



MEMORANDUM

DATE: 1/24/2019
TO: Planning Commission
FROM: Julia Ayres, Associate Planner, via John Swiecki, Community Development Director
SUBJECT: **Study Session: Inclusionary Housing and Density Bonus Ordinance Update**

Background

The current 2015-2022 Housing Element of the General Plan and recently adopted State law require updates to the City's Inclusionary Housing and Density Bonus Ordinance (BMC Chapter 17.31, adopted in 2009). In this context, the Planning Commission has reviewed the current regulations, recent regulatory trends in neighboring jurisdictions, and other pertinent information over the course of four workshops and study sessions from July to November in 2018.

Preliminary Modifications to the Ordinance for Review

In these previous discussions, the Planning Commission provided consensus on the following aspects of the ordinance update:

- Utilize a percentage-based inclusionary requirement for rental and for-sale housing developments instead of the current sliding scale requirement (15% inclusionary requirement for rental housing developments) and include at least one alternative to constructing the units, pursuant to AB 1505 (adopted 2017).
- Streamline the density bonus regulations in the Municipal Code to replace sections repeating language from State law with references to the governing State regulations, where applicable.

Consistent with this direction, staff drafted percentage-based inclusionary requirements and suggested alternatives (by-right and discretionary) in Attachment 1. The draft language revisions also lower the threshold for projects subject to the inclusionary requirements from six to five dwelling units or lots in order to make the threshold for density bonus and inclusionary housing projects uniform throughout the Chapter.

The draft language also suggests adjusting the income targeting of inclusionary housing units in rental developments to focus on very low income households, as opposed to low or moderate income households. The reason for this suggested income targeting modification is twofold:

- 1) The City currently has not issued or approved any residential developments for very low income households. Our Regional Housing Needs Allocation (RHNA) for the 2015-2022 planning cycle identifies the need for 114 dwelling units affordable to very low income households.
- 2) The Low Income Housing Tax Credit (LIHTC) program is geared toward this deeper affordability level. The LIHTC is a State-administered process whereby private capital is invested into affordable rental housing development in exchanges for tax credits. The LIHTC program requires eligible projects to provide housing affordable to households making no more

than 50-60 percent of the area's median income, which falls within the very low income household category.

Staff has also drafted suggested revisions to the density bonus requirements to add a category for small projects that do not qualify for a density bonus under State Density Bonus law, as well as an option for a developer to request one additional incentive or concession above that otherwise allowed by State Density Bonus law for projects that provide more than the minimum requirement of very low income housing (Attachment 2). This draft language is attached for the Commission's review. This is specifically intended to implement Housing Element Program H.B.5.a (excerpted in the attachment).

Staff also reviewed the density bonus regulations to reduce redundancy and ensure consistency with current State law. This portion of the ordinance is undergoing review by the City Attorney.

Additional Information

During prior discussions the Planning Commission also requested additional information on the following topics:

- More countywide data on inclusionary housing requirements and implementation.
- More information on how nexus fees and development impact fees are controlled and spent by a jurisdiction.
- Information on the income stratification of Brisbane residents.

Attachments 3, 4, and 5 address these data requests.

Discussion

Tonight's study session is intended primarily for the Commission to review the draft revisions to the inclusionary and density bonus requirements and give feedback to staff. Once the Commission has provided feedback on the breadth and content of revisions to the ordinance, staff will prepare a comprehensive update to the ordinance for Commission and community review at a public hearing. Additional study sessions may be required, depending on the Commission's discussion and direction.

Attachments:

1. Draft inclusionary housing regulation revisions
2. Draft density bonus regulation revisions
3. Countywide summary of inclusionary housing regulations, implementation status, and other information from 21 Elements
4. White paper on fees prepared by Goldfarb Lipman for 21 Elements
5. Brisbane household income estimates from 2017 American Communities Survey

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Draft Inclusionary Housing Requirements

17.31.030 - Basic inclusionary requirement.

