



APPLICATION FOR LAND USE CONSISTENCY DETERMINATION  
San Mateo County Airport Land Use Commission  
C/CAG ALUC

APPLICANT INFORMATION

Agency: **City of Belmont**

Project Name: **General Plan Housing Element 2023-2031**

Address: **One Twin Pines Lane, Suite 310**

APN: **n/a**

City: **Belmont**

State: **CA**

ZIP Code: **94002**

Staff Contact: **Carlos de Melo**

Phone: **650-595-7440**

Email: **cdemelo@belmont.gov**

PROJECT DESCRIPTION

The City of Belmont has prepared a comprehensive update to the General Plan Housing Element covering the period 2023 through 2031. A Programmatic Environmental Impact Report was also prepared to consider any potential environmental impacts of the growth contemplated in the Housing Element. Both documents were adopted/certified by Belmont City Council in January 2023 to meet HCD deadlines, the City is now working with HCD on revisions to achieve certification.

REQUIRED PROJECT INFORMATION

For General Plan, Specific Plan or Zoning Amendments and Development Projects:

A copy of the relevant amended sections, maps, etc., together with a detailed description of the proposed changes, sufficient to provide the following:

1. Adequate information to establish the relationship of the project to the three areas of Airport Land Use compatibility concern (ex. a summary of the planning documents and/or project development materials describing how ALUCP compatibility issues are addressed):
  - a) Noise: Location of project/plan area in relation to the noise contours identified in the applicable ALUCP.
    - Identify any relevant citations/discussion included in the project/plan addressing compliance with ALUCP noise policies.
  - b) Safety: Location of project/plan area in relation to the safety zones identified in the applicable ALUCP.
    - Include any relevant citations/discussion included in the project/plan addressing compliance with ALUCP safety policies.
  - c) Airspace Protection:
    - Include relevant citations/discussion of allowable heights in relation to the protected airspace/proximity to airport, as well as addressment of any land uses or design features that may cause visual, electronic, navigational, or wildlife hazards, particularly bird strike hazards.



City of Belmont  
One Twin Pines Lane  
Belmont, CA 94002

June 8, 2023

San Mateo County Airport Land Use Commission  
C/CAG - City/County Association of Governments of San Mateo County  
555 County Center, 5th Floor  
Redwood City, California 94063  
Attention: Susy Kalkin, Transportation Systems Coordinator/ALUC Staff

*Sent via Email: [kkalkin@smcgov.org](mailto:kkalkin@smcgov.org)*

SUBJECT: Transmittal of City of Belmont General Plan Housing Element 2023-2031 for Land Use  
Consistency Determination

Dear Suzy,

The City of Belmont is preparing an update to the General Plan Housing Element 2023-2031, and is seeking a land use consistency determination from the San Mateo County Airport Land Use Commission.

The City of Belmont adopted the Housing Element in January 2023 as required by HCD, and subsequently submitted the document to HCD for review and certification. HCD notified the City of Belmont in writing in April 2023 that additional revisions to programs and analysis are required to compliance with statutory requirements. During their review HCD did not request any changes to our housing opportunity sites inventory or our proposed minor zoning modifications; our zoning changes are summarized in the attached development standards summary exhibit.

The City's Housing Opportunity Sites inventory relies heavily on existing pipeline projects (942 units) and assumes current development trends (i.e. lot consolidation for high density multi-family projects) will continue along the El Camino Real transit corridor.

To facilitate your review of our plan, please find the following materials included with this submittal:

1. C/CAG Application for Land Use Consistency Determination
2. Belmont General Plan Housing Element (includes redlines requested by HCD)
3. Housing Element City-wide Opportunity Sites Zoning Map
4. Summary of Housing Opportunity Sites Development Standards



City of Belmont  
One Twin Pines Lane  
Belmont, CA 94002

If you have any questions or need additional information to complete your review, please send the request to:

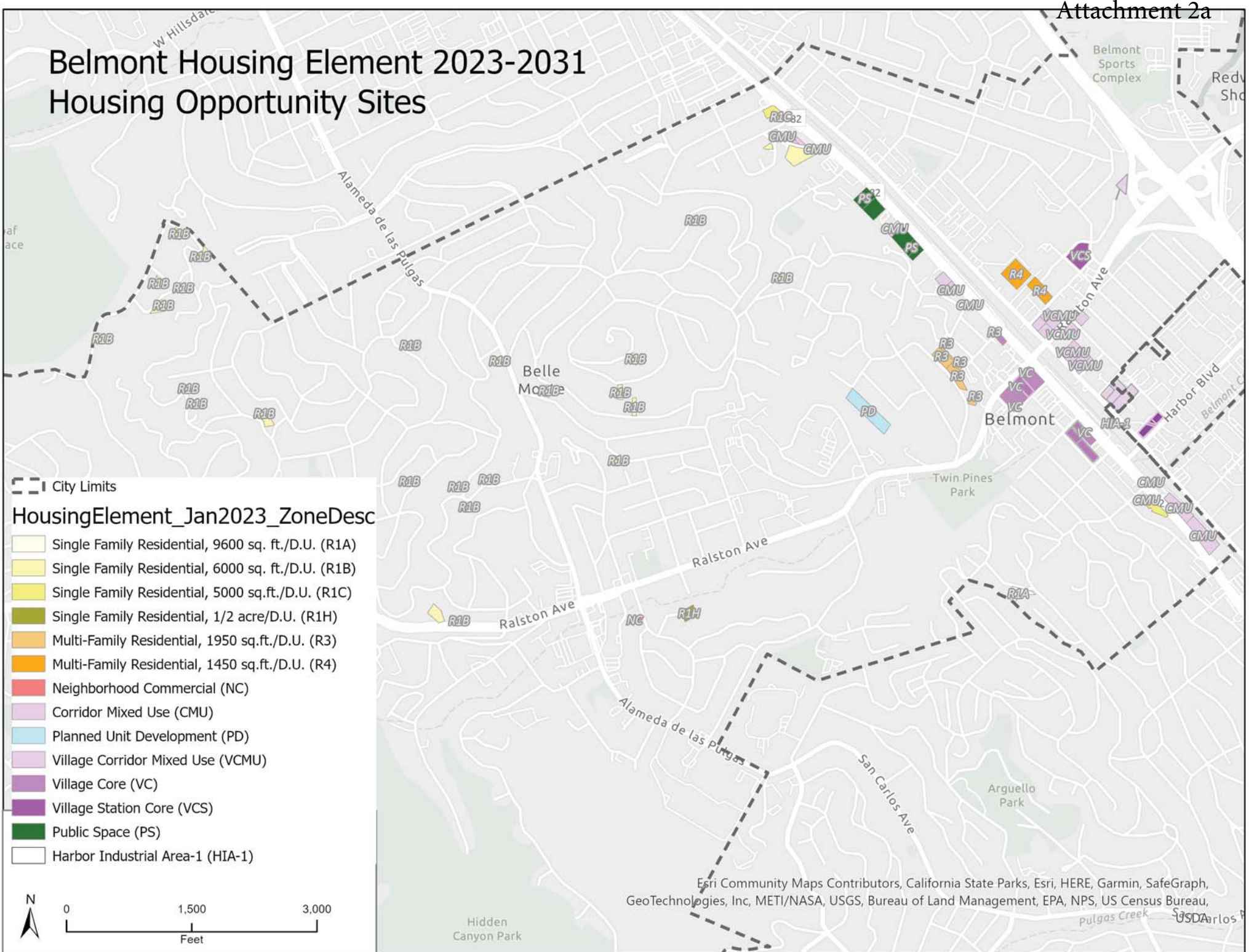
Carlos de Melo, Community Development Director, [cdemelo@belmont.gov](mailto:cdemelo@belmont.gov)  
Diana R. Elrod, Housing Element Project Manager, [dianarelrod@gmail.com](mailto:dianarelrod@gmail.com)

