

To: Kevin Bryant, Town Manager, Town of Woodside

From: Patrick O’Keeffe, Special Advisor

Subject: Responses to State Department of Housing and Community Development
First Housing Element Review Comment Letter

Date: March 7, 2023

The following provides information to respond to questions and comments from the State Department of Housing and Community Development (HCD) in their first Housing Element review letter dated October 14, 2022. The HCD comments are attached as Attachment A and the responses follow the order and organization of the HCD letter (which follows the order of the HCD Compliance Checklist). Each response first summarizes the HCD comment, then provides a response for HCD consideration. In some cases, the response is a summary of where the information requested already exists. Where supplemental information or policies may be appropriate there is a recommended revision to the element. For either type of response, the applicable page numbers are stated at the end in bold to assist HCD staff with completing the HCD Compliance Checklist.

The Town staff and its consultant team met twice with HCD in January 2023, to discuss the responses and key issues. Two meetings with the Town Council were held in January to discuss the additional January HCD comments. This revised version of the Response to Comments reflects additional responses and revisions to Housing Element policies per Council direction provided on January 31st. This Response to Comments and a second version of the Housing Element will be resubmitted to HCD for a second formal review, along with all of the appendices. There are 12 appendices A through L that were submitted to HCD for the first Housing Element review. For the second review most of the appendices remain the same except for revisions to the following:

- Appendix F – Housing Development Constraints and Zoning Analysis
- Appendix G – Adequate Sites Analysis
- Appendix H – Public Engagement Summary
- Appendix K – AFFH Analysis
- Appendix I – ADU Production

A. Review and Revision

HCD Comment

The comment starts with Government Code Section 65588(a) and (b) requiring review of the previous element (Cycle 5) to evaluate the implementation progress. The HCD comment adds a statement requiring a thorough program-by-program review in addressing housing goals,

including quantifying results and evaluating effectiveness, and including special needs populations.

Woodside Response

Section 2.0 of the Cycle 6 draft Housing Element contains the information set forth in the statute and the addresses the HCD comments as follows:

- Section 2.1 and Table 2-1 describe how the Town met and exceeded its Cycle 5 RHNA goals by 63 units (**Page 2-1**).
- Section 2.2 and Table 2-5 is a program-by-program review and evaluation of each housing policy in the Cycle 5 element and includes how the policy will be carried over and/or modified for Cycle 6 based on the review. Where appropriate, data is quantified to support the analysis such as Table 2-3 showing building permits issued for Accessory Dwelling Units (ADU's) (**Pages 2-4, 2-6**)
- Special needs groups are discussed in Section 3.0, "Goal H4: Promote the Availability of Housing for Special Needs Groups" promoting housing opportunities for the disabled and seniors. Section 2.2 includes a narrative discussion on modification of the Town Municipal Code in Cycle 5 to facilitate special needs housing and additional measures needed for Cycle 6. Information and data on other special needs groups including large households, female-headed households and homeless are included in Section 1.2 Woodside Demographics – Characteristics and Trends (**Pages 2-5, 1-3**).

B. Housing Needs, Resources, and Constraints

1. Affirmatively Furthering Fair Housing (AFFH)

HCD comments start with a citation of Government Code Section 65583 (c)(10)(A) regarding measures to assess and promote fair housing in the community. Comments and responses about specific aspects of compliance with this section are discussed in the following sections a) through h). The consulting firm of Dyett and Bhatia was engaged to amend and supplement the AFFH analysis in a new Appendix K.

a) Fair Housing Enforcement and Outreach

HCD Comment

In summary this comment states the element must include information about the Town's ability/capacity to provide enforcement and outreach for fair housing, including investigation of complaints, remedies, efforts/methods to communicate with protected classes and the public, and compliance with fair housing laws and regulations.

Woodside Response

The revised Appendix K of the Cycle 6 Housing Element states that from 2013 to 2021 only two fair housing inquiries were filed, and from 2017 to 2021 no fair housing complaints were filed (data was available in different time frames). Section 3.0 of the Cycle 6 draft Housing Element contains information on outreach including Town Council meetings, webinars, and Planning Commission meetings. Per national data from the National Fair Housing Alliance (provided in Appendix K), 73% of the 2020 fair housing complaints were processed by private fair housing

organizations rather than state or federal government agencies. **(Pages: Appendix K and Housing Element Section 3.3).**

In addition, the following policies to provide outreach to protected classes were implemented for the Cycle 5 Housing Element **(Page 299)**:

- **Goal H5: Provide, Develop, and Maintain Public Information Regarding Housing Availability** – contains information about the Town providing extensive information on the Town website regarding housing resources available in the region. The Town has recently updated the links for Housing Resources on the website.
- **Policy H1.1(b) Rental Availability Information** – states the Town will continue to provide information on its website as a resource for listings of affordable rentals.
- **Policy H5.4f Public Participation** – states the Town will solicit additional input at rezoning hearings.
- **Policy H4.4(a) Equal Opportunity Housing Organizations** – states the Town supports a variety of equal opportunity housing organizations including HIP Housing and the Housing Endowment and Regional Trust (HEART) and provides links to housing resources on its website, as outreach to protected classes based upon race, age, gender, family status, and religion.
- **Policy H4.4(b) Referrals**- states the Town has and will provide links to housing resources on its website, including links to two investigative and enforcement agencies: the U.S. Department of Housing and Urban Development, and the State Department of Fair Housing and Employment. These agencies provide resources and a means for resolution of fair housing complaints, including filing complaints related to discrimination against protected classes.