- A. This section shall apply to all housing developments with five (5) or more dwelling units, except for the following:
 - 1. Housing developments that are developed pursuant to the terms of a development agreement executed prior to the effective date of this chapter, provided that such housing developments shall comply with any affordable housing requirements included in the development agreement.
 - 2. Housing development tentative or vesting tentative maps exempted by Government Code Section 66474.2 or 66498.1, provided that such maps shall comply with any predecessor ordinance in effect on the date the application for the map was deemed complete.
- B. For-sale Housing Developments. A for-sale housing development subject to the inclusionary requirements of this Chapter shall provide the following inclusionary lots or units, unless an alternative is elected pursuant to Section 17.31.050 of this Chapter:
 - 1. A for-sale housing development with five (5) to ten (10) dwelling units or lots must provide fifteen percent (15%) of the units at affordable ownership costs for moderate income households.
 - 2. A for-sale housing development of eleven (11) or more dwelling units or lots must provide ten percent (10%) of the units at affordable ownership costs for moderate income households and five percent (5%) of the units or lots at affordable ownership costs for lower income households.
- C. Rental Housing Developments. A rental housing development with five (5) or more dwelling units must provide fifteen percent (15%) of the units at affordable rents to very low income households.
- D. For purposes of calculating the number of inclusionary units required by this section, any calculations resulting in fractional units shall be rounded to the next larger integer. Additionally, any density bonus units authorized pursuant to this chapter shall not be counted as part of the housing development.
- E. Contemporaneous construction of five (5) or more dwelling units on a lot, or on contiguous lots for which there is evidence of common ownership or control, even though not covered by the same city land use approval, shall also be considered a single housing development. Construction shall be considered contemporaneous if any building permits are issued within five (5) years following the date of completion of any earlier construction.

17.31.050 - Alternatives to Constructing Inclusionary Units.

- A. For-Sale Housing Developments. Each applicant for a for-sale housing development subject to the requirements of this Chapter may, at the sole discretion of the applicant, elect to construct the required affordable for-sale lots or units as accessory dwelling units within the housing development. The accessory dwelling units shall comply with the development standards for accessory dwelling units established by Chapter 17.43 of this Title, and shall be rented to households whose gross incomes range between 50 and 70 percent of the area median income, subject to a recorded deed restriction and subject to the owner occupancy requirements established by Chapter 17.43 of this Title.
- B. Rental Housing Developments.
 - 1. An applicant for a rental housing development subject to the inclusionary requirements of this Chapter may, at the sole discretion of the applicant, elect to pay an in-lieu fee as

Attachment 1

established by resolution of the City Council, for each required inclusionary unit to the Brisbane Housing Authority's Low and Moderate Income Housing Fund, instead of constructing the inclusionary units within the residential development, pursuant to Government Code Section 65850(g).

2. An applicant for a rental housing development may request one or more of the following alternatives as an alternative to constructing the inclusionary units within the housing development, subject to City Council review and approval per subsection C of this Section:
 - a. **Off-Site Construction.** The applicant may request to construct some or all of the inclusionary units at a location within the City outside of the residential development. Off-site inclusionary units shall be located on sites that are compatible with adjacent land uses, appropriately zoned for the intended residential development, and are in proximity to or will provide access to employment opportunities, urban services, major roads or other public transit facilities.
 - b. **Dedication of Land.** The applicant may donate land within the City to the City or to a designee of the City that is suitable for affordable housing development. The land shall meet all of the requirements of Government Code Section 65915(g). The value of the land shall be not less than the sum of the in-lieu fee that would be due under subsection A.1 of this Section 17.31.050. The valuation of any land offered in-lieu shall be determined by an appraisal made by an appraiser mutually agreed upon by the City and the applicant. Costs associated with the appraisal shall be borne by the applicant.
 - c. **Funding of Affordable or Special Needs Housing Project.** The applicant may make a contribution to a special needs housing project or program or other affordable housing project in the City in an amount equivalent to the in-lieu fee payment per subsection A.1 of this Section 17.31.050.
 - d. **Other Alternatives.** The City Council may approve other alternatives to the construction of new inclusionary units. Alternatives may include, but are not limited to, acquisition and rehabilitation of affordable units, conversion of existing market-rate units to affordable units, or construction of special needs housing projects or programs (shelters, transitional housing, etc.).