Additional information related to the Belmont Housing Element update process can be found on our website at [www.belmont.gov/housing](http://www.belmont.gov/housing). We look forward to working with your agency to complete the required review of the Belmont Housing Element.

Sincerely,

Carlos de Melo  
Community Development Director  
[cdemelo@belmont.gov](mailto:cdemelo@belmont.gov)  
(650) 595-7440

# Belmont Housing Element 2023-2031 Housing Opportunity Sites



## Belmont Housing Sites Development Standards Summary

Proposed zoning changes marked in **RED** font

Site Zoning Designation	General Land Use Allowed	Density Existing	Density Proposed	FAR Existing	FAR Proposed	Maximum Height Existing	Maximum Height Proposed
CMU	Corridor Mixed Use	45-60 Units/acre	<b>No Maximum</b>	1.75-2.2	<b>2.0-2.5</b>	45-55 ft	No Change
VCMU	Village Corridor Mixed Use	No Maximum	No Change	2.0-2.5	No Change	50-65 ft	No Change
VC	Village Core (Mixed Use)	No Maximum	No Change	2.0-2.5	No Change	50-65 ft	No Change
VCS	Village Station Core (Mixed Use)	No Maximum	No Change	1.5-2.0	<b>2.0-2.5</b>	45-60 ft	No Change
R-1A	Residential Low Density	1-7 Units/acre	No Change	0.27-0.53	No Change	28 ft	No Change
R-1B	Residential Low Density	1-7 Units/acre	No Change	0.27-0.53	No Change	28 ft	No Change
R-1C	Residential Low Density	1-7 Units/acre	No Change	0.27-0.53	No Change	28 ft	No Change
R-1E	Residential Low Density	1-7 Units/acre	No Change	0.27-0.53	No Change	28 ft	No Change
R-1H	Residential Low Density	1-7 Units/acre	No Change	0.27-0.53	No Change	28 ft	No Change
R-2	Duplex Residential	14 Units/acre	No Change	0.6	No Change	35 ft	No Change
R-3	Multi-Family Residential	20 Units/acre	No Change	0.85	No Change	35 ft	No Change
HIA-1	Harbor Industrial Area (608 Harbor Blvd to be annexed into Belmont)	No Maximum	No Change	5.0	No Change	65 ft	No Change

Notes:

1. The proposed zoning changes to maximum density in the CMU district and increased FAR in the CMU and VCS districts are estimated to net an increase of 246 units but are not required to meet the City's RHNA allocation.
2. The City is not proposing any increases to maximum allowable building heights as specifically directed by the City Council.



### 3. 2023-2031 BELMONT GOALS, POLICIES, AND PROGRAMS

#### 3.1. GOAL H.1. – Production of new housing at all income levels, with a focus on affordable housing

The need for additional affordable housing was a prominent and pervasive sentiment noted throughout the Housing Element outreach process. Households of various sizes and socioeconomic backgrounds have reported feeling the pressure of the high costs of housing. To meet the targets set by RHNA, the city must facilitate the production of abundant and affordable new housing in a wide diversity of forms. To support this goal, the city will be employing two approaches, with the first being directly involved in housing production. This can be done by using public funds to build more units, partnering with nonprofits and other groups to establish pre-approved ADU plans that are available to property owners, and using local ordinances to require that developers create more affordable units that can serve a diverse variety of populations and providing incentives for additional affordable unit development. In addition, the policies outlined below would also encourage and streamline housing development through the adoption of objective design standards, updates to the Zoning Code, creating minimum densities for housing projects, developing policies for missing middle housing, and streamlining the application review and processing timelines for affordable development projects.

#### 3.2. GOAL H.2. – Preservation of existing housing that is affordable to lower- and middle-income residents

As the City continues to grow, it remains important to maintain and preserve existing affordable housing as well as non-deed restricted housing that is naturally affordable for middle and lower-income households. The most direct method of achieving this goal would be to prevent the conversion of existing affordable units from becoming market rate by renegotiating agreements, using public funds to acquire the units, or requiring developers to replace any lost units. Alternatively, the city can indirectly preserve affordable housing by improving the quality of life for individuals and families who currently reside in them. Residents that are able to thrive in low-income housing are less likely to be displaced. Therefore, the city proposes to incentivize upgrades to low-income homes through rehabilitation, accessibility modifications, or energy efficiency changes.

