

**City of Pleasanton 6th Cycle Housing Element
HCD November 14, 2022 Letter - Comments and Responses - DRAFT
December 2, 2022**

Finding/ Comment #	Comment	Response	Reference
A. Review and Revision			
A	<p><i>Review the previous element to evaluate the appropriateness, effectiveness, and progress in implementation, and reflect the results of this review in the revised element. (Gov. Code, § 65588 (a) and (b).)</i></p> <p>As part of the review of programs in the past cycle, the element must also provide an evaluation of the effectiveness of goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female headed households, farmworkers and persons experiencing homelessness). Programs should be revised as appropriate to reflect the results of this evaluation.</p>	A more detailed discussion of the effectiveness of 2015 Housing Element goals, policies, and programs in meeting the housing needs of special needs populations will be added. This will include a reference to proposed programs targeting special needs populations under Goal 5.	Appendix D (Existing Programs Review), Section D.1 (Existing Housing Programs Review)
B. Housing Needs, Resources, and Constraints			
B.1	<p><i>Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2...shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)</i></p> <p><u>Patterns and Trends:</u> While the element reports general information and data, it must analyze this data for trends over time, patterns across census tracts, and coincidence with other components of the assessment of fair housing. Additionally, the element must evaluate patterns on a regional basis, comparing the City within the Tri-Valley subregion and Alameda County or bay area region as a whole. This analysis should particularly emphasize disparities in income compared to the region and include appropriate programmatic responses to encourage housing mobility and promote new affordable housing opportunities throughout the City, regardless of the regional housing need allocation (RHNA).</p>	Tri-Valley data will be added to supplement comparisons with Alameda County. Data for familial status over time will be added. Programs to promote new affordable housing opportunities throughout the city will be referenced and emphasized.	Appendix F (Affirmatively Furthering Fair Housing), Section F.4.2 (Integration and Segregation); Section F.6 (Contributing Factors and Meaningful Actions)
B.1 (cont)	<p><u>Identified Sites and Affirmatively Furthering Fair Housing (AFFH):</u> The element includes some discussion regarding sites and the assessment factors of the fair housing section. However, this approach to whether identified sites affirmatively further fair housing must also account for the location of identified sites by income group. A full analysis should address the income categories of identified sites with respect to location, the number of sites and units by all income groups and how that affects the existing patterns for all components of the assessment of fair housing (e.g., segregation and integration, access to opportunity). In addition, the analysis should be supported by local data and knowledge and other relevant factors. The element should also discuss whether the distribution of sites improves or exacerbates conditions, including any isolation of the RHNA. If sites exacerbate conditions or isolate the RHNA, the element should identify further program actions that will be taken to promote inclusive communities and equitable quality of life throughout the community (e.g., housing mobility and new housing choices and affordability in higher resource or higher income areas).</p>	AFFH sites analysis maps (Section F.5) will be revised to show income levels of sites. A subarea sites analysis will be prepared to show distribution of sites and unit capacity by income groups relative to subareas and all components of the assessment of fair housing. Analysis will be summarized in table format. Analysis will conclude whether the distribution of sites improves or exacerbates conditions, including any isolation of RHNA. If conditions are found to be exacerbated or RHNA isolated, new program(s) will be added to promote inclusive communities and equitable quality of life throughout the community. This analysis will be completed after the final sites list is approved by the City Council on December 20, 2022.	Appendix F (Affirmatively Furthering Fair Housing), Section F.5 (Site Inventory)

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B.2	<p><i>Include an analysis of population and employment trends and documentation of projections and a quantification of the locality's existing and projected needs for all income levels, including extremely low-income households. (Gov. Code, § 65583, subd. (a)(1).)</i></p> <p><i>Include an analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition. (Gov. Code, § 65583, subd. (a)(2).)</i></p> <p><i>Analyze any special housing needs such as elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. (Gov. Code, § 65583, subd. (a)(7).)</i></p> <p><u>Extremely Low-Income (ELI) Households:</u> While the element quantifies existing and projected ELI households, it must also analyze their housing needs. The analysis of ELI housing needs could consider tenure, overpayment, resources and the effectiveness of strategies and the magnitude of housing need. To assist the analysis, see the enclosed data and sample analysis at http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/extremely-low-income-housing-needs.shtml.</p>	<p>A subsection on extremely low-income households will be added to the housing needs assessment (Appendix A). This will summarize data, resources, and strategies currently dispersed throughout the draft Housing Element.</p>	<p>Appendix A (Housing Needs Assessment), Section A.3.4 (Special Housing Needs)</p>