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Draft Density Bonus Requirements

Excerpt from 2015-2022 Housing Element:

Policy H.B.5 Encourage utilization of the density bonus program to provide housing affordable to extremely-low, very-low- and/or low-income households, including supportive housing for extremely-low income families and larger households.

Program H.B.5.a Amend the Affordable Housing Ordinance (BMC Chapter 17.31) to permit the City to grant a proportionately lower density bonus and/or incentives for affordable housing projects that do not qualify under Government Code Section 65915 due to their small size or other limitations, as well as to grant a density bonus and/or other incentives greater than required for projects that meet or exceed the qualifications for a density bonus (as provided by AB 2280), such as those that include units for extremely-low-income families and larger households. Once the amendment is adopted, develop an outreach program to ensure its successful implementation.

Time Frame: December 31, 2016

Responsibility: Community Development Department, Planning Commission, City Council

Funding Source City funds

17.31.060 - Density bonuses.

H. A developer of a housing development containing between two (2) and four (4) dwelling units or lots may request City Council approval of a density bonus as shown in Table 17.31.060. The City shall waive or reduce any development standard that may preclude development of the project consistent with the requested bonus consistent with Section 17.31.070 of this Chapter.

Table 17.31.070

Zoning District	Lot Size	Percentage of lots or dwelling units affordable to lower income households	Density Bonus
R-2	4,950-7,499 SF	50% (1 unit)	30%
R-3	4,950 SF	30% (1 unit)	15%
	6,000 SF	50% (2 units)	15%
SCRO-1	5,000-5,999 SF	30% (1 unit)	15%
	6,000-7,499 SF	50% (2 units)	15%

17.31.070 - Incentives and concessions and waiver or reduction of development standards.

A. Subject to the findings included in Section 17.31.130, when a developer seeks a density bonus, the city shall grant incentives or concessions as described in Government Code Section 65915(d) and 65915.5, as may be amended over time. A developer of a housing development that exceeds the qualifications for a density bonus per Government Code Section 65915 may request that the city grant one additional incentive or concession above the maximum number prescribed by Government Code Section 65915(d)(2), as applicable to the project.

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Status of Inclusionary/Nexus Fee Requirements in San Mateo County

City	Date	Applicability	On-site Income and Unit Requirements	% of Total Units	Rounding	In-Lieu Fee	Term	Alternatives/Incentives/Other fees
Belmont	2017	For sale and rental; 25 units	For sale: 15% for moderate income households Rental: 15% for low income households.	15%	fractions of a unit round up	24 or fewer units \$20/s.f. for both single family and multi-family housing projects.	99 years	For-Sale : 24 units or less may provide 15% of the units at moderate income households rather than pay fee. 25 units or more may provide 15% of the dwelling units at affordable rent to low income households rather than provide for-sale units. For Rent: 24 units or less may provide 15% of the units at low income households rather than pay fee.
Colma	2015	For Sale ; 5 units	40% @ 50% AMI, 20% @ 80% AMI, 40% @ 120% AMI	20%	pay fee or provide unit	For sale: Fewer than 15 units For rent: n/a		Housing impact fee required for rental projects of 5 or more units and non-residential projects
Daly City	2014	For Sale; 5 units	For Sale: 100% @120%	20%	<0.50 round down; >0.50 round up	For sale projects only	55 years	Housing impact fee required for all rental projects; Off-site construction, land dedication, or combination of both
Half Moon Bay	2010	For Sale; 10 units	30% @ 50% AMI, 35% @ 80% AMI, 35% @ 120% AMI	20%	>0.50 round up provide unit	20% of the building permit valuation for the market rate units		
Menlo Park	2011	For Sale; 5 units	5-9 units: 100% @ <110% AMI 10-19 units: 100% @ <110% AMI 20+ units: 100% @ <110% AMI	5-9 units: 1 unit 10-19 units 10% 20+ units 15%	pay fee or provide unit	5-6 units: 2% of sale price 7+ units: 3% of sale price		Land dedication, off-site construction, or acquisition and rehabilitation of existing units.- subject to Council approval. For each on-site BMR unit provided developer may build one additional market rate unit.
Pacifica	2007	For Sale and rental; 8 units	50% @ 80% AMI 50% @120% AMI	15%	<0.50 round down; ≥0.50 round up	Cost of BMR unit	Ownership: 45 years, Rental: 55 years	Land dedication, off-site construction, in-lieu fees, combination- subject to Commission approval. Bonus available for on-site construction of BMR units
Redwood City	2018	For sale and rental; 20 units	10% moderate income, 5% low income, 5% VLI or alternative of equivalent value (Rental) 15% to Moderate Income (Sale)	Rental: 20% For sale: 15%	Pay in-lieu fee for fractional amounts	\$400k per unit (rental) 5-19 Units: Must pay \$20-25 fee per SF	Ownership: 30 years Rental: 55 years	Affordable Housing Commercial Linkage Fee

