



## CITY COUNCIL AGENDA REPORT

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September 15, 2020  
Community Development  
Planning Division

**TITLE: RECEIVE UPDATE ON 6<sup>th</sup> CYCLE REGIONAL HOUSING NEEDS ALLOCATION PROCESS; REVIEW AND PROVIDE DIRECTION ON PROPOSED HOUSING ELEMENT SCOPE OF WORK AND SCHEDULE, AND DIRECTION TO PROCEED WITH SOLICITATION FOR CONSULTANT SERVICES**

### **SUMMARY**

On June 9, 2020, the Department of Housing and Community Development (HCD) issued the 6<sup>th</sup> Cycle Regional Housing Need Determination (RHND) to ABAG/MTC. The RHND reflects the total allocation of projected housing need for the 2023-2035 period, for the entire nine-county Bay Area region. The draft local Regional Housing Need Allocation (RHNA) for each local jurisdiction will be published in Spring 2021, and finalized in Summer 2021. Upon receipt of the final RHNA, each local jurisdiction must update its Housing Element of the General Plan no later than January 2023, including an action plan to adopt re-zoning of adequate land to account for the assigned housing units.

With the objective of initiating work on the City's Housing Element Update in early 2021, this agenda item provides an update on and overview of the 6<sup>th</sup> Cycle RHNA and housing element process, and an initial evaluation of the City's potential RHNA allocation. It also provides an opportunity for the City Council to provide input on several elements that will guide the planning effort, including the overall project approach; and the project scope of work, including major work tasks, proposed public process, and schedule; and direction to proceed with solicitation for consulting services.

### **RECOMMENDATIONS**

Staff recommends the City Council:

1. Receive the presentation from staff;
2. Discuss the and provide input on the Housing Element process, proposed scope of work and initial schedule, as reflected in this report; and
3. Provide direction to proceed with solicitation for consulting services.

## **FINANCIAL IMPACT**

The City has received preliminary approval for Local Early Action Planning Grant Program (LEAP) funds in the amount of \$300,000, to be used for professional planning services and environmental (CEQA) review. These services will be retained and directly managed by the City. Staff believes that the overall cost of the Housing Element update is likely to exceed the grant-funded amount. If additional funds are required, they would come from the General Fund and/or the Lower Income Housing Fund.

## **BACKGROUND**

### Housing Element Update and RHNA

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. Preparation and periodic update of the housing element is required by state law; and thus, the element reflects the state's housing goal of "attaining decent housing and a suitable living environment for every California family," as well as a reflection of the unique concerns of the community. State law establishes a series of very specific requirements as to the scope, content, and process by which a housing element is updated and adopted, including review and approval (known as certification) by the State Department of Housing and Community Development (HCD).

The current Housing Element, which was adopted in 2015, covers the period from 2015 to 2022. The next Housing Element update, the sixth cycle of such updates required by State law, must be adopted by January 2023, to address the period from 2022-2030.

As part of the required update, HCD requires each jurisdiction in the State to demonstrate capacity to meet and accommodate their local "fair share" of the assigned Regional Housing Need Determination (RHND), including total housing units across a series of affordability categories. This local distribution is known as the Regional Housing Need Allocation (RHNA) and is determined and assigned through a process led by HCD and regional Councils of Governments (i.e. for the Bay Area, ABAG/MTC).

On June 9, 2020, HCD issued the 6th Cycle RHND to ABAG/MTC. The RHND reflects the total allocation of projected housing need for the 2023-2035 period, for the entire nine-county Bay Area region, and, as discussed in more detail below, reflects approximately 2.35 times more units than were included in the prior cycle.

