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## **(FOR FURTHER ANALYSIS)**

### **1. PROJECT DESCRIPTION**

The proposed Project consists of a comprehensive update to the Housing Element of the Town of Atherton General Plan.

#### **State Housing Element Requirements**

Since 1969, California has required that all cities and counties adequately plan to meet the housing needs of the community. These requirements are promulgated in Government Code Section 65580 and beyond which establish the State's housing policies and identifies the responsibilities of a municipality to facilitate the improvement and development of housing to make adequate provisions for the housing needs of all economic segments of the community. These State policies establish the contents and process that local governments must follow in preparing their housing elements. Pursuant to Government Code Section 65583, the housing element must include:

1. Analysis of demographic, social, and housing characteristics, current and future housing needs due to population growth and change, and other factors affecting housing need.
2. Analysis of governmental and nongovernmental constraints that affect the development, maintenance, and improvement of housing for all income groups and people with disabilities;
3. Inventory of resources available to address the Town's housing needs, including available land for housing, as well as the financial resources and administrative capacity to manage housing programs; and
4. Specific actions or programs to address the development, improvement, and conservation of housing to meet current and future needs. This includes goals, policies, and specific housing programs.

The State Department of Housing and Community Development is responsible for administering and ensuring local government compliance with Housing Element Law.

#### **Project Location**

The Town of Atherton is an incorporated town in San Mateo County. Atherton is bounded by Redwood City on the north, Menlo Park on the east and south, and Woodside on the west.

#### **Existing Land Uses**

The Town has an area of approximately 3,600 acres or 5.6 square miles; 89% of which is residential, 5% parks and open space, and 6% public and private schools and municipal facilities. The Town has been primarily developed with lower density residential uses, with no commercial or industrial uses. The Town of Atherton has minimal vacant available land for development.

#### **General Plan and Zoning Designations**

The Town of Atherton contains three land use categories: single family, low density, parks and open space, and public facilities and schools. The Single Family Residential Low Density General Plan designation is applied to all residential areas within the Town of Atherton and allows either one (1) or three (3) units per net acre. This land use designation allows a conventional single-family detached home with the additional use of an accessory dwelling unit and other uses identified in the Town's Municipal Code.

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The corresponding zones to the Town's General Plan land use designations are: R-1A and R-1B (single family residential), public open space (POS), and public facilities and schools (PFS).

### Description of Project

The project is the adoption and implementation of the Town of Atherton's Housing Element Update (project). The 2023 – 2031 Housing Element includes the following components:

- **Introduction:** An introduction and overview of the 2023- 2031 Housing Element purpose, process, definitions, RHNA Allocation and relationship to other elements.
- **Assessment of Housing Needs:** A discussion of the Town's demographic and economic characteristics, housing and household descriptions including sales and rental prices, and special housing needs.
- **Fair Housing Assessment:** This section provides an overview of Assembly Bill (AB) 686, a law designed to enforce fair housing throughout the state, an assessment of fair housing issues in the region, access to opportunities, disparate housing needs, a site inventory analysis, and findings of contributing factors to fair housing issues and implementation actions.
- **Housing Resources:** This section provides an inventory of sites suitable for residential development, an analysis of zoning that encourages and facilitates a variety of housing types, and adequate sites for emergency shelters, transitional and supportive housing, and farm worker housing.
- **Constraints on Housing:** This section identifies governmental and non-governmental constraints on housing in the Town of Atherton.
- **Review of the 2015-2022 Housing Element:** This section reviews the effectiveness of the 5<sup>th</sup> Cycle Housing Element, progress in implementing it, and future opportunities for housing.
- **Housing Goals, Quantified Objectives, and Policies:** This section identifies the goals, objectives, and policies of the Housing Element.
- **Housing Programs:** This section includes a list of the programs that will help achieve these goals and policies, and a summary of objectives with general timeframes in which those objectives might be achieved, along with the agency responsible for implementing the program.
- **Community Engagement:** This section describes the efforts to engage the community in preparing the Housing Element update. During this Planning Period, Atherton held several public meetings to discuss the proposed strategies with the community. The Town also partnered with 21 Elements and the Let's Talk Housing effort to engage with current and potential beneficiaries of housing programs and services and their advocates.
- The appendices summarize the 21 Elements survey analysis, ABAG/MTC Housing Needs Data Reports, AFFH Atherton Map, San Mateo County-wide housing needs, housing element site inventory form, Menlo College Faculty and Staff Housing Considerations, and correspondence from an interested property owner.