City	Date	Applicability	On-site Income and Unit Requirements	% of Total Units	Rounding	In-Lieu Fee	Term	Alternatives/Incentives/Other fees
San Bruno	2008	For Sale; 10 units	40% @ 80% AMI, 60% @ 120 AMI	15%	<0.50 round down; >0.50 round up	(# Units) X (Net Cost) X (15%) 5-10 units must pay fee		
San Carlos	2010	For Sale; 7 units	66.5% @ 80% AMI, 33.5% @ 120 AMI	15%	<0.50 round down; >0.50 round up pay fee	2-6 units only (Sale Price - Affordable Price) x units owned		Fewer/larger affordable units, deeper affordability/fewer units, off-site construction, historic structure preservation, rental affordable units in lieu of for-sale units, or combination
San Mateo City	2010	For Sale and Rental; 5 units	For Sale: 10% @ 80% AMI OR 15% @ 120 AMI Rental: 10% @ 50% AMI, OR 15% @ 80% AMI	Option: 10 or 15%, depending on income target	>0.50 round up to provide unit; <0.50 pay fractional fee (5-10 Units)	2017-18: 5-10 units only 5 units \$77,550 6 units \$93,060 7 units \$108,570 8 units \$124,080 9 units \$139,590 10 units \$155,100 10 or more must build	Ownership: 45 years Rental: perpetuity	Affordable Housing Commercial Linkage Fee In-lieu fee recalculated annually
South San Francisco	2018	For Sale and Rental; 4 units	For-Sale: 7.5% @120%, 7.5% @80% . Rental: 10% @ 80% of AMI (2018-19); 10% @80%, 5% @ 50% of AMI (2019 onward)	For-Sale: 15% Rental: 10% (2018-19), 15% (2019 onward)	>0.50 pay fee	\$308,000/ required BMR unit (economic feasibility study completed)	55 years	Off-Site Construction, Dedication of Land, Construction of Accessory Dwelling Units, Funding of Affordable Housing Project, acquisition and rehabilitation of affordable units, conversion of existing market units to affordable units, or construction of special needs housing projects or programs. All at Council discretion Affordable Housing Commercial Linkage Fee

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A SUMMARY OF LEGAL ISSUES REGARDING COMMERCIAL LINKAGE FEES AND AFFORDABLE HOUSING IMPACT FEES

Commercial linkage fees are impact fees charged to new retail, office, hotel and other *non-residential* development to offset the impact of commercial growth on the need for affordable housing. Affordable housing impact fees are charged to new market-rate *residential* development to offset the impact of new market-rate housing on the need for affordable housing. While some commercial linkage fees have been in place for over 25 years, affordable housing impact fees are relatively new.