Through a process that has been underway since late 2019, ABAG/MTC will develop a methodology and formula for distribution of the RHNA, with the Draft RHNA allocations expected in the Spring of 2021. ABAG convened a 35-member Housing Methodology Committee (HMC) in Fall 2019, comprising local elected officials and staff representing each of the nine Bay Area Counties, as well as representatives from various stakeholders and interest groups, including housing advocates, environmental organizations, labor, and the building industry among others. Pleasanton staff is participating on the HMC as one of the two staff representatives for Alameda County (the other is from Oakland), providing an opportunity to closely monitor the RHNA

methodology process, and weigh in on key decision points. The HMC will make their recommendation to ABAG in September, 2020.

Thus far, the HMC’s initial recommendations have tended to skew larger RHNA allocations towards so-called “high opportunity” and jobs-rich communities, including communities such as Pleasanton. Based on decision points made by the HMC to date Pleasanton and neighboring Tri-Valley cities appear likely to receive an increased local allocation that will be at least similar, proportionately, to the RHND increase, and potentially even larger. However, the actual allocation will not be finalized until Spring/Summer 2021, based on the recommendation of the HMC, review and decision by the ABAG/MTC Executive Board, and approval by HCD.

The draft schedule for the RHNA and Housing Element process is included as Attachment 1.

**2023-2035 RHND**

The proposed, Bay-Area wide RHND is summarized in Table 1, below. As shown, the total regional allocation of 441,176 units reflects an approximately 2.3-fold increase over the prior RHND. It is also noted that the proportions of units in each income category have shifted slightly compared to the 5<sup>th</sup> Cycle, with increases in both the Very-Low and Above-Moderate categories, and a corresponding decrease in the proportion of Low and Moderate income units.

**Table 1: Regional RHND 5<sup>th</sup> and 6<sup>th</sup> Cycle Comparison**

Category	5 <sup>th</sup> Cycle RHND (2015-2023)		6 <sup>th</sup> Cycle RHND (2023-2035)		Comparison	
	Units	% Total	Units	% Total	Increase	Proportionate Increase
Very Low	46,680	24.8%	114,442	25.9%	+67,762	2.45
Low	28,940	15.4%	65,892	14.9%	+36,952	2.28
Moderate	33,420	17.8%	72,712	16.5%	+39,292	2.18
Above-Moderate	78,950	42.0%	188,130	42.6%	+109,180	2.38
<b>TOTAL</b>	<b>187,990</b>		<b>441,176</b>		<b>+253,186</b>	<b>2.35</b>

Although the proportionate increase in the RHND compared to the last cycle will not necessarily translate precisely to the City’s local RHNA, it is nonetheless a good indicator of the potential magnitude of the change in that number.

For reference, and again noting that the final RHNA allocation remains to be determined, if Pleasanton’s RHNA were to see a similar 2.3-fold increase as the RHND, the City will need to plan for approximately 4,848 units for the 2023-2035 period. This compares to 2,067 units in the prior cycle (and 3,277 units in the cycle before that), as shown below in Table 2. Of these, assuming similar distribution across income categories as the RHND, about 41 percent, or approximately 2,645 units, would be in the very-low and low- income categories.

**Table 2: 6<sup>th</sup> Cycle RHNA Estimate for Pleasanton**

	<b>5th Cycle RHNA (2015-2023)</b>	<b>ESTIMATED 6<sup>th</sup> Cycle RHNA (2023-2035)**</b>	<b>Comparison</b>	
<b>Category</b>	<b>Units</b>	<b>Units</b>	<b>Increase (Units)</b>	<b>Increase (Proportion)</b>
Very Low	716	1,754	+1,038	2.45
Low	391	891	+500	2.28
Moderate	407	887	+480	2.18
Above- Moderate	553	1,316	+763	2.38
<b>TOTAL</b>	<b>2,067</b>	<b>4,848</b>	<b>+2,782</b>	<b>2.35</b>

**DISCUSSION**

The following outlines several items that are expected to be key factors for consideration in the Housing Element Update.

1. Key Planning Considerations

*Site Inventory*

To address the anticipated RHNA needs, the updated Housing Element will be required to include an inventory of sites or parcels within the City, that demonstrates the City’s capacity to accommodate sufficient housing to meet the assigned RHNA goals. Under current state law, a jurisdiction is not required to *build* the RHNA-assigned housing units. Rather, it is required to adopt a land use program – appropriate General Plan and Zoning – including identification of specific sites with available infrastructure and suitable physical conditions to accommodate these housing units under market-driven conditions.

To meet the new RHNA, it will be necessary for the City to identify and ultimately rezone a number of parcels throughout the city. Much of the City’s concern and challenge in prior years has been identifying sites for higher density housing to meet lower-income housing needs – that will be the case this cycle as well. However, based on a preliminary analysis of the current inventory, staff believes that it may also be necessary to identify sites, beyond those that are already zoned, to accommodate moderate and above-moderate units as well.<sup>1</sup>

A number of variables will affect the amount of land that may need to be identified for re-zoning, including the number of sites eligible to be “carried over” from the prior inventory, assumed density for each site, assumed affordability levels, and potential

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<sup>1</sup> The Housing Element is required to identify/designate sites sufficient to accommodate the entire RHNA, and to include a program to re-zone any such sites, if needed, within three years of housing element adoption.

constraints that might require adjustment to the capacity of certain sites, to a level that HCD would consider realistic. Recent changes to state law have made the analysis and requirements for identifying sites more challenging than in previous housing cycles, with an expansive list of criteria that must be used to demonstrate to HCD that sites, particularly non-vacant sites, are viable and suitable to be included in the inventory.

Another key change in state law requires sites that were identified in previous Housing Elements, that have not been developed, to be modified to allow housing by-right to be modified to allow housing by-right; as well as provide additional analysis for non-vacant high-density sites to demonstrate that the existing uses would not impede additional residential development and that it is realistic to assume that the site will re-develop in the coming cycle. Based on a review of these, and other criteria, staff believes that the majority of high-density sites in the current inventory will be *unable* to be carried over to the next cycle: however, every effort will be made to utilize these sites if possible.

A very preliminary analysis, based on a presumed RHNA in the range of 4,800 units, suggests that 200 or more acres may need to be identified and/or re-zoned for housing, at various densities and affordability levels, this cycle. This estimate assumes that approximately 1,000 units (in various income categories) could be “carried over” from the prior inventory<sup>2</sup>; and that the remainder would be accommodated on sites at various densities. While the number of acres required to be re-zoned could be higher or lower based on multiple factors, it is nonetheless likely to be significant. It is difficult to provide an exact comparison between the prior and current cycle; however, the total inventory for all sites included about 594 acres<sup>3</sup>; of this, 87 acres were included as High Density Housing sites, yielding a total of 1,711 units.

#### *No Net Loss Provisions*

Another major factor the City must consider in developing the inventory, is the effect of the more stringent “no net loss” provisions that were adopted by the State in 2017, via Senate Bill 166 (SB 166). This is perhaps the most impactful piece of new housing legislation adopted in the last three years. Under the prior version of the law, also known as the Housing Accountability Act (HAA), cities were prohibited from downzoning sites or approving projects at less density than identified in their Housing Element, but no stipulations were made for approval of projects at different affordability levels than identified. Under SB 166, if the approval of a development project results in fewer units by income category, the jurisdiction must identify additional sites to accommodate the RHNA obligation lost as a result of the approval (including re-zoning of sites if insufficient capacity exists in the inventory).

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<sup>2</sup> “Carryover” units may include those counted on sites already zoned for housing, or that have planning approvals in place, but have not yet actually constructed those units.

<sup>3</sup> This acreage is quite substantial, in part because the Housing Element’s inventory lists the acreage of the entire parcel identified, when in many cases only a portion would include the housing development. For example: the Stoneridge Mall property is listed as a 74.6 acre site, where only 10 acres of the parcel was actually zoned/designated for housing. The Lund Ranch property encompassed 123 acres, with much of that area ultimately dedicated as open space, and a much smaller area ultimately developed as single family housing.