There are several goals and objectives for the Housing Element Update including the following eight overarching and interrelated goals that reflect the values of the community.

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1. Facilitate the private development of housing to meet a portion of the above moderate income housing need identified for Atherton.
2. Use accessory dwelling units to meet a substantial portion of the Town's moderate to very low-income housing need.
3. Facilitate the development of faculty and student housing on school campuses to meet a portion of the moderate and very low-income housing need identified for Atherton.
4. Promote private efforts to conserve and improve Atherton's existing housing supply.
5. Encourage special consideration to the maintenance and expansion of housing opportunities for handicapped and low and moderate income and homeless persons.
6. Meet the needs of seniors, in light of the pending growth of this population in San Mateo County.
7. Continue to promote housing opportunities for all persons regardless of race, sex, marital status, ancestry, national origin, or color.
8. Support efforts to affirmatively further fair housing in Atherton.

Specific Objectives that support these goals are included in the Housing Element document and further discussed throughout this analysis.

### Regional Housing Needs Allocation (RHNA)

In accordance with Government Code § 65584, projected housing needs for each city and county in the San Francisco Bay area region are prepared by Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC) under a process known as the Regional Housing Needs Assessment (RHNA). The RHNA allocates regional housing needs by income level among member jurisdictions.

California law established the planning period for the current RHNA from 2023 to 2031. ABAG's RHNA allocation for Atherton during this period is 348 units. The 348 units for Atherton are out of the anticipated construction need of 441,176 additional housing units in the ABAG region. Atherton's 348 units distributed into Very Low Income, Low Income, Moderate Income, and Above Moderate-Income categories. Each category is defined by households falling into a certain percentage of the Area Median Income (AMI) as shown in Table 1.

**TABLE 1: RHNA ALLOCATION**

<b>Income Category</b>	<b>6<sup>th</sup> Cycle RHNA</b>	<b>10% Buffer Units</b>	<b>Total Units</b>	<b>Percent</b>
Extremely Low / Very Low	94	9	103	26%
Low*	54	5	59	16%
Moderate*	56	6	62	18%
Above Moderate	144	14	158	40%
<b>Total</b>	<b>348</b>	<b>34</b>	<b>382</b>	<b>100%</b>

### Comparison of Site Inventory and RHNA

In addition to the proposed goals, objectives, policies, and programs to meet the RHNA, Atherton factored in pipeline projects and ongoing programs including the potential RM 10 (23 Oakwood) project, vacant

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sites, lot splits (SB 9), private school sites and accessory dwelling units (ADUs). The total new housing units needed to achieve the 6<sup>th</sup> Cycle RHNA are summarized in Table 2.

**TABLE 2: NET RHNA – PROJECTED DWELLING UNITS**

	<b>Very Low &amp; Low 0-80% AMI</b>	<b>Moderate 81-120% AMI</b>	<b>Above Moderate &gt;120% AMI</b>	<b>Total New Housing Units</b>
<i>Projected Dwelling Units</i>				
ADUs	112	56	112	280
Lot Splits (SB 9)	0	0	48	48
Vacant Sites	0	0	8	8
RM 10 (23 Oakwood)	4	0	12	16
PFS (Private Schools)	40	40	0	80
<b>Dwelling Unit Total</b>	<b>156</b>	<b>96</b>	<b>180</b>	<b>432</b>
Total Net New Units Above or below RHNA	+8	+40	+36	+84

### Anticipated Accessory Dwelling Units (ADUs)

Assembly Bill (AB) 2299 (2016), Senate Bill (SB) 1069 (2016), AB 494 (2017), SB 229 (2017), AB 68 (2019), AB 881 (2019), AB 587 (2019), SB 13 (2019), AB 670 (2019), AB 671 (2019), and AB 3182 (2020) – The 2016 and 2017 updates to State law included changes pertaining to the allowed size of accessory, permitting ADUs by right in at least some areas of a jurisdiction, and limits on parking requirements related to ADUs. More recent bills reduce the time to review and approve ADU applications to 60 days, remove lot size and replacement parking space requirements, and require local jurisdictions to permit junior ADUs (JADUs).

In 2021 and 2022, the Town of Atherton experienced the construction of 44 new ADUs, three (3) JADUs, and seven (7) ADU conversions. Based on this trend, the town projects an average of 35 new ADUs per year over the next eight (8) years. The Housing Element includes programs to amend the zoning code to facilitate ADU and JADU construction.

