting updated definitions, use regulations, development standards, and ministerial processes based on the outcome of a complete SB 9 analysis. Staff anticipates adoption of an ordinance to implement the requirements of SB 9 as part of the Housing Element adoption process. Production and affordability will be monitored every two years and alternative actions will be implemented if necessary to meet the RHNA. <p><i>Timeline: 2023 (immediate); Ongoing</i></p> <ul style="list-style-type: none"> In coordination with research being conducted at the State level, pursue opportunities to incentivize and provide funding assistance for homeowners to provide affordable units under SB 9 to further housing opportunities and more affordable homeownership options in high opportunity areas. <p><i>Timeline: Bring proposed amendments to City Council for hearing in conjunction with the Housing Element (by May 31, 2023); Monitor production and affordability every two years and implement alternative action, if necessary; Ongoing coordination</i></p> <p>Responsible Party: Community Development and Transportation Funding Sources: Departmental Budget</p>
City-owned Sites: Given the element identifies publicly-owned sites, it should include a discussion of suitability and availability for development in the planning period, including an anticipated schedule for development, any necessary	<p>There are two city-owned sites identified in the Housing Element; 611 Heller St and 1580 Maple Street. Both are suitable sites for housing. 611 Heller St is vacant and very conservatively has capacity for one single family dwelling. 1580 Maple Street is located on the site of the former Maple Street Shelter and the County has recently issued a request for proposals for residential development and has selected MidPen Housing to develop the site. Additional details about the sites have been added to Tables H3-20 and H3-21. A narrative description of the existing uses on 1580 Maple Street has also been added to p. H3-28 of the TBR Housing Resources Chapter:</p> <p>1580 Maple St</p>

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steps to develop the properties and any known constraints to development in the planning period. Lastly, the element should add or modify programs based on the outcomes of this analysis and commit to a schedule of action to facilitate development, numerical objectives consistent with assumption and compliance with the Surplus Land Act.

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This site consists of one 2.02 acre parcel in the MU-WF zoning district. It is adjacent to a recently approved townhome residential development that borders the creek. In 2021, Redwood City negotiated a land swap of a 2.5-acre parcel at 1469 Maple Street for 2.02 acres of County-owned land at 1580 Maple Street, currently the site of a 145-bed homeless shelter and a decommissioned jail. The County is constructing a new shelter on the 1469 Maple Street site, with 240 individual sleeping units. As part of the property exchange, the County has a 5-year option period to ground lease from the City the portion of the 1580 Maple Street Parcel not needed for the Blomquist roadway extension. This allows the City to construct the Blomquist Extension, and leaves 1.5 acres that could be used for other uses including potential additional affordable housing or permanent supportive affordable housing. The County issued a request for proposals in July 2022 and selected MidPen Housing to develop the site in August 2022. MidPen's proposed development for the site includes 108 extremely low-income units plus two manager's units for a total of 110 units. All 108 units are proposed as permanent supportive housing units for people experiencing homelessness.



Program H1-9 has been added to p.H-26 of the Goals and Policies Chapter:

Program H1-9: [City Owned Sites for Housing](#). The City-owned vacant lot at 611 Heller St has been identified as a site suitable for housing, along with the former Maple Street Shelter (1580 Maple). The County of San Mateo has an option to ground lease the Maple Street Site for an affordable housing development. The County issued a request for proposals for the site and selected MidPen Housing to develop the site in August 2022. The City will comply with the Surplus Land Act and will move forward with affordable housing efforts at these locations.

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	<p>Objective:</p> <ul style="list-style-type: none"> ▪ Issue an RFP for development of the Heller St site. Identify any site and development constraints, remove barriers, and apply development incentives. ▪ Coordinate with the County regarding the proposed affordable housing project at the Maple Street site. <p>Timeframe: Issue RFP for Heller Site by December 2027; Continue coordinating with the County on their development process for the Maple Street Site until project completion which is estimated for 2025</p> <p>Responsible Party: City Manager's Office, Housing Division and Community Development and Transportation</p> <p>Funding Sources: Departmental Budget</p>
<p>Sites Identified in Prior Planning Periods: Sites identified in prior planning periods shall not be deemed adequate to accommodate the housing needs for lower-income households unless a program, meeting statutory requirements, requires rezoning within three years. The element should include a program if utilizing previously identified sites in the current planning period.</p>	<p>The AB 1397 analysis has been revised to provide further analysis and a program has been included to meet statutory requirements.</p> <p>The AB 1397 analysis has been revised as follows on p. H3-37 to H3-39 of the TBR Housing Resources Chapter.</p> <p>Site Suitability, Realistic Capacity Availability and Re-use of Sites (Assembly Bill [AB] 1397)</p> <p>Site Suitability</p> <p>Consistent with updated Housing Element law (Assembly Bill 1397), related to the suitability of small and large sites, the lower-income sites inventory presented in this section is limited to sites of between 0.5 and 10 acres in size, as HCD has indicated these size parameters best accommodate lower-income housing. In this inventory, several sites include multiple parcels that are less than one-half acre in size; however, when consolidated with adjacent parcels, most achieve more than 0.5 acres. Lot consolidation is common in Redwood City, and Program H1-8 is included to continue to facilitate lot consolidation and support small site development. Small sites (less than one-half acre) are credited toward the moderate-income categories to account for a potential variety of types, sizes, and amenity levels in future higher-density development projects.</p> <p>Realistic Availability</p> <p>AB 1397 also adds specific criteria for assessment of the realistic availability of non-vacant sites during the planning period. If non-vacant sites accommodate half or more of the lower-income need, the Housing Element must present "substantial evidence" that the existing use does not constitute an impediment for additional residential use on the site. Due to the built-out nature of Redwood City, most sites have existing uses. Non-</p>

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vacant sites included in the inventory have been chosen due to their location, existing uses, and potential for intensification. To ensure that appropriate sites have been chosen, properties that show recent investments or updates or that contain uses of local importance are not included, and clear criteria were used to evaluate all sites within Redwood City, as described above.

[In order to ensure sites selected for the site inventory do not have existing uses that are impediments to housing development, staff conducted extensive analysis to only select sites that are most likely to develop during the planning period, employing a front-end method of filtering out parcels. Development likelihood and feasibility was determined by a number of different variables, including developer interest, improvement-to-land value ratio, existing lot coverage, lot size, future development potential, and existing use and unit count where applicable. The City analyzed the most current parcel-level data across such variables to determine which sites were most appropriate for inclusion into the site inventory and to estimate the number of additional units that are likely to be developed. Additionally, staff conducted visual screenings of sites and removed any site that appeared unlikely to develop for any reason based on an aerial photography analysis.](#)

[As indicated in the project- and site-specific descriptions above, all of these screening criteria are met on the identified sites. One of the most important criteria in determining whether existing uses are an impediment to housing development is developer and/or property owners' interest in redeveloping the site. Where property owners and developers have indicated interest in redevelopment, the existing use can be determined to not impede development. This information, along with past development trends that indicate the types of uses that redevelop into housing \(as summarized in Table H3-9\) provides crucial data to support which uses are more likely to redevelop into housing over time. Housing trends indicate that shopping centers and small retail restaurant establishments with extensive surface parking are likely to redevelop. For example, the Broadway Plaza project \(listed under Table H3-2: Approved Projects\) will redevelop an existing strip commercial center, which was identified as an opportunity site during the previous housing element. The commercial center had included active uses, including a Big Lots, Jack in the Box, and a grocery store, which will be redeveloped into a project with 518 residential units, a child care center, office, and retail space. Projects in the development pipeline replace office/professional buildings \(e.g., 353 Main Street\), a hotel \(e.g., Comfort Inn\), storage \(e.g., 920 Shasta St\), and a bank \(e.g., 1900 Broadway\). The sites identified to meet the RHNA contain similar uses to these approved and proposed projects, as well as the history of development trends portrayed in Table H3-9.](#)

[H3-20, H3-21, -H3-22, and H3-23 include a summary of criteria used to determine site viability. As indicated, the existing uses are not deemed an impediment to redevelopment and will likely discontinue in the planning period as new housing projects move forward and are pursued.](#)

Re-use of Sites

AB 1397 also requires that specific parameters be placed on sites that were used in previous planning cycles but did not develop and are now used in the current Housing Element to meet the lower income RHNA. [Specifically, vacant sites identified in the previous two Housing Elements and non-vacant sites](#)

[identified in the previous Housing Element may only be deemed adequate to accommodate a portion of the housing need for lower-income households if the site is zoned at residential densities consistent with the default density established by HCD \(30 units per acre\) : The site must meet the required default densities \(i.e., is zoned to allow 30 du/acre\);](#) and the site must allow residential use by right for housing developments in which at least 20 percent of the units are affordable to lower income households. 'By right' means that no review is required under the California Environmental Quality Act (CEQA), unless a subdivision is required, and the project can only be reviewed using 'objective' design standards. [Per HCD guidance sites identified in previous Housing Elements but credited toward the moderate-or above moderate-income RHNA in the current Housing Element are not subject to the provisions of AB 1397 since they are not being used to address the lower-income RHNA.](#)

~~However, As noted in HCD guidance documents, due to updates in the prior planning period to the general plan or other planning activities, such as the creation of a precise plan, some sites previously identified in the housing element may have been rezoned allowing a higher density, and therefore increasing the potential housing capacity of the site. because the zoning characteristics of this site have changed, it can be considered a new site for the purposes of the Housing Element inventory. Because the Downtown Precise Plan will be amended in conjunction with the Housing Element to remove development maximums, and the maximum density in the MU-C, MU-N, and MU-T zoning districts was increased, all sites in these areas are considered new sites. Only one site at 2650 El Camino Real (indicated in Figure H3-1) is allocated to meet the very low- or low-income RHNA and is reused from previous cycles without a change to zoning to be considered a new site.~~

[Many of the sites identified in the previous Housing Element have developed with housing. However, a few parcels have not redeveloped yet; these sites are included to meet the 2023-2031 RHNA because they remain highly viable sites for redevelopment with new housing. These parcels are subject to AB 1397 reuse requirements and are identified in Tables H3-20, H3-21, H3-22, and H3-23 and in Figure H3-1. Program H1-9 has been added to be Housing Plan to create a housing overlay for sites subject to AB 1397 that allows residential use by right for housing developments in which at least 20 percent of the units are affordable to lower-income households.](#)

Program H1-10 has been included meeting the statutory requirements for reuse sites on p. H-26 of the Goals and Policies Chapter

[Program H1-10: Provide Adequate Sites for Lower Income Households on Nonvacant Sites Previously Identified .](#)

[AB 1397 requires that vacant sites identified in the previous two Housing Elements and non-vacant sites identified in the previous Housing Element only be deemed adequate to accommodate a portion of the housing need for lower-income households if the site is zoned at residential densities consistent with the default density established by HCD \(30 units per acre\) and the site allows residential use by right for housing developments in which at least 20 percent of the units are affordable to lower-income households.](#)

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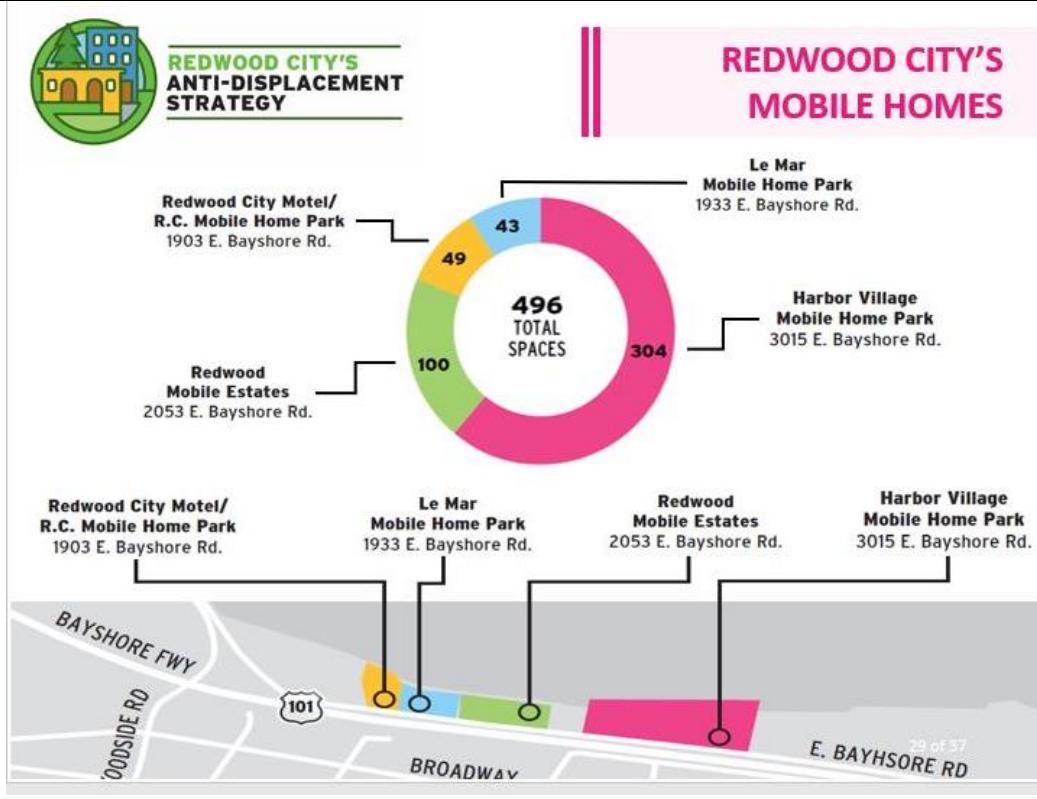
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	<p>Objective:</p> <ul style="list-style-type: none"> For vacant sites identified in the last two planning cycles, and nonvacant sites identified in the last planning cycle (see Table H3-20 and H3-21 in the Resources Chapter of the Housing Element), rezone the sites to create a housing overlay that allows residential use by right pursuant to Government Code section 65583.2(i) for housing development projects²⁴ in which at least 20 percent of the units are affordable to lower-income households. 'By right' means that no review is required under the California Environmental Quality Act (CEQA), unless a subdivision is required, and the project can only be reviewed using objective design standards. <p>Timeframe: January 2026</p> <p>Responsible Party: Community Development and Transportation</p> <p>Funding Sources: Departmental Budget</p>
<p>Availability of Infrastructure: The element includes a general statement on availability of utilities. However, it must also analyze whether sufficient total water and sewer capacity (existing and planned) can accommodate the regional housing need and add or modify programs if necessary.</p>	<p>The following had been added regarding the analysis of the availability of infrastructure (p. H3-53 of the Housing Resources Chapter):</p> <p><u>As part of the Housing Element update, an Environmental Impact Report will assess the impacts of the Housing Element and proposed zoning changes on the City's available water supply and sewer capacity to ensure that planned development, consistent with the regional need, is supportable in the future.</u></p>
<p>For your information, water and sewer service providers must establish specific procedures to grant priority water and sewer service to developments with units affordable to lower-income</p>	<p>Compliance has been demonstrated compliance through a program to establish a procedure. See p. 45 of the Goals and Policies Chapter.</p> <p>Program H4-10: Water and Sewer Service Providers. Government Code §65589.7 requires water and sewer providers receive amendments to Housing Elements promptly.</p> <p>Objective:</p>

²⁴ Housing development projects include residential-only projects and mixed-use projects where at least 2/3 of the square footage is residential.

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<p>households. (Gov. Code, § 65589.7.) The element should clarify whether the City is a water or sewer service provider and if so, demonstrate compliance with this requirement either through discussion or a program to establish a procedure.</p>	<ul style="list-style-type: none"> ▪ Immediately following adoption, deliver the 2023-2030<ins>2031</ins> Redwood City Housing Element to all providers of sewer and water service within the City of Redwood City. ▪ <u>As the local water and sewer provider, establish procedures to grant priority water and sewer service to developments with units affordable to lower-income households.</u> <p>Timeframe: <u>Immediate—Deliver the Housing Element to all providers</u> within one month of adoption of the Housing Element; <u>establish priority procedures for affordable developments by December 2024.</u></p> <p>Responsible Party: Community Development and Transportation</p> <p>Funding Sources: Departmental Budget</p>
<p>Zoning for a Variety of Housing Types (Manufactured Housing): As noted on page H2-16, the element should include a program to amend zoning and procedures to permit manufactured housing in compliance with state law.</p>	<p>The following has been added to clarifying the City's definition of a "dwelling" is inclusive of manufactured housing in compliance with state law on p. H2-20 of the TBR Housing Constraints Chapter:</p> <p>State law requires that mobile and manufactured homes be considered a single-family dwelling and permitted in all zones that allow single-family housing. Manufactured housing can be subject to design review. Mobile home dwellings are permitted by right within the MH District. <u>Program H3-5 is included in the Housing Plan to revise and update The Zoning Ordinance definitions to include manufactured homes within the Ordinance's definition of "dwelling."</u> <u>" is inclusive of manufactured homes consistent with State law.</u> There are four mobile home parks in Redwood City. As part of the City's Anti-Displacement Strategy, preservation recommendations have been identified, including rezoning parks that do not currently have consistent residential zoning and General Plan Land Use designations to the Mobile Home Park zoning district and the MDR General Plan land use designation (Program H2-7).</p>

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	<p>4. An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures... (Gov. Code, § 65583, subd. (a)(5).)</p> <p>Land Use Controls: While the element identifies development standards on page H2-8, it must analyze whether the development standards are a constraint to development.</p> <p>The analysis should address all development standards (e.g., lot coverage, heights, setbacks, parking) and any impacts on housing supply, cost, timing, ability to achieve maximum densities and any preponderance of utilizing exception processes.</p> <p>The analysis has been updated to address all development standards and their impact on the supply of housing on p. H2-8 to H2-12 in the TBR Housing Constraints Chapter:</p> <p><i>Development Standards</i></p> <p><u>Residential development standards established in the Zoning Ordinance are designed to provide orderly development of the City and to protect and promote the health, safety, and welfare of local residents, as well as implement the policies of the General Plan. The development standards established by the Zoning Ordinance can have an effect on the ability of property owners to construct and maintain housing. Each of the standards is examined and its impact on housing in Redwood City is discussed below. If these development standards are amended as discussed below, and the housing is not getting constructed on these lots, the City will propose a minor exception process to ensure there are no constraints to housing development.</u> Table H2-3 below summarizes key development standards for the residential and applicable portions of the mixed-use zones.</p> <p>...</p> <p><i>Lot Size and Width</i></p> <p><u>These lot area minimums are considered the main constraint to housing production in R-2 through R-5 districts in Redwood City. The current Zoning Ordinance establishes minimum lot areas in residential zones. There are no minimum lot areas in the mixed use zones. The minimum lot area in residential zones varies depending on the number of dwelling units constructed. Currently, all multifamily residential zoning districts (R-2, R-3, R-4, and R-5) require a 7,500 square foot minimum lot size to build a duplex and a 10,000 square foot lot to build a triplex. This restriction limits the density allowed, creating a gap between the envisioned General Plan density and the allowed Zoning District density. It also incentivizes development to acquire multiple lots for one larger development, which often does not maintain the existing building pattern of smaller buildings on narrower, smaller lots. These lot area minimums are considered a constraint to housing production, particularly for Missing Middle Housing. Multifamily districts also currently require minimum lot widths for duplex or triplex development, with a minimum lot width requirement of 50 feet for duplexes and 75 feet for triplexes. Lots in older neighborhoods are rarely built with these types of dimensions. Only four percent of R-2 lots are wide enough for a triplex, and only six percent of R-4 or R-5 lots have the necessary width.</u></p> <p><u>The Redwood City Housing and Human Concerns Committee initiated an effort to analyze and amend the City's Zoning Ordinance to remove these barriers in the R-2, R-3, R-4, and R-5 zoning districts. The largest impact of these changes is anticipated to occur in the R-2 and R-3 zones, where previous zoning regulations limited many individual parcel's ability to achieve maximum densities. These zone text amendments are proposed in conjunction with adoption of the Housing Element (Program H4-3) and include revisions to:</u></p>

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- Minimum Lot Size: Revise to 5,000 square feet for all building types in R2-R5 zones (removing 7,500 minimum square feet for duplexes, 10,000 square feet for triplexes, and 1,000 to 2,500 square feet for each additional unit in excess of three units on the same lot, depending on the zoning district).
- Minimum Lot Width: Revise to 50 feet for all building types. This is revised down from 50 feet for a single-family dwelling or duplex and 75 feet for a triplex or larger development.
- Minimum Lot Frontage: Revise to 35 feet for all building types. This is revised down from 35 feet for a single-family dwelling and 50 feet for a duplex, triplex, or larger development.