I. What Are Nexus Studies?

Both commercial linkage fees and affordable housing impact fees must be justified by a ‘nexus study’ demonstrating that the amount of the fee is justified by the impact of typical development projects on the need for affordable housing.

Commercial Linkage Fees. A nexus study for a commercial linkage fee typically looks first at the number of employees generated by different types of development and the expected wages of those workers. This data is then translated into new households created by those workers and their expected household incomes, divided into various categories: very low income, low income, moderate income, and above moderate income. For each income category, the report calculates the dollar subsidy required to construct housing affordable to those workers and translates that into a cost per square foot of commercial development.

Affordable Housing Impact Fees. A nexus study for new market-rate housing is similar. It looks at the amount of income that new residents are expected to spend on local-serving jobs (retail, personal services, health care, education, etc.) and the new jobs that will be created by those increased expenditures. Once the number and expected income of those new jobs is determined, the study determines the need for affordable housing as is done for commercial linkage fees.

The impact of new housing on the need for affordable housing is usually less than the impact of new commercial development. For instance, in one study, each 100,000 square feet of office space was found to create a need for 84 affordable units, while each 100 condominium units were found to create a need for 18 affordable units.

II. Review in the Courts

Few published cases have reviewed either commercial linkage fees or affordable housing impact fees. In *Commercial Builders of Northern California v. City of Sacramento*,¹ the Ninth Circuit Court of Appeals in 1991 found the City of Sacramento's linkage fee to be constitutional. The City had completed a detailed nexus study showing the effects of commercial development on the need for low-income housing and had adopted a fee that raised only nine percent of the cost of the needed housing.² The court concluded that the fee “bears a *rational relationship* to a public cost closely associated with” new development.³

Generally Applicable Fees v. Individual Project Fees. A fee like Sacramento’s that is generally applicable to broad classes of development—offices, retail stores, apartments—need only be supported by studies showing that it is reasonably related to the impacts of new development “in the *generality* or *great majority* of cases.”⁴ However, if there is no set formula for calculating the fee, then the burden of proof is

¹ 941 F.2d 872 (9th Cir. 1991), *cert. denied* 504 U.S. 931 (1992).

² *See id.* at 873.

³ *Id.* at 874 (emphasis added).

⁴ *San Remo Hotel v. City & County of San Francisco*, 27 Cal 4th 643, 673 (2002).

on the community to demonstrate that the fee has an “essential nexus”⁵ and is “roughly proportional”⁶ to the specific impact of a project on the need for affordable housing.

In-Lieu Fees v. Nexus-Based Fees. Communities with adopted inclusionary ordinances may allow the developer to pay an “in-lieu fee” if the developer does not actually construct the units. While a nexus-based fee is based on the project’s impact on the need for affordable housing, an “in-lieu fee” is based on the cost to the locality of providing an affordable home if the developer does not build the home on site.. In *Calif. Building Industry Ass’n v. City of San Jose*,⁷ the California Supreme Court held that no nexus study is required to justify an inclusionary requirement that allows an in-lieu fee as an alternative.

However, because of State laws involving rent control, neither an inclusionary requirement nor an in-lieu fee can be applied to *rental* housing unless the developer agrees by contract to provide affordable rental housing in exchange for a public subsidy or regulatory incentives.⁸ Only a nexus-based fee can be charged to rental developments.

Amount of Fees. There are few legal constraints on the amount of fees. Nexus-based fees cannot exceed those justified by the nexus study. They must not be so high as to be confiscatory or to prevent all feasible use of the property, and housing development, in particular, must remain feasible to ensure that housing can be built as shown in a community’s housing element.

In general, policy considerations are usually more important than legal considerations in determining the amount of the fees. They are often set below the maximum justified amounts because of various policy considerations, such as comparisons with other cities.

III. Adoption of Nexus-Based Fees

Ordinance and Fee Resolution. Fees may be adopted by either ordinance or resolution. Most communities choose to adopt the actual fee *amount* by resolution so that the amount of the fee can be changed more easily if conditions change.