#### 3.3. GOAL H.3. – Protection of current residents to prevent displacement

Belmont's demographics will fluctuate as the city continues to grow and evolve. But while change is inevitable, the loss of the existing community is not. Therefore, it remains a priority for the city to prevent gentrification and displacement through protection of lower-income residents. Policy tools included within this goal such as commercial linkage fees, relocation fees, documentation requirements for landlords, and right to return policies help balance the scales against the market forces that lead to displacement while extending vital tenant protections. Additional programs are included in the Fair Housing Action Plan.

#### 3.4. GOAL H.4. – Promotion of community engagement and public outreach

To increase effectiveness and successfully achieve the Housing Element's goals and policies, the City should increase access and awareness of housing programs through use of new technology as part of a robust and proactive public outreach strategy. By expanding availability of digital resources, the barriers of proximity, transportation, and time opportunity cost can be reduced for many. In addition, by providing education and information on regulatory requirements and specific programs and protections offered

locally, regionally, and by the state, the city can improve access to housing for all income groups and special needs communities. Public outreach in a diversity of methods, forms and languages can be used to reach the widest breadth of residents and program beneficiaries to ensure those in need can find supportive programs and service providers. Targeted digital, print, and in-person outreach and engagement methods can also be effective at reaching the communities most affected by housing policies and programs.

### **3.5. Affirmatively Furthering Fair Housing – Fair Housing Action Plan**

The actions to achieve the Fair Housing goal are meant to address the fair housing issues found in the AFFH analysis, specifically for groups that have disparate housing impacts when compared to the whole of Belmont. This includes, for example, Hispanic and single-female heads of households who have disproportionate housing needs while being concentrated in census tracts that have higher rates of poverty. Persons with disabilities are also more likely to experience housing discrimination due to low economic opportunity and failure of landlords to provide reasonable accommodations.

## E.4. HOUSING ELEMENT 2023-2031 GOALS, POLICIES AND PROGRAMS

### GOAL H.1: Production of new housing at all income levels, with a focus on affordable housing

Number	Policy	Agency/Dept/Division Lead	Funding Source(s)	Program Measure(s)	Targets	Implementation Timeline
Policy H.1.1	Monitor Regional Housing Need Allocation	Housing	City	Monitor housing production against ABAG Fair Share Allocation in compliance with no net loss requirements during planning period. <b>Monitor all housing unit production by all income categories.</b>	Track every year in March, prior to the preparation of the Annual Progress Report (which is sent to HCD on April 1). <b>To comply with no net loss provisions, if capacity is decreased below the RHNA allocation for lower income, the City will, within one year, find new sites or rezone areas to mitigate unmet RHNA due to changes in production.</b>	2023 - 2031 (Annually)
Policy H.1.2	Use Public Funding for Low/Moderate Income Housing	Housing	City funds, and state and federal funds, as available	Add more City supported housing with affordability restrictions to the market. Use City funds to produce additional affordable housing projects and to leverage other regional, state, and federal funding sources to support the construction of affordable housing.	<p>a. The City shall utilize local Affordable Housing Funds (Inclusionary housing in-lieu funds, Commercial Linkage Fees, and Residential Development Mitigation Fees) to fund affordable housing development, and to leverage other public funding sources for affordable housing projects. Priority shall be given to development of housing at lower-income levels.</p> <p>b. Explore the option of creating a stand-alone Housing Trust fund using available funding sources.</p> <p>c. Modify the Inclusionary Housing requirement to incentivize provision of lower-income housing units, for example by requiring a smaller percentage of units if providing units to ELI households. See also AFFH Action Item 1.2, which calls for adjusting the city's Below Market Rate (inclusionary) program to allow a smaller unit contribution (&lt;15%), larger density bonuses, and/or increased city support in exchange for affordable units that address the needs of residents with extremely low and very low incomes who face very high rates of cost burden in the city.</p>	<p>a. 2023-2031 (Ongoing)</p> <p>b. Conduct a best practices review in Q2 2024; make recommendations to CC in Q4 2024; implement recommended program in Q2 2025.</p> <p>c. Conduct best practices review for incentives in Q1 2024; bring recommendations to PC/CC in Q3 2024; implement program in Q4 2024.</p>
Policy H.1.3	Incentivize Accessory Dwelling Units (ADU) Development, <b>Updating and Monitoring</b>	Planning Division	N/A	Implement and maintain programs to encourage and support ADU and Junior ADU production to increase lower income housing opportunities. Review whether funding will require deed restrictions, and whether the program should be targeted only to lower-income homeowners who otherwise could not afford to build an ADU.	<p>a. Provide technical ADU design tools and resources to homeowners to encourage ADU development, and adopt pre-approved ADU plans (i.e. HEART) <b>through outreach to owners.</b></p> <p>b. Collaborate with other countywide jurisdictions to establish uniform standards and requirements.</p> <p>c. Periodically review ADU permitting fees and adjust as needed to avoid cost barriers. <b>At the same time, review projected new ADUs against actuals and revise inventory as needed.</b></p> <p>d. Determine if there are areas of the City where an over-the-counter permit can be issued.</p> <p>e. Conduct a best practices review of using City housing funds to assist homeowners adding an ADU to their property to be rented to lower-income households</p> <p>f. Ensure ongoing consistency with State ADU laws. The ordinance will be revised to conform to HCD's review letter within six months of receipt.</p>	<p>a. Research regional approaches for ADU tools in Q2 2025; bring recommended changes as pre-approved ADU plans to PC/CC in Q3; adopt recommendations and implement in Q1 2026.</p> <p>b. As written, but every two years beginning in Q3 2023.</p> <p>c. Beginning in Q1 2024 as part of the APR preparation, review actual ADU production against projected, and revise as necessary. At the same time, review permitting fees to determine if they constitute a constraint and reduce as needed. This will occur every two years.</p> <p>d. Conduct review of locations where an OTC permit can be issued based on environmental and other constraints in Q1 2026; bring recommendations to PC/CC in Q3 2026; implement the program in Q1 2027.</p> <p>e. Conduct a best practices review beginning in Q1 2025; bring recommendations to the PC/CC in Q3 2025; implement program in Q1 2026.</p> <p>f. Upon receipt of the State's analysis, the City will update its ADU zoning requirements to be consistent with State law within 6 months of receipt.</p>
Policy H.1.4	Housing Funds Investment Strategy	Planning Division	N/A	Develop an affordable housing funds investment policy establishing priorities and goals.	Develop priorities for investment addressing disparate housing concerns of those with special needs, including but not limited to people with disabilities <b>including those with development or intellectual disabilities</b> , seniors, single female heads of households and farmworkers; households with race/ethnicity-based disparate needs (AFFH concerns) and households earning very and extremely low incomes. Consider priorities for new construction, rehabilitation, anti-displacement efforts, ADUs, etc.	Conduct a best practices review for prioritizing funding investments beginning in Q1 2025; outreach to special needs organizations including Housing Choices in Q2 2025; bring recommendations to CC in Q4 2025 and implement recommended policy changes in Q1 2026.
Policy H.1.5	Update Zoning Code	Planning	N/A	Modify the Zoning ordinance to allow for increased floor area ratios and density.	<p>a. Modify the CMU Corridor Mixed Use zoning district to increase the maximum allowed Floor Area Ratio (FAR) from 1.75 (2.2 with community benefits) to 2.0 (2.5 with community benefits), and to eliminate the maximum density metric.</p> <p>b. Modify the VCS Village Station Code zoning district to increase the maximum allowed Floor Area Ratio (FAR) from 1.5 (2.0 with community benefits) to 2.0 (2.5 with community benefits).</p> <p><b>Zoning Changes result in net increase of 246 Units; this zoning change is not required to meet RHNA allocation.</b></p>	Conduct a comprehensive audit of the zoning ordinance beginning in Q3 2023; bring recommended changes for adoption to the PC/CC in Q3 2024, adopt changes and implement in Q1 2024.



