

City of Woodside Draft 3 Preliminary Review

(Most recent revisions in red/~~GREY~~ highlights/underline/strikethrough)

Received: 3-15-2024

Prior Review: 5-12-2-23 (formal); 1-11-2024

	HCD's Previous Findings	Page	Y/N/~	HCD Prior Feedback	Revised Review	
1.	Review and Revise					
a.	<p>The element was not revised to address this requirement. Please see HCD's prior letter for additional information.</p> <p>A thorough program-by-program review is necessary to evaluate Town's performance in addressing housing goals. As part of this analysis, the element should describe and quantify the actual results of the prior element's programs and evaluate effectiveness by, for example, comparing those results to the planned objectives. This information and analysis provides the basis for developing an effective housing program.</p> <p>In addition, as part of the review of programs in the past cycle, the element must 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).</p>	1-3 2-1-	Yes		--	
2.	Affirmatively Furthering Fair Housing					
a.	Fair Housing Enforcement and Outreach: Ongoing outreach clarity needed	H-15	Yes		--	
3.	Sites Inventory					
a.	<p>Progress in Meeting the RHNA: In addition, Table 3-5 (page 3-34) includes pipeline ADUs, single family development assumptions, and land divisions. The element must clarify whether the units and land divisions listed are current applications being processed, or the basis for the assumptions. Table 3-5 (current applications vs assumptions) clarified?</p>	G-10	~	Element should state that affordability's are based on submitted applications	G-9 element should state affordability of pipeline projects is based on submitted applications	<p><u>4-17-24 Meeting with HCD staff: HCD staff acknowledged that Table G-1 in Appendix G provides details of already submitted projects as "pipeline projects", and that the income level distribution in Table G-1 notes that all new SFDs are above-moderate-income units and that the new ADU income levels are distributed based on the ABAG ADU Study. It was agreed that minor changes to Appendix G would be made to further clarify that Table G-1 includes actual submitted applications and that the income level distribution is sufficient.</u></p> <p><u>Town Action: Minor changes to Appendix G are made to further clarify that Table G-1 includes actual submitted applications (See page G-10).</u></p>

<u>b.</u>	<p>Realistic Capacity: Methodology okay? Not based on land use controls or typical densities but rather market feasibility study.</p> <p>Previous Finding: The element generally was not revised to address this requirement. Please see HCD's prior review for additional information.</p> <p>While the element provides assumptions of residential buildout for sites included in the inventory, it must also provide support for these assumptions. For example, the element should demonstrate what specific trends, factors, and other evidence led to the residential capacity assumptions. The estimate of the number of units for each site must be adjusted as necessary, based on the land use controls and site improvements, typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction, and on the current or planned availability and accessibility of sufficient water, sewer, and dry utilities.</p> <p>In addition, currently, the rezone sites assume residential capacity at maximum allowable densities which do not appear to account for land use controls. The element must support this with past residential development trends as described above or revise residential capacity assumptions as appropriate.</p> <p>Finally, the calculation of residential capacity must also account for the likelihood of 100 percent non-residential uses in zones that allow 100 percent non-residential uses. This analysis should consider development trends and may utilize residential performance standards or policies and programs that ensure a residential component.</p>	G-13 3-21	Yes		--	
<u>c.</u>	Environmental Constraints: Any other known barriers to redevelopment missing	SI 3-22-	Yes		--	
4. Zoning for a Variety of Housing Types						
<u>a.</u>	Emergency Shelters: Development standards, including parking requirements needed	3-18	No	The element should describe the development standards of the Community Commercial (CC) zone	3-26 and Program 4.3a (page 3-85)	