### SB 9

Senate Bill 9 or SB 9 waives discretionary review and public hearings for building two homes on a parcel in a single-family zone and subdividing a lot into two that can be smaller than the previously required minimum size. In early 2022, the Town adopted an implementing ordinance consistent with state law to provide property owners clarity for the development opportunities under SB 9. The ordinance allows new lots created under the provisions of SB 9 to utilize the existing development standards for the base zoning district. A new residence built on a lot created through an SB 9 lot split can use the same setbacks, floor area ratio, building heights and other standards as provided for any existing lot in the same zoning district.

It is projected that approximately 48 new above moderate-income housing units will result from lot splits and new housing development facilitated by the 2021 SB 9 State law (GC section 65852.21) during the 2023-2031 Planning Period. There are 606 lots of an acre or greater in size, and Atherton received six (6) applications in 2022 and an additional six (6) inquiries that would result in a total of 23 new dwelling units.

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### Vacant Sites

The Town of Atherton surveyed all town parcels to determine adequate sites for housing. There is little vacant developable land in the Town, and most of the Town's land acreage is developed at existing General Plan densities. However, the Town did identify seven (7) undeveloped sites that it expects would provide single-family housing at above-moderate income level. These sites are listed in Table 3.

**TABLE 3: VACANT SITES**

Site ID	APN	Address	Lot Acres	Current Zoning	Existing Residential Density Allowance	Additional Net Residential Units
1	070-343-100	97 Santiago	1.42	R-1A	One dwelling unit per acre	1
2	070-180-400	95 Faxon	1.13	R-1A	One dwelling unit per acre	1
3	070-131-010	15 Monte Vista	1.78	R-1A	One dwelling unit per acre	1
4	070-012-350	282 Polhemus	2.12	R-1A	One dwelling unit per acre	2
5	070-180-240	12 Faxon Forrest	0.95	R-1A	One dwelling unit per acre	1
6	070-180-350	16 Faxon Forrest	0.85	R-1A	One dwelling unit per acre	1
7	070-180-020	25 Monte Vista	0.98	R-1A	One dwelling unit per acre	1
<b>Total Units</b>						<b>8</b>

### Residential Sites Inventory

An important component of the Town of Atherton Housing Element is the identification of sites for future housing development, and an evaluation of the adequacy of those sites in fulfilling the Town's share of regional housing needs. To accomplish this, all town parcels were surveyed to determine their development capacity. Due to the lack of vacant and underutilized sites in Atherton, the Town has selected candidate sites for rezoning. Each site was analyzed in light of the development standards for its proposed zoning designation. All parcels in Atherton were evaluated through a process of elimination based on required criteria set by the State (HCD).

### Housing Opportunity Sites

The Town has selected ten (10) housing opportunity sites, in addition to the ADU, SB 9, and vacant sites identified above. The Town is proposing to rezone these properties to a multi-family housing at densities ranging from 10 dwelling units per acre (du/ac) to 40 du/ac, and/or provide a housing overlay zone to the sites' zoning designation for these specific properties. The Housing Element does not institute the rezoning or zoning overlay, but rather these are recommended legislative actions that would be implemented separately and after adoption and certification of the Housing Element. A list of sites is identified in Table 4.

The rezoning or zoning overlay allows residential units to be built at a minimum density of 10 dwelling units per acre and maximum density of 40 dwelling units per acre. Potential units were calculated based on the minimum density allowed and would yield a total of 80 units at a minimum density and 111 at a maximum density on approximately 8.14 acres of land.

**TABLE 4: HOUSING OPPORTUNITY SITES**

Site ID	Address	Lot Acres	Units Pursuant to SB 10	Proposed Zoning Overlay and Net Residential Units			
				R-10	R-15	R-20	R-30

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1	2 Selby Lane	0.33	5	3	5	7	x
2	8 Selby Lane	0.37	5	4	6	7	x
3	89 Victoria Dr.	0.32	5	3	5	6	x
4	99 Victoria Dr.	0.30	5	3	5	6	x
5	97 Santiago Ave.	1.43	10	14	21	29	x
6	290 Polhemus Ave.	1.7	10	17	26	34	x
7	999 Ringwopd Ave.	0.90	9	9	14	18	27
8	352 Bay Rd.	0.92	9	9	14	18	28
9	318 Bay Rd.	0.94	9	9	14	18	28
10	296 Bay Rd.	0.93	9	9	14	19	28
	<b>TOTALS</b>	<b>8.14</b>	76	80	124	162	111