Policy H.1.6	Adopt Objective Design Standards	Planning	N/A	Adopt Objective Design Standards to expedite production of housing.	Conduct a comprehensive audit of the zoning ordinance and adopt any changes needed Objective Design Standards for multi-family residential projects and mixed-use projects with a residential component to comply with State law.	Conduct a comprehensive audit of the zoning ordinance beginning in Q3 2023; bring recommended changes for adoption to the PC/CC in Q3 2024, adopt changes and implement in Q1 2024.
Policy H.1.7	Establish By-Right Housing Designation for Prior Housing Sites	Planning Division	N/A	Designate housing sites that have carried over from the prior Housing Element to allow housing development by-right.	Amend the Zoning Code to establish a By-Right designation for housing sites reused from prior Housing Elements for housing projects that propose a minimum of 20% affordable units.	Develop code amendments for resused housing sites in Q2 2023; bring proposed changes to PC/CC in Q4 2023; implement in Q1 2024.
Policy H.1.8	Evaluate and Update Permanent Supportive Housing Requirements	Planning Division	N/A	Amend zoning code to allow permanent supportive housing projects.	Update zoning to be consistent with AB 2162 to allow by right 100% affordable housing that has 25% or 12 units of permanent supportive housing, where multifamily or mixed-use housing is permitted.	Develop code amendments for resused housing sites in Q2 2023; bring proposed changes to PC/CC in Q4 2023; implement in Q1 2024.
Policy H.1.9	Update Requirements for Mobile Home Parks	Planning Division	N/A	Amend zoning code requirements regarding mobile home parks.	Update zoning to allow mobile home parks as a special use in all residential zones to be consistent with Government Code Section 65852.7.	Develop code amendments for resused housing sites in Q2 2023; bring proposed changes to PC/CC in Q4 2023; Implement in Q1 2024.
Policy H.1.10	Update Requirements for Farmworker Housing	Planning Division	N/A	Amend zoning code requirements regarding farmworker housing.	Update zoning to define farmworker housing and allow farmworker housing within the districts to be determined, consistent with state requirements.	Develop code amendments for resused housing sites in Q2 2023; bring proposed changes to PC/CC in Q4 2023; Implement in Q1 2024.
Policy H.1.11	Update Requirements for Homeless Persons	Planning Division	N/A	Amend zoning code requirements regarding low-barrier navigation centers.	Update zoning to define low barrier navigation centers and allow them in the same zones where emergency shelters are permitted, consistent with state requirements. <b>Zoning will be updated to permit these uses in multifamily and mixed use zones pursuant to AB 101, Government Code section 65660.</b>	Develop code amendments for resused housing sites in Q2 2023; bring proposed changes to PC/CC in Q4 2023; implement in Q1 2024.
Policy H.1.12	Update Requirements for Residential Care Facilities	Planning Division	N/A	Amend zoning code requirements for residential care facilities.	Update the zoning ordinance to ensure definition of residential care facilities and small residential care facilities continue to comply with State law, and amend the zoning code to eliminate the requirement for a use permit for care facilities of seven or more persons with a disability, and allow them in all zones allowing residential uses based on objective criteria to facilitate approval certainty.	Develop code amendments for resused housing sites in Q2 2023; bring proposed changes to PC/CC in Q4 2023; implement in Q1 2024.
Policy H.1.13	Lot Consolidation Fee Waivers	Planning Division	N/A	Waive the lot consolidation fees for certain developments.	Waive lot consolidation fees when housing developments include at least 20% very low- and/or extremely- low income units.	Bring proposal to waive lot consolidation fees for developments with ELI and/orVLI units to the PC/CC in Q3 2023. Implement in Q1 2024.
Policy H.1.14	Revise CUP Requirements	Planning Division	N/A	Amend CUP requirements to ensure any identified constraints are removed.	Review CUP requirements to determine if requirements can be eliminated for certain projects.	In Q2 2025, conduct best practices review of CUP requirements to make recommendations to remove potential constraints; bring recommendations to the PC/CC in Q4 2025; adopted changes in Q1 2026 and implement in Q2 2026.
Policy H.1.15	Water and Sewer Providers	Planning Division	N/A	Ensure immediate delivery of the Housing Element to water and sewer providers.	Water and sewer service providers must establish specific procedures to grant priority water and sewer service to developments with units affordable to lower-income households. (Gov. Code, § 65589.7.) Local governments are required to immediately deliver the housing element to water and sewer service providers. HCD recommends including a cover memo describing the City's housing element, including the City's housing needs and regional housing need.	Upon adoption in January 2023, the City will immediately send the Housing Element to applicable water and sewer providers.
Policy H.1.16	Emergency Shelters	Planning Division	N/A	Ensure compliance with State Housing Laws pertaining to emergency shelters.	Review existing zoning requirements to ensure compliance with State Housing Law pertaining to emergency shelters. Update to ensure compliance with emergency shelter parking requirements comply with AB139/Government Code section 65583, subdivision (a)(4)(A).	Develop code amendments for emergency shelters in Q2 2023; bring proposed changes to PC/CC in Q4 2023; Implement in Q1 2024.
Policy H.1.17	Transitional Housing and Supportive Housing	Planning Division	N/A	Ensure compliance with State Housing Laws pertaining to emergency shelters.	Transitional housing and supportive housing must be permitted as a residential use in all zones allowing residential uses and only subject to those restrictions that apply to other residential dwellings of the same type in the same zone. (Gov. Code, § 65583, subd. (c)(3).) While the element states that the City complies with these requirements, according to the table on Page B-19, transitional housing is not allowed in Village zoning districts where multifamily is allowed. The element must ensure consistency between the analysis and the tables and add programs as appropriate.	Develop code amendments for transitional and supportive housing in Q2 2023; bring proposed changes to PC/CC in Q4 2023; Implement in Q1 2024.
Policy H.1.18	Parking Requirements	Planning Division	N/A	Reduce parking requirements in certain R zones.	The City to modify the parking requirements in the R-2, R-3, and R-4 zoning districts to reduce parking requirements consistent with other multi-family zoning districts (CMU, RC, Village Districts). It should also be noted that effective January 2023, Assembly Bill 2097 will prohibit all Cities from enforcing minimum parking standards on properties within one half mile of public transit. A large majority of R-2, R-3, and R-4 properties are located within one half mile of public transit and will not be subject to minimum parking standards.	Beginning in Q1 2025, develop code amendments to reduce parking requirements in the R-2, R-3 and R-4 zoning districts to be consistent with other multifamily zoning districts. Bring recommended changes to PC in Q4 2025 and to CC in Q1 2026 for approval. Implement in Q2 2026.
Policy H.1.19	Update Definition of Family	Planning Division	N/A	Amend zoning code definition of Family.	Amend the Zoning Code definition of "Family" to remove the reference to "internally structured relationship" and instead define a family as one or more persons living together in a dwelling unit, with common access to, and common use of all living, kitchen, and eating areas within the dwelling unit.	Develop code amendments for tdefinition of family in Q2 2023; bring proposed changes to PC/CC in Q4 2023; implement in Q1 2024.