			<p>that allows emergency shelters as permitted uses and should provide an analysis of proximity to transportation and services for these sites, hazardous conditions, and any conditions inappropriate for human habitability.</p> <p>The element should also clarify whether or not emergency shelters are permitted by-right.</p> <p>In addition, the element should describe how emergency shelter parking requirements are in line with AB139/Government Code section 65583, subdivision (a)(4)(A).</p> <p>The element should include programs as necessary to comply with these requirements.</p>			
5. Governmental Constraints						
a.	Land Use Controls: The element briefly describes some development standards but still must analyze all relevant land use controls impacts as potential constraints on a variety of housing types. The analysis must also evaluate the impacts of land use controls independently and cumulatively on housing cost and supply, feasibility, ability to achieve maximum densities, timing, and approval certainty. Please see HCD's prior review for additional information. Missing cumulative analysis.	3-18 F1-	No	<p>All relevant development standards should be described in detail and analyzed for potential constraints (i.e., height limits other than Measure J, allowable densities (du/acre per zone), building setbacks, lot coverages, minimum unit sizes, parking requirements, open space requirements, floor area ratios, etc.).</p> <p>The element should clarify whether zoning controls are conducive for development at</p>	<p>3-17 and F1-</p> <p>1.) Height limits need clarification. How many stories are allowed in each zone? What is the maximum height limit in feet? Potential constraint analysis of height limits for multifamily projects should also be included. Programs should be added or revised to address identified constraints (e.g., two story/less than 36-foot height limits for multifamily</p>	<p>1) 4-17-24 Meeting with HCD staff: <u>HCD staff acknowledged Pages 3-18 and 3-19 includes the height limits for all existing residential zoning districts, and that constraints to height for Single-Family Dwellings (SFDs) have been analyzed to ensure no height constraints. Town staff noted, and HCD staff acknowledged, that the Town is in the process of adopting multi-family (MF) development standards and that Program H3.2.a could be further clarified to ensure that any standards adopted for MF development shall not restrict the ability for a MF site to be developed with the density outlined in the Housing Element. HCD staff acknowledged that the Housing Element would not specify the number of "stories" or a specific height limit since each MF site has its own constraints and that a statement to ensure new standards would not limit site density is adequate.</u></p> <p><u>Town Action: Program H3.2.a is further clarified to ensure all new standards will not prohibit maximum density.</u></p> <p>2) 4-17-24 Meeting with HCD staff: <u>HCD staff acknowledged that the Town does not have current lot coverage requirements for SFD or ADU development, therefore no further analysis is required. HCD staff noted that any lot coverage requirements applied to new MF development should be addressed in Program H3.2.a that would not restrict maximum density for MF housing.</u></p> <p><u>Town Action: Program H3.2.a is further clarified to ensure all new standards will not prohibit maximum density.</u></p>

				<p>maximum densities for each zone.</p> <p>Programs with specific commitments to addressed constraints identified as part of analysis should be added with discrete timing, as needed.</p>	<p>projects) needed as appropriate.</p> <p>2.) Lot coverage feasibility analysis needed (Table 3-4, page 3-18).</p> <p>3.) Parking standards are a constraint to development (four spaces required). The element should add a program to reduce parking requirements higher density/MF zones.</p> <p>4.) Minimum unit sizes utilized? Clarify if so and/or analyze standard for potential constraints, if needed.</p> <p>5.) Feasibility of MFRD, including Canada College development, should be clarified in addition to other potential constraint analysis (i.e., infrastructure, phasing, easements, environment, development standards, approval findings, etc.)</p> <p>6.) Programs H3.1a must explicitly commit to by right definition “consistent with 65583.2(h) and (i).” In addition, program should include alternative actions (explicitly including rezoning), if needed, to identify additional multifamily sites if developments do not progress as expected by a specific date (2027)</p>	<p><u>3) 4-17-24 Meeting with HCD staff: HCD staff acknowledged that the Town requires 4 onsite parking spaces (enclosed or not enclosed) for SFDs, which is important since most neighborhoods do not have on-street parking, curbs, sidewalks, etc., and that such an off-street parking requirement for SFDs is necessary to ensure resident or guests do not park on the roadway and/or adjacent to steep unimproved hillside banks. HCD staff acknowledged that the Town would apply reduced parking requirements for MF housing. Such as 2.25 spaces per unit (2 spaces for each unit and 0.25 spaces for each unit for guest parking). Program H3.2.a shall note that any parking requirements for MF housing shall not restrict maximum density for MF housing.</u></p> <p><u>Town Action: Program H3.2.a is further clarified to ensure all new standards will not prohibit maximum density.</u></p> <p><u>4) 4-17-24 Meeting with HCD staff: HCD staff acknowledged the Town does not have a minimum unit size and that changes made to Program H3.2.a, as noted above, are adequate.</u></p> <p><u>Town Action: Program H3.2.a is further clarified to ensure all new standards will not prohibit maximum density.</u></p> <p><u>5) 4-17-24 Meeting with HCD staff: HCD staff acknowledged that Program H3.2.a, as modified pursuant to the direction and response in item 1) above, clarifies that new standards for approval of multi-family housing zoning would not limit the maximum density allowed. HCD staff asked for page 3-20 to be modified to clarify that Program H3.2.a is referenced. Furthermore, HCD acknowledged there is an analysis outlining potential development constraints for the new MF zoned sites on pages 3-46 through 3-48. HCD indicated that the existing analysis may be adequate and would review it again.</u></p> <p><u>Town Action: Program H3.2.a is further clarified to ensure all new standards will not prohibit maximum density. Sites to be rezoned for MF zoning call out potential constraints to development.</u></p> <p><u>6) 4-17-24 Meeting with HCD staff: HCD staff noted that Program H3.1.a referenced other Programs for commitment by right, but that this Program should include the reference must explicitly commit to by right definition “consistent with 65583.2(h) and (i).” Program H3.1.a shall be updated to provide a specific date (2027) for the Town to identify additional multi-family housing sites if developments do not progress as expected.</u></p> <p><u>Town Action: Program H3.1.a is updated to clarify “by right” zoning consistent with 65583.2(h) and (i), and that the Town shall identify one or more additional multi-family housing sites for rezoning to 20-units per acre if the developments do not progress as expected.</u></p>
<u>b.</u>	Fees and Exactions: The revised element identifies the total amount of fees and their proportion to the development costs for	3-18 F1-	No	Fees in Appendix F (i.e., Table F-1, F-2, and F-3) are not	3-22 and F1	<u>1) 4-17-24 Meeting with HCD staff: HCD staff clarified that Draft 3 of the Housing Element acknowledged that Table F-3 states “no data” for “Large Multi-Family” developments since the Town does not have any data for costs on multi-family housing. Table F-3 shows that SFD permit fees are 2% of development costs</u>