Housing developers have the right to provide affordable housing rather than paying the fee. Consequently, in almost all cases, the fee resolution is accompanied by an ordinance. Typical provisions include:

- Authority to adopt fees by resolution;
- Establishment of a restricted fund to receive the fees;
- Appropriate use of the fees;
- The amount of affordable housing required to mitigate the impact if proposed as an alternative to paying the fee;
- Basic standards for on-site affordable housing and provisions for ensuring affordability;
- Exemptions from fee payment;
- Waiver provisions to allow a developer to challenge the ordinance as applied to his/her property.

Some communities choose to adopt the ordinance as part of their zoning ordinance, while others adopt the ordinance as part of an impact fee ordinance. Several communities have adopted very basic ordinances and have included most of the above provisions in guidelines adopted by resolution.

CEQA Status. The adopted Guidelines under the California Environmental Quality Act state that a project subject to CEQA does not include “the creation of a government funding mechanism . . . which

⁵ *Nollan v. California Coastal Commission*, 483 U.S. 825, 837 (1987).

⁶ *Dolan v. City of Tigard*, 512 U.S. 374, 391 (1994).

⁷ 61 Cal. 4th 435 (2015).

⁸ See *Palmer/Sixth St. Props., L.P. v. City of Los Angeles*, 175 Cal. App. 4th 1396, 1410-11.

does not involve any commitment to any specific project which may result in a potentially significant physical impact on the environment.”⁹ Since the adoption of a fee schedule does not involve a commitment to any specific project, it is not a “project” and so is not subject to CEQA. It is irrelevant whether the fees are adopted by ordinance or resolution.

Adoption of an inclusionary ordinance usually does not involve any provisions that might require physical changes in the environment; the terms usually involve changes in the affordability of certain units, not their design. In this case, the inclusionary ordinance is often found to be exempt from CEQA under the “common sense exemption” because it can be determined with certainty “that there is no possibility that the activity in question may have a significant effect on the environment.” (Guidelines Section 15061(b)(3).)

Public Notice and Hearing. If an ordinance is adopted or amended as part of the adoption of the nexus-based fees, procedures established in state law, local ordinance, or city charter regarding notice and hearing for that type of ordinance must be followed.

The fees themselves must be adopted at a public hearing held by the City Council or Board of Supervisors after notice is provided as required by Government Code Section 66018. Additionally, although fees for affordable housing have not been determined to be “fees” as defined by the Mitigation Fee Act, agencies may wish to follow the notice procedures in Government Code Section 66019. These code sections together require:

- Two published notices with at least five days separating the notices (for example, published 10 days and 4 days before the public hearing);
- Notice to anyone requesting notice at least 14 days in advance of the hearing;
- Availability of supporting information 10 days before the hearing.

The fees may not become effective until 60 days after adoption. (See <http://21elements.com/Download-document/738-Hearing-Notice-Commercial-Linkage-and-Residential-Housing-Fees.html>, login required, contact Josh Abrams at 510.761.6001 for login)

IV. Other Issues

Use of Fees. The justification for nexus-based fees is that new development creates new jobs, and some of those employees need affordable housing. Consequently, nexus-based fees need to be used for housing that benefits *employees*. Use of the fees for types of housing where residents may not be employed, such as emergency shelters, senior housing, and supportive housing, may not be consistent with the purpose of the fees. If communities wish to use these fees for these types of housing, a survey should be done to determine if residents are typically employed. One community found that substantial proportion of persons using its shelters were, in fact, employed in the community.

Relation to Housing Element. The Housing Element does not need to be amended due to the adoption of housing fees or an inclusionary ordinance, nor does the ordinance need to be submitted to HCD.¹⁰ However, agencies should ensure that any fees or ordinances are consistent with the policies and programs in their Housing Elements.

⁹ CEQA Guidelines Section 15378(b)(4).

¹⁰ See *Action Apartment Ass’n v. City of Santa Monica* (2008) 166 Cal. App. 4th 456, 471.