Policy H.1.20	Zoning Constraints Review	Planning Division	N/A	Amend zoning code to eliminate zoning constraints to development of housing.	The City will conduct a peer agenciesevaluation of zoning standards that have potential to impact development of multi family housing. Development standards that should be analyzed include: <ul style="list-style-type: none"><li>•Minimum required floor area per unit,</li><li>•Parking,</li><li>•Minimum open space requirements,</li><li>•Maximum building heights,</li><li>•Minimum setbacks for mixed-use developments when next to residential zones,</li><li>•Requirements for Conditional Use Permits for certain ground floor</li></ul> If the results of this peer agency analysis finds that Belmont's development standards are more restrictive than the median of surrounding agencies, the zoning ordinance should be amended to reduce the development standards.	Peer agency evaluation completed in 2024, zoning amendments adopted by 2025.
Policy H.1.21	Density Bonus	Planning Division	N/A	Update the Density Bonus Ordinance	Update the Density Bonus Ordinance to complay with current state law, and review annually to ensure updated laws are incorporated into the ordinacne	Update the Density Bonus Ordinance in 2024, with implementation by the beginning of 2025.

GOAL H.2: Preservation of existing housing that is affordable to lower- and middle-income residents

Number	Policy	Agency/Dept/ Division Lead	Funding Source(s)	Program Measure(s)	Targets	Implementation Timeline
Policy H.2.1	Support Retention of Existing Lower Income Units	Housing Division	N/A	Preserve “at-risk” affordable units through monitoring and partnering, working with nonprofits, and exploring available funding sources to preserve affordability. This activity will include both units in all affordable developments with expiring deed restrictions, as well as potential BMR units that are reaching the end of the term.	a. Advertise units going to sale to nonprofits.  b. Outreach and negotiate with owners for affordability extensions.  c. Provide tenant education and affirmatively market available units to affected. tenants.  d. Add a displacement preference for new affordable housing for people displaced.	Annually, at the time of APR preparation, review the list of potentially at-risk units within the next ten years. In addition in Q1, reach out to any owners regarding potentially affordability extensions. Assist in the provision of tenant education by owners and nonprofit stakeholders. Liaise with nonprofits in Q2 to update them on potential acquisition opportunities. Ensure compliance with State Preservation Notice Law.  In Q1 2024, draft preferences for any new affordable projects for displaced tenants in at-risk properties. Bring recommended language to CC for adoption in Q4 2024 and implement in Q1 2025.
Policy H.2.2	Manage Portfolio of Deed Restricted Affordable Units	Housing	City	Identify a service provider to manage the City’s growing portfolio of affordable units, both those in the Below Market Rate program as well as all-affordable projects, as necessary.	Develop a Request for Proposals to distribute to Bay Area service providers to manage existing and new affordable units, both for sale and rental; select a provider and begin transitioning this work to the provider.	In Q3 2024, draft RFP for potential service providers; launch RFP in Q1 2024; receive responses and bring proposed service provider to CC for approval in Q2 2025; select provider and implement program in Q4 2025.
Policy H.2.3	Target Rehabilitation Funding to Special Needs Groups	Housing and County of San Mateo	CDBG	Invest more resources in lower resource neighborhoods (utilize federal CDBG to provide capital improvements).	Conduct best practices review for housing rehabilitation programs the City assist in funding; research providers that could target special needs groups. Include in the analysis the concept of purchasing currently “naturally occurring affordable housing” to rehabilitate and then hold rents so that they become more affordable over time. Conduct proactive outreach to stakeholders every two years.	Conduct best practices review and outreach to stakeholders bi-annually beginning in Q1 2024; develop recommendations to bring to the PC/CC in Q3 2024; implement approved programs in Q1 2025.
Policy H.2.4	Require Replacement Units	Planning Division	N/A	Require replacement units for low-income households and below market rate units lost during any construction or demolition projects. Establish tenant protections in local ordinance to extend measures of AB1482 related to relocation, documentation, and right to return policy in eviction cases. Require that demolition permits include an assessment of rents to determine income status and plan to replace lots lower income units.	Consider implementation of a program to update the zoning ordinance and other policies to permanently require replacement of units (beyond Housing Crisis Act sunset date of 2034). The City commits to a replacement housing program for units affordable to lower-income households (Gov. Code, § 65583.2, subd. (g)(3)) for nonvacant sites with existing, vacated, or demolished residential uses and occupied by, or subject to an affordability requirement for, lower-income households within the last five years there must be. The replacement housing program has the same requirements as set forth in Government Code section 65915, subdivision (c)(3).	Conduct best practices review beginning in Q2 2026 on replacement options that would extend past 2034, including conferring with neighboring jurisdictions interested in the same outcomes; bring recommendations to CC in Q3 2027 and implement approved programs in Q4 2027.
Policy H.2.5	Housing Service Organization Partnerships	Housing	City Housing Funds	The City will continue to partner with and provide financial assistance or resources to supporting housing service organizations and/or non-profit organizations that help preserve existing housing that is affordable to lower income residents.	a. Continue to provide annual financial assistance or other support resources to community organizations such as HIP Housing, Project Sentinel, or others.  b. Promote service providers and programs on the City’s website and in City communications; distribute materials to residents.	a. Outreach to housing service providers bi-annually to confer on resources available, beginning in Q2 2024.  b. Update the City’s website bi-annually in Q2 to promote service providers, including fair housing services, and ensure that materials available tor esidents are up to date.

