



Request for Policy Analysis (Council Referrals)

Department Housing Rules Date April 1, 2026 Item C.1
 Department Rep. Name/Ext. Erik L. Soliván Councilmember Sponsorship Vice Mayor Foley, Councilmembers Campos, Tordillos, Cohen, and Casey
 Policy/Ordinance Subject Emergency Interim Housing (EIH) Siting Policy

Staff Recommendation

<input checked="" type="checkbox"/> GREEN Adopt based on tradeoffs outlined on next page	<input type="checkbox"/> YELLOW Defer to a later designated date or the annual Budget Process	<input type="checkbox"/> RED Recommend Council not adopt nominated idea	<input type="checkbox"/> NEEDS CLARIFICATION OR MORE TIME TO EVALUATE
---	--	--	--

Staff Evaluation

Is this already underway in a department work plan?	Is this time critical or an emergency?	Will this require substantial resources, staffing, budget, strategic support, or reprioritizing existing work plan?
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Criterion to Determine Scale of Project Complexity

Project complexity is determined by scoring the project in each of the 3 criteria below and then summing the score.

a. Low Complexity is a sum of 6 or less.

b. Medium Complexity is a sum of 7 – 9. Total Score = 9

c. High Complexity is a sum of 10 or greater.

Scoring Criterion		Low Complexity	Medium Complexity	High Complexity
	Estimated Duration	6 – 9 months <input type="checkbox"/> = 1	9 - 18 months <input checked="" type="checkbox"/> = 2	More than 18 months <input type="checkbox"/> = 3
(Internal)	Organizational Complexity	Can easily be absorbed into existing work plan <input type="checkbox"/> = 1	Planned work (future) <input checked="" type="checkbox"/> = 2	Work not currently proposed <input type="checkbox"/> = 3
	Have staff with required skillset/knowledge	<input type="checkbox"/> = 1	Have staff with required skillset/ requires moderate research <input checked="" type="checkbox"/> = 2	Do not have staff with required skillset/requires significant research <input type="checkbox"/> = 3
	Less than or equal 2 staff required	<input checked="" type="checkbox"/> = 1	3 - 4 staff required <input type="checkbox"/> = 2	More than 5 staff required <input type="checkbox"/> = 3
(External)	1 Additional department; no community outreach required <input type="checkbox"/> = 1	2 Other departments Involved; some community outreach required <input checked="" type="checkbox"/> = 2	3 or more departments and/or external partners involved; significant community outreach required <input type="checkbox"/> = 3	

DEPT. Required	<input type="checkbox"/> Airport	<input type="checkbox"/> Auditor	<input type="checkbox"/> CMO	<input type="checkbox"/> OEDCA	<input type="checkbox"/> ESD	<input type="checkbox"/> Fire	<input type="checkbox"/> HR	<input type="checkbox"/> IT	<input type="checkbox"/> PRNS	<input type="checkbox"/> Police	<input type="checkbox"/> Retirement
	<input type="checkbox"/> Attorney	<input type="checkbox"/> Clerk	<input type="checkbox"/> CMO – Budget	<input type="checkbox"/> Community Energy	<input type="checkbox"/> Finance	<input checked="" type="checkbox"/> Housing	<input type="checkbox"/> IPA	<input type="checkbox"/> Library	<input type="checkbox"/> PBCE	<input type="checkbox"/> PW	<input type="checkbox"/> DOT

CMO Approval: /s/ Lee Wilcox Date 3/24/2026

Analysis

Explain the rationale for staff recommendation, including any mitigating factors that need to be considered (recent legislative action, significant work plan changes, etc.). Please address the following as well.

GREEN LIGHT: The Administration can implement this nominated idea under its current work plan. Item should be sent to Council to add to department work plan. (1) How will the idea be approached? (2) If adopted, what is its impact and/or tradeoff to the City Council Focus Area or to a department work plan, including strategic support? (3) What is the minimum viable scope to move the idea forward and reduce its complexity?

Since 2017, the City Council has directed the development of emergency interim housing (EIH) across San José, with a preference for placing sites equitably in all council districts. The proposed siting policy will formally adopt this preference and apply it to all future EIH locations, providing clearer requirements for site selection of future, new sites that help prevent both the concentration of poverty and the clustering of new sites in any one area.

Key considerations for future EIH siting include:

1. Existing EIH site locations and the location of Permanent Supportive Housing (PSH) developments.
2. Neighborhood impacts, as well as proximity to services and public transportation.

YELLOW LIGHT: Administration recommends Council defer this nominated idea to a later designated date or the annual Budget Process due to (describe cost implications, workload impacts, or other factors)

RED LIGHT: The Administration recommends Council not to adopt this nominated idea due to (describe reason implementation would be difficult if not impossible – conflict with other laws, etc.).

Analysis (Continued)

3. Total development costs to ensure that new sites are financially sustainable.

4. As directed in the Rules and Open Government Committee memorandum titled "Emergency Interim Housing Siting Policy," incorporate the equitable distribution of EIH sites across city and track with the Reducing Unsheltered Homelessness City Council Focus Area, aligned with shelter system management.

This citywide distribution approach promotes fairness by preventing over-saturation of facilities in historically impacted neighborhoods, supports better outcomes for unhoused residents by allowing them to remain closer to their existing support networks, and reaffirms that reducing unsheltered homelessness is a shared responsibility. Taken together, these elements advance a more balanced, sustainable, and effective strategy for addressing homelessness across San José. The Housing Department anticipates implementing this direction by March 30, 2027 and will include this referral as part of the Department's work plan.