### Municipal Code Changes

Implementation of the Housing Element would effectuate the following zoning changes to the Atherton Municipal Code:

- **RM-10 Overlay Zone – 23 Oakwood:** The project proposes an amendment to the Town's Municipal Code of an RM-10 overlay zone to permit multifamily residential uses by right. Included in the amendment request is a maximum density of 10 dwelling units per acre, building height standards of 40 feet, setbacks to accommodate the density, parking, and objective design standards. The site would yield 16 dwelling units.
- **Menlo College – 1000 El Camino Real:** Implementation of the Housing Element would institute an overlay zone on two locations of the Menlo College site as described:
  - **Site 1:** The existing O'Brien surface parking lot at the southwest corner of El Camino Real and Alejandra Avenue is approximately 75,000 square feet (1.7 acres) in area. The site is level and currently contains a paved parking lot. The lot is surrounded by mature vegetation. Construction of a multi-family housing building is feasible at this location with podium parking at ground level and three-stories of housing above, or below grade parking. The Town does not have on-site parking requirements. Parking would be replaced to meet the needs of the college. The Town will rezone this site to permit 40 units per acre by right with objective design standards. The College has expressed interest in developing 60 dwelling units at this site.
  - **Site 2:** There are four residences located on the campus in World War II barracks that are currently utilized for faculty housing. Demolition of these residences would accommodate 30 apartment units, resulting in a net increase of 26 multifamily housing units. This site would be rezoned at a density of 20 units per acre.
  - **Site 3:** The College has identified a site interior to the campus that is viable for a multi-story multi-family development of 40 to 60 units. This site would be rezoned at a density permitting 40 dwelling units per acre. The site, near the Administration Building, is currently used as parking. Additional parking can be developed near the entry to the College off El Camino Real.

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Additional actions for all three sites include reducing the minimum front yard setback to 30 feet, amending the height limit to allow up to four-stories or 48 feet, permitting multi-family housing by right with objective design standards.

- **Menlo School – 50 Valparaiso Avenue:** Implementation of the Housing Element would allow for an overlay zone at two locations on the Menlo School as described below:
  - **Site 1:** A surface parking located at the southwest corner of the campus with frontage on Valparaiso Avenue and the school entry drive, approximately 56,000 square feet (sf.) would have an overlay zone of 20 dwelling units per acre, and this site would yield 25 dwelling units.
  - **Site 2:** An approximately 44,000 sf. surface parking lot located at the southeast corner of the campus, with a frontage on Valparaiso Avenue and the school entry drive. With an overlay zone permitting 20 dwelling units per acre, this site could yield approximately 20 dwelling units.

To accommodate the new housing development, the zoning will be amended as follows:

- Rezone sites 1 and 2 to permit multifamily housing at a density of 20 units per acre.
- Reduce the minimum front yard setback to 30 feet (along Valparaiso Road).
- Amend the height limit to allow four-stories or 48 feet.
- Permit multifamily housing by right with objective design standards.
- Implementation of the Housing Element would amend the ADU provisions of the Atherton Municipal Code, permitting the following:
  - Second story ADUs above detached garages, increasing the allowable height to 18 feet.
  - Two ADUs to be constructed on properties two-acres or greater in area; the first ADU is exempt from floor area limitations and the second ADU will be included in the ADU floor area.
  - Allow pool housing and guest houses to be rented as ADUs.
  - Waiving fees for all new ADUs.
  - Eliminating the occupancy limitation on ADUs, including guest and pool houses.

Further, implementation of the Housing Element would result in the following amendments to the Atherton Municipal Code:

- Allowing Permanent Supportive Housing by-right in use zones where multi-family and mixed-uses are permitted; and a by-right allowance for 100% affordable housing that has 25%, or 12 units, of permanent supportive housing where multi-family or mixed-use housing is permitted.
- Permitting Low Barrier Navigation Centers in zones where multi-family and mixed uses are permitted.
- Permitting mobile homes and manufactured housing on a permanent foundation under the manner as single-family homes.

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- Allowing group homes for seven or more residents in any district where residential uses are permitted.
- Permitting shelters, and amending their parking requirements, without discretionary action.
- Amending the minimum lot size in the R-1B and subdivision ordinance allowing one-third (0.33) acre lots for the subject zone.