GOAL H.3: Protection of current residents to prevent displacement

Number	Policy	Agency/Dept/ Division Lead	Funding Source(s)	Program Measure(s)	Targets	Implementation Timeline
Policy H.3.1	Expand Tenant Protections	Community Development Department	N/A	Expand tenant protections in local ordinance to extend measures of AB1482 related to relocation, documentation, and right to return policy in eviction cases.	a. Extend AB1482 provisions to require tenant relocation payments for No Fault evictions for those with tenure less than one year.  b. Explore tenant protection policies that require documentation from landlords who use substantial remodel exemption to evict tenants.  c. Establish Right to Return policy for tenants displaced from homes due to demolition or substantial remodels.	In Q3 2023, draft extended tenant protections provisions and research policy provisions for substantial remodel exemptions and right of return policies. Bring recommended language to PC/CC in Q3 2024. Implement language in Q4 2024. Conduct proactive outreach to tenants and tenant groups bi-annually.
Policy H.3.2	Home Ownership Financing	Housing	N/A	Support home ownership opportunities and connect potential home owners to financing sources specifically targeted to first time homebuyers or affordable housing units.	Partner with housing organizations and financing stakeholders to host at least one first time homebuyer workshop in Belmont during the planning period.	In Q3 2025 and every three years after, partner with stakeholders, including HEART, to offer first time homebuyer workshops in Belmont.

GOAL H.4: Promotion of community engagement and public outreach

Number	Policy	Agency/Dept/ Division Lead	Funding Source(s)	Program Measure(s)	Targets	Implementation Timeline
Policy H.4.1	Update the City's Webpage	Housing	N/A	Increase community outreach and availability of resources in multiple languages through the Housing webpage.	a. Maintain and improve webpage with comprehensive housing related information and materials, and coordinate with providers to market programs electronically.  b. <b>Prepare written procedures for SB 35 projects.</b> Update the City's website with information and resources for SB 35 streamlined ministerial review, including providing a Notice of Intent form.  c. Provide information in multiple languages, including fair housing and Housing Choice Vouchers.  d. Create and maintain a developer resources page to make it easier to navigate the City's development process; include updated development and impact fees consistent with State law .	Update the City's website bi-annually in Q2 to provide transparency on development fees, standards, fair housing, and SB 35 streamlining. Begin this effort in 2024.
Policy H.4.2	Support a Countywide Below Market Rate Unit Waitlist	County of San Mateo	N/A	Support development of countywide affordable rental waitlist to streamline and centralize occupancy of BMR units.	Support the county in developing online portal for a BMR waitlist.	As written (we need the County to give us a better timeline)

BELMONT FAIR HOUSING ACTION PLAN (AFFH)

Action Area 1: Enhancing housing mobility strategies - Removing barriers to housing in areas of opportunity and strategically enhancing access

Number	Action	Responsible Party/Type of Action	Fair Housing Category	Fair Housing Issue and Contributing Factors	Objectives and Quantified Objectives	Timeline
Action 1.1	Improve access to fair housing information.	City of Belmont/ Human Resources	Outreach and capacity enforcement	Lack of fair housing complaints filed  Lack of access to information about fair housing rights. Limited knowledge of fair housing by residents	Provide an easy way for residents and property owners to find information on fair housing laws, rights, and responses (filing a complaint, ensure property owners do not violate fair housing laws).  Conduct a best practices review of other jurisdictions' websites. Update Belmont's website to contain fair housing resources and information on how to file complaints.	Complete best practice review by fall 2022; complete website update by year end 2022.
Action 1.2	Adjust the city's Below Market Rate (inclusionary) program to allow a smaller unit contribution (<15%), larger density bonuses, and/or increased city support in exchange for affordable units that address the needs of residents with extremely low and very low incomes who face very high rates of cost burden in the city.	City of Belmont/ Lane Use Resources	Disproportionate housing needs	Very high rates of cost burden for <50% AMI households and Black and Hispanic households; high rates of overcrowding among Asian households  Lack of affordable housing citywide; low housing production	Expand the variety of housing units produced under the inclusionary housing program.  Perform a feasibility analysis to redesign the program to allow a menu of options (e.g., 8% of units for extremely low income or 15% for low income or 30% for moderate income).	Complete feasibility analysis by Fall 2023; Implement redesigned program by Spring 2024.
Action 1.3	Design a regional forgivable loan program for homeowners to construct an ADU that is held affordable for extremely low income households for 15 years. Market through HEART.	21 Elements, HEART/ Land Use Resources	Disproportionate housing needs	Very high rates of cost burden for <50% AMI households and Black and Hispanic households; high rates of overcrowding among Asian households  Lack of affordable housing citywide; low housing production	Increase opportunities for lower-income households to find housing that is affordable.  Design a regional loan forgiveness program.	Begin design in Summer 2025 and complete by winter 2026.

