



City of South San Francisco
400 Grand Ave
South San Francisco, CA 94080

To the honorable South San Francisco City Council,

The Housing Leadership Council (HLC) appreciates this opportunity to comment on the city of South San Francisco's housing element. HLC works with communities and their leaders to create and preserve quality affordable homes. We were founded by service providers and affordable housing professionals over 20 years ago to change the policies at the root cause of our housing shortage.

Over the past couple of years, South San Francisco has undergone a General Plan update, intended to accommodate the community's housing needs through 2040. The Housing Leadership Council applauds SSF's undertaking and the ambitious plan it has produced. Independently of the housing element process, SSF has already implemented substantial upzoning in recent years, generating impressive new capacity. As a result, the city has over 3,500 proposed or approved units in its pipeline, already fulfilling a large portion of SSF's 6th cycle Regional Housing Needs Allocation.

Nonetheless, South San Francisco will continue to face challenges in planning for affordable housing, especially very low- and extremely low-income housing. Over the last housing element cycle, 16 low-income and 89 very low-income units were built in SSF, just 5.7% and 15.8% of the 5th cycle RHAN goal, respectively. Even with its recent rezonings in place, SSF has not yet demonstrated capacity to meet its very low-income RHNA obligation for the 6th RHNA cycle, much less its obligations for the other cycles slated to occur between now and 2040.

This letter provides proposals for changes and additions that will enable South San Francisco to meet its housing obligations for all residents regardless of income. The first part of this letter examines South San Francisco's needs and constraints analyses. The second part evaluates South San Francisco's goals, policies, and programs. HLC has not yet had a chance to review SSF's Affirmatively Furthering Fair Housing analysis or site inventory, and we may provide additional comments later in the process elaborating on our findings upon review.

Needs and Constraints Analyses

State law requires housing elements to have several technical analyses, including an analysis of housing needs within the jurisdiction and an analysis of the governmental and nongovernmental

constraints to meeting those housing needs. Each of these analyses must connect directly to the site inventory and the goals, policies, and programs of the housing element.

First and foremost, SSF's needs analysis emphasizes the community's limited supply of housing accessible to its very low- and extremely low-income households. 48.6% of SSF's households are lower income; "70% of employed residents earn less than \$75,000 annually and 52% of workers in South San Francisco job sites (whether they live in SSF or not) earn less than \$75,000 annually."¹ The jobs housing balance has increased from 2.24 in 2002 to 3.24 in 2018.

Furthermore, from 2010 to 2020 median "Home prices increased by 114% from 2010 to 2020," to \$1,190,200.² From 2009 to 2019, median rent increased by almost \$1,000. Though SSF presents this data demonstrating the need for more deeply affordable housing, the city pursues few policies to promote such housing. As will be elaborated more in later sections, the city's housing element Goal #3, "Remove Constraints to Housing Development," does not make any substantial commitments to remove constraints. Though other sections directly address some significant identified special housing needs, such as housing for the disabled, few policies target production of general very low-income housing.

SSF's housing element likely leaves some constraints unaddressed because the draft constraints analysis does not acknowledge very many of them. According to the draft, "The City of South San Francisco does our best to avoid all these selfimposed constraints on housing production."³ In its efforts to paint the city in the best light possible, the draft housing element sometimes ties itself into knots, claiming "While not an obstacle to housing development, the existing General Plan was limited in furthering South San Francisco's housing goals given the limited priority development areas near mass transit." Somehow, the existing General Plan was "not an obstacle" to housing while also being "limited in furthering" SSF's housing goals.

Nonetheless, the draft housing element makes reasonable cases that standard barriers to housing development, such as high fees and long permit processing times, are not significant constraints in South San Francisco. Those constraints that SSF considers, it tends to justify. However, some constraints merit further discussion, including:

- **Setbacks and Minimum Lot Size Requirements:** Large setbacks, minimum lot width and depth, and other requirements on usage of lots size potentially present a significant constraint on housing development in the Downtown Residential and the Downtown Station Area Zoning Districts.
- **Floor Area Ratio:** FARs of 0.5, 3.0, and 4.0 in the DRC, LNC, and GAC Downtown Station Area Zoning Districts likely constrain housing in those locations. For example, the DRC zone requires a minimum 80 du/ac and allows a maximum of 125 du/ac, both unrealistically high densities for the vast majority of lots with a 0.5 FAR.
- **Lack of Access to Local Subsidy:** Despite implementation of a commercial linkage fee and in-lieu fees to fund affordable housing, to HLC's knowledge SSF does not have a

¹ [Draft Housing Element](#), p. 33

² [Draft Housing Element](#), p. 35

³ [Draft Housing Element](#), p. 49

program to regularly release a Notice of Funding Availability to the affordable housing development community. Furthermore, the city has substantial publicly owned land on which it could further promote affordable housing.

Fully analyzing the housing needs present in South San Francisco and the governmental constraints to meeting those needs will help the city implement the necessary policies and programs to make its site inventory viable.

Site Inventory (preliminary comments)

Though the Housing Leadership Council was not able to review South San Francisco's site inventory, we noticed that the city currently plans for only 670 very low-income units to be developed over the next RHNA cycle, well below the city's allocation of 871 VLI units. In order to comply with RHNA guidelines, the city will need to demonstrate capacity for the full quantity of VLI homes.

Fortunately, SSF's site inventory provides a strong foundation for promoting affordable housing. Because more than half of its lower-income units are projected to come from pipeline units and ADUs, the city elects to evaluate "opportunity sites under the standard burden of proof rather than substantial evidence," meaning that the city needs a lower burden of proof in order to plan for lower-income housing on a site.⁴

Despite this wiggle room, SSF uses its minimum densities to calculate realistic site capacity. Though HLC questions the validity of some of SSF's selected sites and its ADU projections, at a glance it appears that the city has complied with the letter of the law and produced site inventory projections according to HCD's guidelines. Thus, SSF can plan to increase its deeply affordable housing production from a strong starting point.