<p>single family development and compares the total amount of fees to other jurisdictions in the region, it should also list all fees (i.e., development impact fees, permitting fees, planning fees, etc.) and analyze their impact as potential constraints on housing cost, supply, and affordability. The element must add programs to address potential constraints as appropriate. All fees listed? Analysis?</p> <p>In addition, while the element states multifamily fees will be established alongside rezoning (p. 3-18), it should add or modify programs to commit to establish fees that do not act as a constraint on development.</p>			<p>sufficient for a complete analysis of local fees and exactions. The element must list all fees (i.e., development impact fees, permitting fees, planning fees, etc.) within the jurisdiction and analyze their impact as potential constraints on housing cost, supply, and affordability.</p> <p>FYI – link to fees (not sufficient to substitute analysis) provided on page F-2 is broken.</p> <p>In addition, It seems the City intends to apply single family fees to multifamily projects? Program H3.3a should commit to establish Multifamily fees with discrete timing. For example, development impact fees for larger projects should generally be less than SFR, specific commitment needed. Also depends on complete analysis.</p>	<p><u>1.)</u> Total cost of fees as proportion of total cost of development needs clarification. Program to address needed if over 15% of total costs. Table F-3 states “no data” (page F-13).</p> <p><u>2.)</u> In addition, the element should include a listed breakdown of development impact fees.</p> <p><u>3.)</u> Program H3.3a needs specific commitment regarding multifamily project fees</p>	<p><u>and an SFD with ADUs is 9% of development costs (since the Countywide survey was completed, the Town removed building permit fees for ADUs per Program H1.3.a). Program H3.3.a requires multi-family housing development fees to be adopted by the end of 2024. During the 4-17-24, Meeting, HCD staff noted that Program H3.3.a is adequate with the inclusion of a mid-cycle review of the permit fees for multi-family development that includes affordable housing (below above moderate income) in Program H3.3.a.</u></p> <p><u>Town Action: Program H3.3.a. is updated to provide a review of the multi-family housing permit fees in 2027, to determine if the fees for such development should be reduced if they create a barrier to the construction of multi-family affordable housing units.</u></p> <p><u>2) 4-17-24 Meeting with HCD staff: HCD staff acknowledged that the only “impact fee” is already included in Appendix F on page F-7, which is Road Impact Fees. The Road Impact Fee has already been included and analyzed. HCD noted that other cites have more impact fees which was the reason for the comment and understands that Woodside does not have any additional impact fees than what is already included in Appendix F. HCD staff asked the Town to include a statement in Appendix F to clarify that the Road Impact Fees are the only Town Impact Fees.</u></p> <p><u>Town Action: Appendix F is updated to clarify that the Road Impact Fees are the only Impact Fees required by the Town, which is included on Page F-2.</u></p> <p><u>3) 4-17-24 Meeting with HCD staff: HCD staff acknowledged that Program H3.3.a includes a specific commitment regarding multi-family housing permit fees for projects that include affordable housing.</u></p> <p><u>Town Action: Program 3.3.a is updated to provide a review of the permit fees in 2027, and that permit fees for affordable multi-family housing units shall be reduced at the time of review if such fees create a barrier to constructing the multi-family affordable housing projects.</u></p>
<p><u>c.</u> Local Processing and Permit Procedures: The following should be clarified – type of permits, discretionary procedure, approval bodies, approval findings.</p> <p>In addition, architectural review should be analyzed as potential constraint.</p>	<p>3-19 Appx F</p>	<p>No</p>	<p>Design review approval findings should be described in detail and analyzed for potential constraints on approval certainty and approval times.</p> <p>In addition, architectural review requirement should be analyzed for potential constraints.</p> <p>Lastly, multifamily objective design standards (mentioned on page 3-19) should</p>	<p>3-22</p> <p>Design review criteria subjective i.e., “neighborhood character, aesthetic, compatibility.” The element should add or revise a program to remove subjective approval findings.</p>	<p><u>4-17-24 Meeting with HCD staff: HCD staff acknowledged that the Town responded to the initial comment to provide the design findings for SFDs on Pages 3-22 – 3-23. During the discussion between HCD staff and Town staff it was clarified that new MF zoning will have ODS for each of the sites outlined for MF housing in the Housing Element. The Town has already started public hearings for ODS on MF sites identified in the Housing Element.</u></p> <p><u>Town staff noted the design review criteria analysis for SFDs is provided, starting on Page 3-22, and that this design criteria is only for SFDs and accessory structures to SFDs that are not ADUs, which only include housing units at the “Above Moderate Income Level.”</u></p> <p><u>Town staff asked if the existing design review criteria for above moderate-income Units (SFDs) needs to be changed, and if so, what State statue prohibits the existing design evaluation criteria from being applied to above moderate income units. In the analysis provided on pages 3-22 through 3-23 indicates that the design review findings do not provide a barrier to construction of above moderate income SFDs. HCD staff would further review to determine if the existing design guidelines can continue to be applied to above moderate income SFDs.</u></p>