With these revisions constraints to development in multi-family residential zoning districts will be significantly reduced.

Lot Coverage

Maximum lot coverage standards vary from 40 percent in RH to R-2 zones to 60 percent in R-3 to R-5 zones. Mixed use zones have no maximum standard. These standards are typical in many Bay Area cities and in Redwood City have not historically been considered overly restrictive to the production of housing.

Heights

In Redwood City, the maximum building height ranges from 28 feet in low density residential zones to 75 feet in high density residential zoning districts. In mixed use zoning districts, height limits vary from six to twelve stories in the Downtown Precise Plan area and 40 to 60 feet in the other mixed-use zones. These heights are not considered a constraint, since past development trends in the City show that high-density residential developments are able to achieve close to or exceed the maximum permitted densities under current height limits. The City's inclusionary ordinance for developments less than 20 units have affordability requirements that trigger the state density bonus incentives, which include bonus heights. Furthermore, the City is increasing building heights and densities in mixed use zones (Program H1-6) to further encourage development of housing and affordable housing in the community.

Setbacks

Front setback requirements range from 15 to 25 feet in residential zones, 0 to 35 feet in the Downtown Precise Plan, and no minimum to eight feet in mixed use zones. Side and rear setbacks range from five to 25 feet in residential zones, 0 to 15 feet in Downtown, and no minimum to 10 feet in mixed use zones. These standards are typical to many cities in the Bay Area and do not pose a constraint to housing production.

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	<p>Research has shown that parking minimum requirements encourage less dense development because more physical space is needed to accommodate these requirements. In recent years, many cities across California have instead begun to implement parking maximums, which establish a cap for the number of parking spaces allowed. This controls the amount of space used to accommodate parking and allows housing developers to build more dwelling units. With this principle in mind, Redwood City's parking maximums are not considered a constraint. Furthermore, according to a 2014 study prepared for the 21 Elements project, Redwood City requires equal to or less parking than nearly all neighboring jurisdictions. Even so, Redwood City understands the cost of constructing parking can be a constraint to new housing development, especially for smaller infill projects. During the previous Housing Element planning period, the City updated parking requirements for single-family, duplex, and triplex projects to increase site design feasibility and align with accessory dwelling unit allowances, including allowing for tandem parking and parking within required setbacks. The Housing Element includes Program H4-3 to reduce the number of parking space required outside of downtown and mixed-use zones, remove the requirement for covered parking spaces and allow parking to be located within required setbacks in residential multi-family zoning districts, to further reduce impediments to site planning and support middle housing in these areas. In addition, to further incentivize higher density housing and to ensure impediments are removed if they are identified. Program H4-7 to is included in the Housing Element to continue to analyze parking standards and consider for persons with disabilities and pursue reduced parking requirements and analyze other measures for parking for all multi-family units such as eliminating parking minimums and unbundling parking from the dwelling unit for large projects.</p>
<p>Local Processing and Permit Procedures: The element lists various permit procedures (e.g., design review, conditional use permit (CUP), planned development), it should clarify which procedures are typical for development, particularly developments consistent with zoning and the general plan.</p> <p>The analysis should describe the components of the procedure, list and evaluate approval findings and</p>	<p>The following has been added to provide clarity on which procedures are typical for development, the components of the procedures, and an analysis on approval findings. It includes an analysis on CUPs and planned developments. Finally it discusses the discrepancies in length of approval time between single family and multi-family projects (p. H2-26 and H2-28 to H2-29).</p> <p>Processing and permit procedures may pose a considerable constraint to the production and improvement of housing. Common constraints include lengthy processing time, unclear permitting procedures, layered reviews, multiple discretionary review requirements, and costly conditions of approval. These constraints can increase the final cost of housing, uncertainty in the development of the project, and overall financial risk assumed by the developer. Redwood City's development review process is designed to accommodate housing development applications of various levels of complexity and requiring different entitlements. Processing times vary with the complexity of the project. Table H2-9 outlines 10 outlines the typical timelines for various residential entitlement approvals that may be required. Single-family dwelling unit applications (a single unit on an existing lot) typically take two months and depend upon a complete submittal; while a multifamily family development consisting of 20 units or more can take six to nine months. These timeframes are not unusual for residential development in the region. The discrepancy in length of approval time between single family and multi-family projects is due to the level of complexity of larger multi-family projects. Ministerial review is limited to one-story single-family homes and/or ADUs, and developments utilizing the regulations of SB 9. An Architectural Permit is required for new two-story single-family homes and duplexes and multi-family projects of three or more units. Planning Commission review is also required for projects that are over 35 feet in height.</p>

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<p>address any impacts on housing supply (number of units), cost, timing, and approval certainty.</p> <p>If exception processes such as CUPs or planned developments are typical or required, the element should include specific analysis and programs to address constraint.</p> <p>For example, the element should clarify whether the CUP is required for all developments that exceed three stories or 35 feet in height and whether the planned development permit is optional.</p> <p>Lastly, the element must analyze the significant discrepancies in length of approval time for single family and multifamily projects under ministerial review.</p>	<p><u>Larger, and thus more complicated projects generally require additional information from applicants to ensure compliance with zoning standards. Staff reviews the plans and contacts the applicant if any corrections are necessary. Lengthy review periods, multiple application revisions, and delays in approval can increase the time it takes to process development applications, increasing cost of development. The City complies with permit streamlining requirements; however, there are additional factors within the City's control that can contribute to delays and increased costs to housing development, in particular the time associated with multiple public hearings and levels of review. Program 4-9 in the Housing Plan calls for the City to streamline the development review process and reduce the number of projects that must receive Planning Commission review.</u></p> <p>...</p> <p><u>Planning Commission Review and Conditional Uses</u></p> <p>Discretionary review of residential development in Redwood City may be subject to the Conditional Use Permit (CUP) process, <u>which is intended to apply to uses or other Planning Commission review. The Planning Commission review process is applied to large residential projects that are more complex in nature, including projects over 35 feet in height. The CUP process is intended to apply to projects</u> that are generally consistent with the purposes of the district where they are proposed but require special consideration to ensure that they can be designed, located, and operated in a manner that will not interfere with the use and enjoyment of surrounding properties or adversely affect the city's infrastructure, the built or natural environment, city resources, or the City's ability to provide public services. As was outlined in Table H2-2 – Zoning Districts Permitted Land Uses, Redwood City currently requires CUP approval for certain residential development land use types in certain districts. The Zoning Administrator or</p>

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	<p>Planning Commission (if the project includes an environmental document that needs to be approved or if the project exceeds three stories or 35 feet in height) conducts a public hearing and must find. <u>Use permits may be approved if all of the following findings can be made:</u></p> <ul style="list-style-type: none"> • That the proposed use will be consistent with the general plan and zoning regulations, • <u>That the proposed use</u> is compatible with surrounding uses, • <u>That the use and its associated structures</u> will not be detrimental to the public health or safety, the general or welfare, or the environment, of the people and property of Redwood City, • <u>That the use and facilities</u> will not adversely affect or conflict with adjacent uses or impede the normal development of surrounding property, <u>and</u> • That adequate public and private facilities such as utilities, landscaping, parking spaces and traffic circulation measures are or will be provided for the proposed use. <p>Processing for CUP applications normally does not exceed six months. However, CUPs may be appealed, and in such instances, the processing time can be extended. Program H4-9 is included in the Housing Plan for the City to streamline the number of projects requiring Planning Commission review and study additional ways to speed housing approvals.</p> <p>Planned Development Permits</p> <p>Redwood City also has a process to allow certain zoning requirements to be different from those which otherwise would be required by a Zoning district. The Planned Development Permit <u>is an optional process that</u> permits variations to height limits, lot coverage, building site sizes, setbacks, sign regulations, and parking standards. A Planned Development Permit with such modifications can only be granted approval if it is determined that the proposed development will provide an environment of physical and functional desirability in harmony with the character of the surrounding neighborhood or district. This permit is reviewed by either the Zoning Administrator or Planning Commission, depending upon size of the parcel/development. <u>Projects on less than one acre are reviewed by the Zoning Administrator, whereas large projects on a site larger than one acre are reviewed by the Planning Commission.</u> While this discretionary type of review can add time to an approval, it provides a vehicle for medium to large scale residential development within an existing zoning district by encouraging flexibility in design standards and is not considered a constraint. <u>Planned Development Permits are an optional permit process, rarely used in Redwood City, to provide individual/unique development standards that would not otherwise be allowed.</u></p>
Design Review: The element must describe and analyze the design	Further analysis has been added regarding the design review process including approval procedures and decision-making criteria, for their impact as potential constraints on housing supply and affordability (p. H2-27 to H2-28).

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review guidelines and process, including approval procedures and decision-making criteria, for their impact as potential constraints on housing supply and affordability.

For example, the analysis could describe required findings and discuss whether objective standards and guidelines improve development certainty and mitigate cost impacts.

The element must demonstrate this process is not a constraint or it must include a program to address this permitting requirement, as appropriate.

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Design Review

Redwood City implements design review through an Architectural Permit. The purpose is to provide a means through architectural control to protect and enhance the natural beauty of the environment and to provide for the orderly and harmonious appearance of structures and grounds. An Architectural Permit is required for new two-story single-family homes and duplexes, but no public hearing is required. Multifamily residential projects of three or more units also require an Architectural Permit, with a public hearing. [The Architectural Review](#) [The Architectural Permit process begins with the submittal of an application that is filed with the Planning Division. The application is checked for completeness within 30 days of submittal and fee payment.](#) [The Architectural Advisory](#) Committee advises the Zoning Administrator and Planning Commission on matters concerning building and landscape architecture, site design, and signs. Specifically, the committee reviews applications for Architectural Permits pertaining to multi-family dwellings, signs, landscaping, commercial and industrial buildings, and makes recommendations. [Decisions regarding an Architectural Permit are based on the following findings:](#)

- [The existence of sufficient variety in the design of the structure and grounds to avoid monotony in the external appearance;](#)
- [The size and design of the structure shall be considered for the purpose of determining that the structure is in proportion to its building site and that it has a balance and unity among its external features so as to present a harmonious appearance;](#)
- [The extent to which the structure conforms to the general character of other structures in the vicinity insofar as the character can be ascertained and is found to be architecturally desirable;](#)
- [The extent to which excessive ornamentation is to be used and the extent to which temporary and second-hand materials, or materials which are imitative of other materials, are to be used;](#)
- [The extent to which natural features, including trees, shrubs, creeks, and rocks, and the natural grade of the site are to be retained;](#)
- [The accessibility of off-street parking areas and the relation of parking areas with respect to traffic on adjacent streets;](#)
- [The reservation of landscaping areas for the purposes of separating or screening service and storage areas from the street and adjoining building sites, breaking up large expanses of paved areas, separating or screening parking lots from the street and adjoining building sites, and separating building areas from paved areas to provide access from buildings to open space areas;](#)
- [In the case of any commercial or industrial structure, the review authority shall consider its proximity to any R District and shall consider the effect of the proposed structure upon the character and value of the adjacent R District area;](#)

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	<ul style="list-style-type: none"> <u>The provision of permeable areas and drainage design appropriate to capture and treat stormwater runoff prior to its discharge from the site including, but not limited to, the use of vegetated swales, landscape features, permeable pavement materials, infiltration basins or engineered designs.</u> <p><u>Residential construction on lots of fifteen (15) percent average slope or more is also subject to the following findings:</u></p> <ul style="list-style-type: none"> <u>Includes appropriate design considerations and specific construction techniques to ensure structural integrity, fire safety, site stability and sedimentation and erosion control; and</u> <u>Respects the existing natural constraints of the site, avoids excessive grading and minimizes abrupt changes in grade; and</u> <u>Minimizes expansive exterior walls, upper story building massing and appearance of underfloors with a well-articulated architectural design; and</u> <u>Preserves trees and existing vegetation as to the extent practical and preserves and protects the areas near creeks.</u> <p><u>Appeals can be made within 15 days of the date of action, which include the decisions made by the Planning Manager, Director, Zoning Administrator, Subdivision Committee or Planning Commission.</u> This discretionary review and process is performed in conjunction with related permits for a residential development project and does not add to the timing for approvals. Program H4-9 is included in the Housing Plan to indicate that the City will craft and adopt objective design standards to provide local guidance on design and standards for residential and mixed-use projects as allowed by state law. <u>Objective standards and processes improve development certainty and can help mitigate cost impacts through a shortened development review timeline. As indicated in Program H4-9, in addition to reducing Planning Commission review of projects, the findings for approval of an Architectural Permit will also be revisited to remove subjectivity from the process for those projects that comply with objective standards.</u></p>
<p>Inclusionary Requirements: The element must analyze the inclusionary requirement for impacts on housing cost, supply and timing.</p> <p>The analysis should address the 20 percent requirement, relationship to State Density Bonus Law, whether</p>	<p>Additional analysis has been added regarding the City's Affordable Housing Ordinance, including addressing the 20 percent requirement, relationship to State Density Bonus Law, whether impact fees are imposed if meeting inclusionary requirements and impacts of the live/work preference on housing mobility (p. H2-13 to H2-15).</p> <p>Affordable Housing Ordinance</p> <p>In 2018, the City adopted new requirements for the provision of affordable housing within the construction of residential housing projects. This involved establishing a new Article 29 (Affordable Housing Requirements) and combining this with the requirements for Affordable Housing Impact Fee (previously Municipal Code Article XVII, adopted in 2015). At that time, the City also updated the Zoning Ordinance with the State Density Bonus requirements in a related effort (Zoning Ordinance Section 32.19). The City conducted careful analysis before adopting this Ordinance and weighed potential benefits and drawbacks. The Affordable Housing Ordinance has requirements for both residential and nonresidential development. Large</p>

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impact fees are imposed if meeting inclusionary requirements and impacts of the live/work preference on housing mobility.

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residential developments (20 units or more) are required to provide affordable housing units on-site. [Small residential developments \(5 to 19 units\) and nonresidential development are subject to the affordable housing impact fee. Projects may also utilize the State Density Bonus law to offset costs of providing the on-site affordable units. The state density bonus law increases the economic feasibility of affordable unit construction by allowing for additional market-rate units and concessions from development standards.](#) [Small residential developments \(5 to 19 units\) and nonresidential development are subject to the affordable housing impact fee. Impact fees are not imposed if a project meets inclusionary requirements by constructing affordable housing units. Developers of residential or nonresidential development projects may propose to mitigate the affordable housing impacts of such development through an alternative mitigation program, such as the provision of off-site affordable units, donation of land for the construction of affordable units, or purchase of existing units for conversion to affordable units.](#)

Table H2-5 summarizes the City's inclusionary requirements for new projects by affordability level. Alternative percentages and affordability levels are considered as part of the Affordable Housing Plan. Many projects opt instead to provide additional very low- and low-income units, for a lower overall percentage of affordable units.

Table H2-5: Inclusionary Housing Requirements

Affordability Level	Rental Projects	Ownership Projects
Moderate-Income	10%	15%
Low-Income	5%	--
Very-Low Income	5%	--
Total	20% Affordable Units	15% Affordable Units

The Affordable Housing Ordinance also allows for developers of residential or nonresidential development to propose an alternative means of compliance, such as providing off-site affordable units, donation of land for the construction of affordable units, or purchase of existing units for conversion to affordable units. Recently, the City has had several nonresidential developers propose an alternative means of compliance by providing on-site or off-site affordable units instead of paying the affordable housing impact fee.

The City has been implementing the Affordable Housing Ordinance for several years now and has not seen a decrease in housing development demand. [In 2018, the City prepared an Inclusionary Housing Analysis studying the current requirements \(20 percent of units as affordable to a mix of incomes for](#)

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rental units and 15 percent of units affordable to moderate-income households in ownership projects). As part of this effort, staff conducted a survey of surrounding cities' affordable unit requirements. While there is a general average of 10-15 percent affordable requirements with minimum number of units at 10, other cities, including South San Francisco and San Francisco have a 20 percent requirement or higher.

To ensure feasibility and effectiveness, the City considered a balance between the percentage of affordable units required and the level of affordability. Greater affordability results in a higher cost to the project developer, potentially reducing the total number of units (market-rate and below-market-rate) that may be feasible. In addition, affordable housing percentages that align with state density bonus incentives are important for ensuring feasibility and effectiveness. With that in mind, staff developed several options for consideration and ultimately recommended an option requiring affordability for a variety of levels within each project, as outlined in the current ordinance. The impacts of the current ordinance were analyzed and determined to be feasible from a market perspective.

The analysis modeled a 225-unit rental development typical of what might be built in Redwood City. It included a mix of unit sizes from studios to three bedrooms, with most of the units being one bedroom or two bedroom. The density was assumed to be 225 units per acre. The total development cost was approximately \$133.64 million, including affordable housing impact fees. The unit sizes and rents summarized in Table H2-6 were assumed.

Table H2-6: Inclusionary Housing Analysis (2018)

<u>Unit Type</u>	<u>Number in development</u>	<u>Square Footage</u>	<u>Rents</u>
Studio	16	563	\$2,821
1 Bedroom	135	774	\$3,351
2 Bedroom	68	1,149	\$4,389
3 Bedroom	6	1,441	\$5,519

The analysis modeled the following options:

- A 15 percent inclusionary zoning requirement affordable to Very Low Income households. The developer would be entitled to a 35% density bonus for the Very Low Income units and flexibility in application of zoning and development standards, with the use of the State Density Bonus law.

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- [A 15 percent inclusionary zoning requirement affordable to Low Income Households. The developer would be entitled to a 27.5% density bonus for the Low Income units. They would also be entitled to flexibility in zoning standards²⁵](#)
- [A inclusionary requirement that included all of the following: 5 percent affordable to Very Low Income households, 5 percent affordable to Low Income households, and 10 percent affordable to Moderate Income households. State Density Bonus provisions would also apply.](#)

[The model also assumes lower land costs \(or potentially land costs that stay constant as all other costs increase\) when the inclusionary housing ordinance is applied. Holding all other factors constant, the analysis predicted that prices for developable land will decrease based on new government requirements, such as an inclusionary requirement. This is consistent with the experience of other cities as well.](#)

[The model determined that the most feasible option was to require developers to provide 20% of the units affordable to a mix of income levels \(10% of the units to be affordable to Moderate Income, 5% to Low and 5% to Very Low\). Assuming a 20 percent density bonus and land prices decrease 5 percent, this development would be the most feasible \(19.9% profit, 5.1% yield on cost\).](#)

[Furthermore, the City is proactive and in 2021 identified components of the program that require updating to improve clarity and effectiveness, revisions to ensure that affordable housing units are delivered concurrently with new development, and miscellaneous clarifications to improve the understanding and implementation of the ordinance. Additionally, in an effort to mitigate displacement, the City adopted amendments in 2021 to include a local live/work preference for households who live, formerly lived, work, or are offered work in the Redwood City. The City has articulated two primary purposes in support of the local live/work policy: \(1\) to reduce the impacts of the City's jobs/housing imbalance and \(2\) to reduce the displacement of lower income households by providing affordable housing opportunities for lower income households. In addition, the City has a secondary purpose for the local preference, which is to reduce greenhouse gas emissions \(GHG\) by providing affordable housing that is located near to where the City's lower wage employees work. When developing the local live/work policy, the City analyzed potential disparate impacts on protected classes to ensure that the policy did not inadvertently and disproportionately benefit one protected class over another. The analysis found that when looking at primary job holders \(who would be impacted by the work aspect of the preference\), most racial categories pass the 80% test²⁶ and would not be disproportionately impacted by the policy. The one group that does not pass the 80% test \(Native Hawaiian or Pacific Islander primary job holders\) makes up less than 1% of the households in San Mateo County. When solely looking at low- and moderate-income households who live in Redwood City, multiple](#)

²⁵ The density bonus calculation is complicated in several ways. The density bonus could increase the cost of construction if different building technologies are needed, while the required zoning flexibility could reduce it. Therefore, the cost of construction is not changed in the model. The model assumes that developers will only use a 25% bonus to be conservative.