In the last cycle, the City's inventory identified sites yielding a total number of housing units above that strictly needed to meet the RHNA<sup>4</sup>. This approach was strategic, to provide a buffer in the event some sites did not remain viable over the course of the Housing Element period. As an important related note, as allowed by the State's "default density" provisions, most of the high-density housing sites were counted as producing exclusively very-low and low-income units. Given that actual projects constructed typically provide only a portion of their units at below-market rates, if the City pursues a similar zoning strategy in this next cycle, it may be advisable to develop a secondary list of sites that would be eligible for re-zoning if and when necessary, to meet future no net loss requirements.

### *Strategic Considerations*

Given all of these challenges, some of the key strategic and policy considerations that will need to be part of the Housing Element sites analysis and selection process, include:

- Housing Densities: The minimum density considered by the State to produce low- and very-low income units (in communities such as Pleasanton) is 30 DUA. In the prior Housing Element, the majority of high density sites were zoned at this density, with a few sites at 40 DUA. In this cycle, it may be beneficial to consider zoning more sites at, or even above, 40 DUA. As has been seen with recent developments in Pleasanton, projects built at 30 DUA will generally be surface-parked; whereas projects at and above 40 DUA can support integrated, structured parking, leaving more of the site available for on-site open space and amenities.

Given that sites zoned at higher densities will yield more units, thus requiring less land to be rezoned, and may offer more favorable site design outcomes, the City may wish to consider zoning selected sites (for example, sites located with a half mile of BART) at densities above 40 DUA, assuming the projects could be designed in a manner that met community standards and expectations, and impacts appropriately mitigated.

- Secondary/Contingency List: Given the provisions of SB 166, the City may wish to consider creating a secondary or contingency list of sites to be considered for re-zoning, if and when needed, to address No Net Loss provisions.
- Zoning "Buffer": It may also be beneficial for the Sites Inventory to include a "buffer," similar to or larger than that included in the 2015 Housing Element, to account for the fact that not all sites may remain viable throughout the Housing Element period, and thus providing some flexibility in meeting RHNA goals and no net loss requirements. (This strategy could also help to address the "No Net Loss" issue as well, instead of or in addition to the secondary list of sites discussed above).

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<sup>4</sup> The total RHNA was 2,067 units, whereas the inventory listed sites available to provide 3,243 units, a buffer of 1,176 units.

- Density and Site Development Assumptions: The 2015 Housing Element took the general approach that lower-income units would be accommodated on higher-density sites (e.g. as apartments and condominiums) and that moderate and above-moderate income units would be accommodated on low- and medium density sites (e.g. as detached and attached single-family units like townhomes). In this cycle, and particularly given the likely need to identify sites for moderate- and above-moderate housing, the Housing Element could consider alternative approaches, such as allocating a share of the moderate- and above-moderate need to higher density sites and in multi-family developments.<sup>5</sup>
- Criteria for Ranking and Selecting sites: The prior housing element site inventory and selection process included a multi-step process that included developing criteria to score and rank the various sites. This list (see Attachment 2), relied largely on criteria used in the Tax Credit Allocation (TCAC) process for affordable housing projects, such as transit proximity, availability of infrastructure and services, and lack of environmental constraints. Staff believes a similar set of criteria, expanded to include specific parameters required to be addressed by State law, will be appropriate to use, but will be seeking input through the Housing Element process on an updated list.

## 2. Housing Element Approach and Scope of Work

Although the Housing Element Update process will include a robust community conversation about the distribution and density of sites throughout the City, the above-mentioned options should be thoughtfully considered throughout the process. The final policies and inventory choices may include multiple strategies as the City's moves through the process and receives public comment and engagement.

Staff is recommending that the Planning Commission be the advisory body providing input on the plan, rather than convening a separate appointed task force. Additional public engagement opportunities will be provided through dedicated public meetings and workshops, key stakeholder meetings, as well as regular consultation with City Council, to provide input on key policy questions, ensure the plan is proceeding according to expectations, and to provide any necessary course corrections.