Action Area 2: Encouraging new housing choices and affordability in high resource areas: promoting housing supply, choices and affordability in areas of high opportunity and outside of areas of concentrated poverty

Number	Action	Responsible Party/Type of Action	Fair Housing Category	Fair Housing Issue & Contributing Factors	Objectives & Quantified Objectives	Timeline
Action 2.1	Add more city supported housing with affordability restrictions. Affirmatively market the housing to households with disproportionate housing needs including Black and Hispanic households.	City of Belmont/ Financial Resources	Disproportionate housing needs	Very high rates of cost burden for <50% AMI households and Black and Hispanic households; high rates of overcrowding among Asian households  Lack of affordable housing citywide; low housing production	Increase development of accessible units beyond minimum requirements  Modify developer agreements when appropriate; update inclusionary policy	Implement by 2026

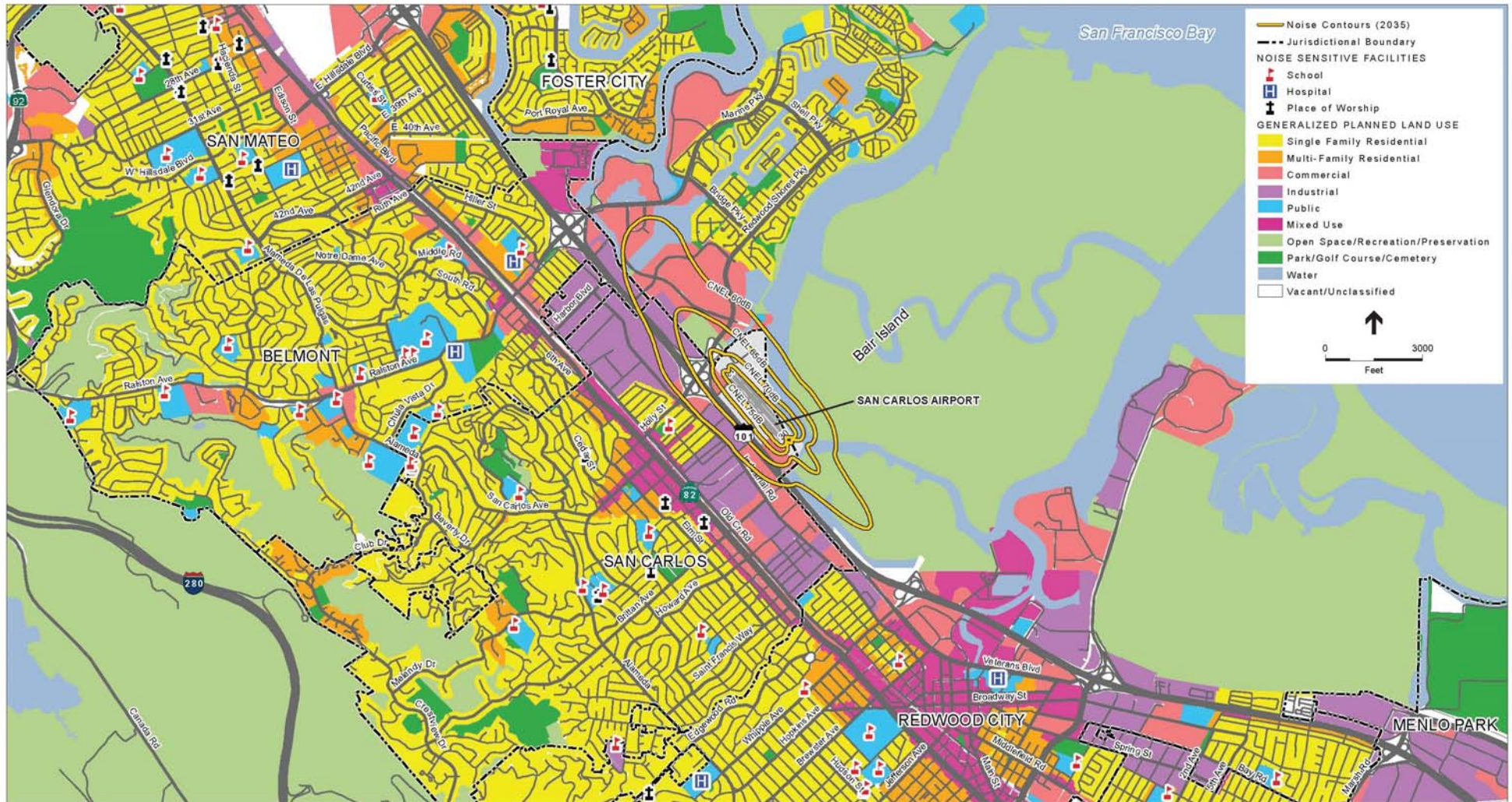
**Action Area 3: Improving place-based strategies to encourage community conservation and revitalization including preservation of existing affordable housing: involves approaches that are focused on conserving and improving assets in areas of lower opportunity and concentrated poverty**

Number	Action	Responsible Party/Type of Action	Fair Housing Category	Fair Housing Issue & Contributing Factors	Objectives & Quantified Objectives	Timeline
Action 3.1	Engage the school district in conversations and a plan to address proficiency gaps in education for Black and Hispanic students.	City of Belmont/ Human Resources	Disparities in educational outcomes	Differences in proficiency gaps; higher suspension rates for Hispanic students  Unclear; could be related to support and resources	Work with school district leaders to engage in conversations about the nexus between healthy housing and educational attainment; develop a plan to reach Hispanic households with students about housing resources that currently are available to them.  Meet with school district leaders to create a workshop in which local housing and service providers with cultural competency assist 100 Spanish-speaking families access services to improve their housing condition.	Meet with school district in early 2027; develop workshop by the end of 2027.