²⁶ "Passing the 80% test" signifies that a given racial category has a preference qualification rate of at least 80% the category with the highest preference qualification rate and is therefore unlikely to be disproportionately adversely impacted by the preference.

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	<p>racial categories do not pass the 80% test. However, as the policy would also apply to non-resident Redwood City job holders, former residents without a time restriction, and persons who are offered employment in Redwood City, the potential pool of persons and households who could apply for the preference is much broader and not fully measurable. The broad applicability of the live/work policy to a diverse array of residents and workers indicates that the policy is less likely to result in a disparate impact and does not limit housing mobility.</p> <p>As evidenced by the continued and ongoing level of housing production in Redwood City, the City's inclusionary housing requirements have not constrained residential development and has been effective in increasing the number of affordable units within the city. Overall, the Inclusionary Affordable Housing Ordinance has proven to be an effective tool in the community, creating permanently affordable units for lower and moderate-income residents. Program H2-4 continues the City's commitment to this important policy and provides for monitoring during the Housing Element planning period through an update to the related nexus study.</p>
On/Off-Site Improvements: The element must identify actual on and off-site requirements for a typical development and evaluate the impacts on housing costs and timing.	<p>The analysis has been updated to list and analyze actual on and off-site requirements for a typical development as follows (p. H2-12):</p> <p>On-/Off-Site Improvements</p> <p>Site improvements and property dedications are important components of new development and contribute to the creation of decent housing. Housing construction in Redwood City is subject to a variety of site improvement and building code requirements. Due to the built-out nature of Redwood City, most of the residential areas are already served with adequate infrastructure. However, areas that are not already served by infrastructure are required to provide adequate street, water, and sewer capacity.</p> <p>In areas already served by infrastructure, site improvement requirements vary depending on the existing condition of each project site. The undergrounding of utilities is required of all projects, and some projects are required to provide street trees. The most common improvements for a typical new residential construction project include: upgrading sewer mains if they are aged or insufficient to meet needed capacity, upgrading water mains if they are aged or insufficient to meet fire safety requirements, restoration of streets surrounding the project site, and reconstruction of frontage streets when necessary. Subdivisions require sidewalks to be constructed if none exist and where they do exist that they are brought up to standard if needed.</p> <p>These extra requirements, especially the undergrounding of utilities, can add substantial additional cost to affordable housing projects. The City does offer an in-lieu utility underground fee to projects that qualify and informs affordable housing developers of the in-lieu fee option (commercial projects). The City also takes steps to work with developers to exempt affordable housing projects from this fee.</p>

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	<p><u>requirement.</u> The on- and off-site improvement standards imposed by the City are typical for most communities and do not pose unusual constraints for housing development. <u>The City is entirely built-out and as such, new development is not required to complete vast infrastructure improvements.</u> <u>Conditions of approval to complete on- and off-site improvements are provided to applicants in a timely manner and do not have a significant impact on project timing. While these improvements may increase the cost of production, adequate sewer, water, and street infrastructure is a necessary component of a healthy and productive city.</u> The Housing Plan includes a Program H4-1 to <u>consider removing</u><u>further study</u> the utility undergrounding requirement for residential development and <u>analyze</u> allowing in-lieu fees to contribute towards future undergrounding actions, <u>and to consider</u><u>including</u> exemptions to the fee for 100 percent affordable housing projects. <u>Program H4-1 also calls for analyzing and supporting programs that provide alternative options for meeting fire safety requirements.</u></p>
Codes and Enforcement: The element must describe the City's code enforcement process and procedure (i.e., whether the City's code enforcement is proactive or complaint based) and analyze its impact as potential constraints on housing supply and affordability.	<p>The following has been added to further describe and analyze the City's code enforcement procedure and its impact as potential constraints on housing supply and affordability (p. H2-17):</p> <p>Codes and Enforcement</p> <p>Redwood City implements the 2019 edition of the California Building Code, and 2019 edition of the California Green Building Standards Code. These codes establish standards and require inspections at various stages of construction to ensure code compliance and minimum health and safety standards. Although these standards and the time required for inspections increase housing production costs and may impact the viability of rehabilitation of older properties, the codes are mandated for all jurisdictions in California. The City continues to adopt minor amendments related to Very High Fire Hazard Zones and sprinkler requirements, but has not adopted local amendments to the model codes that increase housing costs that differ from those in immediately surrounding communities.</p> <p>The City enforces code compliance to promote property maintenance in accordance with the City Zoning and Building ordinances and State and County Health Codes. <u>The City achieves code compliance through proactive and complaint based measures. The City describes the Code Enforcement program on its website and provides links to brochures that educate residents on various code violations and how to avoid/resolve them, such as overgrown weeds and vegetation encroachment, illegal dumping, street vending, signage, and more.</u></p> <p>Staff investigates and enforces City codes and State statutes when applicable. <u>Staff seeks compliance first and foremost and enforcement efforts are directed at providing opportunities for solving problems and eliminating violations, not punishing people. Complaints can be submitted over the phone, emailed, or through myRWC, the City's desktop and mobile application.</u> Requests for inspections are responded to within 24 hours. Violation of a code regulation can result in a warning, citation, fine, or legal action. If a code violation involves a potential emergency, officers will respond immediately;</p>

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	<p>otherwise, complaints are generally followed up within one working day by visiting the site of the alleged violation, and if necessary, beginning the process of correcting the situation. The violation penalties are not considered restrictive since the City initiates corrective measures through warnings and courtesy notices before advancing to more serious methods such as citations. These measures are necessary to ensure continued minimum health and safety standards are maintained and are not considered a constraint to housing supply or affordability.</p>
<p>Constraints on Housing for Persons with Disabilities: The element briefly describes its reasonable accommodation procedure.</p> <p>However, the element should also describe the process and decision-making criteria such as approval findings and analyze any potential constraints on housing for persons with disabilities.</p>	<p>Additional details have been added describing the City's reasonable accommodation procedures and decision-making criteria and any potential constraints for persons with disabilities (p. H2-22 to H2-23):</p> <p>Reasonable Accommodation</p> <p>Both the Federal Fair Housing Act and the California Fair Employment and Housing Act ("Acts") direct local governments to make reasonable accommodation (i.e., modifications or exceptions) in their zoning laws and other land use regulations to allow disabled persons an equal opportunity to use and enjoy a dwelling. For example, it may be a reasonable accommodation to waive a setback requirement so that elevated ramping can be constructed to provide access to a dwelling unit for a resident who has mobility impairments. Whether a modification is reasonable depends on the circumstances and must be decided on a case-by-case basis.</p> <p>The City adopted a reasonable accommodation ordinance in 2014. The City's Reasonable Accommodation established a procedure for individuals with disabilities to seek minor deviations from the Zoning Ordinance to ensure equal access to housing. Reasonable accommodations may be requested by a homeowner, tenant, landlord on behalf of a tenant, or non-profit organization providing other services to the person with disabilities. The initial request may be submitted to the City for Section 504 of Fair Housing Amendments Act compliance via an application or letter. The City is expected to respond to each request within three business days from the date the request is made. The following findings must be made for approval:</p> <ul style="list-style-type: none"> • That an individual residing on the property and requiring reasonable accommodation is protected under the Acts; and • That accommodating the request would provide direct benefit to the individual by meeting specific housing needs; and • That the request is the minimum necessary to provide the necessary relief from the City's zoning ordinance to meet the needs of the individual; and • That the request is not detrimental to and will not adversely impact the adjacent properties or surrounding neighborhood; and • That the request does not place an undue financial or administrative burden on the City; and • That the request does not significantly alter the overarching purposes or intent of the City's zoning ordinance/land development regulations.

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	<p>Appeals can be made through the City's standard appeal process. Furthermore, Redwood City does not require Architectural Permits and does not charge a fee for first story additions to single family residences, including bedroom additions that could be used to accommodate caretakers for persons with disabilities; a Reasonable Accommodation request. In addition, the City provides CDBG and HOME funds to a number of nonprofit organizations and local community groups to provide housing preservation services and accessibility improvements. Program H6-2 and H6-3 are included in the Housing Element for the City to continue its Reasonable Accommodation program and consider a universal design ordinance. Overall, these procedures do not pose a constraint on housing for persons with disabilities as the City provides adequate resources for submitting reasonable accommodation requests and the procedure is typical to that of many cities across California.</p>
Zoning, Development Standards and Fees: The element must clarify compliance with new transparency requirements for posting all zoning, development standards, fees, and inclusionary requirements on the City's website and add a program to address these requirements, if necessary.	<p>The following has been added to clarify compliance with transparency requirements (p.H2-23):</p> <p>Fees and Exactions</p> <p>Housing construction imposes certain short- and long-term costs upon local government, such as the cost of providing planning services and inspections. As a result, the City relies upon various planning and development fees to recoup costs and ensure that essential services and infrastructure are available when needed. Impacts fees are also charged to cover the cost of providing municipal services or mitigating project impacts. These fees are summarized in Table H2-67. The total amount of fees varies from project to project based on type, existing infrastructure, and the cost of mitigating environmental impacts. Most cities do not control school and water impact fees. Government Code Section 65940.1(a)(1) requires jurisdictions to post all up-to-date fees on their website. Redwood City's latest fee schedule can be accessed on the City's website at https://www.redwoodcity.org/departments/community-development-department/planning-housing/planning-services/planning-permits-fees. The City prioritizes transparency and posts information in clear and accessible formats, including dashboards and through summary webpages. All zoning and development standards are posted on the website, along with inclusionary requirements.</p>
5. Analyze any special housing needs such as elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. (Gov. Code, § 65583, subd. (a)(7).)	
Farmworkers: The element describes farmworkers are a small percentage of the City's labor force, that Redwood City has no farmland and; therefore, specific programs are not needed.	<p>The analysis has been updated to include farmworker data at the county level from the USDA on p H1-16 of the TBR Needs Assessment Chapter:</p> <p>Due to the high cost of housing and low wages, a significant number of migrant farmworkers have difficulty finding affordable, safe, and sanitary housing. Farmworkers are traditionally defined as persons whose primary incomes are earned through permanent or seasonal agricultural labor. There are 143 residents who are employed in agriculture, forestry, fishing, and hunting industries in Redwood City, representing only 0.3 percent of the City's</p>

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<p>However, the housing needs of farmworkers are often under-counted and are not limited to the amount of farmland in Redwood City.</p> <p>As a result, the element should at least consider the housing needs at a county level and add or modify programs as appropriate to address the specific and unique needs of farmworkers.</p> <p>The analysis may utilize United States Department of Agricultural data (Agricultural Census) and information available through the Department of Education to address this requirement.</p>	<p>labor force. The California Department of Education reports 80 students living in migrant worker families in Redwood City, as of the 2019-2020 school year. Maps from the State of California Department of Conservation Farmland Mapping and Monitoring Program show no farmland in Redwood City.</p> <p>The United States Department of Agriculture periodically completes a census of farms and their characteristics. The most recent data (2017) provides an overview of farm operations in San Mateo County.</p> <p>— There are 241 farm operations with hired workers in San Mateo County.</p> <ul style="list-style-type: none">• Two thirds (67.22 percent) of these farms are owned by individuals or families, while 17.43 percent are owned by corporations.• A total of 1,321 farmworkers were estimated to live and work in San Mateo County, including 978 permanent workers and 343 seasonal workers.• The vast majority (88.38 percent) of farm operations have access to internet. In 2017, 58.52 percent of all hired farm workers were working less than 150 days, while 41.48 percent of all farm workers worked more than 150 days out of the year.• The average age of a farm producer in San Mateo County in 2017 was 59 years of age. <p>More explanation has been provided regarding the nature of farmworker housing needs and policies to address these needs on p. H1-11 of the TBR Needs Assessment Chapter.</p> <p>Due to the low number of agricultural workers in the City, the housing needs of migrant and/or farmworker housing need can be met through general affordable housing programs.</p> <p>Farmworkers in Redwood City are actually more similar to very low or extremely low-income households than traditional migrant workers. This is because today's farmworkers are more settled and typically live in one location, rather than following the crops. As noted above, almost 75% of farmworkers in San Mateo County are permanent workers. They are also more likely to have families and are looking for schools, employment for a spouse/partner and a location to live in that provides a community. Because of this, they will benefit from the existing and proposed affordable housing programs in Redwood City. Additionally, the City continues to provide information on affordable housing resources and notifications in English and Spanish and the City participates in the County's affordable search website, Doorway, that ensures new affordable housing listings are publicized in Spanish and that vacancy searches are mobile-friendly. Lastly, Policy H3.1 and Program H3-3 provide opportunities for housing for special needs groups, including farmworkers, and extremely low income households and Program H4-8: Farmworker Housing requirements under the Employee Housing Act.</p>

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However, the housing needs of farmworkers are often under-counted and are not limited to the amount of farmland in Redwood City.

As a result, the element should at least consider the housing needs at a county level and add or modify programs as appropriate to address the specific and unique needs of farmworkers.

The analysis may utilize United States Department of Agricultural data (Agricultural Census) and information available through the Department of Education to address this requirement.

labor force. [The California Department of Education reports 80 students living in migrant worker families in Redwood City, as of the 2019-2020 school year.](#) Maps from the State of California Department of Conservation Farmland Mapping and Monitoring Program show no farmland in Redwood City.

[The United States Department of Agriculture periodically completes a census of farms and their characteristics. The most recent data \(2017\) provides an overview of farm operations in San Mateo County.](#)

— [There are 241 farm operations with hired workers in San Mateo County.](#)

- [Two thirds \(67.22 percent\) of these farms are owned by individuals or families, while 17.43 percent are owned by corporations.](#)
- [A total of 1,321 farmworkers were estimated to live and work in San Mateo County, including 978 permanent workers and 343 seasonal workers.](#)
- [The vast majority \(88.38 percent\) of farm operations have access to internet.](#)
[In 2017, 58.52 percent of all hired farm workers were working less than 150 days, while 41.48 percent of all farm workers worked more than 150 days out of the year.](#)
- [The average age of a farm producer in San Mateo County in 2017 was 59 years of age.](#)

More explanation has been provided regarding the nature of farmworker housing needs and policies to address these needs on p. H1-11 of the TBR Needs Assessment Chapter.

~~Due to the low number of agricultural workers in the City, the housing needs of migrant and/or farmworker housing need can be met through general affordable housing programs.~~

[Farmworkers in Redwood City are actually more similar to very low or extremely low-income households than traditional migrant workers. This is because today's farmworkers are more settled and typically live in one location, rather than following the crops. As noted above, almost 75% of farmworkers in San Mateo County are permanent workers. They are also more likely to have families and are looking for schools, employment for a spouse/partner and a location to live in that provides a community. Because of this, they will benefit from the existing and proposed affordable housing programs in Redwood City. Additionally, the City continues to provide information on affordable housing resources and notifications in English and Spanish and the City participates in the County's affordable search website, Doorway, that ensures new affordable housing listings are publicized in Spanish and that vacancy searches are mobile-friendly. Lastly, Policy H3.1 and Program H3-3 provide opportunities for housing for special needs groups, including farmworkers, and extremely low income households and Program H4-8: Farmworker Housing requirements under the Employee Housing Act.](#)

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<p>C. Housing Programs</p> <p>1. <i>Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the Housing Element... (Gov. Code, § 65583, subd. (c).)</i></p> <p>To have a beneficial impact on housing outcomes in the planning period, programs must have specific commitment (beyond considering) to housing outcomes, discrete timing (e.g., at least annually) and where appropriate numerical targets. To address this requirement, programs should be revised, as follows:</p>	<p>Throughout the Goals and Policies Chapter, the programs and policies now have specific commitments “beyond considering.” See below for changes to the summary of key actions on p. H19.</p> <h3>Key Actions that Accomplish Housing Goals</h3> <p>In addition to the baseline requirements of State law, Redwood City has taken a comprehensive approach to increasing housing opportunities and equity in housing choice, through a number of key actions. Measures that are anticipated to result in the most potential for positive change include:</p> <ul style="list-style-type: none"> • Increase the Capacity for New Housing Throughout the City by <ul style="list-style-type: none"> ○ Creating a working target of 150 percent of the initial RHNA goal of 4,588, for a total of 6,880882 homes. ○ Considering Propose ordinance amendments to rezoneing commercial areas to Mixed Use Corridor zoning district, ○ Increasing densities and building heights in existing Mixed Use zoning districts and the Downtown, and ○ Amending the Zoning Ordinance to increase the ability for middle housing (duplexes, triplexes and small apartments) to be built in established multifamily residential zoning districts. • Preserve and produce affordable housing by <ul style="list-style-type: none"> ○ Continuing to implement the Affordable Housing Ordinance, ○ Continuing to provide subsidies, as funds are available, to assist in the development of affordable housing units, ○ Pursuing Implementing the proposed adopted Anti-Displacement Strategy which includes recommendations for preserving unsubsidized affordable housing units and mobile home parks, and ○ Partnering with community organizations to produce and preserve affordable housing. • Encourage a Wider Variety of Home Types by <ul style="list-style-type: none"> ○ Updating requirements to make it easier to permit supportive housing, group homes and care facilities for seniors and non-seniors, and ○ Making it easier to construct middle housing (duplexes, triplexes, and small apartments) in residential zoning districts. • Increase Housing at All Income Levels in High Resource Neighborhoods by

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	<ul style="list-style-type: none"> ○ Implementing SB 9 duplexes in single family neighborhoods, ○ Continuing to encourage accessory dwelling units in single family neighborhoods, ○ Increasing middle housing opportunities, and ○ Studying increasing densities (upzoning) in single family neighborhoods beyond SB 9 requirements. ● Streamline Review by <ul style="list-style-type: none"> ○ Creating objective design standards for residential projects, and ○ Exploring Identifying methods of to shortening permitting times. ● Supporting Extremely Low Income (ELI) Housing by <ul style="list-style-type: none"> ○ Encouraging flexible building types and configurations, including single room occupancy developments (SROs), group homes, and other types of housing for extremely low-income residents ○ Updating requirements to make it easier to permit supportive housing, group homes and care facilities for seniors and non-seniors ○ Pursuing Implementing the proposed adopted Anti-Displacement Strategy which includes recommendations for preserving unsubsidized affordable housing units and mobile home parks ○ Partnering with community organizations to produce and preserve affordable housing ○ Tracking construction of ELI units in the City's Annual Progress Report and online dashboard ○ Prioritizing a portion of affordable housing funds to assist in the development of housing affordable to extremely low-income households ○ Updating the Nexus Study, with considerations for incentivizing ELI units as part of the affordable housing ordinance ● Support Housing for People with Disabilities by <ul style="list-style-type: none"> ○ Considering Studying a universal design ordinance that may better address housing needs for people with disabilities, and bring forward ordinance amendments if they provide benefits for housing production for people with disabilities, and ○ Publicizing information about the City's Reasonable Accommodations ordinance. ● Reduce Costs by <ul style="list-style-type: none"> ○ Considering reduction in Completing an analysis of parking innovations, reducing parking requirements for residential projects, particularly these unbundling of parking, and eliminating minimum parking near high frequency transit and retail services, ○ Allowing in-lieu fees for undergrounding utilities associated with residential projects, and ○ Encouraging innovation in construction technology such as mass timber, modular and prefabricated buildings.
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In addition to the Programs listed in the HCD Comment letter, additional concrete actions and timeframes were added to the following:
Program H1-7 (p. H-25):

