



# Section 4

## *Housing Plan*

## Section 4: Housing Plan

The Housing Plan described in this Chapter includes the City’s goals, policies, and objectives for the 2023-2031 planning period. The Housing Plan addresses the need to plan for additional housing opportunities, remove constraints to affordable housing, improve the existing housing stock, and provide equal opportunities for all current and future residents of Brentwood.

These goals, policies, and programs were developed based on:

- Review of the City’s 5<sup>th</sup> Planning Cycle Housing Element;
- Input and feedback from the community, stakeholders, and decision makers;
- New State law requirements; and
- Analysis provided in the Community Profile and the Constraints, Resources, and Fair Housing Chapters of this 2023-2031 Housing Element.

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## A. Goals, Policies, and Actions

### H.1 - Housing Goal

**Facilitate a diversity of housing opportunities to enhance the City's living environment and to satisfy the shelter needs of all Brentwood residents.**

#### Housing Policies

- **Policy H.1-1:** Encourage adequate residential sites with densities distributed throughout the City for the production of new for-sale and rental residential units, emergency shelters, and transitional and supportive housing sites for existing and future residents.
- **Policy H.1-2:** Endeavor to ensure the supply of safe, decent, and sound housing for all residents.
- **Policy H.1-3:** Provide incentives for water and energy conservation measures in new housing and substantial housing rehabilitation projects.
- **Policy H.1-4:** Encourage multi-family rental units for Brentwood's population that include an adequate variety of choices of product types, price, unit sizes, amenities, and location of housing in the community and maintain an adequate supply of rental housing available to very-low-, low- and moderate-income persons. Minimize displacement of tenants, particularly seniors, disabled, and low- and moderate-income residents in rental apartments and encourage ownership of lower-cost residential units by prior renters through the regulation of condominium conversions.

#### Implementing Actions

##### Action H.1a: Biennial Evaluation

Conduct a biennial evaluation of the City's inventory of available sites, including very high-density residential sites, and take appropriate action to ensure an ongoing supply of available sites at appropriate densities to meet projected housing needs. This biennial evaluation shall include an assessment of the effect of the City's midrange density land use policy to ensure that it does not become a barrier or impact the cost to the development of additional housing opportunities and hinder the efficient use of the City's available vacant residential land supply. The biennial evaluation will also include an evaluation of factors such as built densities, development standards such as parking requirements, processing time, and impacts on approval and development costs. If the evaluation identifies constraints, the City will take action within one year to mitigate its impacts on development. In addition, should the Residential Growth Management Program be reinstated, the City shall evaluate the program for consistency with SB 330 requirements and include an evaluation of any impacts or constraints on the development of housing.

##### Objectives:

- Maintain adequate residential sites.
- Biennial evaluation of available sites, the City's midrange density land use policy, and factors such as built densities, processing time, and impacts on approval and development costs. Adopt amendments within one year if constraints are identified.

**Timing:** Biennial review and evaluation; amendments to occur within one year, if constraints are identified

**Responsible Agency:** Community Development Department, Planning Commission, City Council

**Funding Source:** General Fund

**Action H.1b: Accessory Dwelling Units**

The City is projecting 14 ADUs per year throughout the planning period – this is based on development trends since 2019 and does not exceed the total average. The City shall support and accommodate the development of Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs) during the 2023-2031 planning period to meet projection figures detailed in **Appendix B** of this Housing Element.

**Objectives:**

- Amend the ADU ordinance to comply with State law.
- Implement a permit-ready ADU program (pre-approved ADU plans that do not require additional review).
- Post a user-friendly FAQ on the City’s website to assist the public and advertise ADU resources across online social media platforms.
- Create an expedited plan check review process.
- Research potential State and Regional funding sources for affordable ADUs and make information publicly available.

**Timing:** Amend the ADU ordinance by January 2025; Implement remaining objectives by January 2026; review ADU development annually; make program changes, if necessary, within six months

**Responsible Agency:** Community Development Department

**Funding Source:** General Fund

**Action H.1c: ADU and JADU Monitoring**

The City shall monitor the development of ADU and JADU applications, location, affordability, and other relevant features to ensure adequate ADU development is occurring to meet the City’s 2023-2031 development goals. The City shall evaluate the need to adjust policies and actions if the pace of applications and development is less than anticipated in Appendix B. Should changes need to be made due to a gap in the numbers of ADUs projected and the number of ADUs permitted, the City shall make changes proportional to the gap identified. For example, if actual production and affordability of ADUs is far from anticipated trends, then density or fee incentives for projects incorporating ADUs or something similar would be an appropriate action. If actual production and affordability is near anticipated trends, then measures like outreach and marketing might be more appropriate.

**Objectives:**

- Create and implement an ADU and JADU monitoring program.
- Annually review development trends and make changes proportional to potential gaps as needed – by the midpoint of the planning period, if actual production and affordability of ADUs is not keeping pace with assumed trends in the inventory, the City shall establish a process to provide additional incentives which may include, but are not limited to, density increases, fee incentives, or other strategies for projects incorporating ADUs, or other similar actions. If actual production and affordability is near anticipated trends, then measures like outreach and marketing might be more appropriate.

**Timing:** Create a monitoring program by January 2025; annually review development trends and by the midpoint of the planning period; make program changes, if necessary, within six months

**Responsible Agency:** Community Development Department

**Funding Source:** General Fund

**Action H.1d: Monitor At-Risk Projects**

Where assisted housing projects are “at risk” of reverting or converting to market rate pricing, develop strategies including potential expenditure of City housing funds to preserve their ongoing affordability. The City shall identify and implement opportunities to preserve ongoing affordability – such as, but not limited to, financial resources and technical assistance – so that existing affordable units are not at risk of converting to market rate after their restricted affordability term expires. If affordable units will be lost, opportunities to convert existing market-rate units to affordable units shall be investigated by determining whether provision of rehab improvement assistance or purchase of affordability covenants is warranted.

**Objectives:**

- Monitor units at-risk of converting to market-rate and outreach to property owners to identify resources and programs available to maintain affordability.
- Identify and pursue funding opportunities to assist in the preservation of at-risk, affordable units.
- Investigate opportunities to convert existing market-rate units to affordable units through rehabilitation improvement assistance.
- Comply with noticing requirements.
- Provide tenant education and assistance through a variety of methods including, but not limited to, informational materials online and in-person at City Hall, annual workshops or informational webinars, and/or partnerships with local organizations and agencies that provide assistance to renters and low-income households.
- Coordinate with qualified entities in identifying solutions to maintaining affordability for units at-risk of converting to market rate.

**Timing:** Monitor units through the planning period; outreach to property owners by January 2025; investigate opportunities for units at risk of converting to market rate annually; annually identify and pursue funding opportunities; comply with noticing requirements within 3 years, 12 months, and 6 months of the affordability expiration dates; begin coordinating with qualified entities by January 2025

**Responsible Agency:** Community Development Department

**Funding Source:** State Funds, County CDBG and HOME Funds, City Housing Fund, and other potential funding sources

**Action H.1e: Community Education Regarding the Availability of Rehabilitation Programs**

Collaborate with the Contra Costa County HOME Consortium and CDBG Urban County to offer educational materials and events for lower-income households, owners, and managers of rental properties, non-English-speaking households, and other special needs groups about available rehabilitation programs and available affordable housing opportunities. Conduct targeted multi-lingual outreach using neighborhood and community organizations, the City and County websites, and various print, broadcast, and online media.

**Objectives:**

- Collaborate with relevant agencies and organizations to discuss and review available resources. Agencies and organizations the City currently collaborate and partners with include, but is not limited to, Contra Costa County HOME Consortium, CDBG Urban County, Village Drive Resource Center, ECHO Housing, Inc.
- Continue to host an annual City Council meeting with a CDBG representative to discuss rehabilitation funds for older housing units and programs to assist property owners.
- Proactively outreach to households and provide educational opportunities on available programs for special housing needs populations.

- Maintain informational materials online.
- Seek to assist in rehabilitating 30 housing units through community education and outreach efforts.

