Burlingame – HCD letter highlights for 21 Elements

Extremely-Low Income Households

HCD wanted to see a more detailed analysis of the City's projected ELI households, and what we planned to do to help accommodate that group. We had not broken out these numbers separately from the Very-Low Income households, so we went back to the CHAS data and included a specific statement of the number of ELI households we expected to see over the course of the planning period. We also added a program to provide development incentives to housing builders who provided units for ELI households.

Condition of Housing Stock

HCD was concerned that we did not include any units for rehabilitation or preservation. Based on the new state law definition of units eligible for rehabilitation, the City did not feel that any of the existing housing stock would qualify, specifically regarding the "unfit for human habitation" requirement. Staff confirmed with the Code Enforcement Officer and the Building Division staff that there have never been citations or reports of homes that are unfit for human habitation. This supporting information was then articulated in the Housing Element.

Suitability of Sites

Burlingame included underutilized sites, some of which are currently occupied by businesses. The State wanted an explanation as to why we thought they were likely to redevelop. We provided information on projects which have been proposed and built on similar sites. We also identified sites that HCD felt were "small." Staff explained that these sites were actually typical in Burlingame, but included a program to encourage lot consolidation.

Emergency Shelters

HCD asked the City to prove that the sites identified for emergency shelters could in fact "physically" fit a shelter the size of which is required to house the unmet need in the City. Staff identified the average size site in those zones identified and explained how the typical square footage of an emergency shelter required to meet the City's unhoused could be accommodated.

Reasonable Accommodation

HCD wanted to see more with regard to how the City accommodates persons with disabilities, not just in terms of development standards. They were interested in seeing accommodation with regard to broader zoning and maintenance improvement and development of housing. Staff utilized language compiled from the 21 Elements group and added programs for application streamlining and procurement of grant money.