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	<p><i>Timeframe:</i> Immediate – In conjunction with Housing Element adoption Bring Precise Plan amendments to City Council for hearing in December 2022</p>
	<p>Program H2-4(p. H-30):</p> <ul style="list-style-type: none"> Update the Affordable Housing Impact Fee Nexus Study as required by Government Code Section 65940.1 and 66016.5 (by January 1, 2030), including a study of target affordability levels and considerations for incentivizing extremely low-income units as part of the affordable housing ordinance. The nexus study update will be conducted as part of the 21 Elements led countywide nexus study update. As part of this update to the nexus study, review the Affordable Housing Ordinance and consult with local affordable housing developers to identify potential revisions that would better support development of affordable housing, and especially LIHTC financed housing. Revise the Affordable Housing Ordinance, as necessary. Continue to allow alternative requirements to the AHO on a project-by-project basis in the near term. <p><i>Timeframe:</i> Ongoing</p> <p><i>Timeframe:</i> Ongoing: Update the nexus study in partnership with 21 Elements, review the AHO, consult with affordable housing developers, and as needed, revise the AHO by December 2030</p> <p>Program H2-7 (p. H-32):</p> <p><i>Timeframe:</i> Immediate – Bring amendments to City Council for hearing in conjunction with Housing Element adoption (by May 31, 2023)</p>
<ul style="list-style-type: none"> Program H1-1 (Adequate Sites): The program should include annual implementation. 	<p>Program H1-1 has been revised to include annual implementation (p. H-20):</p> <p><i>Timeframe:</i> Ongoing</p> <p><i>Timeframe:</i> Track housing development and progress toward the RHNA on an ongoing basis, with an annual Housing Element Report to HCD. Annually track approved and proposed housing projects</p>

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	<p><u>identified to meet the RHNA and implement alternative actions (i.e., incentives) within a reasonable time (e.g., within one year) if projects are not moving toward completion as anticipated.</u></p>
<ul style="list-style-type: none"> Program H1-3 (Replacement Unit Requirements): The program should implement revisions by a specified date (e.g., month and year). 	<p>Program H1-3 has been revised to implement revisions by a specified date (e.g., month and year) (p. H-21):</p> <p>Timeframe: Review Zoning Ordinance and <u>consider</u><u>hold hearing with City Council regarding revisions by December 2024 (Immediate)</u>; Ongoing</p>
<ul style="list-style-type: none"> Program H1-4 (Densities in High Opportunity Areas): The program should include an implementation component beyond a study, especially if the City is relying on the program to implement missing middle housing. 	<p>Program H1-4 has been revised to include an implementation component beyond a study (p. H-23)</p> <p>Objective: Study changes to R-1 and/or RH neighborhoods that could increase the density allowed, <u>(beyond SB 9 requirements)</u>, such as including additional density for corner lots. <u>After SB 9 has been in place for three years, the City will analyze what additional zoning changes could be done to the R-1 or RH neighborhoods.</u></p> <p>Timeframe: <u>Short Range</u>—Complete community engagement and technical study by <u>2025</u><u>December 2026</u>; <u>hold hearing with City Council regarding study recommendations by February 2027</u></p>
<ul style="list-style-type: none"> Program H1-5 (Accessory Dwelling Units): The program should include annual reviews and updates as needed. 	<p>Program H1-5 has been revised to include annual reviews and updates as needed (p. H-23):</p> <p>Timeframe: <u>Ongoing</u></p> <ul style="list-style-type: none"> <u>Continue to offer pre-approved plans, which support streamlining the permit review process.</u> <u>Continue to offer flat fees for building permits for ADUs.</u> <u>Promote additional pre-approved plans on the City's website.</u> <u>Provide homeowner/applicant assistant tools by including and promoting State funding resources including the CalHFA ADU grant program and Casita Coalition financing guide on the City's website, and by promoting home sharing programs to connect ADU owners and renters, and offering counseling with a City staff-ADU specialist.</u> <u>Explore and pursue funding options to support ADU construction for lower-income homeowners.</u> <u>Continue to provide square footage bonuses for ADA accessible ADUs.</u> <u>Analyze the feasibility of eliminating or reducing permit fees or development impact fees for ADA-accessible ADUs that exceed the minimum square footage thresholds for fee waivers.</u>

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	<p><i><u>Timeframe:</u></i> Ongoing; Annually review progress toward meeting the RHNA as compared to the projections in ADU production made in the Housing Element as part of the Annual Progress Report process. Monitor ADU production trends, permit fees, and ADU affordability every other year. If biannual monitoring shows that ADU production is falling below the Housing Element projections, then within six months implement appropriate action to increase production, such as additional incentives, adjusting fees, increasing homeowner assistance tools, pursue funding options to support ADU construction for lower-income homeowners, and update communications strategy to increase awareness of existing programs. If necessary, revise strategy in 2026.</p>
<ul style="list-style-type: none"> Programs H1-6 (Densities in Mixed Use Zoning Districts) and H2-6 (Rezone Commercial Office): The timing of these programs should clarify amendments will be completed by the housing element due date. 	<p>Program H1-6 has been to clarify amendments will be completed by the housing element due date (p.H-24):</p> <p>Objective:</p> <ul style="list-style-type: none"> Complete a zoning text amendment to increase densities in the mixed use zoning districts as follows: <ul style="list-style-type: none"> Increase MU-CMUC from 60 du/ac to 80 du/ac Increase MU-NMUN from 40 du/ac to 60 du/ac Increase MUT-MUT from 20 du/ac to 40 du/ac for base zoning and 40 du/ac to 60 du/ac for projects that propose community benefits <p><i><u>Timeframe:</u></i> Immediate – Bring amendments to City Council for hearing in conjunction with the Housing Element adoption(by May 31, 2023)</p> <p>Program H2-6 has been clarify amendments will be completed by the housing element due date (p. H-32):</p> <p><i><u>Timeframe:</u></i> Immediate – Bring amendments to City Council for hearing in conjunction with the Housing Element adoption(by May 31, 2023)</p>
<ul style="list-style-type: none"> Program H2-3 (Preservation of At-Risk Affordable Housing): 	Program H2-3 has been revised include specific timing as well as include proactive outreach to owners with outreach beginning three years before expiration of affordability for at-risk properties (p.H2-29):

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<p>The program should include specific timing as well as include proactive outreach to owners. The program should also include outreach to owners to comply with Government Code sections 65863.10, 65863.11, and 65863.13 beginning three years before expiration of affordability for at-risk properties.</p>	<p>Objectives:</p> <ul style="list-style-type: none"> ▪ Annually monitor the affordability status of: <ul style="list-style-type: none"> ○ Casa de Redwood (134 affordable units) ○ Franklin Street Apartments (31 affordable units) ○ Oxford Apartments (3 affordable units) ○ Redwood City Commons (58 affordable units) ○ Redwood Village (13 affordable units) ▪ Continue to work with non-profit organizations to preserve existing affordable housing in the City. As needed, support funding applications to preserve at-risk units. ▪ <u>Proactively outreach to owners with expiring affordability covenants annually, starting three years prior to the affordability expiration date.</u> ▪ For developments considering converting to market rate, work with the owners and property managers to discuss preservation options and present options to owners for rehabilitation assistance and/or mortgage refinancing in exchange for extending affordability restrictions. ▪ Hold public hearings upon receipt of any Notice of Intent to Sell or Notice of Intent to Convert to Market Rate Housing, pursuant to Section 65863.10 of the Government Code and provide tenant education on housing rights. <p><i>Timeframe: Ongoing</i></p> <p><i>Timeframe: Conduct proactive outreach annually starting by December 2023 for Redwood Plaza Village, Redwood City Commons, and Oxford Apartments; by December 2025 for Franklin Street Apartments; and by December 2026 for Casa de Redwood; Hold public</i></p>
<ul style="list-style-type: none"> • Program H2-5 (First-Time Homebuyer Opportunities): The program should include proactive outreach to developers and homebuyers as well as other actions if the code amendments are not adopted. 	<p>Program H2-5 has been revised to include proactive outreach to developers and homebuyers as well as other actions if the code amendments are not adopted (p.H-31):</p> <p>Objectives:</p> <ul style="list-style-type: none"> ▪ Continue implementing the Affordable Housing Ordinance including below-market-rate (BMR) requirements for ownership development. ▪ Continue to provide homeownership assistance to eligible first-time homebuyers at Wyndham Place. ▪ Continue to advertise available homeownership financing opportunities with San Mateo County, such as HEART and MCC. ▪ <u>Consider Hold a hearing with the City Council regarding Municipal Code amendments to allow smaller subdivisions (fewer than five units per project) in existing neighborhoods to facilitate homeownership opportunities. If code amendments are not adopted, proactively outreach to developers and homebuyers regarding available homeownership financing options.</u>

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	<ul style="list-style-type: none"> Continue maintaining an affordable housing interest list and promote new affordable housing opportunities to that list, with updates as new opportunities arise. <p>Timeframe: Ongoing; Short Range – Conduct annual outreach to developers; update the affordable housing interest list annually; Conduct a study and community engagement on potential subdivision amendments; present in a study session to decision makers within four years of Housing Element adoption by June 2027</p>
<ul style="list-style-type: none"> Program H4-1 (Site Improvements and Fees): The program should include implementation beyond considering an action to revise undergrounding requirements. 	<p>Program H4-1 has been revised to include implementation beyond considering an action to revise undergrounding requirements (p. H-38).</p> <p>Program H4-1: Site Improvements and Fees. In Redwood City, a number of onsite improvements are required, including the undergrounding of utilities and upgrading of infrastructure such as sidewalks and alleyways and water mains (to meet fire safety requirements). Fees and on-site requirements can add substantial costs to affordable housing projects.</p> <p>Objectives:</p> <ul style="list-style-type: none"> Continue to exempt extremely low, very-low, and low-income affordable housing projects from the City's park impact fee and provide a 50-percent discount to moderate-income affordable housing projects and a reduced Transportation Impact fee for affordable housing developments, senior projects, and transit-oriented development. Consider removing Remove the utility undergrounding requirement for residential development and allowing allow in-lieu fees to contribute towards future undergrounding actions; consider pursue exempting 100% affordable housing developments from this fee. Analyze and support programs that provide alternative options for meeting fire safety requirements. <p>Timeframe: Ongoing; consider/adopt as appropriate; hold a Study Session with City Council on an affordable housing site improvement exemption ordinance for utility undergrounding by December 2026 (Mid Range)</p> <p>Responsible Party: Community Development and Transportation</p> <p>Funding Sources: Departmental Budget</p>

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Questions/Comments from July 8, 2022 Letter	<p>• Program H4-3 (Middle Housing Development): The program should include timing for implementing Phase two.</p> <p>Program H4-3 has been revised include timing for implementing Phase two (p. H-40):</p> <p>Program H4-3: Middle Housing Development. Duplexes, triplexes, and smaller multi family<ins>multifamily</ins> developments can provide affordable housing options to renters and owners, increasing the supply of housing and assisting Redwood City in meeting its regional share of housing growth. To remove constraints and better encourage small multi-family developments in the R-2, R-3, R-4, and R-5 zoning districts, zoning text amendments will be pursued.</p> <p>Objectives:</p> <ul style="list-style-type: none">▪ Phase 1: Complete zoning text amendments to encourage middle housing as follows:<ul style="list-style-type: none">○ Minimum Lot Size: Revise to 5,000 square feet for all building types (removing 7,500 minimum square feet for duplexes, 10,000 square feet for triplexes, and 1,000 to 2,000 square feet for each additional unit in excess of three units on the same lot, depending on the zoning district).○ Minimum Lot Width: Revise to 35 feet, or 20 feet wider than the driveway approach width, whichever is greater. This is revised down from 50 feet for <ins>all building types. This is a single family dwelling or duplex and reduction from</ins> 75 feet for a triplex or larger development.○ <u>Parking Requirements: Minimum Lot Frontage</u>: Revise to 35 feet for all building types. This is a reduction from 50 feet for a duplex, triplex, or larger development.○ <u>Parking Requirements: Revise to a minimum of 1 space per unit for a multifamily dwelling outside the downtown and mixed-use zones. This is a reduction of 1 space per unit.</u> Remove requirement for covered parking spaces and allow parking to be located within required setbacks. <u>Remove guest parking requirements. Remove minimum parking requirements for most commercial and all residential in all areas within ½ mile of high frequency transit.</u>○ Minimum Open Space: Reduce requirement from 300 square feet of open space <u>plus 100 additional square feet</u> per bedroom to <u>150</u>300 square feet of open space per unit.▪ Phase 2: <u>Consider Analyze</u> additional changes to the R-2 through R-5 Zoning Districts to further encourage middle housing, such as establishing a minimum density of no less than 75 percent of the maximum allowable density or one dwelling unit, whichever is greater.

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- Program H4-3 (Middle Housing Development): The program should include timing for implementing Phase two.

Program H4-3 has been revised include timing for implementing Phase two (p. H-40):

Program H4-3: **Middle Housing Development.** Duplexes, triplexes, and smaller ~~multi family~~multifamily developments can provide affordable housing options to renters and owners, increasing the supply of housing and assisting Redwood City in meeting its regional share of housing growth. To remove constraints and better encourage small multi-family developments in the R-2, R-3, R-4, and R-5 zoning districts, zoning text amendments will be pursued.

Objectives:

- Phase 1: Complete zoning text amendments to encourage middle housing as follows:
 - Minimum Lot Size: Revise to 5,000 square feet for all building types (removing 7,500 minimum square feet for duplexes, 10,000 square feet for triplexes, and 1,000 to 2,000 square feet for each additional unit in excess of three units on the same lot, depending on the zoning district).
 - Minimum Lot Width: Revise to ~~35 feet, or 20 feet wider than the driveway approach width, whichever is greater. This is revised down from~~ 50 feet for all building types. This is a single family dwelling or duplex and reduction from 75 feet for a triplex or larger development.
 - [Parking Requirements: Minimum Lot Frontage](#): Revise to 35 feet for all building types. This is a reduction from 50 feet for a duplex, triplex, or larger development.
 - [Parking Requirements: Revise to a minimum of 1 space per unit for a multifamily dwelling outside the downtown and mixed-use zones. This is a reduction of 1 space per unit.](#) Remove requirement for covered parking spaces and allow parking to be located within required setbacks. [Remove guest parking requirements. Remove minimum parking requirements for most commercial and all residential in all areas within ½ mile of high frequency transit.](#)
 - Minimum Open Space: Reduce requirement from 300 square feet of open space [plus 100 additional square feet](#) per bedroom to [150](#)~~300~~ square feet of open space per unit.
- Phase 2: [Consider Analyze](#) additional changes to the R-2 through R-5 Zoning Districts to further encourage middle housing, such as establishing a minimum density of no less than 75 percent of the maximum allowable density or one dwelling unit, whichever is greater.

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	<p><i>Timeframe:</i> Complete Phase 1 zone text Bring proposed amendments to City Council for hearing in conjunction with the Housing Element adoption (Short Range) (by May 31, 2023); Study and hold a City Council hearing for Phase 2 zone text amendments within three by December 2026; Monitor production and affordability every two years of Housing Element adoption (Mid Range) and identify/implement alternative actions, if necessary, to meet the RHNA (Ongoing).</p>
<ul style="list-style-type: none"> Program H4-4 (Density Bonuses): The program should include timing on how often the ordinance will be reviewed during the planning period. 	<p>Program H4-4 has been revised include timing on how often the ordinance will be reviewed during the planning period (p.H-41):</p> <p><i>Timeframe:</i> 2023 (immediate); (Ongoing); Review the ordinance annually to ensure that changes to State law are incorporated.</p>
<ul style="list-style-type: none"> Program H4-9 (Housing Accountability Act): The program should include specific timing (e.g., month and year) (p.H-44). 	<p>Program H4-9 has been revised include specific timing (e.g., month and year) (p.H-44):</p> <p><i>Timeframe:</i> Adopt Objective Design Standards Craft development and design standards that are objective and consistent with the Housing Accountability Act, streamline housing projects to reduce the level of projects that require Planning Commission review, and bring proposed amendments to City Council for hearing by June 2025 (Short Range).</p>
<ul style="list-style-type: none"> Program H5-1 (Equity and Outreach Plan): The program should describe how often the City will partner with advocates and organizations throughout the planning period. 	<p>Program H5-1 has been describe how often the City will partner with advocates and organizations throughout the planning period (p.H-46).</p> <p> EJ Focus Program H5-1: Equity and Outreach Plan. Engage with the community on housing programs, policies, and affordable housing opportunities. Follow the City's adopted 2021 Equity Plan to ensure participation from those that are not often represented in decision-making about housing construction, protection, and preservation. Consider Analyze how various policy and approval decisions burden or benefit different populations in the City.</p> <p>Objectives:</p> <ul style="list-style-type: none"> Partner with housing advocates and other community organizations to provide information to hard-to-reach populations on housing topics. Complete an annual report of Housing Element progress and make available to the public in a user-friendly dashboard format. Notify and invite interested community members to attend and discuss housing production progress at a public hearing.

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	<p><i>Timeframe:</i> Ongoing</p> <p><i>Timeframe:</i> Ongoing; partner with housing advocates at least annually to provide outreach on evolving housing topics and city initiatives</p>
<ul style="list-style-type: none"> Program H5-2 (Consult with Public Agencies): The program should include annual proactive outreach. 	<p>Program H5-2 has been revised include annual proactive outreach (p.H-46):</p> <p>Objectives:</p> <ul style="list-style-type: none"> Support regional efforts to address housing issues, including participation in 21 Elements, CDBG entitlement jurisdiction monthly meetings, and countywide housing studies. Support the San Mateo County Housing Authority's outreach efforts to property owners related to acceptance of Housing Choice Vouchers, including help with outreach to property owners with units in high and moderate opportunity areas. Work with the County to contact landlords of multi-family complexes in moderate and high opportunity areas every two years and provide fair housing information and assistance. Continue to outreach to a wide range of public agencies including County agencies, neighboring jurisdictions, and regional organizations for the development of the City's CDBG Annual Action Plans and Five-Year Consolidated Plans. <p><i>Timeframe:</i> Ongoing; proactively outreach to public agencies annually</p>
<ul style="list-style-type: none"> Program H5-3 (Affirmatively Market Accessible and Affordable Units): The program should describe how often the list will be updated, how often coordination will occur, as well as proactive outreach. 	<p>Program H5-3 has been revised describe how often the list will be updated, how often coordination will occur, as well as proactive outreach (p.H-47):</p> <p><i>Timeframe:</i> Ongoing</p> <p><i>Timeframe:</i> Ongoing; annually update list of community service providers to provide to affordable housing developers; on an ongoing basis coordinate with developers of proposed projects in Redwood City to ensure organizations are notified when new affordable housing opportunities become available; perform proactive outreach to those developers during the entitlement and building permit process to ensure developers are conducting appropriate marketing about local affordable and accessible housing units.</p>

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<ul style="list-style-type: none"> Program H6-1 (Anti-Displacement Strategy): The program should include implementation timing. 	<p>Program H6-1 has been revised include implementation timing (p.H-48):</p> <p> EJ Focus</p> <p>Program H6-1: Anti-Displacement Strategy. To address the City's first two housing principles – Preserve and Protect – the City is in the process of developingadopted an Anti-Displacement Strategy to serve as a policy roadmap for preventing and mitigating the impacts of displacement.</p> <p>Objectives:</p> <ul style="list-style-type: none"> Once adopted, Implement recommendations in the Anti-Displacement Strategy including: <ul style="list-style-type: none"> Tenant Protection Ordinance Amendments Preservation of Unsubsidized Affordable Housing Mobile Home Preservation Community Land Trust Support <p>Timeframe: Ongoing; Adopt; Begin implementing Anti-Displacement Strategy and begin implementing recommendations in 2022; Complete Tenant Protection Ordinance Amendments by December 2024, establish a housing preservation fund by December 2023 (Immediate; Start other ongoing preservation efforts in 2023 including supporting community land trusts (Ongoing), bring proposed amendments for mobile home park rezoning to City Council for hearing in conjunction with the Housing Element (by May 31, 2023)</p>
<ul style="list-style-type: none"> Program H6-2 (Fair Housing Services): The program should describe how often actions and outreach will occur. 	<p>Program H6-2 has been revised to describe how often actions and outreach will occur (H-49):</p> <p>Objectives:</p> <ul style="list-style-type: none"> Continue to support fair housing services for Redwood City residents and provide information on housing discrimination and the resources available to victims of discrimination, in both English and Spanish, at City Hall, the public library, and on the City's website. Publish fair housing information, including any community meetings, on non-traditional media such as social media platforms, and conduct targeted outreach to tenants, mobile home park residents, and other lower income populations. Continue to educate landlords on reasonable accommodation and disability rights, including posting reasonable accommodation on the website and at prominent locations near the permit counter. Continue to support equal opportunity lending programs and ensure that non-discriminatory practices will be followed in the selection of residents for participation in housing programs.