**Timing:** Annually collaborate with agencies and organizations, review informational materials, and conduct outreach; annually review rehabilitated units and resources available

**Responsible Agency:** Community Development Department; Contra Costa County CDBG/HOME Consortium

**Funding Source:** County CDBG and HOME funds

#### **Action H.1f: Housing Condition Survey**

Maintain a current housing condition survey of a representative sample of all housing units within the City. This survey should include the number of units in need of rehabilitation or replacement.

#### **Objectives:**

- Conduct a housing condition survey annually and advertise through the utilities bill, newsletters, newspaper, social media, and on the City’s website.
- Update the housing condition survey and annually monitor the number of units in need of rehabilitation. Update the survey every five years.
- Provide information online on resources available to units in need of rehabilitation.
- Identify new programs or actions needed to address units in need of rehabilitation depending on the data collected by the survey. This may include allocating additional funding towards assisting homeowners with upgrades, conducting informational workshops on available resources, sending out mailers to households in need of rehabilitation with resources, or other similar actions.

**Timing:** Update the survey by January 2025; update the survey every following five years; annually conduct the survey and provide information online on resources available

**Responsible Agency:** Community Development Department

**Funding Source:** General Fund

#### **Action H.1g: Residential Design Guidelines**

Continue implementation of the City’s approved Residential Design Guidelines and encourage a variety of housing types to continue to provide safe, sound, and attractive for units all residents. The intent of these guidelines is to express the housing design features the City would like to encourage in order to improve certainty and to minimize the processing time for design review applications. The City will also review the Residential Design Guidelines for subjective language and adopt modifications to promote objectivity – as of January 24, 2023, the City Council has approved to create objective standards for all residential uses by the end of 2023.

#### **Objectives:**

- Implement the Residential Design Guidelines.
- Annually meet with housing developers to provide them with information on the Residential Design Guidelines and receive input and feedback. If constraints are identified as part of the feedback received, the City will adopt amendments within 6 months.

**Timing:** Annually meet with developers, and adopt amendments within 6 months if feedback is received identifying constraints; amend the Residential Design Guidelines by January 2024; implement the guidelines throughout the 2023-2031 planning period

**Responsible Agency:** Community Development Department

**Funding Source:** General Fund, SB 2 Planning and Development Grant

**Action H.1h: Code Enforcement**

Continue to provide both proactive and reactive code enforcement to encourage adherence to and address land use regulations and State and local laws, health and safety concerns, property maintenance, and nuisance conditions.

**Objectives:**

- Maintain code compliance.
- Assist homeowners in addressing code enforcement violations through technical assistance. The Code Enforcement Division currently mails informational materials to all new homeowners quarterly, and they also attend community events to provide educational materials and speak at HOAs.
- Seek and pursue funding opportunities to provide resources for homeowners.

**Timing:** Annually review the number and type of code enforcement cases, assist homeowners through technical assistance, and pursue funding opportunities

**Responsible Agency:** Community Development Department

**Funding Source:** General Fund

**Action H.1i: Water Conservation Program**

Continue implementation of the City's Water Conservation Program. The program promotes the use of water conservation devices in existing structures, including use of low-flow toilets and shower heads, and water-conserving landscaping.

**Objectives:**

- Implement the Water Conservation Program.

**Timing:** Review effectiveness annually; changes, if necessary, to be made within one year

**Responsible Agency:** Public Works Department

**Funding Source:** CDBG, Water Enterprise

**Action H.1j: Energy Efficient Design**

Continue to implement the California Green Building Standards Code (CalGreen), encouraging new development and substantial rehabilitation projects to achieve a greater reduction in efficiency and conservation where feasible. Continue to encourage new development projects to meet LEED standards and apply for LEED certification.

**Objectives:**

- Implement the California Green Building Standards Code.
- Provide information on LEED certification online and outreach to housing developers with informational materials.

**Timing:** Review the California Green Building Standards Code for updates every three years; annually outreach to developers with information and maintain updated information online  
**Responsible Agency:** Community Development Department  
**Funding Source:** General Fund

**Action H.1k: Condominium Conversion**

Continue implementation of the City’s adopted condominium conversion ordinance to regulate conversions of multi-family units and to mitigate tenant displacement and minimize displacement of seniors, disabled, and low- and moderate-income residents. Continue monitoring of condominium conversions to insure that a proposed conversion would not result in a disproportionate balance of available rental housing with a variety of choices in tenure, price, unit sizes, amenities, and location in the community. The City did not see any condominium conversions during the 5<sup>th</sup> cycle.

**Objectives:**

- Monitor condominium conversions.

**Timing:** Annually review condominium conversions and adopt ordinance amendments, if necessary  
**Responsible Agency:** Community Development Department  
**Funding Source:** General Fund

**Action H.1l: Farmworker and Employee Housing**

California Health and Safety Code Sections 17021.5 and 17021.6 requires agricultural employee housing for six or fewer persons to be permitted by-right, without a Conditional Use Permit or other discretionary permit that is not likewise required of a family dwelling of the same type in the same zone, in single-family residential zoning districts, and in agricultural zones with no more than 12 units or spaces designed for use by a single family or household or 36 beds in a group quarters. The City shall amend the Zoning Code to comply with these State requirements. The Zoning Code shall also be amended to permit employee housing consisting of no more than 12 units or 36 beds in the same manner as other agricultural uses in the same zone.

**Objectives:**

- Amend the Zoning Code to comply with State requirements regarding farmworker and employee housing.

**Timing:** Amend the Zoning Code by January 2025  
**Responsible Agency:** Community Development Department  
**Funding Source:** General Fund

**Action H.1m: Senate Bill 35 Streamlining**

The City shall establish written procedures to comply with California Government Code Section 65913.4 and publish those procedures for the public, as appropriate, to comply with the requirements of Senate Bill 35 (SB 35), Chapter 366 Statutes 2017. These requirements apply at any point in time when the City does not meet the State mandated requirements, based upon the SB 35 Statewide Determination Summary Report for Housing Element progress and reporting on Regional Housing Needs Assessment (RHNA). The City shall process development projects with at least 50 percent affordable units through a streamlined permit process set forth in State law. All projects covered by SB 35 are still subject to the objective development standards of the Brentwood Municipal Code, including the Building and Fire Codes. However, qualifying projects cannot be subject to discretionary review or public hearings; and in many



cases, the City cannot require parking. Reduced parking requirements would be established consistent with the requirements of SB 35 for qualified streamlining projects.

**Objectives:**

- Establish SB 35 procedures and provide information online.
- Develop and implement the program.

**Timing:** By January 2025

**Responsible Agency:** Community Development Department

**Funding Source:** General Fund

**Action H.1n: Residential Incentives**

The Sites Inventory (**Appendix B**) identifies sites that allow mixed use development. To encourage residential development on these sites and maximize the development potential identified in the Sites Inventory, the City will promote existing residential incentives and identify potential new incentives as appropriate, including but not limited to, priority processing, granting fee waivers, granting concessions, providing technical assistance, providing funding support, and/or other similar incentives.

**Objectives:**

- Promote existing incentives and identify potential new incentives for the development of residential uses on sites identified in the Sites Inventory that allow both residential and non-residential uses.
- Establish and implement a residential incentives program to encourage residential development on mixed use sites. Annually promote the program to the development community.

**Timing:** Annually review and promote residential development incentives; establish and implement a residential incentives program by January 2025 promote the program to the development community annually

**Responsible Agency:** Community Development Department

**Funding Source:** General Fund

**Action H.1o: Safety Element Update**

Senate Bill 1035 (SB 1035), Chapter 733 Statutes 2018 requires that the City revise the Safety Element to identify flood hazards and address the risk of fire hazards in certain lands upon each revision of the Housing Element. The City Council shall adopt amendments to the Safety Element in accordance with the requirements of SB 1035. **Objectives:**

- Adopt an updated Safety Element, which identifies and addresses flood and fire hazards.

**Timing:** By January 2025

**Responsible Agency:** Community Development Department, City Council

**Funding Source:** General Fund

**Action H.1p: Replacement Housing**

The City may have existing non-vacant sites included within the sites inventory that may contain vacant or demolished residential units that were occupied by lower-income households or households subject to affordability requirements within the last five years. The City will adopt a formal replacement housing program to ensure any units currently occupied by lower-income households, or households subject to affordability requirements within the last five years, that are lost for housing units are replaced in compliance with Government Code Section 66300.