Staff proposes to engage a professional services team to assist with this effort and would like to issue a Request for Proposals for both planning and CEQA-related services in Fall, 2020. A lead consultant to help staff prepare the Housing Element Update would then be selected. The professional services contract, including a final proposed scope of work, will be brought back to the City Council for review and approval at a future meeting.

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<sup>5</sup> Note that legislation is currently being considered (AB 725 (Wicks)), that would require a portion of moderate- and above-moderate RHNA to be accommodated on multi-family sites.

Key project tasks are expected to include:

- **Project Initiation:** This task will include retaining professional consultant services to assist with the Housing Element process, and various start-up tasks to ensure the consultant is familiar with the City's existing policies and regulations, implications of recent State law changes locally, the City's prior Housing Elements; etc. This task would likely include introductory public meetings with the Planning Commission and City Council, to "set the stage" for the upcoming process.
- **Sites Inventory, Evaluation and Selection; Policy Formulation.** This task would include analysis of vacant and underutilized sites that could be used to accommodate the next RHNA allocation. Staff also anticipates this phase of the project to include a well-structured process to solicit interest from property owners who may be interested in having their sites considered in the inventory. At the front end of the process, staff and the consultant will work with the community, Planning Commission and City Council, to identify criteria to be used to select specific sites for inclusion in the Housing Element. To the extent there are major policy items to be considered in the process, these may be vetted with the Planning Commission and Council at this stage. Staff also anticipates engaging with HCD staff early in the sites selection process, to ensure the sites inventory will meet state law requirements, and incorporate appropriate assumptions with respect to development capacity of high density sites, in particular.
- **Public Review Draft Housing Element and Draft EIR.** Based on the outcomes of the prior task, staff and consultants will create the Draft Housing Element. The draft plan preparation will include public outreach including public meetings and check-ins with the Planning Commission and City Council throughout the Housing Element Update process, and with the Housing Commission. The draft Housing Element will be submitted to HCD for review and comment during this period, as required by State law. This task will include several subtasks including:
  - Finalizing the housing site inventory, and recommended sites for rezoning, and developing the project description for the EIR.
  - Compiling the background sections of the Housing Element, including the Housing Needs Assessment, which addresses the housing needs of all sectors of the City's population, and regulatory and other constraints to housing production, and
  - Draft Goals, Policies and Programs, to address the City's identified housing needs in accordance with the requirements of State law.
- **Final Housing Element and EIR Review, Adoption and Certification:** Following receipt of public, HCD and other comments on the Housing Element Update, Draft EIR, the final EIR and final Housing Element, including Site Inventory will be prepared for consideration of approval by the City Council for adoption, including public hearings with both bodies to review and consider the plan.



### Community Process

As indicated in the outline scope above, providing appropriate opportunities for public, Planning Commission, and City Council input will be important at each stage of the Housing Element and Site Inventory Selection process. This will include:

- *Planning Commission meetings and hearings.* The Planning Commission would provide in-depth review and guidance to staff and the consultant team throughout the process. As with all Planning Commission meetings, the public will be able to attend and provide comments at each meeting. Outreach to the Housing Commission will also be made at appropriate junctures.
- *Public and key stakeholder workshops and meetings.* The exact format of these meetings will be tailored to the desired objectives and staff will work with the professional services team to ensure that each meeting provides meaningful opportunities for public comment and that all public comments are captured and reported back to the Planning Commission. Additional public outreach and information will be provided through a dedicated project web-page, interested parties list, and other tools.
- *City Council Input and Direction.* The project scope will include consultation with the City Council at key junctures, such as during the development of site selection criteria, creation of the recommended sites inventory, review of the draft plan, and for the adoption of the plan itself. These meetings will provide the opportunity for the Council to receive updates on the progress of the plan, provide input and direction on key policy questions, and ensure that the planning process is proceeding in an appropriate policy direction.

In addition to the above public meetings, staff anticipates engaging with key private and public agency stakeholders, such as local agencies, organizations, non-profit and for-profit developers, housing service providers, and housing financial professionals to get input on aspects of the Housing Element Update affecting (or with the potential to affect) those agencies' and organizations services and programs.

### Schedule/Timeline

The overall Housing Element Update process is expected to take approximately 24 months to complete, from project initiation through the site inventory considerations and selection concluding in the adoption of the Housing Element and EIR. Staff is aiming to begin work by early 2021, with the final plan adopted by January 2023.

### Interface with East Pleasanton Specific Plan

Although the start of the EPSP process has been delayed due to the COVID crisis, staff has reviewed the prior schedule and believes it will still be possible to dovetail the key decision points – particularly the recommendation on the “base plan” for East Pleasanton, and extent to which it should include residential uses – with the Housing Element Update and sites inventory.

The ability to process the two plans concurrently will allow for the City Council to take into account whatever increment of the RHNA may be “solved” in East Pleasanton and provide more certainty as it proceeds with the Housing Element update. Likewise, because the City will be well underway with the Housing Element sites analysis and selection process before the draft EPSP is finalized, information and outcomes from each process can be reflected in both documents, including in the required CEQA analysis.

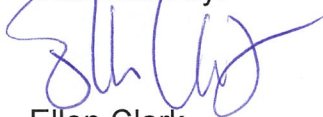
## CONCLUSION

If City Council directs staff to proceed with the Housing Element Update, staff will return to City Council with a professional services contract to begin the project, which will also include a more detailed scope of work.

Staff recommends that the City Council:

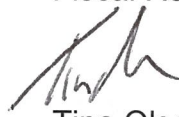
1. Receive the presentation from staff;
2. Discuss the and provide input on the Housing Element process, proposed scope of work and initial schedule, as reflected in this report; and
3. Provide direction to proceed with a solicitation for professional consulting services.

Submitted by:



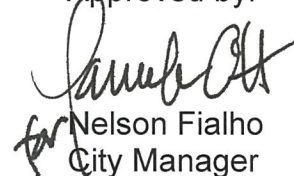
Ellen Clark  
Director of Community  
Development

Fiscal Review:



Tina Olson  
Director of Finance

Approved by:



Nelson Fialho  
City Manager

Attachments:

Attachment 1: RHNA and Housing Element Schedule

Attachment 2: 2014-2022 Housing Element Criteria List

## REGIONAL HOUSING NEEDS ALLOCATION



ABAG 2023-2031 RHNA and Plan Bay Area 2050 Key Milestones	Proposed Deadline
Housing Methodology Committee kick-off	October 2019
Subregions form <sup>1</sup>	February 2020
Plan Bay Area 2050 Regional Growth Forecast	April 2020
HCD Regional Housing Need Determination <sup>2</sup>	Summer 2020
Plan Bay Area 2050 Draft Blueprint	July 2020
Proposed RHNA methodology, <sup>3</sup> draft subregion shares	Fall 2020
Plan Bay Area 2050 Final Blueprint	December 2020
Final subregion shares <sup>4</sup>	December 2020
Draft RHNA methodology to HCD for review <sup>5</sup>	Winter 2021
Final RHNA methodology, <sup>6</sup> draft allocation <sup>7</sup>	Spring 2021
RHNA appeals <sup>8</sup>	Summer 2021
Final Plan Bay Area 2050	September 2021
Final RHNA allocation <sup>9</sup>	Winter 2021
Housing Element due date <sup>10</sup>	January 2023

*Dates are tentative and subject to change.*

To learn more, visit the [ABAG RHNA website](#) or [Plan Bay Area 2050 website](#).

### Glossary of Acronyms

ABAG – Association of Bay Area Governments

HCD – California Department of Housing and Community Development

RHNA – Regional Housing Needs Allocation

<sup>1</sup> GC §65584.03(a).

<sup>2</sup> GC §65584.01(b)(1).

<sup>3</sup> GC §65584.04. ABAG/Subregion must conduct at least one public hearing prior to releasing draft methodology.