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	<p>Timeframe: Ongoing; post information by December 2024; revisit information and update for accuracy annually</p>
<ul style="list-style-type: none"> Program H6-3 (Affirmatively Further Fair Housing): The program should include implementation beyond “consider”. 	<p>Program H6-3 has been revised to include implementation beyond “consider” (p.H-49).</p> <p>Objective:</p> <ul style="list-style-type: none"> ConsiderComplete analysis and community engagement on implementing a universal design ordinance (accessibility), including considerations of “visibility” of all units, and bring forward ordinance amendments if they provide benefits for housing production for people with disabilities. <p>Timeframe: Complete analysis and community engagement by 2027 (Mid Range), including proactive outreach to non-profit service providers and developers, and hold a City Council hearing by December 2027</p>
<p><i>2. Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning... (Gov. Code, § 65583, subd. (c)(1).)</i></p>	<p>As noted in Finding B4, the element does not include a complete site analysis; therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing</p> <p>As indicated above, in the Resources chapter of the Technical Background Report, additional information and analysis is presented for a complete site analysis which supports the adequacy of sites and zoning capacity. No additional programs are required to address a shortfall of sites or zoning available. In addition, programs were added based on the revised site analysis, including Program H1-9 and H1-10 (p.H-26):</p>
	<p>Program H1-9: City Owned Sites for Housing. The City-owned vacant lot at 611 Heller St has been identified as a site suitable for housing, along with the former Maple Street Shelter (1580 Maple). The County of San Mateo has an option to ground lease the Maple Street Site for an affordable housing development. The County issued a request for proposals for the site and selected MidPen Housing to develop the site in August 2022. The City will comply with the Surplus Land Act and will move forward with affordable housing efforts at these locations.</p> <p>Objective:</p>

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types. In addition, the element should be revised as follows:

- [Issue an RFP for development of the Heller St site. Identify any site and development constraints, remove barriers, and apply development incentives.](#)
- [Coordinate with the County regarding the proposed affordable housing project at the Maple Street site.](#)

Timeframe: Issue RFP for Heller Site by December 2027; Continue coordinating with the County on their development process for the Maple Street Site until project completion which is estimated for 2025

Responsible Party: City Manager's Office, Housing Division and Community Development and Transportation

Funding Sources: Departmental Budget

[Program H1-10: Provide Adequate Sites for Lower Income Households on Nonvacant Sites Previously Identified.](#)

AB 1397 requires that vacant sites identified in the previous two Housing Elements and non-vacant sites identified in the previous Housing Element only be deemed adequate to accommodate a portion of the housing need for lower-income households if the site is zoned at residential densities consistent with the default density established by HCD (30 units per acre) and the site allows residential use by right for housing developments in which at least 20 percent of the units are affordable to lower-income households.

[Objective:](#)

- [For vacant sites identified in the last two planning cycles, and nonvacant sites identified in the last planning cycle \(see Table H3-20 and H3-21 in the Resources Chapter of the Housing Element\), rezone the sites to create a housing overlay that allows residential use by right pursuant to Government Code section 65583.2\(i\) for housing development projects²⁷ in which at least 20 percent of the units are affordable to lower-income households. 'By right' means that no review is required under the California Environmental Quality Act \(CEQA\), unless a subdivision is required, and the project can only be reviewed using objective design standards.](#)

Timeframe: January 2026

Responsible Party: Community Development and Transportation

Funding Sources: Departmental Budget

²⁷ Housing development projects include residential-only projects and mixed-use projects where at least 2/3 of the square footage is residential.

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<p>Programs H1-6 (Densities in Mixed Use Zoning Districts) and H2-6 (Rezone Commercial Office): The programs commit to, among other things, increase allowable densities in several mixed-use zones concurrently with adoption of the housing element. Please be aware, if these changes to zoning are necessary to accommodate the RHNA for lower income households and adoption does not occur before the beginning of the planning period, the element may need to address a shortfall of adequate sites and trigger meeting by-right requirements pursuant to Government Code section 65583, subdivision (c)(1) and section 65583.2, subdivisions (h) and (i).</p>	<p>Program H1-6 has been revised as follows: Timeframe: Immediate – Bring amendments to City Council for hearing in conjunction with the Housing Element adoption(by June 2023)</p> <p>Program H2-6 has been revised as follows: Timeframe: Immediate – Bring amendments to City Council for hearing in conjunction with the Housing Element adoption(by June 2023)</p>
<p>Program H4-5 (SB 9 Zoning and Subdivision Ordinance Amendments): As the City is relying on developing units utilizing SB 9, the program must commit to adopting updated definitions, use regulations, and development standards beyond “considering” and modified based on the outcomes of a complete analysis, including monitoring production and affordability every two years and taking alternative action if necessary (p. H-41).</p>	<p>Program H4-5 has been revised to commit to adopting updated definitions, use regulations, and development standards beyond “considering” and modified based on the outcomes of a complete analysis, including monitoring production and affordability every two years and taking alternative action if necessary (p. H-41).</p> <p>Objective:</p> <ul style="list-style-type: none"> ▪ Review the City’s Zoning Ordinance and Subdivision Ordinance and considerimplement updates as needed to provide clarity and facilitate housing development under SB 9. These include adopting updated definitions, use regulations, development standards, and ministerial processes based on the outcome of a complete SB 9 analysis. Staff anticipates adoption of an ordinance to implement the requirements of SB 9 as part of the

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modified based on the outcomes of a complete analysis, including monitoring production and affordability every two years and taking alternative action if necessary.

Response

	<p>Housing Element adoption process. Production and affordability will be monitored every two years and alternative actions will be implemented if necessary to meet the RHNA.</p> <p><i>Timeframe:</i> 2023 (Immediate); Ongoing</p> <ul style="list-style-type: none"> In coordination with research being conducted at the State level, pursue opportunities to incentivize and provide funding assistance for homeowners to provide affordable units under SB 9 to further housing opportunities and more affordable homeownership options in high opportunity areas. <p><i>Timeframe:</i> Bring proposed amendments to City Council for hearing in conjunction with the Housing Element (by May 31, 2023); Monitor production and affordability every two years and implement alternative action, if necessary; Ongoing coordination</p>
<p>3. The Housing Element shall contain programs which assist in the development of adequate housing to meet the needs of extremely low-, very low-, low- and moderate-income households. (Gov. Code, § 65583, subd. (c)(2).)</p>	<p>The following programs have been revised to assist in the development of housing for all special needs households (e.g., elderly, homeless, farmworkers, persons with disabilities, female-headed households).</p>
<p>Special Needs: While the element includes programs to assist in the development of very low-, low-, and moderate-income households, it must also include a program(s) to assist in the development of housing for all special needs households (e.g., elderly, homeless, farmworkers, persons with disabilities, female-headed households).</p> <p>Specifically, programs should be added or modified to address the needs of persons with disabilities. For example, program actions could</p>	<p>Program H2-8 has been modified as follows (p. H-33):</p> <p> Program H2-8: Acquisition and Rehabilitation of Existing Housing. Under this program, the City assists nonprofit organizations and affordable housing developers in the acquisition of multi-family housing for lower-income families, individuals, veterans, and seniors, and other special needs populations.</p> <p>Objective:</p> <ul style="list-style-type: none"> Implement the preservation recommendations from the adopted Anti-Displacement Strategy, once adopted. Engage with nonprofit housing providers regarding the City's interest in establishing partnerships in the acquisition and rehabilitation of for-sale rental properties, with the goal of completing at least one project during the planning period. <p><i>Timeframe:</i> Ongoing</p>

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include proactive outreach and assistance to non-profit service providers and developers, prioritizing some funding for housing developments affordable to special needs households and offering financial incentives or regulatory concessions to encourage a variety of housing types.

[Timeframe: Ongoing; Begin implementing the Anti-Displacement Strategy recommendations in 2022 including establishing a housing preservation fund by December 2023 \(Recommendation #2\) and start other ongoing preservation efforts in 2023 \(Recommendation #3: Support the Housing Endowment and Regional Trust \(HEART\) of San Mateo County's efforts to create a housing preservation model; Recommendation #4: Support the Lincoln Avenue Capital \(LAC\) preservation model and other similar preservation models; and Recommendation #5: Support Community Land Trusts of the Anti-Displacement Strategy\); Engage with nonprofit housing providers annually](#)

Program H3-1 has been modified as follows (p. H-35):



Program H3-1:
EJ Focus

Senior Housing Needs. The changing needs of the aging baby boomer population include new housing needs and preferences, housing affordability, walkable communities, and access to public transportation, in addition to housing design features that meet the needs of older adults. Redwood City recognizes the changing housing needs of its population, including aging seniors in need of supportive services. To meet such needs, the City encourages the provision of more innovative housing types that may be suitable for the senior community, including shared-housing arrangements, community care facilities, supportive housing, and assisted living for seniors.

Objectives:

- Continue to support organizations that facilitate shared housing arrangements—[including promoting HIP Housing, which provides affordable housing and resources to special needs groups such as the elderly, on the City's website.](#)
- [Proactively contact senior housing providers to gauge senior housing needs and identify changes to zoning or other City policies and regulations that would address these needs.](#)
- Review, revise and consolidate, as needed, the definitions for assisted living, including Residential Care, Senior and Housing for the Elderly.
- [Consider amending](#)[Amend](#) the Zoning Ordinance to ensure that assisted living, senior living, and cottage-style housing are permitted uses in residential zoning districts. [Consider streamlining senior housing to ensure faster development review.](#) Identify necessary development standard revisions to facilitate these housing types.

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	<p><i>Timeframe:</i> Ongoing, consider; annually proactively contact senior housing providers; complete zoning amendments by December 2026; hold City Council hearing on Ordinance amendments by December 2027 (Mid Range)</p> <p>Program H3-2 has been revised as follows (p. H-35):</p> <p>Program H3-2: Residential Care Facilities and Group Homes. Redwood City encourages the development of residential care facilities and group homes. During the previous planning period, the City amended the Zoning Ordinance to remove inconsistencies in definitions and ensure compliance with State law. Additional measures will further facilitate clarity and support housing for persons with disabilities.</p> <p>Objectives:</p> <ul style="list-style-type: none">Review, and revise as needed, the Zoning Ordinance to provide more clarity on the provisions of residential care for non-seniors in larger group settings. Consider Specifically, revise zoning and permit procedures to permit residential care facilities for seven or more persons with objectivity to facilitate approval certainty in all residential zones. Analyze other opportunities for group housing and a wider variety of residential care facilities. <p><i>Timeframe:</i> By 2024 (Immediate)</p> <p><i>Timeframe:</i> Bring proposed amendments to City Council for hearing in conjunction with the Housing Element (by May 31, 2023)</p> <p>Responsible Party: Community Development and Transportation</p> <p>Funding Sources: Departmental Budget</p> <p>Program H3-3 has been revised as follows (p. H-36):</p> <p>Program H3-3: Housing Options for Special Needs and Extremely-Low Income Households. Redwood City neighborhoods offer a diversity of housing types that vary in type, density, and age. Extremely low-income households and households with special needs have limited housing options. To meet the needs of special needs groups, innovative housing options should also be explored.</p>
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Objectives:

- Review the Zoning Ordinance for consistency with AB 2162, effective January 1, 2019, which requires supportive housing to be considered a use by right (ministerially permitted) in zones where multi-family and mixed use are permitted, including nonresidential zones permitting multi-family uses if the proposed housing development meets specified criteria. Comply with AB 2162 requirements to allow for modifications for required parking for units occupied supportive housing residents that are located within one-half mile of a public transit stop.
- ~~Consider amending~~Amend the Zoning Ordinance to explicitly allow ~~SROs, group homes, and other housing targeted to extremely low-income~~ housing options: households, including SROs and group homes for these income groups.
- Amend the Zoning Ordinance to allow low-barrier navigation centers in the CG-R zoning district. Review, and revise as needed, the Downtown Precise Plan and North Main Precise Plan to allow for low-barrier navigation centers by right ~~in areas zoned for, consistent with AB 101. Continue to allow low-barrier navigation centers by-right in~~ mixed-use and nonresidential development; consistent with AB 101.
- Prioritize available housing funding to assist in the development of housing affordable to extremely low-income households- and other special needs populations.
- As part of the Housing Element Annual Progress Report, track and report the number of new affordable housing units providing a preference for people with special needs, including seniors, homeless, people with developmental disabilities, etc. that are added to the housing stock each year.
- Continue to consult with the San Mateo County Center on Homelessness to further align efforts and coordinate homeless services.
- Continue to support the City's Homeless Outreach Team (HOT) in their efforts to reach out to existing homeless in Redwood City and locate and acquire sites for supportive housing. HOT is a collaborative of the City's Fair Oaks Community Center and Police Department together with the County of San Mateo's Center on Homelessness, Behavioral Health and Recovery Services Department, and the Department of Housing, as well as non-profit partners such as LifeMoves, Salvation Army, Street Life Ministries, and Mental Health Association. The HOT Team develops outreach and engagement strategies with a focus on reducing chronic homelessness in our community. The City will coordinate with the HOT annually to identify additional measures that the City can do to support HOT's efforts.

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	<ul style="list-style-type: none"> Proactively contact non-profit service providers and developers for persons with disabilities and other special needs groups and notify them about funding opportunities, as they become available. <p><i>Timeframe:</i> Mid Range: Conduct a study and community engagement on potential zoning amendments; present in and hold a study session to decision makers within four years of Housing Element adoption hearing on the item by December 2024; Ongoing/annually consult with the HOT team to address chronic homelessness</p> <p>Program H3-4 has been revised as follows (H-37):</p> <p> EJ Focus Program H3-4: Public Investment in Infrastructure and Accessibility. Accessibility in infrastructure is an important component of neighborhood quality of life for Redwood City residents with disabilities.</p> <p>Objective:</p> <ul style="list-style-type: none"> Continue to improve access to persons with disabilities through the implementation of the City's ADA Transition Plan that includes ADA improvement to streets, sidewalks, and public facilities. Seek funding, including annual Capital Improvement Program (CIP) and/or CDBG allocations, to prioritize infrastructure and accessibility improvements in the low resource opportunity areas. <p><i>Timeframe:</i> The ADA Transition Plan is planned for completion no later than 2052, possibly sooner based on funding opportunities</p> <p><i>Responsible Party:</i> ADA Coordinator, Community Development and Transportation; City Manager's Office, Housing Division</p> <p><i>Funding Sources:</i> Departmental Budget, CDBG CIP Budget</p>
Program H3-1 (Senior Housing Needs): The program should include an action beyond "consider" as well as describe how the City will support organizations and how often. In addition, to including timing to revise the definitions.:  EJ Focus Program H3-1: Senior Housing Needs .	The changing needs of the aging baby boomer population include new housing needs and preferences, housing affordability, walkable communities, and access to public transportation, in addition to housing design features that meet the needs of older adults. Redwood City recognizes the changing housing

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<p>As the element identified a high need for senior housing, the program should specifically help seniors stay in their homes to address the identified need.</p> <p>In addition, the program should include timing to revise the definitions.</p>	<p>needs of its population, including aging seniors in need of supportive services. To meet such needs, the City encourages the provision of more innovative housing types that may be suitable for the senior community, including shared-housing arrangements, community care facilities, supportive housing, and assisted living for seniors.</p> <p>Objectives:</p> <ul style="list-style-type: none"> ▪ Continue to support organizations that facilitate shared housing arrangements—including promoting HIP Housing, which provides affordable housing and resources to special needs groups such as the elderly, on the City's website. ▪ Proactively contact senior housing providers to gauge senior housing needs and identify changes to zoning or other City policies and regulations that would address these needs. ▪ Review, revise and consolidate, as needed, the definitions for assisted living, including Residential Care, Senior and Housing for the Elderly. ▪ Consider amendingAmend the Zoning Ordinance to ensure that assisted living, senior living, and cottage-style housing are permitted uses in residential zoning districts. Consider streamlining senior housing to ensure faster development review. Identify necessary development standard revisions to facilitate these housing types. <p>Timeframe: Ongoing, consider; annually proactively contact senior housing providers; complete zoning amendments by December 2026; hold City Council hearing on Ordinance amendments by December 2027 (Mid Range)</p>
4. Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)	
As noted in Finding B5, the element requires a complete analysis of potential governmental constraints. Depending upon the results of that analysis, the City may need to revise	See below for how each program based on a revised analysis of governmental constraints.

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or add programs and address and remove or mitigate any identified constraints. In addition, the element should be revised as follows:	
Program H1-8 (Small Lots): The program should implement the incentives and changes to development standards, as well as list out potential revisions that are being considered.	<p>Program H1-8 has been revised implement the incentives and changes to development standards, as well as list out potential revisions that are being considered (P. H-25):</p> <p>Program H1-8: Small Lots. Due to site design and circulation requirements, development on small lots (lots smaller than a half acre) can be more challenging than on large lots.</p> <p>Objective:</p> <ul style="list-style-type: none"> Review implement the Zoning Ordinance revisions identified in Program H4-3 to facilitate small lot development standards to in the R-2, R-3, R-4, and R-5 zones and ensure that maximum densities can be achieved, even on small lots. Revise Remove barriers to development on small lots with the implementation of SB 9 regulations and identify appropriate standards to facilitate development (Program H4-5). Review mixed use zones, increase heights and densities associated with Program H1-6, and identify any additional incentives that could be incorporated, including amending height maximums to remove height limits based on maximum number of stories. Based on this review, if constraints are identified, within one year of Housing Element adoption, the City will revise any standards as necessary. ▪ and will consider incentives for consolidation of parcels, including rounding up when calculating allowable units. <p>Timeframe: Ongoing; Review development standards and consider implement incentives, as appropriate, for achieving higher densities on small lots by December 2024 (Immediate)</p>
Program H3-2 (Residential Care Facilities and Group Homes): The program must clarify what the City will do to allow group homes with seven or more residents. The program should clearly address this constraint and commit to revise zoning and permit procedure to permit group homes for seven or more residents.	<p>Program H3-2 has been revised clarify what the City will do to allow group homes with seven or more residents. It clearly addresses this constraint and commits to revise zoning and permit procedure to permit group homes for seven or more persons with objectivity to facilitate approval certainty in all residential zones.:</p> <p>Program H3-2: Residential Care Facilities and Group Homes. Redwood City encourages the development of residential care facilities and group homes. During the previous planning period, the City amended the Zoning Ordinance to remove inconsistencies in definitions and ensure compliance with State law. Additional measures will further facilitate clarity and support housing for persons with disabilities.</p> <p>EJ Focus</p> <p>Objectives:</p>

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more persons with objectivity to facilitate approval certainty in all residential zones.	<ul style="list-style-type: none"> Review, and revise as needed, the Zoning Ordinance to provide more clarity on the provisions of residential care for non-seniors in larger group settings. ConsiderSpecifically, revise zoning and permit procedures to permit residential care facilities for seven or more persons with objectivity to facilitate approval certainty in all residential zones. Analyze other opportunities for group housing and a wider variety of residential care facilities. <p><i>Timeline: By 2024 (Immediate)</i> <i>Timeline: Bring proposed amendments to City Council for hearing in conjunction with the Housing Element (by May 31, 2023)</i> <i>Responsible Party: Community Development and Transportation</i> <i>Funding Sources: Departmental Budget</i></p>
Program H3-3 (Special Needs and Extremely-Low Income (ELI) Households): The program should remove “consider” from the second action to amend zoning for ELI housing options. In addition, the program should describe how the City will support the homeless outreach team and how often they will consult with the County’s center on homelessness. Lastly, the program must include specific timing and commitment for completing zoning amendments earlier in the planning period (beyond presenting in a study session in four years).	<p>Program H3-3 has been revised to remove “consider” from the second action to amend zoning for ELI housing options. In addition, the program now describes how the City will support the homeless outreach team and how often they will consult with the County’s center on homelessness. Lastly, it includes specific timing and commitment for completing zoning amendments earlier in the planning period (beyond presenting in a study session in four years).</p> <p> Program H3-3: Housing Options for Special Needs and Extremely-Low Income Households. Redwood City neighborhoods offer a diversity of housing types that vary in type, density, and age. Extremely low-income households and households with special needs have limited housing options. To meet the needs of special needs groups, innovative housing options should also be explored.</p> <p>Objectives:</p> <ul style="list-style-type: none"> Review the Zoning Ordinance for consistency with AB 2162, effective January 1, 2019, which requires supportive housing to be considered a use by right (ministerially permitted) in zones where multi-family and mixed use are permitted, including nonresidential zones permitting multi-family uses if the proposed housing development meets specified criteria. Comply with AB 2162 requirements to allow for modifications for required parking for units occupied by supportive housing residents that are located within one-half mile of a public transit stop.