**Objectives:**

- Adopt a replacement housing program for units lost that are currently occupied by lower-income households or households subject to affordability requirements of Government Code Section 66300 within the last five years.

**Timeframe:** Adopt program by January 2025

**Responsible Agency:** Community Development Department, City Council

**Funding Source:** General Fund

**Action H.1q: No Net Loss**

Consistent with SB 166 (No Net Loss), the City will monitor housing sites to ensure adequate sites to accommodate the remaining unmet RHNA by each income category are maintained at all times. Reporting is anticipated to coincide with preparation of the Annual Progress Reports. The City will track each site in its inventory and report annually to the City Council on the adequacy of available sites compared to the progress made towards meeting the RHNA.

If residential development is not sufficiently progressing towards building permits or if the City is not meeting the pro-rated share of the RHNA at all income levels by midway through the planning period, the City will evaluate its sites inventory and capacity to maintain adequate sites throughout the planning period and, if necessary, identify strategies to streamline and/or assist projects through entitlement (including, but not limited to, technical assistance, expedited review, and/or support of funding applications), adopt amendments to the ADU development regulations, or implement other strategies, such as General Plan and zoning changes to allow for greater residential densities.

**Objectives:**

- Monitor housing sites to ensure adequate sites to accommodate the remaining unmet RHNA by each income category.

**Timeframe:** Annually track status of identified sites and report to City Council (by April 1 of each year)

**Responsible Agency:** Planning Division

**Funding Source:** General Fund

**Action H.1r: Parking Standards for Studios and 1-Bedroom Units**

The City shall amend its parking standards for multi-family by requiring 1.5 parking spaces per 1-bedroom units and 1 parking space per 0-bedroom units.

The City will also continue to provide parking reductions as needed and for projects that comply with the City's Affordable Housing Ordinance.

**Objectives:**

- Adopt Zoning Code updates for multi-family unit parking requirements by requiring 1.5 parking spaces per 1-bedroom units and 0.5 spaces per 0-bedroom units.

**Timeframe:** Adopt the Zoning Code updates by January 2025

**Responsible Agency:** Planning Division

**Funding Source:** General Fund

**Action H.1s: CUP and Design and Site Development Review Findings**

As part of the Zoning Code Update, the City shall amend approval findings for CUP and Design and Site Development Review applications to replace subjective language with objective standards.

**Objectives:**

- Adopt Zoning Code updates removing subjectivity in application findings for CUPs and Design and Site Development Reviews.

**Timeframe:** Adopt the Zoning Code updates by January 2025

**Responsible Agency:** Planning Division

**Funding Source:** General Fund

**Action H.1t: Mid-Point Policy**

The City shall remove its mid-point policy to remove any added discretion or constraints, such as requiring the exercise of transferable agricultural credits, significant added amenities, extensive off-site public improvements, or other significant improvements for projects requesting densities above the mid-point for all residential land use categories.

**Objectives:**

- Adopt Zoning Code/General Plan updates removing discretion or constraints, such as requiring the exercise of transferable agricultural credits, significant added amenities, extensive off-site public improvements, or other significant improvements for projects requesting densities above the mid-point for all residential land use categories.

**Timeframe:** Adopt the Zoning Code/General Plan updates by January 2025

**Responsible Agency:** Planning Division

**Funding Source:** General Fund

## ***H.2 - Affordability Goal***

**Encourage housing that is affordable to all socio-economic segments of Brentwood's population.**

### **Housing Policies**

- **Policy H.2-1:** Encourage housing affordable and appropriate for a variety of Brentwood households at all economic levels throughout the City.
- **Policy H.2-2:** Support the use of available local, County, State, and Federal housing assistance programs.
- **Policy H.2-3:** Assist and cooperate with non-profit, private, and public entities to maximize opportunities to develop and preserve affordable housing.
- **Policy H.2-4:** Review and modify, when necessary, all standards and application processes to ensure that none act to constrain the production of affordable units.

### **Implementing Actions**

#### **Action H.2a: Compliance with Affordable Housing Ordinance**

All new residential projects shall provide affordable housing units in accordance with the City's adopted Affordable Housing Ordinance Chapter 17.725. The City will continue to review and monitor the ongoing effectiveness of the City's affordable housing ordinance to ensure developers provide a certain percentage of new homes to qualifying households at an affordable cost for the longest feasible time. The ordinance shall also continue to include a list of automatically available development incentives to encourage the construction of the inclusionary units, as well as provide the details for available alternatives to satisfy inclusionary housing obligations.

In 2022, the City approved an amendment to the Ordinance requiring multi-family developments to construct the required affordable units, instead of paying in-lieu fees, if the project proposes nine or more units. The City will continue to enforce this new requirement.

#### **Objectives:**

- Annually monitor development of affordable housing units and adjust ordinance as needed.
- Provide information on the Affordable Housing Ordinance online and annually outreach to housing developers to provide information on the Ordinance.

**Timing:** Annually monitor affordable housing production and provide information to housing developers

**Responsible Agency:** Community Development Department

**Funding Source:** City Housing Fund

#### **Action H.2b: Additional Development Incentives for Affordable Housing**

Use voluntary incentives to encourage the production of affordable housing, particularly housing affordable to extremely low-, very low-, and low-income groups, and provide incentives for the production of affordable housing where appropriate. Examples of such additional incentives include, but are not limited to, the following:

- Fast track processing. By expediting the development review process, carrying costs for lands being developed with affordable housing can be minimized.
- Fee Deferrals. Continue the provision of financial assistance for projects ensuring the long-term affordability of housing for very low- and low-income households through the use of additional fee deferrals of development processing and development impact fees until issuance of final inspection or 12 months from the date of deferral, whichever occurs first, or other similar incentives, so as to ensure the project's economic feasibility.
- Flexible Development Standards. Modification of the City's standards or approval of design modifications that increase the flexibility of the construction of affordable units for the necessary financial or other feasibility of the affordable housing development. Such modifications may include reduced lot sizes, home sizes, setback requirements, interior amenities, open space, and landscaping requirements.
- Direct Financial Assistance. Establish procedures, by January 2025, for the provision of direct financial assistance, if available, in the form of a loan or grant from the City housing funds for development of ownership and/or rental units affordable to lower income households in accordance with the City's affordable housing ordinance. Seek and pursue funding opportunities to enable the provision of financial assistance for the development of affordable units.
- Additional Concessions and Incentives. On a case-by-case basis, implement the provision of additional concessions or incentives consistent with State law and Brentwood's Housing Element for affordable units that exceed the requirements of the City's affordable housing ordinance.

**Objectives:**

- Provide incentives to affordable housing projects to encourage development of units.

**Timing:** Annually review incentives and effectiveness of the program; if necessary, changes to be made within one year; Establish direct financial assistance procedures by January 2025 and pursue funding annually

**Responsible Agency:** Community Development Department

**Funding Source:** City Housing Fund, and other potential funding sources

**Action H.2c: First-Time Homebuyer Assistance Program**

The City shall continue providing first-time homebuyer assistance services, either directly or through the Contra Costa Urban County and/or HOME Consortium, to lower income Brentwood residents to facilitate homeownership. This may include educational materials, referral information to existing programs, and/or down payment assistance depending upon available City financial resources.

**Objectives:**

- Provide informational materials on the First-Time Homebuyer Assistance Program online and outreach to the community.
- Annually host an in-person First-Time Homebuyer workshop with approved lenders, community groups, credit counseling, and other relevant groups/organizations to provide assistance to potential homebuyers.
- Assist 20 households in accessing First-Time Homebuyer assistance during the planning period.

**Timing:** Annually review households assisted and outreach conducted; annually host workshops

**Responsible Agency:** Community Development Department

**Funding Source:** City Housing Fund/County CDBG and HOME Funds

**Action H.2d: Affordable Housing Assistance**

Review the variety of potential financial assistance programs from both the public and private sectors to provide more affordable housing units. All available local, State, Federal, and private affordable housing programs for new housing and for the conservation and/or rehabilitation of existing housing will be identified for pursuit. City housing funds and other potential funding sources shall be leveraged to the greatest extent possible to create and preserve housing affordable to Brentwood’s workforce by encouraging developers to layer available public housing funds.