**Action Area 4: Protecting existing residents from displacement: strategies that protects residents in areas of lower or moderate opportunity and concentrated poverty and preserves housing choices and affordability**

Number	Action	Responsible Party/Type of Action	Fair Housing Category	Fair Housing Issue & Contributing Factors	Objectives & Quantified Objectives	Timeline
Action 4.1	Develop a plan to preserve the city's affordable units that will expire in the next decade to keep them affordable long term.	City of Belmont/ Human Resources	Disproportionate housing needs	Very high rates of cost burden for <50% AMI households and Black and Hispanic households; high rates of overcrowding among Asian households  Lack of affordable housing citywide; low housing production	Work with property owners of existing assisted housing developments for lower-income households and partner with nonprofits to determine methods to extend affordability covenants to preserve affordable units, including assistance from the City.  Conduct best practices research on other jurisdictions' programs and prepare recommendations to City Council.	Conduct best practices work in 2025; bring recommendations to Council in the beginning of 2026; implement program by mid-2026.
Action 4.2	Partner with Project Sentinel to perform fair housing training for landlords and tenants. Focus enforcement efforts on race based discrimination and reasonable accommodations.	Project Sentinel/ Human Resources	Disproportionate housing needs; housing discrimination	Persons with disabilities and persons of color are most likely to file fair housing complaints with HUD.  Lack of accessible affordable units; housing discrimination	Increase awareness of fair housing laws and tenants' rights to reduce unlawful discrimination and displacement.  Request Project Sentinel to provide training every two years in the Spring, targeting 50 landlords each training. Determine whether this can be accomplished within existing Countywide contracts, or if the City needs to provide additional funding.	Ongoing annual check in with Project Sentinel.



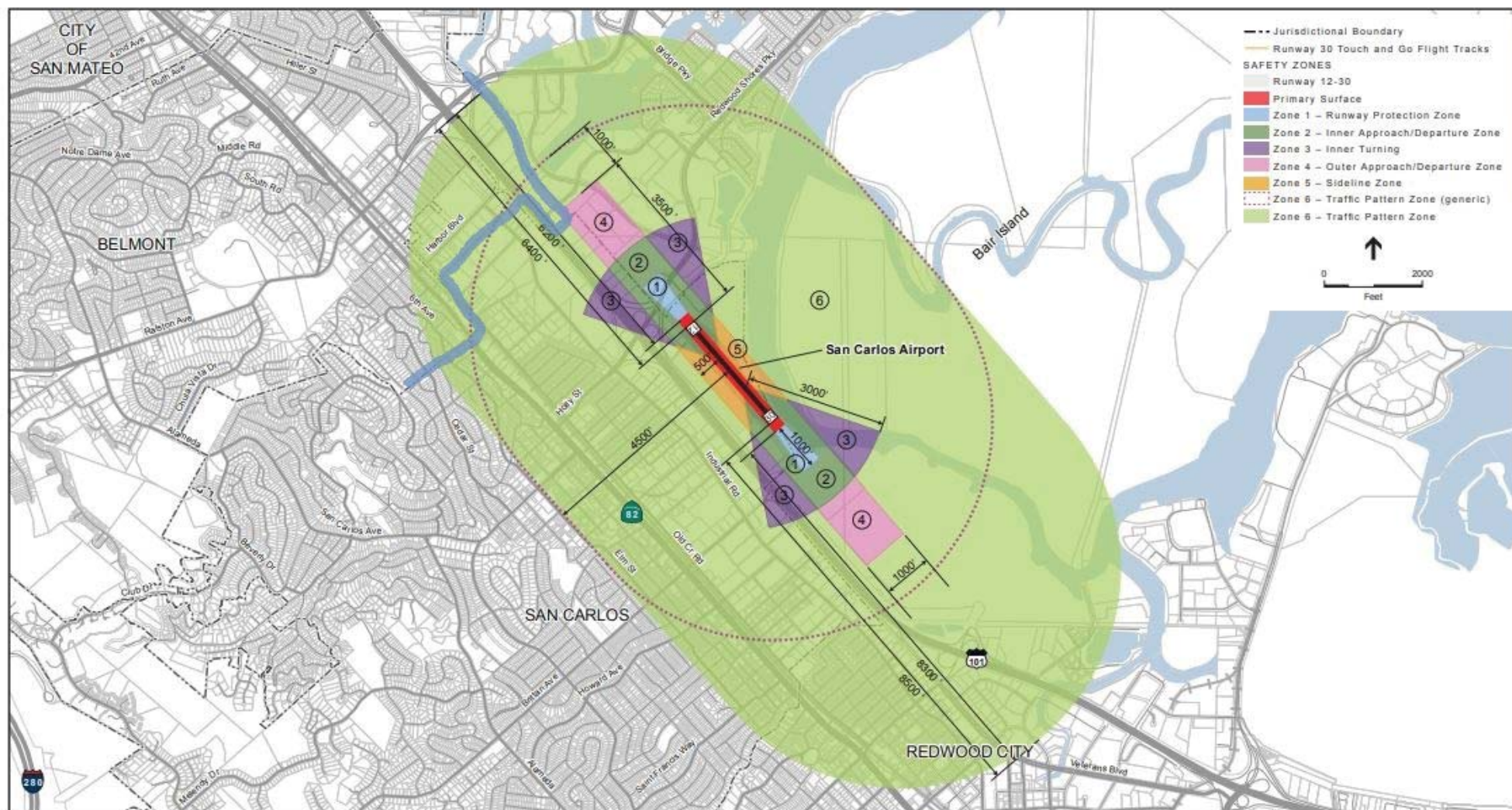


SOURCE: Belmont, 1982; San Mateo County, 1996; Foster City, 1993; Menlo Park, 1994; San Carlos, 2009; City of San Mateo, 2010; Redwood City, 2010; ESRI, 2014; ESA Airports, 2015

San Carlos Airport ALUCP, 130753

**Exhibit 4-2**  
Future Conditions (2035) Aircraft Noise Contours





SOURCE: ESRI, 2014; ESA Airports, 2014