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	<ul style="list-style-type: none"> ▪ Consider amending Amend the Zoning Ordinance to explicitly allow SROs, group homes, and other housing targeted to extremely low-income households, including SROs and group homes for these income groups. ▪ Amend the Zoning Ordinance to allow low-barrier navigation centers in the CG-R zoning district. Review, and revise as needed, the Downtown Precise Plan and North Main Precise Plan to allow for low-barrier navigation centers by right in areas zoned for, consistent with AB 101. Continue to allow low-barrier navigation centers by-right in mixed-use and nonresidential development, consistent with AB 101. ▪ Prioritize available housing funding to assist in the development of housing affordable to extremely low-income households and other special needs populations. ▪ As part of the Housing Element Annual Progress Report, track and report the number of new affordable housing units providing a preference for people with special needs, including seniors, homeless, people with developmental disabilities, etc. that are added to the housing stock each year. ▪ Continue to consult with the San Mateo County Center on Homelessness to further align efforts and coordinate homeless services. ▪ Continue to support the City's Homeless Outreach Team (HOT) in their efforts to reach out to existing homeless in Redwood City and locate and acquire sites for supportive housing. HOT is a collaborative of the City's Fair Oaks Community Center and Police Department together with the County of San Mateo's Center on Homelessness, Behavioral Health and Recovery Services Department, and the Department of Housing, as well as non-profit partners such as LifeMoves, Salvation Army, Street Life Ministries, and Mental Health Association. The HOT Team develops outreach and engagement strategies with a focus on reducing chronic homelessness in our community. The City will coordinate with the HOT annually to identify additional measures that the City can do to support HOT's efforts. ▪ Proactively contact non-profit service providers and developers for persons with disabilities and other special needs groups and notify them about funding opportunities, as they become available. <p>Timeframe: Mid Range Conduct a study and community engagement on potential zoning amendments; present in and hold a study session to decision makers within four years of Housing Element adoption hearing on the item by December 2024; Ongoing/annually consult with the HOT team to address chronic homelessness</p>

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Program H4-2 (General Plan/Zoning Consistency): The program should specify timing as well as describe what amendments will be made.	<p>Program H4-2 has been revised to specify timing as well as describe what amendments will be made (p.H-39):</p> <p>Program H4-2: General Plan/Zoning Consistency. Certain parcels in the City have zones that are inconsistent with the General Plan. In conjunction with the Housing Element, the City is updating the zoning to clarify and streamline the development process on these parcels. <u>For example, some sites have a General Plan designation of High Density Residential (HDR) but a zoning designation of General Commercial (CG), making development difficult. Amendments will make the zoning consistent with General Plan policy while preserving the housing potential for the City; the changes only increase density or allow housing where it was not previously allowed before.</u></p> <p>Objectives:</p> <ul style="list-style-type: none"> Complete identified zoning map amendments to provide consistency between General Plan designations and zoning districts, <u>with revisions from and specifically change</u> nonresidential to residential or mixed-use zoning districts, as applicable <u>for consistency between the General Plan and zoning districts.</u> <p>Timeframe: <u>Bring proposed amendments to City Council for hearing</u> in conjunction with <u>the Housing Element adoption</u> <u>(by May 31, 2023)</u></p>
Program H4-6 (Permit Processing): The program should include specific timing to implement the described actions. The program should also describe how often the process will be evaluated and improved.	<p>Program H4-6 has been revised to include specific timing to implement the described actions. It also describes how often the process will be evaluated and improved (p.H-42):</p> <p>Objectives:</p> <ul style="list-style-type: none"> Continue to evaluate and improve the streamlined processing system to facilitate residential development. <u>Consider approving</u> <u>Streamline</u> 100% affordable housing <u>by right</u>. <u>with a priority staff-level planning entitlement process.</u> <p>Timeframe: Ongoing; <u>Complete analysis</u> <u>Revise Zoning Ordinance to streamline 100% affordable housing</u> and <u>community engagement</u> <u>bring amendments to City Council for hearing in conjunction with the Housing Element</u> <u>(by 2027 (Mid Range) May 31, 2023)</u>.</p>
Program H4-7 (Revised Parking Standards): The program should go	Program H4-7 has been revised to go beyond considering revised parking standards as the parking standards were identified as a potential constraint.

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beyond considering revised parking standards as the parking standards were identified as a potential constraint. For example, the City currently requires two spaces per multifamily unit regardless the number of bedrooms and “up to” a certain number of spaces in the Downtown. The program should reduce parking constraints for multifamily units within the City, as well as in the Downtown and Mixed-Use zones. In addition, the program should include specific timing for implementation.

Response

Revised Parking Standards. The cost of constructing parking can be a significant portion of the cost of developing new housing. Redwood City is a leader in providing innovative parking standards; our Downtown Parking Zone includes reduced parking standards, [incentives for shared parking open to the public](#), as well as a required maximum number of spaces per unit. The Zoning Ordinance also allows for shared and multi-family residential developments within the City’s major Mixed Use areas also have reduced parking standards.

Objectives:

- [Analyze existing parking standards for residential units. Based on this analysis, consider modifications to the Zoning Ordinance to better encourage infill development.](#)
- Review parking standards for housing for persons with disabilities and affordable housing and [consider pursue](#) reductions.
- [Consider Complete an analysis on parking innovations that could further incentivize housing production, including further](#) parking reductions, eliminating parking minimums [near high frequency transit](#), and/or unbundled parking from the dwelling unit for large housing projects.
- [Analyze new technologies that can make more efficient use of existing and future parking, such as Parkade to unbundle parking and Parknav to better utilize on-street parking.](#)
- [Continue to allow in-lieu fee payments for parking in the Downtown Parking Zone, as an alternative means of satisfying the development obligation to provide off-street parking.](#)

Timeframe: [Initiate analysis in 2023; complete analysis and community engagement by 2025 \(Short Term\)](#) and [hold City Council hearing by December 2024. See also Program H4-3 pertaining to parking reductions in R-2, R-3, R-4, and R-5 zones.](#)

Program H4-8 (Employee Housing Act): The program should be implemented earlier in the planning period (e.g., within one year).

Program H4-8 has been revised to be implemented earlier in the planning period (e.g., within one year).:
Program H4-8: [Farmworker Housing \(Employee Housing Act.\)](#). The Employee Housing Act establishes requirements for employee housing in a group home structure or group quarters format.

Objective:

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	<p>— Review Zoning Ordinance definitions for consistency with the Employee Housing Act.</p> <ul style="list-style-type: none"> ▪ Review and revise the Zoning Ordinance definitions as needed to comply with California Health and Safety Code Section 17021.6, which generally requires that farmworker employee housing consisting of no more than 36 beds in group quarters (or 12 units or less designed for use by a single household) be treated as an agricultural use. <p>Timeframe: Complete review, and revise as needed, by 2027 (Mid Range bringing amendments to City Council for hearing in conjunction with the Housing Element (by May 31, 2023)</p>										
5. Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics... (Gov. Code, § 65583, subd. (c)(5).)	<p>As noted in Finding B1, the element must include a complete analysis of AFFH. The element must be revised to add goals and actions based on the outcomes of a complete analysis.</p> <p>Based on a revised analysis of AFFH, program H6-5 has been revised as follows:</p> <p> Program H6-5: EJ Focus Affirmatively Furthering Fair Housing. Federal and State fair housing laws prohibit discrimination in home sales, financing, and rentals based on race, color, religion, sex, or national origin. Redwood City supports and promotes a diverse community of unique neighborhoods where all residents are included and valued, no group is privileged above any other group, and all have opportunity to live in neighborhoods of their choosing. The City has identified the following objectives/meaningful actions to implement:</p> <table border="1"> <thead> <tr> <th>Identified Fair Housing Issue</th> <th>Contributing Factors</th> <th>Priority Level</th> <th>Meaningful Actions</th> <th>Targets and Timeframe</th> </tr> </thead> <tbody> <tr> <td>Disproportionate housing needs among households of color, especially Black or African American and Hispanic households</td> <td>Historical actions that limited economic opportunity and homeownership; limited affordable housing;</td> <td>High</td> <td> Increase the supply of affordable housing through Implementing Programs: <ul style="list-style-type: none"> • Program H1-4: Densities in High Opportunity Areas. • Program H2-4: Affordable Housing Development/Inclusionary Housing Program H2-5: First-Time Homebuyer Opportunities Program H2-8: Acquisition and Rehabilitation of Existing Housing </td> <td> Increase the supply of affordable housing through Implementing Programs: Program H1-4: Densities Choice and Affordability in High Opportunity Areas: Program H2-4: Affordable Housing Development/Inclusionary Housing Program H2-5: First-Time Homebuyer Opportunities Program H2-8: Acquisition and Rehabilitation of Existing Housing </td> </tr> </tbody> </table>	Identified Fair Housing Issue	Contributing Factors	Priority Level	Meaningful Actions	Targets and Timeframe	Disproportionate housing needs among households of color, especially Black or African American and Hispanic households	Historical actions that limited economic opportunity and homeownership; limited affordable housing;	High	Increase the supply of affordable housing through Implementing Programs: <ul style="list-style-type: none"> • Program H1-4: Densities in High Opportunity Areas. • Program H2-4: Affordable Housing Development/Inclusionary Housing Program H2-5: First-Time Homebuyer Opportunities Program H2-8: Acquisition and Rehabilitation of Existing Housing	Increase the supply of affordable housing through Implementing Programs: Program H1-4: Densities Choice and Affordability in High Opportunity Areas : Program H2-4: Affordable Housing Development/Inclusionary Housing Program H2-5: First-Time Homebuyer Opportunities Program H2-8: Acquisition and Rehabilitation of Existing Housing
Identified Fair Housing Issue	Contributing Factors	Priority Level	Meaningful Actions	Targets and Timeframe							
Disproportionate housing needs among households of color, especially Black or African American and Hispanic households	Historical actions that limited economic opportunity and homeownership; limited affordable housing;	High	Increase the supply of affordable housing through Implementing Programs: <ul style="list-style-type: none"> • Program H1-4: Densities in High Opportunity Areas. • Program H2-4: Affordable Housing Development/Inclusionary Housing Program H2-5: First-Time Homebuyer Opportunities Program H2-8: Acquisition and Rehabilitation of Existing Housing	Increase the supply of affordable housing through Implementing Programs: Program H1-4: Densities Choice and Affordability in High Opportunity Areas : Program H2-4: Affordable Housing Development/Inclusionary Housing Program H2-5: First-Time Homebuyer Opportunities Program H2-8: Acquisition and Rehabilitation of Existing Housing							

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		<p>regional lack of affordable housing supply; high housing costs relative to wages</p>	<ul style="list-style-type: none"> • Program H2-5: First-Time Homebuyer Opportunities • Program H2-8: Acquisition and Rehabilitation of Existing Housing • Program H3-4: Public Investment in Infrastructure and Accessibility • Program H4-3: Middle Housing Development • Program H4-5: SB 9 Zoning and Subdivision Ordinance Amendments • Program H5-1: Equity and Outreach Plan • Program H5-2: Consult with Public Agencies • Program H5-3: Affirmative Marketing of Accessible and Affordable Housing Units • Program H6-1: Anti-Displacement Strategy <p>Action Outcomes: Increased public and private investment in low and moderate resource areas and neighborhoods with higher percentages of special needs groups. Through implementation of the City's SB 9 and ADU ordinances, the City seeks to</p>	<p>Program H4-3: Middle Housing Development Program H4-5: SB 9 Zoning and Subdivision Ordinance Amendments Program H5-1: Equity and Outreach Plan Program H5-3: Affirmative Marketing of Accessible and Affordable Housing Units Program H6-1: Anti-Displacement Strategy</p> <ul style="list-style-type: none"> • (from Program H1-4): Study changes to R-1 and/or RH neighborhoods that could increase the density allowed (beyond SB 9 requirements), such as including additional density for corner lots. Complete community engagement and technical study by December 2026; hold hearing with City Council regarding study recommendations by December 2026. • (from Program H2-5): Continue implementing the Affordable Housing Ordinance including below-market-rate (BMR) requirements for ownership development; Continue to provide homeownership assistance to eligible first-time homebuyers at Wyndham Place; Continue to advertise available homeownership financing opportunities with San Mateo County, such as HEART and MCC; Hold a hearing with the City Council regarding Municipal Code amendments to allow smaller subdivisions (fewer than five units per project) in existing neighborhoods to facilitate homeownership opportunities; Proactively contact owners with expiring affordability covenants annually, starting three years prior to the affordability expiration date; Continue maintaining an affordable housing interest list and
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increase affordable housing in high resource single-family districts. The City will seek to collect rental rate information on SB 9 units and ADUs through its permitting process.

[promote new affordable housing opportunities to that list, with updates as new opportunities arise.](#)

- [\(from Program H4-3\): Complete zoning text amendments to encourage middle housing, including revisions to minimum lot size, lot width, lot frontage, parking requirements, and open space by May 31, 2023; Analyze additional changes to the R-2 through R-5 Zoning Districts to further encourage middle housing, such as establishing a minimum density of no less than 75 percent of the maximum allowable density or one dwelling unit, whichever is greater \(Phase 2\) by December 2026](#)
- [\(from Program H4-5\): Review the City's Zoning Ordinance and Subdivision Ordinance and implement updates as needed to provide clarity and facilitate housing development under SB 9 by May 31, 2023; In coordination with research being conducted at the State level, pursue opportunities to incentivize and provide funding assistance for homeowners to provide affordable units under SB 9 to further housing opportunities and more affordable homeownership options in high opportunity areas.](#)

[Housing Mobility Enhancement:](#)

- [\(from Program 2-4\): Continue to provide subsidies, as funds are available, to assist in the development of affordable housing units, acquisition of land for affordable housing construction, and preservation of existing affordable housing; Continue implementing the Affordable Housing Ordinance including below-market-rate \(BMR\) requirements for rental and ownership development;](#)

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update the affordable housing impact fee nexus study by 2030.

- (from Program H5-2): Support the San Mateo County Housing Authority's outreach efforts to property owners related to acceptance of Housing Choice Vouchers, including help with outreach to property owners with units in high and moderate opportunity areas; Work with the County to contact landlords of multi-family complexes in moderate and high opportunity areas every two years and provide fair housing information and assistance (proactively outreach to public agencies annually)
- (from Program H5-3): Annually update list of community service providers to provide to affordable housing developers; on an ongoing basis coordinate with developers of proposed projects in Redwood City to ensure organizations are notified when new affordable housing opportunities become available; perform proactive outreach to those developers during the entitlement and building permit process to ensure developers are conducting appropriate marketing about local affordable and accessible housing units

Place-Based Strategies for Community Preservation and Revitalization:

- (from Program H3-4): Continue to improve access to persons with disabilities through the implementation of the City's ADA Transition Plan (slated for completion citywide by 2052) that includes ADA improvement to streets, sidewalks, and public facilities; Annually seek funding, including annual Capital Improvement Program (CIP) and/or CDBG allocations, to prioritize infrastructure

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[and accessibility improvements in the low resource opportunity areas.](#)

- [\(from Program H5-1\): Partner with housing advocates and other community organizations to provide information to hard-to-reach populations on housing topics and city initiatives at least annually](#)

[Displacement Protection:](#)

- [\(from Program H2-8\): Begin implementing the preservation recommendations from the adopted Anti-Displacement Strategy in 2022, establish a housing preservation fund by December 2023, and start recommendations #3-5 of the Anti-Displacement Strategy in 2023; Engage with nonprofit housing providers regarding the City's interest in establishing partnerships in the acquisition and rehabilitation of for-sale rental properties, with the goal of completing at least one project during the planning period.](#)
- [\(from Program H6-1\): Begin implementing Anti-Displacement Strategy recommendations in 2022; Complete Tenant Protection Ordinance Amendments by December 2024, establish a housing preservation fund by December 2023; Start other ongoing preservation efforts in 2023 including supporting community land trusts \(Ongoing\), bring proposed amendments for mobile home park rezoning to City Council for hearing in conjunction with the Housing Element \(by May 31, 2023\)](#)

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Response
<p>Concentrations of Black or African American and Hispanic residents in low resource areas</p> <p>Concentration of affordable housing and housing density in central areas of the city with low environmental health and high social vulnerability; lack of affordable housing in higher resourced neighborhoods.</p> <p>Moderate</p> <p>Add affordable housing in moderate to high resource areas and address contributing factors through Implementing Programs:</p> <ul style="list-style-type: none"> • Program H1-4: Densities in High Opportunity Areas • Program H1-5: Accessory Dwelling Units • Program H2-4: Affordable Housing Development/Inclusionary Housing • Program H2-5: First-Time Homebuyer Opportunities • Program H4-3: Middle Housing Development • Program H4-5: SB 9 Zoning and Subdivision Ordinance Amendments • Program H5-2: Consult with Public Agencies • Program H5-3: Affirmative Marketing of Accessible and Affordable Housing Units <p>Action Outcomes: An increased variety of housing options available to Redwood City residents throughout the city, including areas that have in the recent past only allowed single-family (largely ownership)</p> <p>Add affordable housing in moderate to high resource areasChoice and address contributing factors through Implementing Programs:</p> <p>Program H1-4: DensitiesAffordability in High Opportunity Areas:</p> <ul style="list-style-type: none"> Program H1-5: Accessory Dwelling Units Program H2-4: Affordable Housing Development/Inclusionary Housing Program H2-5: First-Time Homebuyer Opportunities Program H4-3: Middle Housing Development Program H4-5: SB 9 Zoning and Subdivision Ordinance Amendments Program H5-3: Affirmative Marketing of Accessible and Affordable Housing Units(from Program H1-4): Study changes to R-1 and/or RH neighborhoods that could increase the density allowed (beyond SB 9 requirements), such as including additional density for corner lots. Complete community engagement and technical study by December 2026; hold hearing with City Council regarding study recommendations by December 2026. (from Program H1-5): Continue to offer pre-approved plans, which support streamlining the permit review process and flat fees for building permits for ADUs; Promote additional pre-approved plans on the City's website; Provide homeowner/ applicant assistant tools by including and promoting State funding resources including the CalHFA ADU grant program and Casita Coalition financing guide on the City's website, and by promoting home sharing programs to connect ADU owners and renters, and offering counseling with a City staff-ADU

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housing. Provide adequate sites for over 1,800 very low-income households, over 1,300 low-income households, over 1,700 moderate-income households, and over 1,600 above moderate income households, exceeding the City's RHNA requirements by more than 150%.