Goals, Policies, and Programs

In the following section, HLC describes how South San Francisco can strengthen its Goals, Policies, and Programs to more effectively promote low- and very low-income housing as needed to create a viable site inventory. The city already has a number of strong policies and programs in place. However, several programs that would otherwise be adequate lack clear timelines and quantified objectives. Some opportunities to promote affordable housing go unconsidered

New state laws have added new requirements to the goals, policies, and programs section of a housing element. Passed in 2018, AB 1397 requires cities to directly connect policies and programs to the identified needs, governmental constraints, and site inventory, among other analyses.⁵ Another 2018 law, AB 686, implemented Affirmatively Furthering Fair Housing

⁴ HCD's [Site Inventory Guidebook](#), p. 27

⁵ See, e.g., Gov. Code, § 65583, subds. (b), (c); HCD, Building Blocks, at <https://www.hcd.ca.gov/community-development/building-blocks/index.shtml>

mandates, specifically requiring cities to consider how their goals, policies, and programs can better advance fair housing goals, especially the production of low- and very low-income housing. The specific programs cities implement must include “concrete steps, timelines and measurable outcomes.”⁶

HLC recognizes that South San Francisco has many goals, policies, and programs that have these characteristics. Programs EQ-3.3 (Rental Registry), CRT-10.1 (Preapprove additional ADU plans), and SNP-5.4 (Reduce or Abolish Parking Requirements for Developmentally Disabled Population) are examples of strong policies, with clear timelines and deliverables.

Furthermore, the draft housing element’s goals, policies, and programs demonstrates the city’s receptiveness to feedback from housing advocates and service providers. On June 10, the Equity Advisory Group for the 21 Elements housing element consortium sent a letter to every jurisdiction in San Mateo County outlining policy recommendations for all jurisdictions’ housing elements. Although this letter was specifically requested by city staff from across the county, most cities have ignored the feedback.

On the other hand, SSF’s draft housing element notes “the EAG submitted a list of recommendations to all Cities, including South San Francisco, that has been considered and implemented into the Housing Programs in Chapter 7.” Several programs implement EAG recommendations, including CRT-7.2 (Allow housing on sites with institutional uses), CRT-9.1 (Affordable housing overlay zone), SNP-5.3 (Local Density Bonus Priorities), and SNP-5.4 (Reduce or Abolish Parking Requirements for Developmentally Disabled Populations); others, like CRT-5.1 (Implement Grand Blvd Initiative Policies), demonstrate that the city is already implementing EAG recommendations.

South San Francisco’s city council and planning staff merit recognition for considering input from a wide range of stakeholders. Nonetheless, several programs—including some implemented in response to recommendations from the public—would benefit from revisions, as described below:

- **Program EQ-3.2**, “Conduct a public hearing to consider an anti-displacement plan: This program outlines an important first step toward implementing an anti-displacement plan, but would benefit from clearer quantified objectives to guide the council discussion.
- **Program EQ-7.1**, “Prioritize Capital Improvement Program for vulnerable populations”: Outlines a strong vision to enhance equity for the Orange Park neighborhood but needs quantified objectives by which to measure a capital improvement program.
- **Program EQ-8.1**, “Create Preservation Plan”: Needs quantified objectives by which to measure preservation plan.
- **Program CRT-4.1**, “Site Acquisition for Affordable Housing”: Promises to “work with for-profit and nonprofit housing developers to acquire sites,” but has no quantified objectives or other metric with which to measure success. The program should specify a funding source and a specific timeline for completion.

⁶ HCD’s [Affirmatively Furthering Fair Housing Guidebook](#), p. 55

- In order to strengthen this program, the city should build on it by recognizing South San Francisco's abundance of publicly owned land that could be used for affordable housing. The city should identify city-owned sites that can be used to promote deeply affordable housing and commit to implementing an RFP for each site within the first three years of the 6th cycle planning period.
- **Program CRT-4.3**, "Allow Waivers or Deferrals of Planning, Building, and Impact Fees for Affordable Housing Developments": Promises to "continue to consider the waiver of application and development fees for affordable housing development. Time frame is ongoing; waivers are to be granted on a "case-by-case" basis, which is inadequate to promote housing.
 - Needs quantified objectives; City should instead commit to implementing pre-specified conditions for fee waivers
- **Program CRT-7.2**, "Allow housing on sites with institutional uses": This program makes a significant commitment to allow housing on "sites used for institutional purposes, such as educational facilities and churches," but the program has no timeline; rather, it "Will be considered at some time during period 2023-2031."
 - By adding a clear timeline and quantified objectives for affordable housing on institutional sites, the city will set guidelines for required densities and other incentives to promote housing on these sites.
- **Policy CRT-8**, "Encourage a variety of housing types ... at a range of densities": This policy doesn't have any substantive supporting programs.
- **Program CRT-9.1**, "Affordable housing overlay zone": Needs quantified objectives to guide affordable housing overlay zone, ensure the program creates strong enough incentives to achieve measurable goals
- **Program SNP-5.3**, "Local Density Bonus Priorities": Needs discrete timeline, quantified objectives

The draft housing element may benefit from adoption or adjustment of other policies as well, which HLC may recommend in the coming weeks as we review the document more closely.

HLC wants to be a partner to the city, sharing our collective knowledge of state law and best practices to facilitate fair housing. Please contact me or other HLC staff if you would like to talk further about how South San Francisco can identify and implement policies that will best meet the community's needs.

Thank you for your consideration,



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