				be described in detail (if already established?) or a program should be added to create them with discrete timing and specific commitment.		
<u>d.</u>	Codes and Enforcement: What is chapter 7A requirement? Flag: water sprinkler requirement in all new buildings unusual?	3-20	Yes		--	
<u>6.</u>	Housing Needs Assessment					
<u>a.</u>	Needed special needs populations discussed w/available resource: persons with disabilities including developmental disabilities	3-34 Appx B	Yes		--	
<u>7.</u>	Programs					
<u>a.</u>	• Program H3.1a (Administer and Support New Independent Housing at Cañada College): While the Program was revised to address affordability levels and available resources, it must also add discrete timing associated with incentives and clarify the current status, as stated in HCD's prior review.	3-51 3-65	Yes		--	
<u>b.</u>	• Program H4.1c (Group Homes): In addition to allowing group homes for seven or more persons, the Program should clarify these uses will be allowed in all zones allowing residential uses and similar to other residential uses of the same form in the same zone.	3-53	No	Commitment for Group Homes (7+) needed. See previous finding.	3-64 Program H4.1c should explicitly commit to allow group homes for seven or more persons in all zones allowing residential uses in a similar manner to other residential uses of the same form in the same zone.	<u>4-17-24 Meeting with HCD staff: HCD staff acknowledged the existing Woodside Municipal Code requirements allow "supportive housing" for "target populations" by right without a limit on the number of residents and that Program H4.1.c should be updated to clarify that supportive housing allows over 6 people. No changes to the Town Codes are required.</u> <u>Town Action: Program H4.1.c has been updated to further clarify that supportive housing, which includes groups homes based on the existing definition in Municipal Code 153.005, for over 6 persons in all residential zones is not restricted.</u>
<u>c.</u>	• Program H4.3a (Cooperate with Agencies Providing Emergency Shelter): The Program should commit to how often coordination will occur and describe services and funding that will be provided.	3-55	Yes		--	
<u>d.</u>	• Program H5.2a (Provide Sewer to Address Waste Disposal Failures): The Program should describe how often information will be provided and commit to efforts and actions to improve sewer access.	3-57 G-5	Yes		--	
<u>e.</u>	• Program H6.2c (Evaluate Development Standards in The Western Hills): The Program should go beyond reviewing development standards and commit to	3-58 3-73	~	Program details including specific commitment and timing should align with Table 3-5 starting page 3-60	3-69	

