The Town of Hillsborough

Via email: generalplan@hillsborough.net

Cc: HousingElements@hcd.ca.gov

September 18, 2022

Re: Hillsborough's Draft Housing Element

To the Town of Hillsborough:

YIMBY Law commends the Town on its well-written housing element. We appreciate the Town's candor as to how it constrains housing (Draft, pp.78-83), as well as the clarity of its proposed zoning reforms (*id.* pp.91-94).

That said, the draft has glaring problems. Chiefly, the Town expects 172 homes from the nonvacant Strawberry Hill site (Draft pp.101, 104), whose trustee told the Town he does not intend to redevelop. The draft likewise fails to show that 48 homes would be built on the nonvacant De Guigne Estate (*id.* Pp.100, 104).

The draft also makes unrealistic assumptions about ADU affordability. Bay Area watchdogs for YIMBY Law report that Hillsborough ADUs are in fact rarely rented to lower-income households, rather than kept vacant for guests or pool maintenance. Without a registry to track ADU use or a concrete and current program to monitor ADU production (*id.* p.147), it is impossible to tell whether the City's projection of 168 lower-income ADUs (*id.* p.90) will in fact be built *and* affordably rented.

It is also impossible to evaluate the relative severity of Hillsborough's development fees (see *id.* p.81) without the kind of dollar-denominated comparison Hillsborough included in its fifth cycle draft (pp.27-28). Why omit the comparison in the sixth cycle?

Finally, Hillsborough commits to no timelines for implementing its various policies, goals, and actions (Draft pp.141-48). Many of the proposed programs are also weak commitments to "review," "conduct," "establish," "assess" or "complete" various things the Town can table for later (*ibid.*). Please specify what the Town will actually do.

We look forward to the City's next draft. Please contact me with questions.

Sincerely,



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