<sup>4</sup> GC §65584.03(c).

<sup>5</sup> GC §65584.04(h).

<sup>6</sup> GC §65584.04(i). HCD has up to 90 days to review final methodology.

<sup>7</sup> GC §65584.05(a).

<sup>8</sup> GC §65584.05.

<sup>9</sup> GC §65584.05(g).

<sup>10</sup> GC §65588(e)(3)(A). Housing Element Due Date is 18 months after adoption of the RTP/SCS.

**Key: 1 = Yes; 0 = No**

**I. Criteria for Initial Round of Evaluation**

**1. Infill**

- a. Site is an infill site
- b. Site is not anticipated to require off-site sewer/water infrastructure improvements

**2. Proximity to Modes of Transportation**

- a. Site is within ½ mile of BART
- b. Site is within ¼ mile of BART
- c. Site is within 1/3 mile of transit stop with 15 minute headway to BART
- d. Site is within 1/3 mile of transit stop with 30 minute headway
- e. Site is adjacent to bike route
- f. Site is within ½ mile of freeway on ramp

**3. Proximity to Services and Amenities**

- a. Site is within ½ mile of an existing or approved grocery store
- b. Site is within ½ mile of an existing elementary school
- c. Site is within ½ mile of an existing middle school
- d. Site is within ½ mile of an existing or planned park/open space

**4. Impact on Future Residents**

- a. Site is not anticipated to have odor impacts
- b. The project is anticipated to meet noise standards with no or with reasonable mitigation measures (if adjacent to or across the street from freeway or rail line = 0)
- c. The site is not within BAAQMD's air quality screening distance for new sensitive receptors
- d. The site is within the standard response time for emergency services
- e. The site is outside geological and fire hazard areas

*Site is not within Alquist Priolo zone or fault zone  
Site is not within earthquake induced landslide zone  
Site is not within Special Fire Protection Area*

- f. The site is outside a 300-foot radius of an existing wireless facility
- g. The site will be at least 150 feet from overhead portions of the 230 kV line and at least 37.5 feet from underground portions of the 230 kV line

**5. Height and Mass Compatibility**

- a. Will the project (assuming 3 stories) be no more than one story higher than all adjacent residential development or all residential development across a residential collector or local street
- b. Will the FAR of the proposed project (assuming an FAR of 80%) be less than twice of the allowable FAR for development on all adjacent sites (not including parks) and sites across a residential collector or local street
- c. Site is not adjacent to or across (a residential collector or local street) from an existing single-family detached residential home(s)

**6. Impact Trees, Species, Historic Resources**

- a. The site will not likely require a significant tree mitigation/ consideration
- b. The site will not likely require an environmental analysis related loss of suitable habitat for or the taking of sensitive species
- c. The site will not likely require an analysis related to impacts on historic resources

**7. Potential Inconsistency with General Plan Themes**

- a. Development of the site (assuming 3-4 stories) will not likely be inconsistent with the overarching goals/themes stated in the Introduction section of Pleasanton's General Plan: preserving and enhancing Pleasanton's character<sup>1</sup> and quality of life, and encouraging sustainable<sup>2</sup> development (if potentially inconsistent score = 0)

**8. Site Size**

- a. The site is 5 acres or more in size allowing for design flexibility
- b. The site is 1 acre or more in size allowing for more State/Federal financing opportunities

**9. Interest in Site**

- a. Property owner/developer has expressed interest in the site for high density residential development

**10. Economic Interest**

- a. Site is not adjacent to a freeway

**II. Criteria for Later Round of Evaluation**

- 1. The project will create no significant environmental impacts or will create no significant environmental impacts which cannot be mitigated with reasonable mitigation measures
- 2. Will development of the site with housing be accepted by the surrounding community
- 3. Rezoning of the site will not have a significant fiscal impact on City
- 4. Project will not significantly contribute to an overconcentration of existing and potential high density housing into a few areas of Pleasanton

**Total "Yes" Responses**