**Objectives:**

- Annually identify, pursue, and make affordable housing development funds available for affordable housing projects.
- At the time an application is submitted for affordable housing, the City shall review available funding sources and programs to determine if there are funds available for the project to claim.
- Provide technical assistance for developers to access financial assistance and funding sources.
- Coordinate with other public agencies to access resources and pursue funding opportunities.
- Utilize the Senior Analyst that manages affordable programs to be the point-of-contact for developers seeking information and assistance, as well as to identify and pursue funding opportunities.
- Through these resources and assistance, aim to facilitate the development of 50 extremely low-, 50 very low-, and 50 low-income units during the planning period.

**Timing:** Annual coordination with public agencies; review programs on a case-by-case basis; review affordable units annually; annually identify and pursue funding opportunities

**Responsible Agency:** Community Development Department

**Funding Source:** Private resources, County CDBG and HOME Funds, Federal and State funds, City Housing Fund, and other potential funding sources

**Action H.2e: Partnership Program**

When non-profit, private, and other public entities indicate interest in the development of affordable housing, the City will initiate a first meeting and subsequent follow-up contact to examine opportunities for cooperative efforts to expand the City’s supply of affordable housing. In addition to coordinating with interested entities, the City will proactively conduct outreach efforts to market available incentives and opportunities. Outreach may include, but is not limited to, email blasts, meetings, and phone calls with developers; website notices; social media posts; and other similar actions.

**Objectives:**

- Meet with developers and outside agencies when interest is expressed and follow up annually.
- Outreach to local and regional nonprofits and other entities engaged in building affordable housing to identify partnership opportunities.
- Host builder and developer roundtable meetings to identify opportunities and market available incentives and resources.
- Proactively market candidate sites and incentives to the development community to build relationships and interest.

**Timing:** Meet with developers and agencies on a case-by-case basis based on interest and annually follow-up; annually conduct proactive outreach to nonprofits and other entities to identify partnership opportunities; annually host a building and developer roundtable meeting; annually proactively market candidate sites and incentives to the developer community

**Responsible Agency:** Community Development Department

**Funding Source:** Private resources, County HOME and CDBG Funds, Federal and State funds, City Housing Fund, and other potential funding sources

**Action H.2f: Support Housing Sponsors**

Support non-profit and for-profit corporations in their efforts to make housing more affordable to lower- and moderate-income households. These efforts include, but are not limited to, written support letters for grant applications, identifying available sites for housing development (see related efforts in Program H.2e), City involvement in the development of such sites, and City financial support and contact of housing sponsors on an annual basis. This also includes collaborating with non-profit organizations or affordable housing developers in developing City-owned parcels with affordable housing units.

**Objectives:**

- Contact interested housing sponsors on an annual basis.
- Establish and implement a housing sponsors program aimed at supporting the development of affordable units through the following actions such as, but not limited to, support of grant applications, identifying available sites for housing development, City involvement in the development of such sites, and City financial support and contact of housing sponsors.
- Aim to facilitate the development of 50 affordable units from local partnerships and the housing sponsors program.

**Timing:** Annually outreach and review affordable housing units; biennially review efforts and make changes, if necessary; Establish the housing sponsors program by January 2024

**Responsible Agency:** Community Development Department

**Funding Source:** Private resources, HOME Funds, CDBG Funds, Federal and State Funds, City Housing Fund, and other potential funding sources

**Action H.2g: Streamline Application Process**

Continue efforts to streamline and improve the development review process, as well as eliminate any unnecessary delays and restrictions in the processing of development applications.

**Objectives:**

- Biennially review development review processes and meet with developers to identify potential constraint to the development of housing. If constraints are identified as part of the feedback received, the City will adopt amendments within 6 months.

**Timing:** Biennially meet with developers and review processes, and adopt amendments within 6 months if feedback is received identifying constraints

**Responsible Agency:** Community Development Department

**Funding Source:** General Fund

**Action H.2h: Land Acquisition**

The City shall identify opportunities to acquire appropriately located and residentially zoned land for the purpose of partnering with profit and non-profit developers to construct new affordable housing.

**Objectives:**

- Identify potential residential land for affordable housing, to the extent that financial and staff resources are available to proceed with purchase of land.
- Pursue funding opportunities for the acquisition of land for the purpose of partnering with organizations and developers to develop affordable housing.

**Timing:** Annually; 2023-2031  
**Responsible Agency:** Community Development Department, City Council  
**Funding Source:** City Housing Fund and other potential funding sources

**Action H.2i: Density Bonus Ordinance**

Assembly Bill 2345 (AB 2345), Chapter 197 Statutes 2020 requires a density bonus of up to 50 percent when a qualifying percentage of Below Market Rate (BMR) units are proposed. Among other things, Government Code Section 65915 also authorizes an applicant to receive:

- Two incentives or concessions for projects that include at least 17 percent of the total units for lower-income households, at least 10 percent of the total units for very low-income households, or at least 20 percent for persons or families of moderate-income in a development in which the units are for sale;
  - Three incentives or concessions for projects that include at least 24 percent of the total units for lower-income households, at least 15 percent of the total units for very low-income households, or at least 30 percent for persons or families of moderate-income in a development in which the units are for sale; and
  - Four incentives or concessions for projects that meet additional State law requirements
- The City shall update its Density Bonus Ordinance to comply with State law requirements.

**Objectives:**

- Update the Density Bonus Ordinance in compliance with State law requirements. As of February 2023, the City Council has authorized Staff to move forward with a focused update of the Zoning Ordinance, including the Density Bonus Ordinance, and is anticipated to be completed by mid-2024.

**Timing:** By December 2024; review annually and update as necessary; 2023-2031  
**Responsible Agency:** Community Development Department  
**Funding Source:** General Fund

**Action H.2j: Priority Building Inspections for Affordable Housing Projects**

The City will give priority to low- and very low-income housing projects for building inspections carried out during various stages of the construction process.

**Objectives:**

- Provide priority building inspections to housing projects with lower-income units.

**Timing:** On a case-by-case basis; 2023-2031  
**Responsible Agency:** Community Development Department  
**Funding Source:** General Fund



**Action H.2k: Support Flexibility for Certain Residential Development Standards**

The City has adopted development standards for all residential zoning designations and, as of February 2023, has begun the process of drafting objective development standards. However, applicants may elect to propose their own development standards through the rezoning and planned development amendment processes. The City shall provide the guidance and direction to foster context sensitive development that enhances the community while providing greater flexibility to encourage future development.

**Objectives:**

- Provide information online on programs available for projects proposing affordable housing units and collaborate with developers on potential opportunities for flexible development standards on certain vacant lots.
- Adopt objective development standards and conduct community and developer outreach as part of the process. This outreach may include, but is not limited to, workshop, meetings, informational handouts, e-blasts, newsletters, and phone calls.

**Timing:** Annually review affordable housing unit development; collaborate with developers on a case-by-case basis; Adopt objective development standards by January 2024  
**Responsible Agency:** Community Development Department  
**Funding Source:** General Fund

**Action H.2l: Development Fees**

The City shall monitor required development fees including in-lieu fees, development impact fees, and processing fees, with the aim of reducing constraints on the development of affordable residential projects, including, but not limited to, senior housing, housing for farmworkers, emergency/transitional housing, housing for persons with disabilities (including developmental), single room occupancies, and accessory dwelling units. To respond to changing local market conditions during the planning period, the City shall revise required development fees, if it is deemed appropriate.

Where fees are established and administered by regional agencies, such as the Regional Transportation Development Impact Fee, the City shall request the administering agency to review and reduce fees if the City has determined that the agency’s fee is constraining residential development, particularly development of affordable housing and/or housing for special needs groups.

**Objectives:**

- Address potential constraints to affordable housing as it relates to development fees.
- Conduct a Community Development comprehensive fee update.