Relation to State Density Bonus Law. No density bonus needs to be given for payment of housing fees. Bonuses need to be given only if affordable housing is provided on-site as part of a housing development or a land donation is included that conforms to the strict requirements of the statute.

The local agency's ordinance, resolution, or guidelines should establish the amount of affordable housing that must be provided on-site to mitigate the impacts of the project. If a project provides less housing than required to mitigate the impact, even if enough to allow a density bonus, then the agency can require fees to mitigate the remaining impact, prorated to reflect the amount of on-site mitigation provided. For instance, if a density bonus project provides 5% very low income units, but 10% are required to mitigate the impact, then the agency may impose half of its usual fees.

Fee Protests. Agencies should provide notice of the applicant's ability to protest the fees in the form required by Government Code Section 66020 at the time of project approval. If no notice is given, a protest may be lodged even while the units are under construction.

V. Summary: Considerations in Adopting Nexus-Based Fees

In adopting nexus-based fees, cities and counties should consider the following:

- Establishing generally applicable fees;
- Whether to retain any existing in-lieu fees;
- Adoption of ordinance or amendment to existing ordinance, if required;
- Whether to adopt zoning ordinance or impact fee ordinance;
- Which provisions to include in an ordinance, fee resolution, or guidelines;
- CEQA status;
- Requirements for notice and hearing;
- Use of the fees;
- Consistency with Housing Element;
- Procedures for providing notice of right to protest.

This document has been prepared by Goldfarb & Lipman LLP as a service to provide general information regarding nexus-based fees. This document does not represent the legal opinion of the firm or any member of the firm on the issues described, and the information contained in this publication should not be construed as legal advice. Should further analysis or explanation of the subject matter be required, please contact the attorney with whom you normally consult.

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2013-2017 American Community Survey 5-Year Estimates for City of Brisbane

	Occupied housing units	% occupied housing units	Owner-occupied housing units	% owner-occupied housing units	Renter-occupied housing units	% renter-occupied housing units
	Estimate		Estimate		Estimate	
Occupied housing units	1,871	1,871	1,386		485	
HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS)						
Less than \$5,000	0	0.0%	0	0.0%	0	0.0%
\$5,000 to \$9,999	76	4.1%	0	0.0%	76	15.7%
\$10,000 to \$14,999	0	0.0%	0	0.0%	0	0.0%
\$15,000 to \$19,999	44	2.4%	28	2.0%	16	3.3%
\$20,000 to \$24,999	0	0.0%	0	0.0%	0	0.0%
\$25,000 to \$34,999	185	9.9%	122	8.8%	63	13.0%
\$35,000 to \$49,999	152	8.1%	86	6.2%	66	13.6%
\$50,000 to \$74,999	152	8.1%	113	8.2%	39	8.0%
\$75,000 to \$99,999	249	13.3%	159	11.5%	90	18.6%
\$100,000 to \$149,999	387	20.7%	297	21.4%	90	18.6%
\$150,000 or more	626	33.5%	581	41.9%	45	9.3%
Median household income (dollars)	109,632	109,632	126,419	126,419	-	-
MONTHLY HOUSING COSTS						
Less than \$300	23	1.2%	23	1.7%	0	0.0%
\$300 to \$499	95	5.1%	95	6.9%	0	0.0%
\$500 to \$799	130	6.9%	119	8.6%	11	2.3%
\$800 to \$999	55	2.9%	20	1.4%	35	7.2%
\$1,000 to \$1,499	292	15.6%	204	14.7%	88	18.1%
\$1,500 to \$1,999	171	9.1%	46	3.3%	125	25.8%
\$2,000 to \$2,499	172	9.2%	106	7.6%	66	13.6%
\$2,500 to \$2,999	325	17.4%	212	15.3%	113	23.3%
\$3,000 or more	608	32.5%	561	40.5%	47	9.7%
No cash rent	0	0.0%	(X)	(X)	0	0.0%
Median (dollars)	2,493	2,493	2,689	2,689	1,934	1,934

Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates