

Housing Commission Agenda Report

June 23, 2022
Item 4

- SUBJECT:** P21-0751, 2023-2031 (6th Cycle) Housing Element Update
- APPLICANT:** City of Pleasanton
- PURPOSE:** Review and provide comments on the 6th Cycle (2023-2031) Draft Housing Element
- EXHIBITS:**
- A. Draft Housing Element- [Online Only](#)
 - B. 5th Cycle Housing Element Goals, Policies and Programs Comparison Matrix
 - C. Public Comments

STAFF RECOMMENDATION

Staff recommends the Housing Commission review the 6th Cycle (2023-2031) Draft Housing Element Update and provide comments on the document.

SUMMARY

The City formally initiated the 6th Cycle (2023-2031) Housing Element update process in March 2021 with hearings beginning in May. Since then, there have been approximately 40 public meetings and outreach events to review key components of the Housing Element. Public input provided at these meetings, along with feedback from Commissions and direction from City Council, has been incorporated into a Draft Housing Element. The Draft Housing Element is available for public review and input from June 7 through July 19, 2022.

In order to facilitate public comment, in addition to this hearing, the City hosted a Community Meeting on June 14 and Planning Commission hearing on June 22. Additionally, a City Council hearing will be held on July 19. At any time during the public review period comments can be sent to staff via the project website, provided via email, or provided via mail correspondence. Tonight, staff is requesting the Housing Commission's review and feedback on the Draft Housing Element. Feedback will be reported to the City Council at their July 19 meeting, at which time staff will request direction to forward the document, including any modifications recommended by City Council, to the State Department of Housing and Community Development (HCD) for its required review.

BACKGROUND

The Housing Element is part of the City's General Plan and is a comprehensive statement by the community of its current and future housing needs and proposed actions to facilitate the provision of housing to meet those needs at all income levels. Periodic updates of the Housing Element are required by state law. The element reflects the state's housing goal of "attaining decent housing and a suitable living environment for every California family," as well as

incorporating the unique concerns of the community. The City's current Housing Element, which was adopted in 2015, covers the 5th Cycle planning period from 2015 to 2022. The Draft Housing Element for the Housing Commission's review at this meeting covers the 6th Cycle planning period from 2023-2031.

The City formally initiated the Housing Element update process in March 2021 with hearings beginning in May 2021. At each step of the process, the City has engaged the community through social media, the local press, utility bill mailing, website development, an online survey, and other methods. There have been approximately 40 public meetings and outreach events which included, among others, an in-person booth at the Farmers Market, community workshops, Commission meetings, and Council meetings. Staff also engaged with various stakeholder groups and representative of community-based organizations, as well as the development community, to seek input on opportunities and constraints and challenges around housing in Pleasanton. A summary of the meetings, outreach events, and key engagement themes are included in Section I.E of the Draft Housing Element.

There has also been focused fair housing outreach that included Zoom focus groups, a booth at the Muslim Community Center, a booth at a Dia Del Nino event, and an online survey among other methods. The survey was distributed through the senior center, the library's English learning and adult literacy programs, and with open heart kitchen meal service. It was also distributed to over 20 community organizations that included housing providers and service agencies. A summary of the focused fair housing outreach is included in Appendix F.

The Housing Commission has discussed various parts of the document over the course of five public hearings as follows:

- **May 13, 2021:** Project kick-off and introduction
- **August 24, 2021:** Discussed initial sites criteria to help screen and rank a list of potential sites to be rezoned to meet the City's Regional Housing Need Allocation (RHNA)
- **September 16, 2021:** Reviewed the Preliminary Report which included the Housing Needs Assessment, Housing Constraints Analysis, Existing Programs in the Housing Element, and Housing Resources
- **November 18, 2021:** Reviewed an initial list of potential sites under consideration for rezoning as part of the sites inventory
- **February 28, 2022:** Discussed several housing policy topics including the Inclusionary Zoning Ordinance, Lower-Income Housing Fund, Workforce Housing, Affordability by Design and other programs

The Draft Housing Element in circulation has been prepared to reflect the feedback and public process to date and is available for public review from June 7 through July 19, 2022. In order to facilitate public comment, in addition to this hearing, the City hosted a Community Meeting on June 14 and Planning Commission hearing on June 22. Key themes from those meetings will be reported to the Housing Commission as part of the staff presentation. Additionally, a City Council hearing will be held on July 19. Public comments can be provided to staff via the project website, provided via email, or provided via mail correspondence. Following the public review period, staff and the professional services team will implement revisions as necessary to the Draft Housing Element, prior to submittal to HCD.

Commission and public feedback will be reported to the Council at its meeting on July 19. If recommended by the Council at its meeting, the document will be submitted to HCD in August for its compulsory review, incorporating any revisions recommended by the City Council. HCD will have 90 days to review and comment on the draft document. After HCD's review period, ending in mid-November, staff will incorporate HCD's comments into another draft of the Housing Element for Housing Commission, Planning Commission, and City Council review and discussions/recommendations on the final inventory of housing sites.

Additionally, staff and the professional services team is preparing release of a program-level EIR for public review in fall of 2022; release of the EIR is also subject to a public comment period that will end around the conclusion of HCD's review. The timing allows for the information from the draft environmental analysis, as well as HCD's comments, to be factored into the Commission and Council review and related final direction on further amendments to the Draft Housing Element and sites inventory before it is finalized.

The updated Housing Element and environmental documents would then be re-submitted to HCD for a further review (30-60 days) during the first quarter of 2023, with adoption anticipated in spring of 2023.

HOUSING COMMISSION DISCUSSION

The Draft Housing Element, Exhibit A, is reflective of the requirements by the State and the public process to date. The document includes the four principal sections, and seven appendices as follows:

Main Housing Element Document: The draft document includes an introduction (Section 1), projected housing needs (Section 2), housing resources (Section 3), and the goals, policies, and programs for the Housing Element (Section 4).

The goals, policies, and programs are a key component of the document, representing the City's proposed "housing plan" with a focus on actionable steps and measures that the City will undertake to increase affordable housing and preserve and improve existing housing.

There are seven main goals with a set of policies and programs provided under each goal. Whereas the policies help to guide and inform future City decision-making and direction with respect to a broad range of housing-related topics, the programs provide actionable steps to implement the Housing Element's goals and to make further progress towards meeting the regional housing need allocation. Timeframes and responsibilities for each program are indicated in the text.

In developing the policies and programs, staff used those included in the 5th Cycle Housing Element as a starting point, carrying forward many of the same underlying themes, concepts, and ideas. However, the updated Draft Housing Element substantially revises and re-organizes the prior set of goals, policies, and programs, with the objective to consolidate policies and programs under a smaller number of goals and lesson redundancy that was found among many programs and policies. Modified actions were also re-worded to clarify intent or improved with greater action directive and specificity. As a required component of the Housing Element, Appendix D provides a review of the 5th Cycle programs, evaluates the City's progress towards achieving them, and notes whether they have been continued, discontinued, or modified in the update.

Given the extent of changes, staff has attempted to indicate the correlation between the 5th Cycle and 6th Cycle goals, policies, and programs in two ways. Within the body of the Draft Housing Element, policies and programs are noted as either “New” or “Modified”. When modified from a prior policy/program, reference is provided back to the 5th Cycle program or policy in question. Additionally, Attachment B provides a matrix of all 5th Cycle Housing Element goals, policies, and programs, and points to their disposition in the 6th Cycle Draft, whether deleted or modified.

Some of the new actions/programs may be required per State law (e.g., AB 2923 AB 1397, and SB 166), some are in response to the address housing constraints, and others are in response to feedback from the public, Commissions, and Council. New policies and programs are annotated in the Draft Housing Element text with [NEW] for reference.

Among these are new policies and programs to provide sufficient sites for housing development to accommodate Pleasanton’s share of the regional housing need including¹:

- Actively pursue partnerships and opportunities for the development of affordable housing units. *Policy 1.4*
- Monitor housing sites to ensure adequate sites to accommodate the remaining unmet RHNA by each income category are always maintained. *Program 1.2*
- Adopt zoning standards consistent with the Bay Area Rapid Transit (BART) Transit Oriented Development (TOD) Place Type: Neighborhood/Town Center for AB 2923-eligible parcels. This includes requiring a minimum of 75 dwelling units per acre and five stories. *Program 1.3*
- As required by state law (AB 1397), allow development by right subject to conformance with applicable objective design and development standards, when 20 percent or more of the units are affordable to lower-income households if a lower-income housing site was identified as a housing site (for any income level) in a previous Housing Element’s site inventory. *Program 1.4*
- Expand City efforts to acquire or assist in the development of one or more sites for housing affordable to lower-income households. *Program 1.5*
- Facilitate the development of the Kiewit and Stoneridge Mall properties with housing by undertaking certain actions including adopting a specific plan, master plan, or PUD for development. *Program 1.7*
- Facilitate production of ADUs by preparing and distributing standardized and/or pre-approved building plans and creating/maintaining information (e.g., funding opportunities) on an ADU resource webpage. *Program 1.9*
- Complete annexation of the housing sites located in unincorporated Alameda County (i.e., Lester and Merritt rezone parcels). *Program 1.10*

¹ Please note, the programs and policies are summarized below. For full text, please see the Draft Housing Element pages 20-52.

Policies and programs to facilitate housing production, reflecting a range of housing types, sizes, affordability levels, and tenure, and provide access to housing opportunities that meet the diverse needs of the community including:

- Ensure that new, non-residential development, and market-rate residential development, adequately mitigates the demand it creates for new affordable housing by requiring payment of the Lower-Income Housing Fee. *Policy 2.9*
- Offer local programs and support regional programs that minimize tenant displacement and help subsidize rents for eligible households. *Policy 2.12*
- Expand effectiveness of the Inclusionary Zoning Ordinance including increasing the proportion of inclusionary units required in multi-family projects to be up to 20 percent and identifying a target mix of affordable units (including proportions of very-low, low- and moderate-income units). *Program 2.1*
- Regularly evaluate the Lower-Income Housing Fee to ensure it remains commensurate with the needs generated by the development, is established at a level proportionate with the actual cost to provide new housing, and is in conformance with state law while ensuring that Pleasanton remains locally and regionally competitive in attracting new commercial investment. *Program 2.2*
- Increase support access to rental housing for lower-income households including studying the development of an enhanced local rental assistance program for the workforce that would help offset the costs of market-rate rents. *Program 2.8*
- Analyze and explore State programs and partnerships with major employers to acquire existing market rate housing units or develop new housing units to create moderate or workforce housing. *Program 2.11*

Policies and programs to conserve and improve the existing housing stock including:

- Define single-family homes (or equivalent) to include manufactured homes on a foundation as a conventional single-family home. *Program 3.1*
- Work cooperatively with the owners of existing mobile home parks to stabilize rents through implementation of existing agreements and ensure mobile home parks conversion only occurs in accordance with Government Code §65863.7. *Program 3.2*

Programs and policies to reduce governmental constraints to the development and improvement of housing where feasible including:

- Update and amend existing City design and development guidelines and standards for residential and mixed-use development, to incorporate objective standards. *Policy 4.1*
- Ensure that adequate infrastructure is available to support future planned residential growth. *Policy 4.2*
- Update City codes, policies and regulations, or the implementation thereof, as needed to comply with state law and remove governmental constraints to housing production. *Policy 4.3*
- Develop Objective Design Standards for multi-family and mixed-use development to eliminate subjectivity. *Program 4.2*
- Continue to develop and update plans to identify and address infrastructure deficiencies including conducting a sewer/wastewater capacity analysis to ensure future sewer infrastructure needs are met and continuing to plan for adequate water supply and infrastructure. *Program 4.4*

Programs and policies to address the community's special-housing needs including:

- Provide opportunities to accommodate housing that can assist with individuals' transitions from homelessness, including Single Room Occupancy units (SROs), emergency shelter, and transitional housing for unhoused residents. *Policy 5.4*
- Encourage the development of residential units that are accessible to persons with disabilities or are adaptable for conversion to residential use by persons with disabilities. *Policy 5.6*
- Pursue development and adoption of a local or subregional (Tri-Valley) homeless strategic framework that would incorporate strategies and programs tailored towards the specific needs of Pleasanton's unhoused residents. *Program 5.1*
- Dedicate funding and staff resources to support regional and subregional efforts to address homelessness through a series of programs. *Program 5.2*
- Implement amendments to the Pleasanton Municipal Code to remove governmental constraints and facilitate special needs housing including allowing SROs, allowing transition and supportive housing by right, allowing low barrier navigation centers by right, and amending the emergency shelter separation requirement. *Program 5.6*

Programs and policies to plan effectively for new development and ensure housing is developed in a manner that reduces its environmental impacts, keeps pace with available infrastructure and services, improves the quality of life and for existing and new residents, and is compatible with existing development and adjacent uses including:

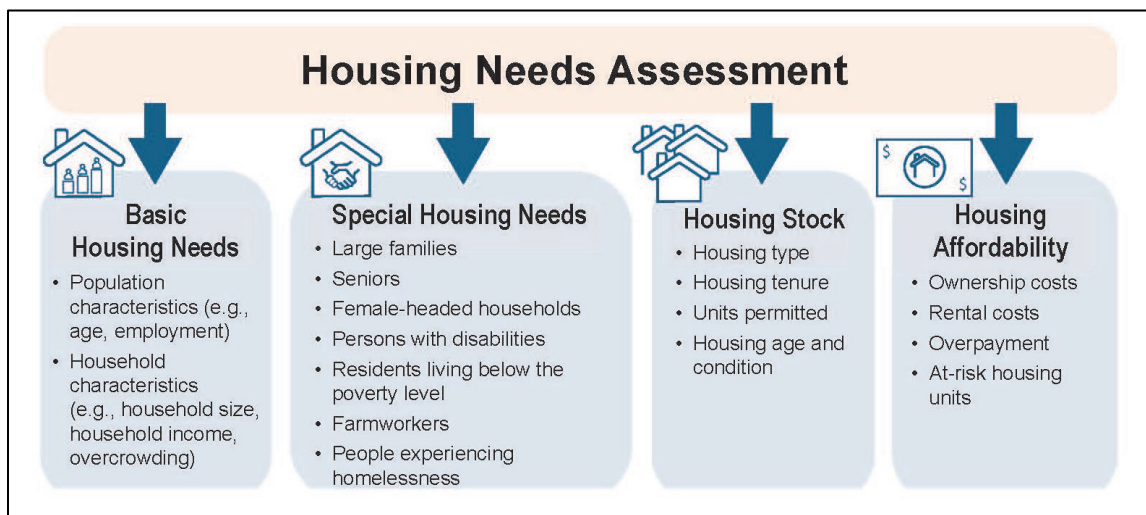
- Seek to improve the local jobs-housing balance and increase the percentage of residents that both live and work in Pleasanton, by accommodating additional housing within the City and facilitating the provision of housing at affordability levels that match local wages, including households with lower-wage jobs. *Policy 6.2*
- Ensure that new housing development and improvements to existing housing (e.g., rehabilitation, remodels, and additions) integrate sustainable design and energy efficiency features. *Policy 6.4*
- Encourage new housing to be located in areas well-served by public transit and the active transportation network and seek to improve these facilities throughout the city. *Policy 6.5*
- Develop and adopt Objective Design and Development Standards for each of the sites zoned for densities above 30 dwelling units per acre. *Program 6.1*
- Implement the Climate Action Plan's (CAP 2.0) applicable actions related to new residential construction, improving residential water and energy efficiency, and reducing VMTs associated with new units. *Program 6.2*
- Enhance multimodal transportation throughout Pleasanton by implementing the network of bicycle and pedestrian facilities envisioned in the Bicycle and Pedestrian Master Plan through several funding approaches, actively participating as a member agency of LAVTA, ValleyLink, and State and regional advocacy efforts to secure improved transit service to and throughout Pleasanton. *Program 6.4*
- Implement the policies and programs of the Downtown Specific Plan (DSP) that aim to improve the amenities, livability, and level of investment in Downtown neighborhoods. *Program 6.6*

Programs and policies to affirmatively further fair housing including:

- As part of the City’s Diversity, Equity, and Inclusion (DEI) efforts, identify and adopt specific practices and strategies to foster greater inclusivity and equity in access to all City programs and services. *Program 7.4*

Appendix A - Housing Needs Assessment: The Housing Needs Assessment establishes the foundation for understanding Pleasanton’s housing needs. It analyzes a range of demographic, economic, and housing-related variables that help define the extent and context of the city’s housing-related needs. As illustrated in Figure 1 below from Appendix A, the needs assessment includes an analysis of the city’s population, special needs groups, employment, housing stock, and housing affordability. Information in this section provides a basis from which to build housing goals, policies, and programs to address those needs. This appendix was previously reviewed by the Commission but includes minor clarifications and edits to the text to respond to feedback.

Figure 1: Housing Needs Assessment Content



Appendix B - Sites Inventory and Methodology: Identifies locations of available sites for housing development to ensure that there is adequate capacity to address the RHNA, in each of the affordability categories.

As shown in Appendix B, the City’s existing zoning (i.e., residential development capacity that exists currently within Pleasanton’s residential and mixed-use zoning districts) and “pipeline” of entitled projects is estimated to accommodate approximately 2,792 housing units; this number includes 93 ADUs that are assumed will be built during the Housing Element period.

As seen in Figure 2 below from Appendix B, this estimated capacity reflects a shortfall when compared to the total RHNA allocation (total of 5,965 units). Thus, a total of up to 25 additional sites have been identified which may be considered for future re-zoning to allow housing, to provide adequate sites capacity to meet the RHNA. Currently, the sites inventory includes a surplus of units above the required RHNA, particularly in the very-low/low-income category (generally derived from sites identified for density above 30 dwelling units/acre), and a smaller surplus of moderate- and above-moderate units.

Staff notes that the distribution of units across income categories varies somewhat from the estimates provided in earlier stages of the process, which was much more preliminary in nature. A majority of those changes resulted in shifting projected unit capacity from the lower-income category, to either moderate or above-moderate – primarily based on screening sites through the detailed criteria set forth by HCD for sites considered suitable to accommodate lower-income housing (such as site size).

Figure 2: Appendix B, Table B-11, Residential Development Potential and RHNA

	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
RHNA	See Very Low	1,750	1,008	894	2,313	5,965
ADUs	See Very Low	5	28	46	14	93
Approved/Entitled Projects	-	-	23	-	393	416
Remaining RHNA	See Very Low	1,745	957	848	1,906	5,456
Site Inventory	See Very Low/Low	1,090		552	641	2,283
Surplus / (Shortfall)	See Very Low/Low	(1,612)		(296)	(1,265)	(3,173)
Rezone Sites (Net New)	See Very Low/Low	2,814		454	1,421	4,689
Surplus / (Shortfall) With Rezone Sites	See Very Low/Low	1,202		158	156	1,516
<i>Source: City of Pleasanton, LWC</i>						

This approach in the current draft was recommended by City Council to allow the City to account for outcomes of other review and analysis that is still pending, including the CEQA analysis, review by HCD, and additional public input; it will allow the greatest flexibility after HCD’s initial review. The adequacy of the sites inventory will be evaluated by HCD and this input may result in removal of some sites, reduced favorability of certain sites, and/or suggested modifications of capacity and affordability assumptions. In any case, during the final phases of Housing Element review that will take place at the end of this year, the City Council will further narrow the sites list to provide a unit count that is closer to the needed RHNA number.

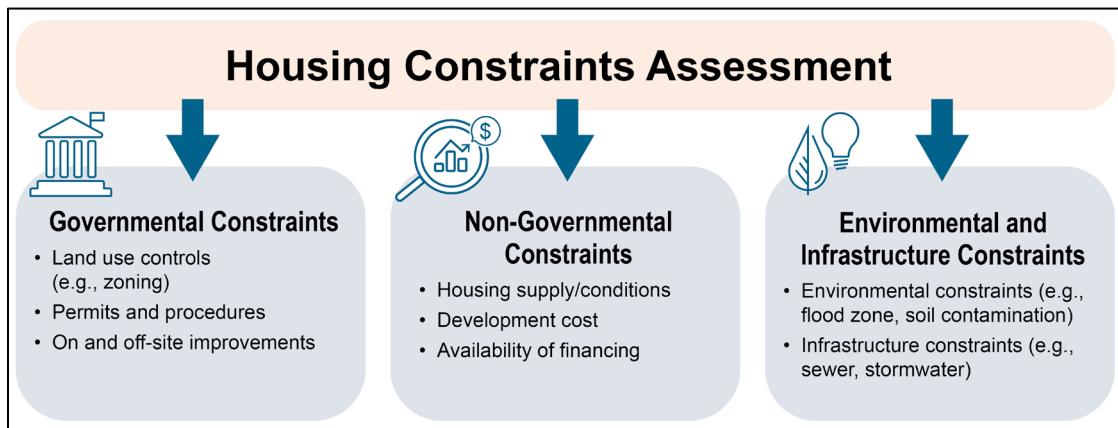
With respect to above-moderate capacity, staff notes that provisions of Housing Element law for sites subject to annexation (i.e. the Lester and Merritt sites) will require the City and Alameda County to negotiate transfer of a portion of Alameda County’s RHNA to the City, to account for incorporation of those parcels into the City of Pleasanton. This negotiation would occur following a future annexation – and while it is likely that the number of RHNA units transferred will be a less than the unit counts noted in the sites analysis (since development in the County could not occur at a similar density without connection to City utilities), the above-moderate inventory is nonetheless sized nonetheless to accommodate such a potential transfer.