**Timing:** Annually monitor and review development fees; if changes are deemed necessary, amend fee schedules or collaborate with external agencies to amend fee schedules within one year; Conduct a Community Development comprehensive fee update for Fiscal Year 2024-2026  
**Responsible Agency:** Community Development Department  
**Funding Source:** General Fund

**Action H.2m: Water and Sewer Priority**

Following adoption of the Housing Element, the City shall provide the water and sewer providers with a copy of the Housing Element. The copy of the Housing Element will be accompanied by a letter identifying the City’s 2023-2031 RHNA allocation for lower- income units and will refer the water and sewer providers to the requirements of State law set forth at Government Code Section 65589.7 regarding the granting of a priority for provision of water and sewer services to proposed developments that include housing units affordable to lower-income households.

**Objectives:**

- Comply with requirements of State law associated with provision of Housing Element to water and sewer providers.

**Timing:** Upon adoption of the 2023-2031 Housing Element, and immediately following the adoption of subsequent amendments to the Housing Element

**Responsible Agency:** Community Development Department

**Funding Source:** General Fund

**Action H.2n: Affordability Monitoring**

Continue to require affordable housing projects that receive City assistance to enter into an affordable housing agreement with the City that includes provisions to ensure initial and continuing affordability – this is required per Ordinance. For rental projects, the affordable housing agreement shall include provisions requiring annual monitoring to ensure that the affordable units are assisting income-eligible households. For for-sale projects, the affordable housing agreement shall include sale and resale provisions that ensure the execution and recordation of deed restrictions to ensure continued affordability for the term of the affordable housing agreement.

**Objectives:**

- Monitor affordable housing projects that receive City assistance.
- Per City Ordinance, continue to require affordable housing projects that receive City assistance to enter into an affordable housing agreement with the City that includes provisions to ensure initial and continuing affordability.

**Timing:** Monitor existing and proposed affordable housing projects on a project-by-project basis; 2023-2031

**Responsible Agency:** Community Development Department

**Funding Source:** General Fund

**Action H.2o: By-Right Development of 5<sup>th</sup> and 4<sup>th</sup> Cycle Sites**

Pursuant to Government Code section 65583.2(c), allow by-right development for projects proposing 20 percent or more of the total units as affordable to lower income households if the site is non-vacant and previously identified with the same zoning in the 5<sup>th</sup> Cycle Housing Element or if the site is vacant and previously identified with the same zoning in the 5<sup>th</sup> and 4<sup>th</sup> Cycle Housing Elements. Please see Table B-8 within the Candidate Sites Analysis for applicable sites.

**Objectives:**

- Allow by-right development for qualifying sites pursuant to Government Code section 65583.2(c).

**Timeframe:** These provisions shall take effect upon adoption.

**Responsible Agency:** Community Development Department

**Funding Source:** General Fund

**Action H.2o: Monitor Effects of Regional Fees**

Like other jurisdictions in the county, Brentwood is subject to regional transportation impact fees levied by Contra Costa County. The City shall monitor the effects of these fees on housing costs and production and continue to work with the East Contra Costa County Regional Fee and Financing Authority (ECCCRFFA), a Joint Powers Authority (JPA) that levies the fee and operates through the TRANSPLAN Committee, to ensure that the fees are equitable and appropriately applied and adjusted. The City shall also support, and work with the ECCCRFFA to pursue, a fee reduction or exemption for high-density housing near transit, and affordable housing developments, as feasible.

**Objectives:**

- Continue to appoint one City Council Member and one Planning Commissioner to represent the City of Brentwood on the ECCCRFFA.
- Continue to participate in regular meetings of the JPA, and work with the other members of the ECCCRFFA to pursue and support reductions to the regional fee for higher-density residential uses near major transit stops and affordable housing developments.

**Timeframe:** Periodically and throughout the planning period, as fees are reevaluated

**Responsible Agency:** City Council and Planning Commission

**Funding Source:** General Fund

### ***H.3 - Equitable Distribution of Affordable Housing Goal***

**Encourage an equitable distribution of housing for all economic groups throughout the community.**

#### **Housing Policies**

- **Policy H.3-1:** Facilitate the integration of new lower income households into the fabric of the community, avoiding, where feasible, identifying housing developments or portions of a development as being restricted to very low-, low-, or moderate-income households.
- **Policy H.3-2:** Facilitate infill and new residential projects within all areas of the City as a means of making each neighborhood more attractive for all types of housing units thereby encouraging future private economic investment in the community.
- **Policy H.3-3:** Maintain an inventory of lands that equitably distributes, through General Plan land use designations and zoning, low-, medium-, high-, and very high-density residential development throughout the community.

#### **Implementing Actions**

##### **Action H.3a: Affordable Housing Design and Distribution**

All affordable units within a mixed-income subdivision shall be harmonious and comparable to the market-rate units in exterior design, quality of materials and architectural elements, and overall construction quality. Affordable units may have different interior amenities and/or slightly different dimensions than market rate units in a residential development. Affordable units in a mixed-income development shall be dispersed throughout the residential development so as to prevent the concentration of affordable units.

##### **Objectives:**

- Monitor affordable housing design and distribution requirements and make information on requirements available to developers and the community online.
- Adopt revisions to mixed-use design requirements following the adoption of the objective development standards.

**Timing:** Monitor requirements as projects are proposed; provide informational materials online by January 2025; review and update, if necessary, on a biennial basis; Adopt revisions following the adoption of the objective development standards

**Responsible Agency:** Community Development Department

**Funding Source:** General Fund

##### **Action H.3b: Community Education**

Continue to educate the community about annual incomes for typical occupations and the equivalent “buying power” of these incomes in today’s housing market. As part of this program, ensure that the community is aware of the income ranges of very low-, low-, and moderate-incomes, and of the typical occupations that fall into these categories.

##### **Objectives:**

- Maintain informational materials online.

- Annually host events/workshops to inform the community of affordable housing programs and provide informational sessions on the housing market, density examples, and community need.
- Annually create and advertise informational materials related to housing such as, but not limited to, the housing market, resources available to the community, development projects, what different densities look like, FAQ on affordable units, and the inclusionary ordinance.

**Timing:** Update materials by January 2025; review and update, if necessary, on a biennial basis; host community events annually; Create and advertise informational materials annually

**Responsible Agency:** Community Development Department

**Funding Source:** General Fund, City Housing Fund

### **Action H.3c: Development Incentives**

Maintain the existing package of incentives to facilitate development of housing intended for extremely low-, very low-, low-, and moderate-income households in a manner which does not distinguish such “affordable” housing from “market rate” housing in the same area. Provide package to housing developers and interested parties at meetings and on the City’s website.

#### **Objectives:**

- Provide a package to relevant entities and online summarizing available incentives for the development of units affordable to lower- and moderate-income households.
- Biennial review of the incentive package with the development community to receive feedback on the efficacy of the incentives. Within one year of receiving feedback, identify if changes to the package are necessary to further incentivize affordable development.

**Timing:** Update materials by January 2024; review and update, if necessary, on a biennial basis

**Responsible Agency:** Community Development Department, Planning Commission, City Council

**Funding Source:** General Fund

### **Action H.3d: Marketing Materials**

Prepare marketing materials to be provided to the building industry, outlining opportunities for the development of housing projects. The City shall provide materials to housing developers and interested parties at meetings and on the City’s website.

#### **Objectives:**

- Provide marketing materials to affordable housing developers and include an inventory of sites and information regarding housing needs (also see similar actions in Action H.2e and H.2f).

**Timing:** Update materials by January 2024; review and update on a biennial basis

**Responsible Agency:** Community Development Department

**Funding Source:** General Fund, City Housing Fund, and other potential funding sources

### **Action H.3e: Meet with Potential Developers**

As infill sites become available on the open market, the City shall actively seek out potential developers as a means of generating interest on their part to undertake residential projects.

#### **Objectives:**

- Outreach to developers with potential residential development opportunities.

**Timing:** Annually outreach to developers; annual review of developer interest and outreach methods  
**Responsible Agency:** Community Development Department  
**Funding Source:** General Fund, City Housing Fund, and other potential funding sources

**Action H.3f: Housing for Extremely Low-, Very Low-, and Low-Income Residents**

Assist developers in accessing City, County CDBG and HOME Funds, Federal, and State housing development programs and funds to undertake development of housing projects for extremely low-, very low-, and low-income households.