### Proposed Housing Element Goals, Objectives, and Policies

The Project establishes goals, objectives, policies, and programs to help the Town meet state-mandated goals. The Town's implementation of these policies and programs includes adoption of overlay zones to sites in the inventory (as described above under "Housing Opportunity Sites" of this Initial Study to meet the Town's RHNA obligation). Pursuant to Government Code Section 65583(c)(1), these actions will be accomplished within 3 years of the Town's adoption of the 2023-2031 Housing Element.

**TABLE 5: HOUSING GOALS, QUANTIFIED OBJECTIVES, AND POLICIES**

<b>3.710 GOAL: FACILITATE THE PRIVATE DEVELOPMENT OF HOUSING TO MEET THE ABOVE MODERATE INCOME HOUSING NEED IDENTIFIED FOR ATHERTON</b>	
Objectives	A. Realize the construction of approximately 150 net new housing units in the above-moderate income category in Atherton from 2023-2031.
Policies	A. Within the limitations of the private housing market the Town shall work with private developers to encourage new housing development.
<b>3.720 GOAL: USE ACCESSORY DWELLING UNITS TO MEET A SUBSTANTIAL PORTION OF THE TOWN'S MODERATE TO VERY LOW-INCOME HOUSING NEED.</b>	
Objectives	A. Realize the construction of 280 new accessory dwelling units planned for occupancy by moderate to extremely low-income households in Atherton from 2023-2031. B. Partner with a non-profit organization to facilitate the rental of ADU and JADU units.
Policies	A. Actively promote the Accessory Dwelling Unit provision of the Atherton Zoning Ordinance by encouraging homeowners and developers to include attached or detached Accessory Dwelling Units in existing or new homes.
<b>3.730 GOAL: FACILITATE THE DEVELOPMENT OF FACULTY AND STUDENT HOUSING ON OR NEAR SCHOOL CAMPUSES TO MEET A PORTION OF THE MODERATE AND VERY LOW-INCOME HOUSING NEED IDENTIFIED FOR ATHERTON</b>	
Objectives	A. Encourage the construction of 34 new faculty housing units at private and public schools in the moderate to very low-income categories in Atherton from 2023-2031.
Policies	A. Encourage schools in Atherton to provide affordable faculty, staff and student housing on and or near their campuses.
<b>3.740 GOAL: FACILITATE THE DEVELOPMENT OF ADDITIONAL AFFORDABLE HOUSING AT THE CALWATER BEAR GULCH RESERVOIR SITE</b>	
Objectives	A. Encourage CalWater Company to develop new housing on its Bear Gulch property.
Policies	A. Encourage the construction of 4 new housing units at the Bear Gulch Reservoir property in Atherton from 2023-2031.
<b>3.750 GOAL: PROMOTE PRIVATE EFFORTS TO CONSERVE AND IMPROVE ATHERTON'S EXISTING HOUSING SUPPLY.</b>	