	modifying development standards by a specified time.					
8.	Programs: Sites					
a.	<p>• Programs H2.1a (Establish Higher Density Zoning Near Freeway Access) and H3.2a (Increased Density): The Programs must commit to meet all by-right requirements (Gov. Code, § 65583.2, subd. (h) and (i)) as noted in the prior review. In addition, the Programs should commit to establish appropriate development standards to facilitate achieving maximum densities.</p>	3-48 3-52	No	<p>“by-right” insufficient, should directly reference statute (see left).</p> <p>In addition, specific commitment to “establish appropriate development standards for multifamily sites in order to facilitate achieving maximum allowable densities” should be added.</p>	<p>3-57</p> <p>Program H2.1a should specifically commit to “establish appropriate development standards for multifamily sites in order to facilitate achieving maximum allowable densities” should be added.</p>	<p><u>4-17-24 Meeting with HCD staff: HCD staff acknowledged Program H2.1.a references Program H3.1.a, which has language to ensure MF standards would ensure the ability for maximum density, but asked that Town staff modify the language to include, “establish appropriate development standards for multifamily sites in order to facilitate achieving maximum allowable densities”, in place of the existing language.</u></p> <p><u>Town Action: Programs H2.1.a and H3.2.a have been modified to include the specific language.</u></p>
b.	<p>• Programs H3.2a (Rezone Town-Owned Sites) and H4.2c (Workforce Housing): While the Programs commits to comply with the Surplus Land Act and disposition of the properties, the Programs should also commit to a schedule of actions to facilitate development in the planning period (e.g., coordination and assistance with funding, final entitlements, issuing building permits), including alternative actions if the sites are not developed by a specified date in the planning period (e.g., by 2028).</p>	3-51 3-54 3-66	~	<p>Program timing should occur earlier in planning period for more significant beneficial impact during the planning cycle (e.g., alternative actions should occur no later than 2028, timing for preceding actions may need to be adjusted as needed).</p> <p>Furthermore, the element should ensure all programmatic details including specific commitment and timing, including H3.2a and H4.2c, align in both Table 3-5 and those listed beginning on page 3-45 Section B (Goals, Policies, and Programs)</p>	3-62	
c.	<p>• Program H1.3f (Monitor ADU Production): The Program should commit to monitor ADU affordability in addition to production and take appropriate action at least twice in the planning period. The Program should specify when appropriate action will be taken. Finally, a menu of action should be considered in stride with progress</p>	3-47	~	<p>Program H1.3f should also include timing to implement alternative actions, if needed (e.g., 6 months following review). Implementation timeline for Program in Table 3-5 starting page 3-60 should also</p>	<p>3-56 3-73</p> <p>Program H1.3f should also commit to monitor the affordability of ADUs</p>	<p><u>4-17-24 Meeting with HCD staff: HCD staff asked Town staff to add “Affordability” to the title of Program H1.3.f, and to include language that requires a survey before issuance of ADU permits requesting information on the proposed cost of rent for the unit as sufficient to understand and monitor affordability of new ADUs. HCD staff acknowledged that Program H1.1.a currently requires such a survey. No further monitoring is required.</u></p> <p><u>Town Action: Programs H1.1.a and H1.3.f have been revised to clarify that affordability of ADUs will be monitored by requiring a survey from applicants with permit submittal.</u></p>