**Objectives:**

- Meet with housing developers to discuss available programs and funding sources to develop lower-income housing units.
- Provide technical assistance to affordable housing developers in the form of one-on-one meetings to review applications and potential projects with affordable housing staff, share financing and funding resources, connect potential applications to other agencies or organizations with additional resources and assistance.
- Provide written support letters for funding applications from affordable housing developers.

**Timing:** Annually meet with developers; annually provide technical assistance and support funding applications  
**Responsible Agency:** Community Development Department  
**Funding Source:** CDBG, HOME, City Housing Fund, Federal and State funds, and other potential funding sources

**Action H.3g: Improve Participation in Existing Local Housing Assistance**

Provide access to available housing assistance programs for Brentwood residents through improved marketing and outreach efforts including providing information at annual forums, scheduling appointments with County housing program specialists in Brentwood, providing multilingual brochures, and posting housing program information on the City's website.

**Objectives:**

- Conduct multilingual outreach to the community with available housing assistance programs.

**Timing:** Annually conduct multilingual outreach; Annually review effectiveness of the program to determine if adjustments need to be made regarding outreach methods; if changes are deemed necessary, implement within six months  
**Responsible Agency:** Community Development Department  
**Funding Source:** City Housing Fund and other potential funding sources

## H.4 - Housing Opportunities Goal

### Promote equal housing opportunities for all residents of Brentwood.

#### Housing Policies

- **Policy H.4-1:** Encourage and support the enforcement of laws and regulations prohibiting discrimination in lending practices and in the sale or rental of housing.
- **Policy H.4-2:** Facilitate the provision of housing opportunities for those residents of the City who have special housing needs including farmworkers, the elderly, disabled, developmentally disabled, large families, and the homeless.

#### Implementing Actions

##### Action H.4a: Affirmatively Further Fair Housing

Pursuant to Assembly Bill 686 (AB 686), Chapter 958 Statutes 2018, the City shall affirmatively further fair housing by taking meaningful actions that foster inclusive communities free from barriers that restrict access to opportunities based on protected characteristics, as defined by State law. The City shall collaborate with the community, stakeholders, and appropriate organizations and agencies to address potential constraints to fair housing. This may include, but is not limited to:

- Analyzing and identifying barriers to entry into homeownership or rental opportunities;
- Reviewing restrictions that may prevent disadvantaged groups from locating in Brentwood;
- Fostering a more inclusive community for all disadvantaged groups.

In addition, the City has identified factors contributing to fair housing issues in Section 3.E.2. These factors include: displacement of residents due to economic pressures, availability of affordable housing, and environmental justice discrepancy. The City will take the following actions to address each contributing factor.

Action H.4a – Contributing Factors and Actions			
Contributing Factor	Meaningful Action	Geographic Target <sup>1</sup>	Priority and Timeline
<b>Housing Mobility</b>			
Availability of Affordable Housing	Conduct landlord outreach to expand the location of participating voucher properties. <b>Metric:</b> Identify 5 additional properties throughout the planning period to participate in the voucher program.	Area 1 and 3	<b>Low</b> Annually conduct outreach. Mid-Cycle review of progress; if changes are deemed necessary, implement within one year.
	Annually host an educational workshop on voucher programs and source of income discrimination. <b>Metric:</b> Aim to engage a minimum of 15 individuals (renters and landlords) per workshop.	City-wide	<b>Low</b> <u>Annually</u>

<b>Action H.4a – Contributing Factors and Actions</b>			
<b>Contributing Factor</b>	<b>Meaningful Action</b>	<b>Geographic Target<sup>1</sup></b>	<b>Priority and Timeline</b>
	<p>Work with and incentivize developers to develop four or more units in a building when possible and identify opportunities for more units or lot consolidations. Incentives may include, but are not limited to, technical assistance, development standards flexibility, and/or reduced fees.</p> <p><b>Metric:</b> Work with developers to maximize potential units per site, including building affordable units. <i>(Note: per the 2022 Inclusionary Ordinance update, projects over nine units cannot pay in-lieu fees and must build the affordable units).</i></p>	Area 1 and 3	<b>Low</b> Annually coordinate with housing developers and provide assistance on a case-by-case basis.
	<p>Facilitate collaboration between local governments and community land trusts through annual meetings as a mechanism to develop affordable housing in higher-opportunity areas, as well as work with local agencies and departments in improving TCAC opportunity ratings in areas of need.</p> <p><b>Metric:</b> Facilitate the development of 100 affordable units within relatively higher-opportunity areas.</p>	City-Wide, with a focus on improving opportunity scores in Area 2	<b>Moderate</b> Maintain and update candidate sites list and annually provide opportunities to relevant agencies and organizations. Offer collaboration and assistance.
<b>Housing Choices and Affordability in Areas of Opportunity</b>			
Environmental Justice Discrepancy	<p>Review and implement changes in the zoning code and standards, permit streamlining, fees, incentives and other approaches to increase housing choices and affordability (e.g., duplex, triplex, multifamily, ADU, transitional and supportive housing, group homes) in higher opportunity areas, as well as improve opportunity ratings in areas of need.</p> <p><b>Metric:</b> Facilitate the development of 100 affordable units within relatively higher-opportunity areas.</p>	Area 1 and Area 3, relatively higher income areas including RCAA neighborhoods.	<b>High</b> By January 2025 establish an incentive plan and begin implementation in 2026. Conduct a Mid-Cycle review; if changes are deemed necessary, implement within one year. See Action H.1q: No Net Loss for additional actions.
Availability of Affordable Housing	<p>Continue to implement inclusionary zoning regulations and promote the creation of affordable units over the payment of in-lieu fees.</p>	City-wide	<b>High</b> <u>On a project-by-project basis</u>



Action H.4a – Contributing Factors and Actions			
Contributing Factor	Meaningful Action	Geographic Target <sup>1</sup>	Priority and Timeline
	<p><b>Metric:</b> Aim for 75 percent of projects subject to inclusionary requirements building affordable units instead of using alternative methods of meeting the requirements, such as in-lieu fees.</p>		
	<p>Assist with the construction of affordable housing for special housing needs population, including, but not limited to, providing technical assistance, streamlined review, reduced development fees.</p> <p><b>Metric:</b> Aim to facilitate the construction of 100 units for special needs populations</p>	City-wide, with a focus on areas in close proximity to community resources	<b>Moderate</b> <u>Throughout the planning period</u>
Racially Concentrated Areas of Affluence	<p>Affirmative marketing to promote equal access to government-assisted housing and to promote housing opportunities throughout that City and within RCAAs. This may include, but is not limited to, noticing of affordable units/projects through direct mail targeted outreach to lower income census tracts; publishing advertising materials in multiple languages, informing service agencies, and outreach to community organizations and places of worship.</p> <p><b>Metric:</b> Conduct affirmative marketing for each new housing development which includes affordable units.</p>	City-wide, with a focus on RCAAs/ Area 3	<b>Moderate</b> <u>On a project-by-project basis</u>
	<p>Facilitate the development of 112 ADUs through Action H.1b. and promote ADU development in areas of opportunity and RCAAs.</p> <p><b>Metric:</b> Facilitate the construction of 112 ADUs with 66 affordable to lower income households and 34 affordable to moderate income households.</p>	City-wide, with a focus on RCAAs/ Area 3	<b>Moderate</b> <u>Throughout the planning period. See Action H.1c for monitoring and planning mid pint review timeframes.</u>
	<p>Review future policies and programs for potentially restrictive practices that would limit diversity in RCAAs.</p> <p><b>Metric:</b> As long-range plans are updated, or as policies and programs are proposed, review language for potentially restrictive practices that would limit diversity with RCAAs.</p>	RCAAs/ Area 3	<b>Low</b> <u>As long-range plans are updated, or as new policies and programs are proposed</u>
	Establish specific incentives for the development of affordable units the RCAAs	RCAAs/ Area 3	<b>Moderate</b>

