



STAFF REPORT

AGENDA ITEM NO: 11a

MEETING DATE: March 16, 2026

To: Honorable Mayor and City Council

Date: March 16, 2026

**From: Joseph Sanfilippo, Economic Development & Housing Specialist – (650) 558-7264
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Subject: Housing Element Annual Progress Report (APR) for 2025

RECOMMENDATION

Staff recommends that the City Council accept, by motion, the 2025 Housing Element Annual Progress Report and authorize its transmittal to the California Governor’s Office of Land Use and Climate Innovation (formerly OPR) and the California Department of Housing and Community Development (HCD).

BACKGROUND

California requires each jurisdiction to prepare a Housing Element as part of its General Plan in order to ensure that all jurisdictions are planning for the projected housing demand throughout California. Unlike other elements of a General Plan, the Housing Element must be updated by deadlines set by the State. Burlingame’s Housing Element can be found at <https://www.burlingame.org/housingelement>.

The process begins with the State advising a region of its Regional Housing Needs Allocation (RHNA), which is the estimated number of housing units that will be needed over the planning period (usually eight years). This allocation is further subdivided among four household income categories: very-low, low, moderate, and above moderate. Affordable housing income limits are determined by HCD and are adjusted for county median income and family size, as detailed in Table 1 below (effective June 1, 2025).

**TABLE 1: 2025 SAN MATEO COUNTY INCOME LIMITS
(BASED ON FEDERAL INCOME LIMITS FOR SMC)**

HUD-defined Area Median Income \$185,700 (based on household of 4). State median \$186,600 (household of 4) due to hold harmless policy.								
Income Category	Income Limits by Family Size (\$)							
	1	2	3	4	5	6	7	8
Extremely Low (30% AMI) *	41,150	47,000	52,900	58,750	63,450	68,150	72,850	77,550
Very Low (50% AMI) *	68,550	78,350	88,150	97,900	105,750	113,600	121,400	129,250
HOME Limit (60% AMI) *	82,260	94,020	105,780	117,480	126,900	136,320	145,680	155,100
HERA Special VLI (50% AMI) ***	78,350	89,550	100,750	111,900	120,900	129,850	138,800	147,750
HERA Special Limit (60% AMI) ***	94,020	107,460	120,900	134,280	145,080	155,820	166,560	177,300
Low (80% AMI) *	109,700	125,350	141,000	156,650	169,200	181,750	194,250	206,800
State Median (100% AMI)	130,600	149,300	167,950	186,600	201,550	216,450	231,400	246,300

The Association of Bay Area Governments (ABAG) is responsible for the public process by which this regional allocation is apportioned to each jurisdiction within its boundaries. In addition to demonstrating how the allocated number of units can be produced, policies in a Housing Element must also:

1. Address the removal of governmental barriers to housing production;
2. Ensure the jurisdiction's housing stock is maintained; and
3. Ensure that housing is available to all types of persons on an equitable basis.

The Housing Element is updated every eight years, and the City is currently in the 6th cycle, which covers the 2023-2031 planning period. The City of Burlingame was allocated 3,257 new units in this RHNA 6th cycle. The City Council adopted Burlingame's 6th cycle Housing Element in December 2023.

DISCUSSION

Annual Report

California Government Code Section 65400 requires that an Annual Progress Report ("APR") be prepared on the status and progress of implementation of the General Plan and Housing Element and submitted to the City Council, the Governor's Office of Land Use and Climate innovation (formerly OPR), and the California Department of Housing and Community Development (HCD) by April 1st of each year. The APR must be prepared in accordance with the provisions set forth by HCD and on the forms provided by HCD (attached). The reporting period for the APR is the 2025 calendar year.

The APR includes reporting the number of building permits issued for *net* new housing units during a calendar year.¹ In addition, the reporting includes housing development applications submitted, units approved by Planning (entitled), and units completed (final inspection/certificate of occupancy). The APR requires the reporting of the numbers of net new units include the site addresses, project names, and assessor parcel numbers (APN).

The Housing Element APR includes information about housing production since the start of the planning period in January 2025, including:

- Information on the types of housing units that were issued building permits;
- Information on the City's progress in meeting its regional housing needs allocation; and
- Progress report on implementation of Housing Element programs.

Tables A and A2 provide a summary of all planning and building permit activity on *net* new housing. In summary, **92 units were entitled** (planning approvals); building permits were issued for **74 net new units**; and **465 units were completed** in calendar year 2025.