[specialist; Explore and pursue funding options to support ADU construction for lower-income homeowners;](#)
[Continue to provide square footage bonuses for ADA accessible ADUs; Analyze the feasibility of eliminating or reducing permit fees or development impact fees for ADA-accessible ADUs that exceed the minimum square footage thresholds for fee waivers \(If biannual monitoring shows that ADU production is falling below the Housing Element projections, then within one year implement appropriate action to increase production.\)](#)
• [\(from Program 2-4\): Continue to provide subsidies, as funds are available, to assist in the development of affordable housing units, acquisition of land for affordable housing construction, and preservation of existing affordable housing; Continue implementing the Affordable Housing Ordinance including below-market-rate \(BMR\) requirements for rental and ownership development; update the affordable housing impact fee nexus study by 2030.](#)
• [\(from Program H2-5\): Continue implementing the Affordable Housing Ordinance including below-market-rate \(BMR\) requirements for ownership development; Continue to provide homeownership assistance to eligible first-time homebuyers at Wyndham Place; Continue to advertise available homeownership financing opportunities with San Mateo County, such as HEART and MCC; Hold a hearing with the City Council regarding Municipal Code amendments to allow smaller subdivisions \(fewer than five units per project\) in existing neighborhoods to facilitate homeownership](#)

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	<p><u>opportunities; Proactively contact owners with expiring affordability covenants annually, starting three years prior to the affordability expiration date; Continue maintaining an affordable housing interest list and promote new affordable housing opportunities to that list, with updates as new opportunities arise.</u></p> <ul style="list-style-type: none"><u>• (from Program H4-3): Complete zoning text amendments to encourage middle housing, including revisions to minimum lot size, lot width, lot frontage, parking requirements, and open space by May 31, 2023; Analyze additional changes to the R-2 through R-5 Zoning Districts to further encourage middle housing, such as establishing a minimum density of no less than 75 percent of the maximum allowable density or one dwelling unit, whichever is greater (Phase 2) by December 2026</u><u>• (from Program H4-5): Review the City's Zoning Ordinance and Subdivision Ordinance and implement updates as needed to provide clarity and facilitate housing development under SB 9 by May 31, 2023; In coordination with research being conducted at the State level, pursue opportunities to incentivize and provide funding assistance for homeowners to provide affordable units under SB 9 to further housing opportunities and more affordable homeownership options in high opportunity areas.</u> <p><u>Housing Mobility Enhancement:</u></p> <ul style="list-style-type: none"><u>• (from Program H5-2): Support the San Mateo County Housing Authority's outreach efforts to property owners related to acceptance of Housing Choice Vouchers,</u>

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					<p><u>including help with outreach to property owners with units in high and moderate opportunity areas; Work with the County to contact landlords of multi-family complexes in moderate and high opportunity areas every two years and provide fair housing information and assistance (proactively outreach to public agencies annually)</u></p> <ul style="list-style-type: none"> • <u>(from Program H5-3): Annually update list of community service providers to provide to affordable housing developers; on an ongoing basis coordinate with developers of proposed projects in Redwood City to ensure organizations are notified when new affordable housing opportunities become available; perform proactive outreach to those developers during the entitlement and building permit process to ensure developers are conducting appropriate marketing about local affordable and accessible housing units</u>
Concentrations of Black or African American and Hispanic residents in environmental hazard areas	Housing density most supported and appropriate among transportation nodes; residents resistant to added density in single family detached neighborhoods.	Moderate	Reduce environmental hazards and implement environmental justice measures adopted into the General Plan in <u>2022-2023</u> . <u>Implement the Redwood City Equity Plan's Equity Lens, Geographic Equity Index, and Equity Review policies</u> . Provide additional housing opportunities in low environmental hazard areas through Implementing Programs:	<p><u>Place-Based Strategies for Community Preservation and Revitalization:</u></p> <ul style="list-style-type: none"> • <u>Reduce environmental hazards and implement environmental justice and air quality measures adopted into the General Plan in 2023, including the prioritization of funding for parks and recreational facilities, pedestrian and bicycle infrastructure, and outreach in environmental justice communities.</u> • <u>Implement the Redwood City Equity Plan. The City has committed to apply an Equity Lens to the implementation of projects, programs, and decisions, weighing burdens and benefits of affected parties, engagement of those</u> 	

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	<ul style="list-style-type: none"> • Program H1-5: Accessory Dwelling Units • Program H1-6: Densities in Mixed Use Zoning Districts • Program H2-4: Affordable Housing Development/ Inclusionary Housing • Program H2-5: First-Time Homebuyer Opportunities • Program H3-4: Public Investment in Infrastructure and Accessibility • Program H5-1: Equity and Outreach Plan • Program H4-3: Middle Housing Development • Program H4-5: SB 9 Zoning and Subdivision Ordinance Amendments <p>Action Outcomes: The City is taking an active role to curb displacement of current lower-income residents while also supporting new development where it makes sense, near transit, services, and jobs and in High Resource areas. The City's Anti-Displacement Strategy has established policies to preserving existing affordable housing. In addition, through the City's</p> <p>most impacted by inequities, and considering potential unintended consequences. The City also commits to considering the Geographic Equity Index as part of identifying potential benefits and burdens, as well as to identify communities in which to focus engagement efforts. The City also committed to an Equity Review of City Policies, including best practices such as inclusive hiring, inclusive sourcing or procurement, and economic mobility/financial empowerment.</p> <p>• (from Program H3-4): Continue to improve access to persons with disabilities through the implementation of the City's ADA Transition Plan (slated for completion citywide by 2052) that includes ADA improvement to streets, sidewalks, and public facilities; Annually seek funding, including annual Capital Improvement Program (CIP) and/or CDBG allocations, to prioritize infrastructure and accessibility improvements in the low resource opportunity areas.</p> <p>• (from Program H5-1): Partner with housing advocates and other community organizations to provide information to hard-to-reach populations on housing topics and city initiatives at least annually</p> <p>Choice and Affordability in High Opportunity Areas (and Low Environmental Risk Areas):</p> <ul style="list-style-type: none"> • (from Program H1-4): Study changes to R-1 and/or RH neighborhoods that could increase the density allowed
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			<p><u>Equity Plan and proposed environmental justice policies in the General Plan, the City has identified Equity Lens, Geographic Equity Index, and Equity Review policies to improve environmental conditions, and support the needs of lower income residents in environmental justice areas.</u></p>	<p><u>(beyond SB 9 requirements), such as including additional density for corner lots. Complete community engagement and technical study by December 2026; hold hearing with City Council regarding study recommendations by December 2026.</u></p> <p><u>• (from Program H1-5): Continue to offer pre-approved plans, which support streamlining the permit review process and flat fees for building permits for ADUs; Promote additional pre-approved plans on the City's website; Provide homeowner/ applicant assistant tools by including and promoting State funding resources including the CalHFA ADU grant program and Casita Coalition financing guide on the City's website, and by promoting home sharing programs to connect ADU owners and renters, and offering counseling with a City staff-ADU specialist; Explore and pursue funding options to support ADU construction for lower-income homeowners; Continue to provide square footage bonuses for ADA accessible ADUs; Analyze the feasibility of eliminating or reducing permit fees or development impact fees for ADA-accessible ADUs that exceed the minimum square footage thresholds for fee waivers (If biannual monitoring shows that ADU production is falling below the Housing Element projections, then within one year implement appropriate action to increase production.)</u></p>
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	<p>Response</p> <ul style="list-style-type: none">• <u>(from Program H1-6): Complete a zoning text amendment to increase densities by 20 du/ac in the mixed use zoning districts by May 31, 2023</u>• <u>(from Program H4-3): Complete zoning text amendments to encourage middle housing, including revisions to minimum lot size, lot width, lot frontage, parking requirements, and open space by May 31, 2023; Analyze additional changes to the R-2 through R-5 Zoning Districts to further encourage middle housing, such as establishing a minimum density of no less than 75 percent of the maximum allowable density or one dwelling unit, whichever is greater (Phase 2) by December 2026</u>• <u>(from Program H4-5): Review the City's Zoning Ordinance and Subdivision Ordinance and implement updates as needed to provide clarity and facilitate housing development under SB 9 by May 31, 2023; In coordination with research being conducted at the State level, pursue opportunities to incentivize and provide funding assistance for homeowners to provide affordable units under SB 9 to further housing opportunities and more affordable homeownership options in high opportunity areas.</u> <p>Housing Mobility Enhancement:</p> <ul style="list-style-type: none">• <u>(from Program 2-4): Continue to provide subsidies, as funds are available, to assist in the development of affordable housing units, acquisition of land for affordable</u>

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				<p><u>housing construction, and preservation of existing affordable housing; Continue implementing the Affordable Housing Ordinance including below-market-rate (BMR) requirements for rental and ownership development; update the affordable housing impact fee nexus study by 2030.</u></p> <ul style="list-style-type: none"> <u>(from Program H5-2): Support the San Mateo County Housing Authority's outreach efforts to property owners related to acceptance of Housing Choice Vouchers, including help with outreach to property owners with units in high and moderate opportunity areas; Work with the County to contact landlords of multi-family complexes in moderate and high opportunity areas every two years and provide fair housing information and assistance (proactively outreach to public agencies annually)</u>
	<p>Loss of affordable housing; Displacement of residents</p>	<p>Limited affordable housing; regional lack of affordable housing supply; high housing costs relative to wages</p>	<p>High</p>	<p>Support anti-displacement efforts and retention of affordable housing through Implementing Programs <u>that protect residents from displacement and create more affordable housing to address lack of supply and high costs:</u></p> <ul style="list-style-type: none"> • Program H1-3: Replacement Unit Requirements • Program H2-3: Preservation of At-Risk, Affordable Housing <p>Displacement Protection:</p> <ul style="list-style-type: none"> <u>(from Program H1-3): The City shall not approve a housing development project that will require the demolition of residential dwelling units regardless of whether the parcel was listed in the inventory unless a) the project will create at least as many residential dwelling units as will be demolished, and b) certain affordability criteria are met.</u> <u>(from Program H2-3): Continue to work with non-profit organizations to preserve existing affordable housing in</u>

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	<ul style="list-style-type: none"> • Program H2-4: Affordable Housing Development/ Inclusionary Housing • Program H2-5: First-Time Homebuyer Opportunities • Program H2-8: Acquisition and Rehabilitation of Existing Housing <ul style="list-style-type: none"> — Program H2-4: Affordable Housing Development/Inclusionary Housing — Program H2-5: First-Time Homebuyer Opportunities • Program H3-3: Housing Options for Special Needs and Extremely-Low Income Households • Program H5-1: Equity and Outreach Plan • Program H5-3: Affirmative Marketing of Accessible and Affordable Housing Units • Program H6-1: Anti-Displacement Strategy • Program H6-4: Water and Sewer Rate Assistance Program Action Outcomes: Strategic tenant protection policy recommendations will slow the City; As needed, support funding applications to preserve at-risk units; Conduct proactive outreach to owners of housing with expiring affordability covenants annually, starting three years prior to the affordability expiration date. • (from Program H2-8): Begin implementing the preservation recommendations from the adopted Anti-Displacement Strategy in 2022, establish a housing preservation fund by December 2023, and start recommendations #3-5 of the Anti-Displacement Strategy in 2023; Engage with nonprofit housing providers regarding the City's interest in establishing partnerships in the acquisition and rehabilitation of for-sale rental properties, with the goal of completing at least one project during the planning period. • (from Program H6-1): Begin implementing Anti-Displacement Strategy recommendations in 2022; Complete Tenant Protection Ordinance Amendments by December 2024, establish a housing preservation fund by December 2023; Start other ongoing preservation efforts in 2023 including supporting community land trusts (Ongoing), bring proposed amendments for mobile home park rezoning to City Council for hearing in conjunction with the Housing Element (by May 31, 2023) • (from Program H6-4): Continue to provide funding assistance to very-low income households in need of help with their water and sewer bills in order to reduce
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				<p><u>the pace and mitigate the impacts of displacement, and development of partnerships and strategies will preserve unsubsidized affordable housing (non-deed restricted).</u> The Anti-Displacement Strategy provides a framework to meaningfully address displacement and serve the City's most vulnerable residents.</p>	<p><u>displacement risk of very low-income households due to utility costs.</u></p> <p><u>Place-Based Strategies for Community Preservation and Revitalization:</u></p> <ul style="list-style-type: none">• (from Program H5-1): Partner with housing advocates and other community organizations to provide information to hard-to-reach populations on housing topics and city initiatives at least annually <p><u>Housing Mobility Enhancement:</u></p> <ul style="list-style-type: none">• (from Program 2-4): Continue to provide subsidies, as funds are available, to assist in the development of affordable housing units, acquisition of land for affordable housing construction, and preservation of existing affordable housing; Continue implementing the Affordable Housing Ordinance including below-market-rate (BMR) requirements for rental and ownership development; update the affordable housing impact fee nexus study by 2030.• (from Program H5-2): Support the San Mateo County Housing Authority's outreach efforts to property owners related to acceptance of Housing Choice Vouchers, including help with outreach to property owners with units in high and moderate opportunity areas; Work with the County to contact landlords of multi-family complexes in moderate and high opportunity areas every two years
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	<p>The following programs were also revised to affirmatively further fair housing (p.H-28). Program H2-2 has been revised as follows (p. H-XX):</p> <p><u>and provide fair housing information and assistance (proactively outreach to public agencies annually)</u></p> <ul style="list-style-type: none"><u>• (from Program 3-3): By December 2024, conduct Zoning Ordinance amendments to allow supportive housing consistent with AB 2162, explicitly allow housing targeted to extremely low-income households, including SROs and group homes for these income groups, to allow low-barrier navigation centers in the CG-R zoning district, DTPP, and North Main Precise Plan, and prioritize funding to assist extremely low-income housing development.</u><u>• (from Program H5-3): Annually update list of community service providers to provide to affordable housing developers; on an ongoing basis coordinate with developers of proposed projects in Redwood City to ensure organizations are notified when new affordable housing opportunities become available; perform proactive outreach to those developers during the entitlement and building permit process to ensure developers are conducting appropriate marketing about local affordable and accessible housing units</u>

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and provide fair housing information and assistance (proactively outreach to public agencies annually)

- (from Program 3-3): By December 2024, conduct Zoning Ordinance amendments to allow supportive housing consistent with AB 2162, explicitly allow housing targeted to extremely low-income households, including SROs and group homes for these income groups, to allow low-barrier navigation centers in the CG-R zoning district, DTPP, and North Main Precise Plan, and prioritize funding to assist extremely low-income housing development.
- (from Program H5-3): Annually update list of community service providers to provide to affordable housing developers; on an ongoing basis coordinate with developers of proposed projects in Redwood City to ensure organizations are notified when new affordable housing opportunities become available; perform proactive outreach to those developers during the entitlement and building permit process to ensure developers are conducting appropriate marketing about local affordable and accessible housing units

The following programs were also revised to affirmatively further fair housing (p.H-28).
Program H2-2 has been revised as follows (p. H-XX):

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| | **Program H2-2 Home Repair Programs.** To maintain the quality and affordability of older neighborhoods and housing stock, the City offers a home improvement program, providing grants from Community Development Block Grant (CDBG) funds to low-income households for minor home repairs and accessibility modifications. **Objectives:** - Provide grant assistance to facilitate the repair of 20 units per year, including home accessibility modifications for disabled persons. ***Timeline:** Ongoing* - [Conduct targeted repair program outreach to the Farm Hill neighborhood which has a higher concentration of people with disabilities.](#) ***Timeline:** Grant assistance is ongoing annually; Work with program service providers to conduct targeted outreach to the Farm Hill neighborhood by December 2024* Program H2-7 has been revised as follows (p. H-32): ***Timeline:** Immediate—Bring amendments to City Council for hearing in conjunction with Housing Element adoption [\(by June 2023\)](#)* Program H2-8 has been revised as follows (p. H-33): **Acquisition and Rehabilitation of Existing Housing.** Under this program, the City assists nonprofit organizations [and affordable housing developers](#) in the acquisition of multi-family housing for lower-income families, individuals, veterans, **and** seniors, and other special needs populations. **Objective:** - [Implement the preservation recommendations from the adopted Anti-Displacement Strategy, once adopted.](#) |

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Program H3-4 has been added (p. H-37):



Program H3-4: [Public Investment in Infrastructure and Accessibility](#). Accessibility in infrastructure is an important component of neighborhood quality of life for Redwood City residents with disabilities.

EJ Focus

Objective:

- [Continue to improve access to persons with disabilities through the implementation of the City's ADA Transition Plan that includes ADA improvement to streets, sidewalks, and public facilities.](#)
- [Seek funding, including annual Capital Improvement Program \(CIP\) and/or CDBG allocations, to prioritize infrastructure and accessibility improvements in the low resource opportunity areas.](#)

Timeframe: The ADA Transition Plan is planned for completion no later than 2052, possibly sooner based on funding opportunities

Responsible Party: ADA Coordinator, Community Development and Transportation; City Manager's Office, Housing Division

Funding Sources: Departmental Budget, CDBG CIP Budget

Program H6-4 has been added (p. H-50):

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	<p>Program H6-4: Water and Sewer Rate Assistance Program (WSRAP). The City will continue to provide funding assistance to very-low income households in need of help with their water and sewer bills in order to reduce displacement risk of very low-income households due to utility costs.</p> <p>Objective:</p> <ul style="list-style-type: none"> ▪ Continue funding and implementing the WSRAP <p>Timeframe: Ongoing</p> <p>Responsible Party: Public Works</p> <p>Funding Sources: Departmental Budget</p>
<p><i>6. Develop a plan that incentivizes and promotes the creation of accessory dwelling units that can be offered at affordable rent... (Gov. Code, § 65583, subd. (c)(7).)</i></p>	
<p>Programs must be expanded to include incentives to promote the creation and affordability of Accessory Dwelling Units (ADUs). Examples include exploring and pursuing funding, modifying development standards and reducing fees beyond state law, increasing awareness, pre-approved plans and homeowner/applicant assistance tools. In addition, given the City's assumptions for ADUs, the element should include a program to monitor permitted ADUs and affordability every other year and take appropriate action such as adjusting assumptions or rezoning</p>	<p>Program H1-5 has been revised as follows:</p> <p>Objective:</p> <ul style="list-style-type: none"> ▪ Support the development of 506 accessory dwelling units during the planning period and as new State laws modify accessory dwelling unit requirements, update the City's ordinance to comply. ▪ Continue to offer pre-approved plans, which support streamlining the permit review process. ▪ Continue to offer flat fees for building permits for ADUs. ▪ Promote additional pre-approved plans on the City's website. ▪ Provide homeowner/applicant assistant tools by including and promoting State funding resources including the CalHFA ADU grant program and Casita Coalition financing guide on the City's website, and by promoting home sharing programs to connect ADU owners and renters, and offering counseling with a City staff-ADU specialist. ▪ Explore and pursue funding options to support ADU construction for lower-income homeowners. ▪ Continue to provide square footage bonuses for ADA accessible ADUs. ▪ Analyze the feasibility of eliminating or reducing permit fees or development impact fees for ADA-accessible ADUs that exceed the minimum square footage thresholds for fee waivers.