Action H.4a – Contributing Factors and Actions			
Contributing Factor	Meaningful Action	Geographic Target <sup>1</sup>	Priority and Timeline
	and high opportunity areas, including, but not limited to, permit streamlining and reduced fees. For example, the City has identified 3 candidate sites in this area for a total of 156 LI units. Incentives could be specific to these sites or other sites that allow high-density housing and may include, but are not limited to, reduced fees, technical assistance, and support to funding applications. <b>Metric:</b> Aim to facilitate the construction of 75 affordable units within RCAs.		<u>Throughout the planning period</u>
Community Conservation and Revitalization			
Environmental Justice Discrepancy	Research and establish targeted investments in areas of most need focused on improving community assets such as schools, recreational facilities and programs, social service programs, parks, streets, active transportation and infrastructure. <b>Metric:</b> Complete at least 4 targeted investments, totaling approximately \$30 million, aimed at improving TCAC Opportunity scores for census tract 31.03 (Area 2).	Area 2	<b>High</b> Begin implementation by January 2026. Create a plan for targeted investments by January 2025.
	Develop a proactive code enforcement program that targets areas of concentrated rehabilitation needs, results in repairs and mitigates potential cost, displacement and relocation impacts on residents. Identify target areas through annual windshield surveys and neighborhood visits. Program will be paired with additional information on funding and resources to the City and/or County’s housing home repair or rehab programs. <b>Metric:</b> Identify areas of need and establish targeted investments and programs to address rehabilitation need.	City-wide – specific target areas will be identified annually and may be subject to change based on the review with a focus on Area 2	<b>High</b> Develop by January 2026. Implement annually and throughout the planning period.
	Complete the first phase of Brentwood Boulevard widening to improve safety, traffic flow, and facilitate development.	Brentwood Boulevard	<b>High</b> <u>By June 2026</u>
	Complete the Downtown Alley Rehabilitation from Midway to Park Way to accommodate additional development in	Downtown Alley from Midway to Park Way	<b>High</b> <u>By January 2025</u>

<b>Action H.4a – Contributing Factors and Actions</b>			
<b>Contributing Factor</b>	<b>Meaningful Action</b>	<b>Geographic Target<sup>1</sup></b>	<b>Priority and Timeline</b>
	the Downtown, enhance access, and reduce infrastructure need for future developments.		
	Complete the Homecoming Park Playground play equipment replacements.	Homecoming Park	<b>High</b> <u>By January 2025</u>
	Complete the Lone Tree Way roadway improvements to support a new K-8 school anticipated to open in July 2024.	Lone Tree Way roadway	<b>High</b> <u>By January 2025</u>
Housing for Special Needs Populations	Create and promote informational materials on housing accessibility, rehabilitation, and maintenance resources. <b>Metric:</b> Aim to assist 10 households with accessibility, rehabilitation, and maintenance needs.	City-wide, with a focus on Areas 1 and 2	<b>Moderate</b> <u>Develop materials by January 2025 and advertise annually throughout the planning period</u>
	Annually host a workshop with relevant community organizations and groups to discuss the needs of persons with disabilities and identify whether additional resources and development concessions are needed. If necessary changes are identified, adopt amendments within 6 months. <b>Metric:</b> Aim to a engage a minimum of 15 individuals and organizations per workshop.	City-wide	<b>Moderate</b> <u>Throughout the planning period</u>
	Extend search times for particular groups with housing choice vouchers, such as larger families with children, persons with disabilities, or seniors. <b>Metric:</b> Extend search times for special needs populations	City-wide	<b>High</b> <u>By January 2026</u>
<b>Protection from Displacement</b>			
Displacement from Economic Pressures	Maintain multi-lingual informational materials on tenant legal counseling and resources and provide materials annually to local organizations that serve non-English speakers. <b>Metric:</b> Aim to protect a minimum of 10 households from displacement through tenant resources throughout the planning cycle.	City-wide with a focus on Area 2	<b>High</b> Create materials by August 2024; update as necessary. Distribute materials annually.
	Create and promote informational materials on the location of participating	City-wide	<b>Low</b> <u>Publish materials by January 2026</u>

Action H.4a – Contributing Factors and Actions			
Contributing Factor	Meaningful Action	Geographic Target <sup>1</sup>	Priority and Timeline
	voucher properties and availability of voucher programs/financial assistance. <b>Metric:</b> Publish materials and update as necessary		<u>and update as necessary</u>
1. See Figure 3-55, in Section 3 of this Housing Element, for an outline of the geographic areas.			

**Timing:** 2023-2031; annually review each actions individual timeline and make changes as necessary  
**Responsible Agency:** Community Development Department  
**Funding Source:** Private Resources, Federal and State funds, CDBG, HOME, City Housing Fund, and other potential funding sources

**Action H.4b: Cooperative Association with Non-Profits**

Continue to refer cases and questions to Bay Area Legal Aid, Housing Rights Inc., Shelter, Inc., and Pacific Community Services for assistance.

**Objectives:**

- Maintain information online on non-profits that provide fair housing assistance and services and, on a need basis, refer cases and questions to said non-profits.

**Timing:** On a case-by-case basis; review information available online annually  
**Responsible Agency:** Community Development Department  
**Funding Source:** City Housing Fund

**Action H.4c: Disseminate Fair Housing Information**

The City shall disseminate fair housing information widely in the community in multiple languages. This effort shall include providing information to local apartment managers and realtors involved in residential rental real estate transactions, providing information at the Brentwood public library, at City Hall, at the Brentwood Community Center and Senior Center, at the Police Department, and at social service offices in Brentwood, on a space-available basis, serving special needs groups including lower-income households.

**Objectives:**

- Disseminate fair housing information annually throughout the community and annually meet with local organizations and agencies to provide information on available resources.

**Timing:** Review annually; meet with organizations and agencies annually  
**Responsible Agency:** Community Development Department  
**Funding Source:** City Housing Fund

**Action H.4d: Foreclosure Prevention and Loan Modification Information**

The City shall continue to provide foreclosure prevention and loan modification information on its website, sponsor workshops for the community, and refer owners to non-profit counseling and service providers for legal, credit, foreclosure, and loan modification counseling.

**Objectives:**

- Maintain information online on resource for foreclosure prevention and loan modification.

**Timing:** Review annually; annually collaborate with local organizations and agencies on available resources

**Responsible Agency:** Community Development Department

**Funding Source:** City Housing Fund

**Action H.4e: Housing Opportunities for Special Needs Groups**

Encourage housing opportunities to meet the special housing needs of farmworkers, elderly, disabled, developmentally disabled, large families, female-headed households, and persons experiencing homelessness. Encourage affordable housing developers to provide units for special needs persons or households, when feasible and appropriate.

**Objectives:**

- Facilitate the construction of 50 special needs units (farmworker, affordable senior, disabled, developmentally disabled, large households, female-headed household, homeless) during the planning period.
- Annually coordinate with housing developers to discuss potential constraints and resources for developing housing for special needs groups.

**Timing:** 2023-2031; annually coordinate with housing developers and review progress in providing housing for special needs groups

**Responsible Agency:** Community Development Department

**Funding Source:** Private Resources, Federal and State funds, CDBG, HOME, City Housing Fund, and other potential funding sources

**Action H.4f: Coordination with Agencies Serving the Homeless**

The City shall cooperate with public and private agencies to develop housing (including transitional housing), family counseling, and employment programs for the homeless. The City shall participate in regional efforts to combat homelessness, including coordination with the Contra Costa Interjurisdictional Council on Homelessness and participation in the Contra Costa Homeless Continuum of Care.

**Objectives:**

- Participate in local and regional efforts to address the needs of persons experiencing homelessness.
- As available, provide funding assistance and support funding applications for efforts addressing homelessness.
- Seek and pursue funding opportunities to address homelessness in the City and participate in regional efforts.

**Timing:** Annually coordinate with public and private agencies; review funding and available assistance annually; annually pursue funding opportunities

**Responsible Agency:** Community Development Department and Contra Costa County

**Funding Source:** Homeless Agencies, Federal and State funds

**Action H.4g: Reasonable Accommodation**

Pursuant to Government Code Section 65583, the City is obligated to analyze and demonstrate local efforts to remove potential and actual governmental constraints to the maintenance, improvement, or development of housing for all income levels and for persons with disabilities. The Fair Housing Act, as amended in 1988, requires that cities and counties provide reasonable accommodation with regard to rules, policies, practices, and procedures where such accommodation may be necessary to afford

individuals with disabilities equal housing opportunities. Reasonable accommodation provides a basis for residents with disabilities to request flexibility in the application of land use and zoning regulations or, in some instances, even a waiver of certain regulations or requirements to ensure equal access to housing opportunities. The City is required to consider requests for accommodations related to housing for people with disabilities and provide the accommodation when it is determined to be appropriate under the factors set forth in Brentwood Municipal Code Chapter 17.760.