	and include potential rezoning if necessary.			include monitoring timing (3 years and 6 years).		
9.	Programs: Constraints					
a.	As noted in Findings B3 and B4, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the Town may need to revise or add programs and address and remove or mitigate any identified constraints.	--	No	Depends on complete analysis	Depends on complete analysis	<u>(This is a general statement and all modified documents, including Programs, are adjusted to address each of the HCD comments as outlined in each response.)</u>
10.	Programs: AFFH					
a.	As noted in Finding B1, the element requires a complete affirmatively furthering fair housing (AFFH) analysis. Depending upon the results of that analysis, the Town may need to revise or add 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 commitment, milestones, geographic targeting and metrics or numerical targets and, as appropriate, address housing mobility enhancement, new housing choices and affordability in higher opportunity or higher income areas, place-based strategies for community revitalization and displacement protection. Particularly, the element must include significant and meaningful action to enhance housing mobility. HCD will send examples under separate cover.	--	No	Programs including ADUs/JADUs, SB9, Homesharing do not go beyond status quo or existing statutory requirements and RHNA – City should include additional programs to promote housing mobility. HCD will provide examples under separate cover.	Programs H2.1.h, H2.1.i, H2.1.j, and H2.1.k are insufficient to significantly support housing mobility for lower income households, going beyond RHNA. The City in its entirety is among the highest resource category in access to opportunity and consists of households with the highest median income in the region. These conditions and circumstances warrant significant and robust actions, not limited to the Regional Housing Needs Assessment (RHNA), to meaningfully promote housing mobility and increase housing choices and affordability throughout the City, including in lower-density neighborhoods. While the element contains a few programs to promote housing mobility such as accessory dwelling units (ADUs), it should include additional actions that promote housing choices and affordability throughout the City and increase quantified	<p><u>4-17-24 Meeting with HCD staff: Town staff had an opportunity to provide an overview of the Town of Woodside physical conditions, detailing several significant constraints that apply to rezoning various parts of Town for higher density development, such as the majority of the Town not having access to sewer that requires onsite septic systems and environmental constraints for sensitive habitat areas and stream corridors, with stream corridors providing further constraints on septic installation.</u></p> <p><u>Town staff discussed that currently the Town allows two ADUs on properties, and that one or both of the ADUs could be attached to the main residence, including conversions of existing spaces within residences for the new ADUs, beyond JADUs.</u></p> <p><u>The Town explained that it had explored several Town properties for higher density housing and have included two Town properties for higher density (Raymundo Drive and High Road) which are feasible to accommodate higher density housing in this Planning Cycle. The Town only has one religious institution (Village Church) which is located on an extremely small site that is mostly built out with a Church and nursery school, and has a small linear parking lot that is adjacent to Highway 84 (Woodside Road), making it impractical for the Church site to accommodate medium to higher density housing (it was noted that the Church received preliminary approval to include an ADU for a sexton's quarters which is part of a compensation package for the Church sexton).</u></p> <p><u>Town staff noted that Program H1.3.a requires the Town to allow additional ADUs on properties that are large enough to accommodate all necessary onsite utilities. This would allow higher density than the 3 units per lot already allowed. The properties that could support additional units are spread throughout the Town and would serve as areas that could accommodate 4-5+ units on each lot. Program H1.3.b requires the Town to remove local barriers for ADUs and JADUs, which will further help the lots that can support more units to do so. Program H1.3.c has already been implemented to remove permits fees for ADUs which further reduces barriers to additional units to be placed on existing lots. The Town is currently in the process of scheduling Planning Commission and Town Council review of ADU regulations, including allowing more ADUs on properties, as part of the Programs mentioned above.</u></p> <p><u>HCD staff noted that given the constraints of the Town, primarily sewer infrastructure, that multiple ADUs allowed on properties to provide medium density sites throughout the Town should be sufficient for the Town to satisfy this comment.</u></p> <p><u>Town Action: Nothing necessary based on existing Programs to allow additional units on properties that throughout entire Town.</u></p>

				objectives for housing choices and affordability. Additional examples of housing mobility actions include identifying additional multifamily capacity, missing middle housing capacity, religious institutional sites, City-owned and public facility sites, and additional conversion of existing spaces within single family residences to ADUs beyond junior accessory dwelling units (JADU).	
11 Quantified Objectives					
<u>a.</u>	The element must include quantified objectives for construction, rehabilitation, and conservation by income group, including extremely low-income households. Please see the Building Blocks for additional information.		No	Include quantified objectives estimating the number of housing units by income category that can be constructed, rehabilitated, and conserved over a five-year time period. This requirement could be addressed by utilizing a matrix like the one illustrated below. See Building Blocks for additional guidance as well as the table example below.	3-52
12 Public Participation					
<u>a.</u>	Page 3-4 states outreach was conducted to various organizations including those advocating for lower income housing – to demonstrate diligent efforts the element should specifically identify which organizations this statement is referring to Page 3-11 summarizes high level key takeaways from public engagement, but should also indicate how public input was directly incorporated into the element including policies and program outcomes	3-4 H-15	Yes		--

13 Other					
<u>i.</u>	Public comments				
<u>b.</u>	Document availability	Cover letter		Yes	
<u>c.</u>	Rezone timing				
<u>d.</u>	50% nonvacant finding				
<u>e.</u>	Electronic sites inventory				
<u>f.</u>	AB 2339				
<u>g.</u>	Minimum density/overlay				