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within a specified time period (e.g., 6 months).	<p><i><u>Timeframe:</u></i> Ongoing: Annually review progress toward meeting the RHNA as compared to the projections in ADU production made in the Housing Element as part of the Annual Progress Report process. Monitor ADU production trends, permit fees, and ADU affordability every other year. If biannual monitoring shows that ADU production is falling below the Housing Element projections, then within six months implement appropriate action to increase production, such as additional incentives, adjusting fees, increasing homeowner assistance tools, pursue funding options to support ADU construction for lower-income homeowners, and update communications strategy to increase awareness of existing programs. If necessary, revise strategy in 2026.</p>
D. Public Participation	
	<p><i>Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the Housing Element, and the element shall describe this effort. (Gov. Code, § 65583, subd.(c)(9).)</i></p>
While the element describes public participation and key themes from public engagement, it should describe how public comments were incorporated into the element.	<p>The following has been added discussing revisions made to the TBR Public Participation Chapter on p. H5-6 to H5-7:</p>

Specific revisions include:

- Removed sites identified to be unlikely to redevelop and added a new site with good potential for redevelopment. This includes:
 - Removing the Ferrari Pond site located off Seaport Boulevard
 - Adding the site at 1950 El Camino Real in the Mixed Use Corridor – El Camino Real zoning district (near Woodside Road) as a potential housing site.
 - Adding the City-owned 611 Heller site.
- Corrected errors and made minor text edits pertaining to projects in the development pipeline
- Added additional information pertaining to:
 - Overcrowded housing conditions
 - Housing needs and trends information for persons with developmental disabilities
 - COVID-19 rent relief
 - Fair housing cases investigated by Project Sentinel
- Modified policies and programs to prioritize housing for extremely low-income households including:
 - An update to the City's affordable housing nexus study with considerations for incentivizing ELI units as part of the affordable housing ordinance
 - Prioritizing housing funds for extremely low-income
 - Added a new program to work with developers to affirmatively market accessible and affordable units
 - Added a new policy to seek additional funding sources for affordable housing
 - Added objectives to programs to:
 - Track and report on the number of new affordable units providing a preference for people with special needs, including seniors, homeless, people developmental disabilities, etc.
 - Review parking standards for affordable housing and consider reductions
 - Report housing progress in a user-friendly dashboard format
 - Support community land trusts

The Draft Element, as revised, ~~will remain~~was submitted to HCD on April 11, 2022 and was made available on the City's website for additional public review and comment during the HCD review period. As revisions are made to respond to HCD comments, this information will also be posted on the City's website. ~~Once HCD has reviewed the draft Element, During the HCD review period, additional comment letters were received. The following changes were made to the Housing Element in response:~~

- The Housing Plan was modified to add a review of the Affordable Housing Ordinance and consultation with affordable housing developers to identify potential revisions that would better support development of affordable housing, and especially LIHTC financed housing.
- Adjusted timeframes for additional revisions to parking standards and innovative parking policy.

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	<ul style="list-style-type: none"> Added modular housing to Housing Policy H-4.4 to encourage innovative construction types. <p>Following HCD's review, the Draft Housing Element was revised to respond to the Department's comments. The revised draft was made available to the public for a 15-day review period on September 9, 2022. The public will also be invited to attend and comment on the Housing Element at hearings held before the Planning Commission and the City Council. The City anticipates the revised Draft Housing Element will be available on the website and at City Hall no less than 10 days prior to each hearing.</p>
COMMENTS RECEIVED DURING CALL	
Affirmatively Furthering Fair Housing Add more about proactive outreach during planning period	<p>Additional information has also been added regarding outreach on page H4-7 and H4-14, with the detailed survey results attached as a new Appendix A:</p> <p>As noted above, a fair housing survey was administered and 163 Redwood City residents responded. The full survey results are found in Appendix A. In collaboration with 21 Element, the City also participated in four “listening sessions” with key stakeholders, that convened more than 30 groups. These stakeholders represented organizations that focused on: fair housing, housing advocacy, housing services, and housing development (market-rate and affordable).</p> <p>Redwood City residents are served by multiple fair housing and housing legal service providers, including Project Sentinel, Legal Aid Society of San Mateo County and Community Legal Services in East Palo Alto (CLSEPA). Project Sentinel provides fair housing services and investigations, housing counseling services, and tenant/landlord services.</p> <p>...</p> <p>A survey <u>was</u> administered to capture residents' <u>housing</u> needs and support the <u>development of the AFFH</u>. <u>The full survey results are found the following housing challenges in Appendix A</u>. Over 160 <u>Redwood City</u> residents completed the survey <u>and found the following housing challenges</u>:</p> <ul style="list-style-type: none"> ▪ About 25 percent of residents said their house or apartment is too small for their family; ▪ 20 percent of renters said they worry that if they request a repair they will experience a rent increase or get evicted; ▪ 12 percent of renters are often late on rent and can't keep up with utilities.
<i>Needs Assessment</i>	

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Add total unemployment rate for the City.																								
<p>Information on the City's and surrounding areas unemployment rate on p H1-3 to H1-4 of the TBR Needs Assessment Chapter:</p> <p>In 2018, Redwood City had 40,418 workers living within its borders who work across 11 major industrial sectors. Table H1-4 provides detailed employment information. Many Redwood City residents work in professional and managerial services (22 percent); health and educational services (20 percent); arts, recreation and other services (14 percent); information (11 percent); and manufacturing and wholesale industries (10 percent). Between 2010 and 2018, the proportion of workers employed in the information industry doubled from five percent to 11 percent. In Redwood City, there was a 3.6 percentage point decrease in unemployment rates between January 2010 and January 2021. 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, Redwood City's unemployment rate was 4.8%, which was lower than the regional unemployment rate of 6.6% and its pandemic-related high rate of 9.3% in April 2020. Redwood City's pre-pandemic unemployment rate was 2.1% (January 2020).²⁸</p>																								
<p>Add disability by age.</p> <p>Table H1-10 has been added breaking down disability by age on p H1-10 of the TBR Needs Assessment Chapter:</p> <p>Many Redwood City residents have disabilities that prevent them from working, restrict their mobility, or make it difficult to care for themselves. There are 6,143 residents with a disability in Redwood City, representing seven percent of residents. As indicated in Table H1-10, the majority of residents with a disability are 75 years or older (46.3 percent), followed by those 65 to 74 years (16 percent). The most commonly occurring disability amongst seniors 65 and older is an ambulatory disability, experienced by 18 percent of Redwood City's seniors. Thirty-seven percent of residents with disabilities live in poverty.</p> <p>Table H1-10: Population with Disabilities by Age</p> <table border="1"> <thead> <tr> <th><u>Age Group</u></th> <th><u>Total in Age Group</u></th> <th><u>Number of Individuals with Disabilities</u></th> <th><u>Percent of Individuals with Disabilities</u></th> </tr> </thead> <tbody> <tr> <td><u>Under 5 years</u></td> <td><u>5,442</u></td> <td><u>61</u></td> <td><u>1.1%</u></td> </tr> <tr> <td><u>5 to 17 years</u></td> <td><u>12,899</u></td> <td><u>446</u></td> <td><u>3.5%</u></td> </tr> <tr> <td><u>18 to 34 years</u></td> <td><u>21,174</u></td> <td><u>501</u></td> <td><u>2.4%</u></td> </tr> <tr> <td><u>35 to 64 years</u></td> <td><u>34,527</u></td> <td><u>2,078</u></td> <td><u>6.0%</u></td> </tr> <tr> <td><u>65 to 74 years</u></td> <td><u>6,285</u></td> <td><u>1,004</u></td> <td><u>16.0%</u></td> </tr> </tbody> </table>	<u>Age Group</u>	<u>Total in Age Group</u>	<u>Number of Individuals with Disabilities</u>	<u>Percent of Individuals with Disabilities</u>	<u>Under 5 years</u>	<u>5,442</u>	<u>61</u>	<u>1.1%</u>	<u>5 to 17 years</u>	<u>12,899</u>	<u>446</u>	<u>3.5%</u>	<u>18 to 34 years</u>	<u>21,174</u>	<u>501</u>	<u>2.4%</u>	<u>35 to 64 years</u>	<u>34,527</u>	<u>2,078</u>	<u>6.0%</u>	<u>65 to 74 years</u>	<u>6,285</u>	<u>1,004</u>	<u>16.0%</u>
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²⁸ Source: California Employment Development Department, Local Area Unemployment Statistics (LAUS), Sub-county areas monthly updates, 2010-2021.

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		<u>75 years and over</u> <u>4,458</u> <u>2,053</u> <u>46.1%</u>				
		<i>Sources:</i> 1. US Census Bureau, American Community Survey 2014-2019 5-year estimates (Table S1810)				
Add a level of risk analysis for projects converting to market rate.		<p>The following has been added regarding level of risk of a project converting to market rate on p H1-24 of the TBR Needs Assessment Chapter:</p> <p>Based on City records and information from the California Housing Partnership Corporation, of the 29 rental apartment developments with 1,203 affordable units, five complexes with a total of 239 units have expiring affordability covenants in Redwood City during the next ten years (2022-2032):</p> <ul style="list-style-type: none"> • Casa de Redwood (134 affordable units) <u>2029; nonprofit owner</u> • Franklin Street Apartments (31 affordable units) <u>2028; for-profit owner</u> • Oxford Apartments (3 affordable units) <u>2026; nonprofit owner</u> • Redwood City Commons (58 affordable units) <u>2026; for-profit owner</u> • Redwood Plaza Village (13 affordable units) <u>2024; for-profit owner</u> <p>Redwood City Commons was at risk of converting to market rate during the previous planning period; the property owners renewed a contract with HUD to maintain affordability an additional ten years. Preservation of at-risk projects can be achieved in a variety of ways, with adequate funding availability. Alternatively, units that are converted to market rate may be replaced with new assisted multi-family units with specified affordability timeframes.</p> <p><u>In order to assess the level of risk of a project converting to market rate, the expiration date of affordability covenants and the ownership structure of the project is considered. Nonprofit ownership generally indicates a lower likelihood of conversion than for-profit ownership. However, to be conservative, all projects with expiring affordability covenants are included in the analysis below. The City has included Program H2-3 in the Housing Plan to monitor the affordability status of projects with expiring affordability covenants and to continue to work with local partners and existing owners to preserve existing affordable housing.</u></p>				
<i>Housing Resources</i> Confirm ADU projections and include a program to monitor production and affordability levels.		<p>The following has been added regarding ADU projections on p H3-13 of the TBR Housing Resources Chapter:</p>				

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[Program H1-5 is included in the Housing Element to monitor production and affordability levels and to implement actions as needed in a timely manner to ensure enough sites identified. The program also includes pursuing the implementation of additional incentives such as continuing to offer pre-approved plans which supports streamlining the permit review process, and lowering fees for ADA-accessible ADUs.](#)

Program H1-5 on p. H-23 of the Goals and Policies Chapter has been revised as follows:

Program H1-5: **Accessory Dwelling Units.** Accessory dwelling units (ADUs) can offer an additional source of affordable housing to homeowners and the community. The City last updated its ADU ordinance in August 2021 and now has an up-to-date ordinance considered compliant with Government Code Section 65852.2.

Objective:

- Support the development of 506 accessory dwelling units during the planning period and as new State laws modify accessory dwelling unit requirements, update the City's ordinance to comply.

Timeline: Ongoing

- [Continue to offer pre-approved plans, which support streamlining the permit review process.](#)
- [Continue to offer flat fees for building permits for ADUs.](#)
- [Promote additional pre-approved plans on the City's website.](#)
- [Provide homeowner/applicant assistant tools by including and promoting State funding resources including the CalHFA ADU grant program and Casita Coalition financing guide on the City's website, and by promoting home sharing programs to connect ADU owners and renters, and offering counseling with a City staff-ADU specialist.](#)
- [Explore and pursue funding options to support ADU construction for lower-income homeowners.](#)
- [Continue to provide square footage bonuses for ADA accessible ADUs.](#)
- [Analyze the feasibility of eliminating or reducing permit fees or development impact fees for ADA-accessible ADUs that exceed the minimum square footage thresholds for fee waivers.](#)

***Timeline: Ongoing:** Annually review progress toward meeting the RHNA as compared to the projections in ADU production made in the Housing Element as part of the Annual Progress Report process. Monitor ADU production trends, permit fees, and ADU affordability every other year. If biannual monitoring shows that ADU production is falling below the Housing Element projections, then within six months implement appropriate*

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	<p>action to increase production, such as additional incentives, adjusting fees, increasing homeowner assistance tools, pursue funding options to support ADU construction for lower-income homeowners, and update communications strategy to increase awareness of existing programs. If necessary, revise strategy in 2026.</p>
<p><i>Housing Constraints</i></p> <p>Add information of multi-family land costs.</p> <p>List emergency shelter development and management standards and whether these pose as a constraint.</p>	<p>The following has been added regarding multi-family land costs on p H2-1 of the TBR Housing Constraints Chapter: According to land sales data prepared by 21 Elements, the cost of land for multi-family homes in the City has an average of \$157,000 per multi-family unit. Among the variables affecting the cost of land, for both single-family and multi-family developments, are the size of lots, location and amenities, the availability and proximity of public services, and the financing arrangement between the buyer and seller.</p> <p>The following has been added regarding emergency shelter development and management standards on p H2-19 and H2-20 of the TBR Housing Constraints Chapter:</p> <p>Emergency Shelters</p> <p>Emergency shelters provide short-term shelter (usually for up to six months of stay) for homeless persons or persons facing other difficulties, such as domestic violence. Emergency shelters are allowed without discretionary review by adding the designation of the Emergency Shelter Combining District to an existing zoning district. This designation is currently applied in portions of two zoning designations, Mixed Use-Transitional and Light Industrial Incubator, totaling approximately 54.8 acres of land designated with the Emergency Shelter Combining District. These properties are located in proximity to transit lines and readily accessible to commercial uses and services of the city. As of 2024 Realizing the expense associated with new construction, the City identified this area to have a mix of medium- to large-sized buildings that would lend themselves to reuse as homeless shelters. Multiple lots throughout this area are underutilized, containing only a small commercial or industrial building on a portion of the lot. Because of the light industrial nature of the area, design requirements would not mandate expensive construction materials, and compatibility with the neighborhood aesthetic character could be achieved through the use of simple building forms. As such, there are realistic opportunities for the development of emergency shelters on underutilized land as well as through the conversion of an existing building. Redwood City supports the distribution of affordable housing, emergency shelters, and transitional housing in areas of the city where appropriate support services and facilities are available in close proximity.</p> <p>The development and management standards for emergency shelters in the Zoning Ordinance (Section 25.8) were drafted to be consistent with State law. Specific provisions for emergency shelters in Redwood City specify:</p>

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- The emergency shelter provider/operator shall have a written management plan including, as applicable, provisions for staff training, neighborhood outreach, transportation issues, security, screening to ensure compatibility of residents with services provided at the facility, and training, counseling, and treatment programs for residents.
- An emergency shelter shall contain a maximum of 50 beds and shall serve no more than 50 homeless persons at any one time.
- Occupancy by an individual or family may not exceed 180 consecutive days unless the management plan provides for longer residency by those enrolled and regularly participating in a training or rehabilitation program. Services shall be provided to assist residents to obtain permanent shelter, income, and services. No individual or household may be denied emergency shelter because of an inability to pay.
- Adequate external lighting shall be provided for security purposes. The lighting shall be stationary and directed away from adjacent properties and public rights-of-way. The intensity shall comply with standard City performance standards for outdoor lighting.
- Onsite management of the facility shall be required during all open hours of operation.
- The emergency shelter facility shall demonstrate that it is in, and maintains in, good standing with County and/or State licenses, if required by these agencies for the owner(s), operator(s), and/or staff on the proposed facility.
- No more than one emergency shelter shall be permitted within a radius of 300 feet of another such facility, as measured from the nearest property lines.
- Interior on-site waiting and client intake areas must be at least two hundred 200 square feet. Outdoor onsite waiting areas shall not exceed 100 square feet, and must be located within direct sight-line of the public right-of-way.
- Parking and outdoor facilities shall be designed to provide security for residents, visitors, and employees.
- The development may provide one or more of the following specific common facilities for the exclusive use of the residents: central cooking and dining room(s), recreation room, counseling center, child care centers, and/or other support services.
- One parking space for each five beds and two additional spaces.

The standards listed above are common across many cities in California and do not constrain the production of emergency shelters, as demonstrated by the various existing and proposed emergency and transitional shelters in the City. As of 2022, there are eight emergency and transitional shelters in Redwood City (Maple Street Shelter, Redwood Family House, Spring Sheet Shelter, Daybreak Shelter, Pacific Emergency Shelter, Catholic Worker House (transitional), Service League: Hope House (transitional) and the RV Safe Parking site). Additionally, the City has one emergency shelter project under development, the County Navigation Center. The availability of land within areas designated as Emergency Shelter Combining District (54.8 acres) can easily accommodate shelters for the 221245 unsheltered homeless persons identified in the City during the most recent Point-In-Time Homeless Count (20192022).

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	<p>Recent State Law (AB 101) AB 101 requires that Low-Barrier Navigation Centers be allowed as a by right use in areas zoned for mixed-use and nonresidential zones permitting multi-family uses. In 2021, the City amended the Zoning Ordinance to define Low Barrier Navigation Centers and allow this use by right in the Central Business (CB) District and all Mixed Use zones (MU-W, MU-T, MU-N, MU-C). As indicated in Program H3-3 in the Housing Plan, the City will also amend the Zoning Ordinance to allow low-barrier navigation centers in the CG-R zoning district and review and revise as needed the Downtown Precise Plan and the North Main Precise Plan to allow low-barrier navigation centers by right in nonresidential and mixed-use zoning districts.</p>
Clarify whether City has an SB 35 approval process in place.	<p>The following has been added regarding emergency shelter development and management standards on p H2-20 of the TBR Housing Constraints Chapter:</p> <p>The City has adopted an SB 35 approval process consistent with State law. As of June 18, 2021, the City of Redwood City was determined to be subject only to SB 35 streamlining for proposed developments with 50 percent or greater affordability. To accommodate any future SB 35 applications or inquiries, the City has created an informational packet that explains the SB 35 streamlining provisions in Redwood City and provides SB 35 eligibility information.</p>

In addition to the revisions that respond to HCD comments, the City made a few additional edits to address typographical errors, changes in circumstances in the sites inventory, and to respond to public comments. Those changes that are substantive are also itemized in the matrix of revisions, in a separate table at the end.

Location	Change
Table H3-22 (Downtown Precise Plan Underutilized Sites) in the TBR Resources chapter	<ul style="list-style-type: none"> Remove City-owned Winslow Lot - The Winslow Lot was removed from the Housing Element sites inventory. There are currently two comprehensive plans underway that may affect development at this location, the Transit District and Central RWC. These plans are still in progress and will not be completed by the time the Housing Element is prepared. The City will comply with Surplus Land Act requirements; however, the City did not have a clear path forward for this site as housing in the next 8 year period until we better understand the outcomes of both of these plans. As such, the site was removed from the inventory.

Table H3-21 (Mixed Use Underutilized Sites) in the TBR Resources chapter	<ul style="list-style-type: none"> Remove 1155 Veterans Blvd (Former K-Mart Site) – A commercial tenant has recently signed a 16 year lease to occupy the site and is currently remodeling the building. The recent occupancy and long-term lease of the tenant makes residential development at the site unlikely.
Added to Table H3-22 (Downtown Precise Plan Underutilized Sites) and new description added to TBR Resources chapter on page H3-35	<ul style="list-style-type: none"> Add 1800 Broadway / 1000 Marshall St to expand the 910 Marshall opportunity site. There is significant developer interest for the site, however at this time the planning efforts of Transit District and DTPP Gatekeeper leave limited resources to explore rezoning or General Plan amendments for this site. Staff has asked the owners to participate in Central RWC visioning process in 2023 in order to pursue housing opportunities at this site. Other nearby properties such as 601 Main and 707 Bradford show feasibility for multifamily residential and projects under review, such as 1900 Broadway, demonstrate development interest in the City's downtown.
Table H3-21 (Mixed Use Underutilized Sites) in the TBR Resources chapter	<ul style="list-style-type: none"> Change affordability levels of 202 Walnut (occupied by Sports Basement) and 300 Walnut (Peninsula Park) to include only moderate and above moderate units. The affordability levels for the site were adjusted to exclude these sites as a “reuse” housing opportunity site. The City would support housing development at the site, but there is concern that categorizing this as a reuse site would also allow by-right mixed-use development and would allow for significant commercial office by-right without any analysis of impacts to the jobs-housing balance, traffic, and GHGs. The sites are owned by one property owner but are bisected by the Kohl’s site at 250 Walnut under separate ownership. Removal from the reuse sites allows the City to explore more comprehensive planning opportunities to include all of the ownership groups into one planning process. The sites are still allocated towards RHNA, because there has been developer interest in redevelopment of the site as a whole. The sites will be upzoned from 60du/ac to 80du/ac.