In compliance with Government Code Section 65583, the City shall continue to provide reasonable accommodations for persons with disabilities pursuant to Brentwood Municipal Code Chapter 17.760.

**Objectives:**

- Maintain updated information on reasonable accommodations on the City’s website.
- Biennially review and update applicable procedures and/or requirements to remove potential constraints.
- Provide information on housing resources available to persons with disabilities to the Regional Center and other local groups or organizations serving the needs of persons with disabilities.

**Timing:** Review biennially, and if determined necessary, amend the Zoning Code within six months; annually provide information on housing resources to the Regional Center and other local organizations and groups serving the needs of persons with disabilities.

**Responsible Agency:** Community Development Department

**Funding Source:** General Fund

**Action H.4h: Low-Barrier Navigation Center**

Assembly Bill 101 (AB 101), Chapter 159 Statutes 2019 requires 'by right' approval of low-barrier navigation centers in areas zoned for mixed uses and nonresidential zones permitting multifamily uses that meet specified requirements. The City shall adopt regulations and procedures for this type of use and establish a ministerial approval process for low-barrier navigation centers. In the interim, any submitted application for this use type shall be processed in accordance with State law.

The City shall also monitor the effectiveness and appropriateness of these regulations and procedures. Should any amendments be warranted pursuant to State law, the City shall amend the Municipal Code.

**Objectives:**

- Adopt and implement procedures and regulations to process low-barrier navigation centers. Procedures shall include establishing a ministerial approval process pursuant to State law.

**Timing:** Adopt and implement by January 2025; review annually

**Responsible Agency:** Community Development Department

**Funding Source:** General Fund

**Action H.4i: Housing for Persons with Developmental Disabilities**

The City shall encourage construction and rehabilitation of housing with supportive services targeted for persons with developmental disabilities, including collaborating with developers of supportive housing to identify opportunities, resources, and potential constraints. The City shall establish regulatory incentives, such as expedited permit processing and fee deferrals, to projects targeted for persons with developmental disabilities. The City shall seek State and Federal funding and support funding applications for housing construction and rehabilitation targeted for persons with developmental disabilities, as staff resources allow. The City shall maintain information online on housing and services available for persons with developmental disabilities.

**Objectives:**

- Collaborate with housing developers and local organizations to identify the needs of local persons with developmental disabilities.
- Seek State and Federal funding and support funding applications.
- Establish regulatory incentives for projects proposing housing for persons with developmental disabilities.

**Timeframe:** Implement by January 2027; annually meet with developers and organizations and seek funding opportunities; review annually

**Responsible Agency:** Community Development Department

**Funding Source:** General Fund

**Action H.4j: Single-Room Occupancy (SRO) Units**

Single-Room Occupancy (SROs) Units may provide a valuable source of affordable housing for individuals and may serve as an entry point into the housing market for persons who previously experienced homelessness. The City’s Municipal Code conditionally permits SROs in the COR and CR zoning district.

**Objectives:**

- Define Single-Room Occupancy Units in the Municipal Code.
- Collaborate with local organizations and agencies to discuss the needs of persons who previously experienced homelessness.
- Support and, when possible, fund local and regional efforts to address the housing needs of persons in Brentwood who previously experienced homelessness.

**Timing:** Add a definition of SRO in the Municipal Code by January 2026; collaborate with organizations annually; annually review funding resources; make changes as necessary throughout the planning period

**Responsible Agency:** Community Development Department

**Funding Source:** General Fund

**Action H.4k: Emergency Shelters**

Pursuant to the provisions of SB 2, AB 139, and AB 2339 the City will continue to facilitate the establishment of emergency shelters to assist those experiencing homelessness. The City will update the Municipal Code to comply with AB 139 parking requirements and AB 2339.

**Objectives:**

- Amend the Municipal Code parking requirements for emergency shelters in compliance with AB 139.
- Amend the Municipal Code to allow emergency shelters by-right in at least one zone that allows residential and revise the definition of emergency shelters pursuant to AB 2339 (2023).

**Timing:** Adopt amendment by January 2025

**Responsible Agency:** Community Development Department

**Funding Source:** General Fund

**Action H.4l: By-Right Permanent Supportive Housing (AB 2162)**

Pursuant to Government Code section 65651, supportive housing shall be a use by-right in zones where multifamily and mixed uses are permitted, including non-residential zones permitting multifamily uses.

**Objectives:**

- Amend the Municipal Code to permit by-right permanent supportive housing in compliance with Government Code section 65651.

**Timing:** Adopt amendment by January 2025

**Responsible Agency:** Community Development Department

**Funding Source:** General Fund

**Action H.4m: Reasonable Accommodations**

The Brentwood Zoning Code allows a request for reasonable accommodation to be made by any person with a disability, their representative or any entity, when the application of a zoning law, building regulation, or other land use regulation, policy, or practice acts as a barrier to fair housing opportunities. An individual with a disability is defined as any individual who has a physical or mental impairment that limits or substantially limits one or more major life activities, anyone who is regarded as having such impairment or anyone who has a record of such impairment.

As part of the ongoing Zoning Code update, the City will amend reasonable accommodations to remove subjective requirements to application findings and constraints.

**Objectives:**

- Adopt Zoning Code updates removing subjectivity and constraints in application finding requirements.

**Timing:** Adopt the Zoning Code updates by January 2025

**Responsible Agency:** Community Development Department

**Funding Source:** General Fund

**Action H.4n: Definition of Family**

The City’s Zoning Code defines “Family” as “the functional equivalent of a traditional family, whose members are an interactive group of persons jointly occupying a single dwelling unit including the joint use of and responsibility for common areas, sharing household activities and responsibilities such as meals, chores, household maintenance, and expenses. If the dwelling unit is rented, this means that all adult residents have chosen to jointly occupy the entire premises of the dwelling unit, under a single written lease for the entire dwelling, with joint use and responsibility of the premises, and the makeup of the household occupying the unit is determined by the residents of the unit rather than by the landlord or property manager.”

As part of the ongoing Zoning Code update, the City will amend its definition of “Family” to remove the requirement that all household members be under a single lease to be considered a family.

**Objectives:**

- Adopt Zoning Code updates removing constraints posed by the City’s definition of “Family” to comply with State law requirements.



**Timing:** Adopt the Zoning Code updates by January 2025  
**Responsible Agency:** Community Development Department  
**Funding Source:** General Fund

**Action H.4o: Residential Care Facilities**

Large residential care facilities occupy a large family home and provide adult or child group home, social rehabilitation center, or adult or child day care center. Approval of a CUP is currently required for large residential care facilities, potentially creating a constraint to the development of this housing type. The City will revise the Zoning Code to remove the CUP requirement and establish a processes and requirements for large residential care facilities to allow these uses in the same way as other residential uses in the same zone.

**Objectives:**

- Adopt Zoning Code updates to allow residential care facilities in all zones allowing residential uses in the same was as other residential uses in the same zone.

**Timing:** Adopt the Zoning Code updates by January 2025  
**Responsible Agency:** Community Development Department  
**Funding Source:** General Fund

**B. Summary of Quantified Objectives**

**Table 4-1** summarizes the City’s quantified objectives for the 2023-2031 planning period by income group.

<b>Table 4-1: 6<sup>th</sup> Planning Cycle Quantified Objectives</b>						
Objectives	Units by Income Level					TOTAL UNITS
	Extremely Low	Very Low	Low	Moderate	Above Moderate	
RHNA	402		232	247	641	<b>1,522</b>
Home Repair/ Rehabilitation	30					<b>30</b>
Special Needs Units	50					<b>50</b>
First-Time Homebuyer	15			5	0	<b>20</b>
Affordable Housing Assistance	50	50	50	0	0	<b>150</b>
Conservation of At-Risk Affordable Housing Units	6			0	0	<b>6</b>