B.2 (cont)	<p><u>Overpayment:</u> While the element identifies the total number of households overpaying for housing (pp. A-59 to A-67), it must quantify and analyze the number of lower-income households overpaying for housing by tenure (i.e., renter and owner) and add or modify policies and programs as appropriate.</p>	<p>Additional detail on overpayment data will be added with reference to relevant programs.</p>	<p>Appendix A (Housing Needs Assessment), Section A.5.3 (Overpayment)</p>
B.2 (cont)	<p><u>Special Housing Needs:</u> While the element reports data on households and persons with special housing needs, the element must also describe the resources available and effectiveness of strategies to these special housing needs groups, then determine the magnitude of housing needs to better formulate policies and programs.</p>	<p>Resources available to special needs populations and effectiveness of strategies will be added. Also, see Finding/Comment A.</p>	<p>Appendix A (Housing Needs Assessment), Section A.3.4 (Special Housing Needs)</p>
B.3	<p><i>An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)</i></p> <p><u>Suitability of Nonvacant Sites:</u> The element must include an analysis demonstrating the potential for redevelopment of nonvacant sites. The analysis shall consider factors including the extent to which existing uses may constitute an impediment to additional residential development, the City's past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites. For example, the element lists various factors (e.g., age of structure, development capacity through density and FAR) utilized to indicate the potential for redevelopment in the planning period; however, it should support the validity of these factors. To support these factors, the element should evaluate development trends or recent experience in redevelopment relative to the factors. For example, the element could utilize Table B-9 (Development on Nonvacant Sites in the Tri-Valley) and list the values of the factors for prior uses.</p>	<p>Data on existing/previous uses and other information (e.g., building age) will be added to the pipeline project table (Table B-3) if available. Similar data will be added to nonvacant sites development Table B-9 as available. Discussion will be expanded to reflect this data.</p>	<p>Appendix B (Sites Inventory & Methodology), Section B.2.2 (Entitled and Proposed Developments) and Section B.2.5 (Suitability of Nonvacant Sites)</p>
B.3 (cont)	<p>In addition, specific analysis and actions are necessary if the housing element relies upon nonvacant sites to accommodate more than 50 percent of the RHNA for lower-income households. For your information, the housing element must demonstrate existing uses are not an impediment to additional residential development and will likely discontinue in the planning period. Absent findings (e.g., adoption resolution) based on substantial evidence, the existing uses will be presumed to impede additional residential development and will not be utilized toward demonstrating adequate sites to accommodate the RHNA.</p>	<p>The required finding will be included in the resolution adopting the Housing Element.</p>	<p>N/A</p>
B.3 (cont)	<p>Finally, the housing element must include a program to provide replacement housing. (Gov. Code, § 65583.2, subd. (g)(3).) The replacement housing program must adhere to the same requirements as set forth in Government Code section 65915, subdivision (c), paragraph (3).</p>	<p>A new program will be added that reflects state law requirements for replacement of protected housing units.</p>	<p>New program under Goal 3 (Conserve and improve the existing housing stock).</p>

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B.3 (cont)	<p>Large Sites: While the element states large sites will only use ten acres of buildable acreage to accommodate lower-income RHNA, it must still provide analysis regarding the development of housing for lower-income households on large sites where the acreage of the parcel exceeds ten acres. Absent sufficient evidence that sites of equivalent size with affordability were successfully developed during the planning prior planning period or other evidence that demonstrates the suitability of these sites, the large sites are deemed inadequate to accommodate housing for lower-income households. For example, the element should describe the characteristics of anticipated development on identified large sites, including opportunities and timing for specific-plan development, further subdivision, parceling, site planning or other methods to facilitate appropriately sized sites that encourage the development of housing affordable to lower-income households. Based on the outcomes of this analysis, the element should add or modify programs.</p>	<p>A discussion of successful development of 5th Cycle sites (Avalon Bay and Vintage) will be discussed. Owner interest and proposed plans for Hacienda Terrace site will be added to discussion. Program 1.7 will be expanded to include outreach efforts with other large site owners to facilitate development (Hacienda Terrace, Metro 580, and Oracle).</p>	<p>Appendix B (Sites Inventory & Methodology), Section B.2.4 (Methodology) - Phase 3: Categorization; Program 1.7</p>