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Objectives	A. Promote the improvement, maintenance and enhancement of the existing housing stock through ongoing private and public rehabilitation efforts, with the objective of processing 1,000 applications for rehabilitation and home improvement between 2023 and 2031.
Policies	A. The Town shall promote conservation and improvement of the condition of its existing affordable housing stock with the goal of conserving all existing affordable units.
<b>3.760 GOAL: ENCOURAGE SPECIAL CONSIDERATION TO THE MAINTENANCE AND EXPANSION OF HOUSING OPPORTUNITIES FOR HANDICAPPED AND LOW AND MODERATE INCOME AND HOMELESS PERSONS.</b>	
Objectives	<p>A. Enforce uniform building code regulations regarding provision of access for handicapped in residential structures, where applicable.</p> <p>B. Support the conservation and development of affordable housing for citizens of modest means.</p>
Policies	<p>A. The Town shall continue to enforce the uniform building code regulations regarding provision of handicapped access in residential structures.</p> <p>B. The Town shall continue to encourage the production and availability of more affordable housing through the development of new accessory dwelling units, and private and public-school faculty and student housing.</p> <p>C. The Town shall cooperate with agencies providing emergency shelter, transitional and supportive housing for the homeless and those in crisis.</p>
<b>3.770 GOAL: MEET THE NEEDS OF SENIORS, IN LIGHT OF THE PENDING GROWTH OF THIS POPULATION IN SAN MATEO COUNTY.</b>	
Objectives	A. Assist in meeting the needs of senior residents.
Policies	<p>A. Enforce uniform building code regulations regarding provision of access for handicapped in residential structures, where applicable.</p> <p>B. Support the conservation and development of affordable housing for seniors with lower incomes.</p> <p>C. Process requests for accessibility accommodations.</p> <p>D. Encourage policies that enable seniors to “age in place” as much as possible.</p> <p>E. Continue to encourage the development of accessory dwelling units, which can provide an affordable option for seniors.</p> <p>F. Identify and prioritize steps that Atherton can take to meet the needs of seniors.</p>
<b>3.780 GOAL: CONTINUE TO PROMOTE HOUSING OPPORTUNITIES FOR ALL PERSONS REGARDLESS OF RACE, SEX, MARITAL STATUS, ANCESTRY, NATIONAL ORIGIN OR COLOR</b>	
Objectives	A. Eliminate discrimination in housing to the extent feasible through Town actions.
Policies	A. The Town shall actively support housing opportunities for all persons regardless of race, sex, marital status, ancestry, national origin or color.
<b>3.790 GOAL: SUPPORT EFFORTS TO AFFIRMATIVELY FURTHER FAIR HOUSING IN ATHERTON.</b>	
Policies	A. Regional Housing Trust Fund or Other Regional Collaboration: Support a regional Housing Trust Fund that is funded by a diversity of jurisdictions and allocated to communities based on poverty, cost burden, and segregation. The fund could support affordable housing production, community amenities, last/first month’s security deposits, down payment assistance, etc. Pair assistance with affirmative marketing to households with disproportionate housing needs including Black and Hispanic households.

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	<p>B. Promote Affordable ADUs and JADUs: Develop a program that would connect service providers that help displaced renters with ADU owners in Atherton that want to rent to low-income renters. Develop assistance programs for JADUs to make alterations easier and more cost effective so that additional units can be developed within the existing building envelope of houses and made available at more affordable rates.</p> <p>C. Rental Assistance Program: The City Council will appoint a committee to convene a discussion with BIPOC (Black, Indigenous and People of Color) populations who are experiencing comparatively high rates of cost burden to discuss solutions for relief and consider rental assistance programs tailored to extremely high-cost burdened residents.</p> <p>D. Promote Fair Housing Information: Update the Town’s website to include fair housing including resources for residents who feel they have experienced discrimination, information about filing fair housing complaints with HCE or HUD, and information about protected classes under the Fair Housing Act.</p> <p>E. Fair Housing Training: The City Council will appoint a committee to partner with Project Sentinel, or another affordable housing organization, to perform fair housing training for property owners, real estate agents and tenants across the region. Focus enforcement efforts on race-based discrimination and reasonable accommodations.</p> <p>F. Human Investment Program (HIP) operates a Homesharing Program in the Town. The Homesharing Program places residents seeking housing with residents open to sharing (renting) a portion of their home. Five residents contacted HIP Housing to learn more about other programs as well as to discuss affordable housing opportunities in San Mateo County. One resident applied to HIP Housing’s Home Sharing Program and worked with a Home Sharing Coordinator to receive home sharing referrals, community resources, as well as ongoing information about affordable housing opportunities including waiting list opening information.</p>
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### Required Discretionary Actions

Adoption of the 2023 – 2031 Housing Element (Atherton Town Council)

### Other Public Agency Review

Approval of the Housing Element by the California Department of Housing and Community Development (HCD)

### California Native American Tribal Consultation

In accordance with AB 52 (PRC Section 21084.2), lead agencies are required to initiate consultation with a tribe with traditional and/or cultural affiliations in the geographic area where a subject project is located if a project may cause a substantial adverse change in the significance of a tribal cultural resource. Should the tribe respond requesting formal consultation, the lead agency must work with the tribe or representative thereof to identify potential impacts and develop avoidance or mitigation measures to reduce potential impacts to tribal cultural resources.

In addition, SB 18 (GC Section 65352.3) requires lead agencies to contact and consult with California Native American tribes prior to amending or adopting any general plan, specific plan, or designating land as open

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space. In accordance with AB 52 and SB 18, notification of the proposed project was mailed to the following tribes on June 20, 2023:

- Amah Mutsun Tribal Band of Mission San Juan Bautista
- Costanoan Rumsen Carmel Tribe
- Indian Canyon Mutsun Band of Costanoan
- The Ohlone Indian Tribe
- Wuksachi Indian Tribe/Eshom Valley Band
- Tamien Nation