It is also noted that all of the sites listed under Appendix B are being analyzed in the CEQA process which, in addition to flexibility through the Housing Element process, may help address

“no net loss” provisions of state law². The City could use this broader list as an inventory of potential *additional* sites that are not included in the Housing Element at the time of adoption, but eligible to be considered at a future date for rezoning if needed, that have already been through the necessary CEQA review.

Appendix C - Housing Constraints Analysis: Analyzes and recommends remedies for existing and potential governmental and nongovernmental barriers to housing development. Figure 3 illustrates these components, as addressed in Appendix C. This appendix was previously reviewed by the Commission but includes very minor clarifications and edits to the text to respond to feedback.

Figure 3: Housing Constraints Assessment Contents



Appendix D - Existing Programs Evaluation and Review: Reviews the prior Housing Element to measure progress in implementing policies and programs. This Appendix evaluates which programs were successful and should be continued, and which programs were ineffective and should be removed or modified. Examples of recommended modifications include integrating changes to reflect state law updates (e.g., no net loss (SB 166), Housing Crisis Act (SB 330), supportive housing, emergency shelters, etc.) and providing more specificity in terms of City actions. This appendix was previously reviewed by the Commission but includes modifications to more closely reflect the array of revised programs included in Section 4 of the Housing Element document.

Appendix E - Public Participation Summaries: Summarizes community outreach and engagement meeting and surveys, with a particular focus on outreach to traditionally underrepresented groups. Additional outreach summaries are provided in Appendix F that are specific to Fair Housing. This appendix will continue to be updated until the conclusion of the public process.

Appendix F - Affirmatively Furthering Fair Housing (AFFH): Affirmatively Furthering Fair Housing (AFFH) is a new requirement for the 6th Cycle and is included based on a 2018 State law (AB 686). AB 686 requires the Housing Element to comprehensively analyze and address

² “No net loss” provisions are a component of the Housing Accountability Act, which, whenever a project is approved with few units, or less affordability than cited in the Housing Element, requires findings to be made that adequate zoning capacity remains in the inventory to accommodate the units not built, or for the City to re-zone additional sites to accommodate that number of units.

patterns of exclusion and segregation (looking both locally and regionally), and to identify meaningful actions and strategies to address those issues and their “contributing factors.” The exhaustive AFFH analysis reflects detailed guidance provided by HCD, as well as best practices from other regions that have already gone through HCD review and certification. The analysis relies both on approved data sets, as well as local knowledge and community input. The analysis includes five sections as follows:

- **Inclusive and Equitable Outreach:** A summary of fair housing outreach and capacity that includes all economic segments of the community.
- **Assessment of Fair Housing:** An assessment of fair housing issues, including integration and segregation patterns, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs for all identified populations. Many of the key issues reflect those identified more generally in the housing needs assessment, including overpayment for housing, particularly among renters, and lack of affordability that is most acute for the lower-wage workforce, the disabled, and seniors. Geographically, downtown Pleasanton was identified as an area where there may be a greater risk for displacement of existing renters and lower-income residents. Lack of access to fair housing resources, especially for those who English is not a primary language, was further identified as a contributing factor in fair housing issues.
- **Analysis of Sites Inventory:** An evaluation of whether the Housing Element’s sites inventory improves or exacerbates conditions for fair housing. The analysis concludes that the sites inventory would not worsen fair housing conditions.
- **Identification of Contributing Factors:** The identification and prioritization of contributing factors related to fair housing issues. Some of the key contributing factors to fair housing issues in Pleasanton include the location and type of housing, lack of affordable, integrated housing for persons with special needs, displacement due to economic pressures, community opposition to housing over time, and lack of marketing and language access regarding housing opportunities and resources.
- **Priorities, Goals, and Actions to Affirmatively Further Fair Housing:** The identification of fair housing goals and actions that directly address the City’s contributing factors.

This newly drafted appendix was not previously reviewed by the Commission.

Appendix G - Housing Resources: Identifies local resources available to support the continued development, preservation, and rehabilitation of housing in Pleasanton; as well as opportunities for energy conservation. In addition to Pleasanton-specific resources, there are regional resources that can support the City’s housing goals, including those offered through Alameda County and the Housing Authority of the County of Alameda (HACA), the State, and the Federal government. This appendix was previously reviewed by the Commission but includes very minor clarifications and edits to the text to respond to feedback.

ENVIRONMENTAL ASSESSMENT

The City is preparing a program-level EIR pursuant to the requirements of CEQA. The Draft Program EIR (DEIR) will focus on changes to land use designations to accommodate residential uses for sites identified in the Housing Element Update and will evaluate the potential environmental impacts of those land use and zoning changes, as well as the implementation of policies and programs included in the updated Housing Element. The DEIR is anticipated to be released for public review in fall 2022. A 45-day public review period will follow release of the

DEIR. The Final EIR, including responses to comments will be considered for certification at the same time as the Housing Element adoption hearings.

PUBLIC NOTICE AND COMMENTS

Notice of this item was published in The Valley Times. This item was also identified in the Pleasanton Weekly's "Agenda Highlights" for upcoming public meetings, and an email notification was sent to all interested parties who have signed up on the Housing Element website: pleasantonhousingelement.com. Staff has received eight public comments specific for this meeting at time of agenda report publication which are included as Exhibit C. Additionally, staff has attached public comments since housing policies were first discussed on February 9. Staff will report on the outcomes of the June 14 Community Meeting and June 22 Planning Commission meeting, since the timing of publication of this report did not allow this information to be included.

CONCLUSION AND RECOMMENDATION

Staff seeks the Housing Commission's review and feedback on the Draft Housing Element, including any recommended revisions or modifications before the document is submitted to HCD for its review.

NEXT STEPS

In addition to the Community Meeting on June 14, the Planning Commission hearing on June 22, and this Housing Commission hearing, there will be a City Council hearing on July 19. Beyond this current round of review and comment, several critical steps remain in the Housing Element process, summarized below:

- **HCD Review of Draft Housing Element (August-November 2022):** Following the forthcoming public review, the Draft, including any revisions recommended by the City Council, will be submitted to HCD. Staff anticipates submitting the Draft in mid-late August. HCD then has a full 90 days to complete its review and provide comments to the City (i.e., HCD's comments would be expected in approximately mid-November).
- **Release of Draft Environmental Impact Report and EIR Comment Period (October-November 2022):** The Housing Element EIR is currently being developed and is anticipated to be released in October 2022. Release of the Draft EIR starts a 45-day comment period, the conclusion of which will approximately coincide with receipt of HCD comments in mid-November.
- **Commissions, Council and Public Meetings – Revised Draft Housing Element (November 2022 -January 2023):** Following publication of the Draft EIR and receipt of HCD comments, staff expects to hold a series of public meetings to seek input on potential revisions to the Housing Element, prior to its resubmittal to HCD. These meetings will include discussion of refinements/narrowing of the Housing Sites inventory, and other components of the Housing Element as needed, based on the outcomes of the prior review and environmental findings.
- **Resubmittal of Housing Element to HCD (January – March 2023).** The revised Housing Element must be re-submitted to HCD, which has 30-60 days to review the document and issue a letter of substantial compliance.

- **Adoption Hearings (March-May 2023).** The Commission and City Council will conduct public hearings to consider adoption of the Housing Element and Certification of the EIR.

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