B.3 (cont)	<p>Environmental Constraints: While the element provides information on general environmental constraints, it should also relate those constraints to identified sites, including a discussion of any other known conditions (e.g., shape, easements, contamination) and impacts on development in the planning period.</p>	<p>Statements identifying that no environmental constraints, contamination, easements, or parcel shape would constrain housing will be added. Information from the Draft EIR will be reference as appropriate. Discussion will also note that development capacities reflect conservative estimates and site conditions (e.g., buildable area).</p>	<p>Appendix B (Sites Inventory & Methodology), Section B.2.4 (Methodology) - Phase 4: Site-by-Site Assessment</p>
B.3 (cont)	<p>Infrastructure: The element includes some discussion on water and sewer providers in the City (pp. C-41 to C-43). However, it must also clarify whether sufficient total water and sewer capacity (existing and planned) can accommodate the regional housing need and include programs if necessary.</p>	<p>Discussion will be expanded to describe that sewer capacity is sufficient to accommodate RHNA, but that water supply is a constraint consistent with the Draft EIR. A program will be added to identify that the City will implement a solution to address water supply.</p>	<p>Appendix B (Sites Inventory & Methodology), Section B.2.4 (Methodology) - Phase 4: Site-by-Site Assessment; Appendix C (Housing Constraints), Section C.4.2 (Infrastructure Constraints)</p>
B.3 (cont)	<p>Electronic Sites Inventory: For your information, pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD. Please see HCD's housing element webpage at https://www.hcd.ca.gov/community-development/housing-element/index.shtml#element for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance.</p>	<p>Form will be submitted with the adopted Housing Element.</p>	<p>N/A</p>
B.3 (cont)	<p>Zoning for a Variety of Housing Types (Emergency Shelters): Parking requirements for emergency shelters should only be the number of spaces necessary for staff working in the shelter and no more than other uses in the same zones. The element indicates one space per four shelter beds plus one parking space for each employee then concludes the standards is similar to hotel uses. However, a standard of one space per four beds is more than what is necessary to accommodate staff. As a result, the element should add or modify programs to revise parking requirements for emergency shelters in compliance with state law.</p>	<p>Analysis will be revised to describe that emergency shelter parking requirement exceed that allowed by state law. Program 5.6 will be revised to include an amendment to emergency shelter parking requirements consistent with state law.</p>	<p>Appendix C (Housing Constraints), Section C.2.2 (Land Use Controls) - Emergency Shelters/Low Barrier Navigation Centers; Program 5.6.</p>
B.4	<p><i>An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures... (Gov. Code, § 65583, subd. (a)(5).)</i></p> <p><i>An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including... requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Government Code section 65583.2, and the length of time between receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality's share of the regional housing need in accordance with Government Code section 65584... (Gov. Code, § 65583, subd. (a)(6).)</i></p> <p>Land Use Controls: While the element describes development standards and some land use controls, it must also analyze those land use controls for impacts on housing supply (number of units), costs, financial feasibility, timing, approval certainty and ability to achieve maximum densities without exceptions (e.g., conditional use permits, variance, planned development).</p>	<p>Additional discussion of RM zones will be added. A program will be added to conduct additional analysis and testing of standards in the RM zones and modify those standards to ensure maximum density can be achieved in the RM zones without exception (e.g., PUD).</p>	<p>Appendix C (Housing Constraints), Section C.2.2 (Land Use Controls) - Development Standards</p>

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B.4 (cont)	In addition, the element concludes development standards are not an impediment to residential development as the use of the Planned Unit Development (PUD) process allows for standards to be created on a case-by-case basis. However, the element should address development standards, specifically parking, use of mid-point density, and heights, for impacts on cost, supply, housing choice, approval and project certainty, and financial feasibility, and include programs to address identified constraints.	Parking analysis will be expanded and a new program added to establish lower multi-family parking rates for studio and one-bedroom units and not require covered parking for studio and one-bedroom units. PUD discussion will be expanded and program added for a modified PUD process for rezone sites that is a conformance review (applies only objective standards and does not require Council approval).	Appendix C (Housing Constraints), Section C.2.2 (Land Use Controls) - Development Standards
B.4 (cont)	<u>Fees and Exaction:</u> While the element describes required fees for single family and multifamily housing development, it must also analyze their impact as potential constraints on housing supply, cost and feasibility. For example, the element (p. C-35) concludes that fees account for a portion of total development costs for a multifamily project but should also evaluate the impacts to support this conclusion, including the impact of fees individually and cumulatively. Excessive fees for housing developments have significant impacts on housing cost, feasibility and production; especially when considering various housing types. The element should include an evaluation of these fees and add programs to address this constraint.	Fee analysis conclusion will discuss City impact fees as being lower or comparable to neighboring jurisdictions. Program 2.3 will be revised to commit to revising fees to a per square foot basis where feasible.	Appendix C (Housing Constraints), Section C.2.4 (Permits and Procedures) - Fee Analysis; Program 2.3
B.4 (cont)	<u>Local Processing and Permit Procedures:</u> The element generally describes the Planned Unit Development (PUD) process but must analyze this process for impacts on supply, cost, financial feasibility, timing and approval certainty. For example, the analysis should clearly state whether the Planned Development process is mandatory or optional, whether the burden of establishing zoning and development standards typically rests with the City or developers, particularly on identified sites, any absence of fixed development standards, any additional legislative approvals and any other requirements or mechanisms that may act as a constraint. While the element's Program 6.1 commits to adopting objective design and development standards, the element should describe how this process is currently implemented, the effect on approval timelines, and the effect on approval certainty.	Planned Unit Development discussion will be expanded to describe when PUDs are mandatory (e.g., mixed-use sites), how PUD standards are established (developer proposed vs. City initiated), and how a modified PUD process will be established for rezone sites (new program).	Appendix C (Housing Constraints), Section C.2.4 (Permits and Procedures) - Planned Unit Development
B.4 (cont)	<u>On/Off-Site Improvements:</u> While the element identifies some improvement requirements, such as minimum street widths the element must also analyze their impact as potential constraints on housing supply and affordability. For additional information and a sample analysis, see the Building Blocks at http://www.hcd.ca.gov/community-development/building-blocks/constraints/codes-and-enforcement-on-offsite-improvement-standards.shtml .	Analysis will be expanded to discuss infill (e.g., downtown) vs. more peripheral areas, reference Capital Improvement Program, and discuss traffic thresholds (i.e., LOS).	Appendix C (Housing Constraints), Section C.2.5 (On and Off-site Improvements)
B.4 (cont)	<u>Constraints on Housing for Persons with Disabilities:</u> The element must evaluate constraints on housing for persons with disabilities, as follows: <u>Reasonable Accommodation :</u> The element indicates a reasonable accommodation request must not fundamentally require an alteration to City programs or laws, including but not limited to land use and zoning, and findings related to impacts on surrounding uses. However, reasonable accommodation is intended as an exception process to zoning, development standards and any other land use controls to provide access to housing for persons with disabilities. The element must include a program to amend the reasonable accommodation process and remove constraints to establish an appropriate process.	The reasonable accommodations analysis will be revised to identify two findings related to fundamental alteration of City law and impacts on surrounding uses as constraints (Municipal Code 18.86.060.A.4 and 5). A new program will be added to amend these findings to clarify intent while ensuring public health and safety objectives are maintained.	Appendix C (Housing Constraints), Section C.2.2 (Land Use Controls) - Reasonable Accommodation
	<u>Definition of Family :</u> The element should fully describe and evaluate the definition of family for potential constraints on housing for persons with disabilities.	The analysis of the definition of family will be expanded, and Program 5.6 will be revised to include amending the Zoning Ordinance definition of family to remove any relation by blood or marriage.	Appendix C (Housing Constraints), Section C.2.2 (Land Use Controls) - Housing for Persons with Disabilities; Program 5.6

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B.4 (cont)	<u>Approval Time and Requests Lesser Densities</u> : The element must include analysis of requests to develop housing at densities below those identified, the length of time between receiving approval for a housing development and submittal of an application for building permits that potentially. The element must address any hinderance on the development of housing and include programs as appropriate.	Discussion on projects coming in with lower densities than allowed/projected will be expanded with specific examples (Appendix B, Section B.2.3, A subsection heading will be added for Length of Time Between Approval and Building Permit Application in Appendix C.	Appendix B (Sites Inventory & Methodology), Section B.2.3 (Density and Capacity Assumptions) - Realistic Capacity and Development Trends; Appendix C (Housing Constraints), Section C.2.4 (Permits and Procedures)
C. Housing Programs			
C.1	<i>Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the Housing Element... (Gov. Code, § 65583, subd. (c).)</i> To have a beneficial impact in the planning period and address the goals of the housing element, programs must be revised with discrete timelines (e.g., at least annually or by January 2025), including for Programs 1.5 (Assist in Development of Lower- and Extremely-Lower Income Housing), 1.6 (High-Density Housing Outreach), 1.7 (Kiewit and Stoneridge Site Development), 2.1 (Inclusionary Zoning Ordinance), 2.2 (Lower-Income Housing Fees), 2.3 (Fees Nexus Study), 2.7 (Density Bonus Zoning Amendments), 2.8 (Rental Housing Assistance), 3.1 (Manufactured Housing Zoning Amendment), 3.5 (Housing Rehabilitation), 4.4 (Housing Infrastructure), 5.1 (Regional Homeless Coordination), 5.6 (Zoning Code Amendments), and 6.1 (Objective Design and Development Standards).	Discrete timing (month and year) will be added to identified programs. Some program timelines will be shifted earlier, as feasible, to result in larger beneficial impact during the planning period.	Various programs.
C.1 (cont)	In addition, while Program 1.8 commits to monitoring Accessory Dwelling Unit (ADU) production halfway through the planning period, this monitoring timeline should be adjusted to every two years and include alternative actions by a specified time (e.g., within six months) if ADUs are not meeting assumptions in the sites inventory, including, but not limited to, additional rezoning.	Program 1.8 will be adjusted to have review and revision action (if necessary) every two years. If significant shortfall of ADU target occurs, a rezoning action will be noted as potential action.	Program 1.8
C.2	<i>Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (Gov. Code, § 65583, subd. (c)(1).)</i> As noted in Finding B3, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types.	See responses under Comment B.3, above.	N/A
C.2 (cont)	In addition, Program 5.6 (Zoning for Special Needs Housing) currently commits to allow transitional and supportive in all zones allowing residential uses and not subject to any special requirements consistent with AB 2162. However, this program conflates two unique requirements. First, the program must commit to permit transitional and supportive in all zones allowing residential then, second and separately, the program should commit to permit permanent supportive housing without discretionary action pursuant to Government Code section 65651.	Program 5.6 language will be revised so as to not conflate distinct requirements for transitional and supportive housing.	Program 5.6
C.3	<i>Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)</i> As noted in Findings B4, the element requires a complete analysis of potential governmental and non-governmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.	See responses under Comment B.4, above.	N/A

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C.3 (cont)	In addition, Program 5.6 (Zoning for Special Needs Housing) commits to allow residential care facilities for seven or more persons subject to conformance with objective standards to ensure no negative impacts on neighborhoods. However, the program should also commit to allow these uses in all residential zones, objectively similar to other residential uses and not constrain housing for persons with disabilities.	Program 5.6 language will be revised to allow residential care facilities for seven or more persons to be allowed in all residential zones and in an objective manner similar to other residential uses.	Program 5.6
C.4	<p><i>Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics... (Gov. Code, § 65583, subd. (c)(5).)</i></p> <p>As noted in Finding B1, the element must include a complete assessment of fair housing. Based on the outcomes of that analysis, the element must add or modify programs. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have specific commitments, milestones, geographic targeting, and metrics and given that most of the City is considered a higher-resource community, the element should focus on programs that enhance housing mobility and encourage the development of more affordable housing choices in an inclusive manner throughout the City.</p>	Programs identified under the affirmatively furthering fair housing analysis will be updated to reflect revisions and new programs (e.g., reasonable accommodation) in response to other HCD comments, and revised so that timelines include specific months in addition to years.	Appendix F (Affirmatively Furthering Fair Housing), Section F.6 (Contributing Factors and Meaningful Action)