While the APR tracks submittals, planning approvals, building permits issued, and units completed, the fulfillment of the RHNA allocation is based only on building permit issuance. However, any unit completed from June 30, 2022 onwards is allowed to be counted in the current cycle. As indicated on Table B, 317 net new units were completed between June 30, 2022 and January 30, 2023. With these

¹ This does not include projects where an existing single-unit dwelling is replaced with a new single-unit dwelling because there would not be a net increase in units on the property. However, it includes new Accessory Dwelling Units (ADUs) if they represent a net increase in numbers of units on a property.

units added to prior reporting year totals, **a total of 1,282 units have been issued building permits in the current RHNA 6 cycle.**

Table B further provides a summary of building permit activity sorted by affordability levels. Of the 1,282 building permits issued so far for this cycle of the RHNA allocation, 291 (approx. 22.7%) were for Below Market Rate (BMR) units affordable to Moderate, Low, or Very Low Income households.

Accessory Dwelling Units (ADUs) are counted towards RHNA allocations as net new housing units. In recent years, the State Legislature has passed a number of bills intended to encourage the construction of ADUs. In 2025, the City received 67 ADU applications. Building permits were issued for 50 ADUs; this number includes both ADU applications submitted in 2025, as well as in previous years.

The affordability levels of ADUs are not currently tracked. HCD has indicated that if affordability information is not available, jurisdictions may utilize ADU affordability assumptions from ABAG’s ADU affordability methodology for the Annual Progress Reports covering calendar year 2025. For many jurisdictions (including Burlingame), this is 30% very low income, 30% low income, 30% moderate income and 10% above moderate income. For reporting purposes, HCD has directed that an affordability level be assigned to each ADU on a random basis using the 30/30/30/10 methodology. This is only for projecting affordability on a citywide basis, however, and does not imply restrictions on specific properties. Pursuant to Housing Element Program H(D-4), the City will begin collecting more granular data tracking use and affordability of ADUs in calendar year 2026.

Burlingame’s progress in meeting its RHNA targets for this housing cycle (2023-2031) is summarized as follows:

**TABLE 2: BUILDING PERMITS ISSUED JUNE 30, 2022 – DECEMBER 31, 2025
RHNA 6 HOUSING ELEMENT CYCLE**

Income Level	RHNA	Building Permits Issued	% of RHNA 2023-2031 Goal
Very Low	863	124	14.4%
Low	497	125	25.2%
Moderate	529	42	7.9%
Above Moderate	1,368	991	74.6%
Total:	3,257	1,282	39.4%

Table D, attached to this staff report, includes information regarding implementation of other Housing Element programs. These reports are informational only and do not change adopted policies or authorize any action or expenditure of funds. These reports are being prepared in compliance with California Government Code Section 65400; once the Council has acknowledged that the Housing Element Annual Progress Reports have been provided for review, staff will forward the reports to HCD and OPR.

FISCAL IMPACT

There is no impact to the General Fund from the preparation of the Housing Element Annual Progress Report.

ENVIRONMENTAL REVIEW

The Annual Progress Report is not subject to the California Environmental Quality Act (CEQA). Pursuant to CEQA Guidelines Sections 15378 and 15378(b)(2), the Annual Report is an informational document required by Government Code Section 65400 and constitutes continuing administrative and general policy reporting activities. The Report does not authorize development or commit the City to any action that could result in a direct or reasonably foreseeable physical change to the environment. Accordingly, the Annual Report is not a “project” under CEQA, and no further environmental review is required.

Exhibits:

- Housing Element Annual Progress Report – Calendar Year 2025
 - 2025 Summary Table
 - Table A: Housing Development Applications Submitted
 - Table A2: Annual Building Activity Report Summary – New Construction, Entitled, Permits and Completed Units
 - Table B: Permitted Units Issued by Affordability
 - Table D: Project Implementation Status pursuant to GC Section 65583
 - Table H: Locally Owned Surplus Sites

The following tables were not included because they are optional or not applicable:

- *Table C: Sites Identified or Rezoned to Accommodate Shortfall Housing Need and No Net-Loss Law (None in 2025 – Not Applicable)*
- *Table E: Commercial Development Bonus Approved pursuant to GC Section 65915.7 (None in 2025 – Not Applicable)*
- *Table F: Units Rehabilitated, Preserved and Acquired for Alternative Adequate Sites pursuant to Government Code section 65583.1(c) (Optional Table – Not Included)*
- *Table F2: Above Moderate Income Units Converted to Moderate Income Pursuant to Government Code section 65400.2 (None in 2025 – Not Applicable)*
- *Table G: Locally Owned Lands Included in the Housing Element Sites Inventory that have been sold, leased, or otherwise disposed of (None in 2025 – Not Applicable)*
- *Table J: Student housing development for lower income students for which was granted a density bonus pursuant to subparagraph (F) of paragraph (1) of subdivision (b) of Section 65915 (None in 2025 – Not Applicable)*
- *Table K: Tenant Preference Policy (No local tenant preference ordinance – Not Applicable)*
- *Table L: Historical Resources (No new sites designated historic in 2025- Not Applicable)*
- *Local Early Action Planning (LEAP) Reporting Table (No LEAP funding applied for in 2025- Not Applicable)*