Recommended revision for the Cycle 6 element: Include the above polices from the Cycle 5 Housing Element as Cycle 6 policies under Goal H2 Affirmatively Further Fair Housing as new subsection H2.2. In addition to the above policies from the Cycle 5 element add the following new outreach polices:

- **Provide Multi-Lingual Information**
The Town will distribute fair housing information in languages other than English, in handouts that will be distributed with ADU applications, and for display at Cañada College, Woodside Library, and Town Hall.
- **Provide Information for Non-Profit Housing Assistance Organizations**
The Town will add information to the Town website on housing complaints enforcement and contact information for non-profit information and enforcement organizations, including Project Sentinel, Legal Aid Society of San Mateo County, and the Community Legal Services of East Palo Alto. Include this information in the handouts developed for ADU applications.
- **Rental Assistance**
In Woodside, renters northeast of Canada and Whisky Hill Road, including Hispanic renters in this area, are more cost burdened than in the rest of town. The Town provides information regarding rental assistance programs offered by the Housing Authority of the County of San Mateo County (HACSM), including financial support, pro-bono legal assistance and emergency rental assistance to low-income tenants facing eviction, and/or

disputing with their landlords over the habitability of their rental unit. Through this program, the Town will also collaborate with HACSM and non-profit service providers active in the county, such as Nuestra Casa, Casa Circulo, and El Centro de Libertad, to proactively promote the availability of these programs with informational fliers and referrals from Promotoras.

- **English Learner Services**

Woodside Elementary English learners having lower test scores and greater absenteeism than native English speakers. As a member of the San Mateo County Libraries Joint Powers Authority, the Town of Woodside supports a range of educational support services offered at the Woodside Branch, including live online tutoring, live help for language learners, online writing assistance, and the LEAP Learning Platform, a diagnostic test center with customized study plans, lessons, and live tutoring. Through this program, the Town will actively promote the availability of these programs to English learners. Town actions may include: posting information and links on the Town website; promoting services via Townwide newsletters; and, facilitating connections between Woodside Elementary teachers and Library staff.

b) Integration and Segregation

HCD Comment Summary

In summary this comment recognizes that the draft Housing Element includes data on integration and segregation but lacks analysis of patterns over time. Further, the comment indicates that the analysis should include patterns regarding family status, disabilities, and income both locally, and in comparison to the region, with a summary of issues. The comment calls for a description of local concentrations of white residents, and racial disparities within the region.

Specific HCD Comments and Town Responses

- *HCD Comment:* “Analysis of integration and segregation patterns over time.”
Woodside Response: Appendix K is a detailed analysis of integration and segregation locally and within the region. Housing Element Section 3.4 Affirmatively Furthering Fair Housing (AFFH), subsection b – History of Segregation in the Region, contains an analysis of patterns of segregation over time from Appendix K and the San Mateo County Historical Association, including a narrative of the segregation patterns since the World War II migration, the discriminatory practices that contributed to the patterns of segregation, and a history of state and federal legislation prohibiting discrimination **(Pages: Appendix K; Housing Element Page 3-12)**.
- *HCD Comments:* “...analyze segregation and integration of family status, income, and persons with disabilities... both locally and regionally and concluding with a summary of issues. Describe local concentrations of white residents and compare to region”
“...regional analysis should analyze how town relates to immediate surrounding areas to examine significant differences in income patterns”. “Describe local concentrations of white residents within the Town and evaluate disparities and differences in race within

the region.” ” A summary of these three issues should be added to the Housing Element.”

Woodside Response:

Family status is analyzed in Appendix B Housing Needs Data Report, however the body of the Housing Element does not repeat the information.

Recommended revision: add the following bullet to Housing Element Section 3, subsection 3.4 Affirmatively Furthering Fair Housing (AFFH), subsection (c) Woodside Fair Housing Assessment, list of bullets page 3-14, as a new bullet: “Woodside households are predominately Married Couple Households at 74.8 % with Female Headed Households representing 5.6% of the households (compared to 10.1% County-wide)., but 46.7% of the female headed households in Woodside fall below the Federal Poverty Line.”

Income: Income is analyzed in Appendix K and summarized in the Housing Element with the following statement: “Economic diversity is also limited: 75% of households in Woodside earn more than 100% of the Area Median Income (AMI) compared to 49% in the county overall. Nearly all census block groups in the town have median incomes above \$125,000 and households experiencing poverty is low throughout Woodside.”

Disabilities: Persons with disabilities is analyzed in Appendix B Housing Needs Report and summarized in Section 1 of the Housing Element with a statement that Woodside has proportionately fewer households with disabilities (5%) than the County as a whole (8%), but this proportion is likely to increase as the population ages. The most common disabilities in the town for all ages are ambulatory (2.6%), hearing (2.3%), and independent living (1.7%) **(Page 3-14)**.

Recommended revision: Repeat the above sentence in the Section 3, subsection 3.4 Affirmatively Furthering Fair Housing (AFFH), subsection (c) Woodside Fair Housing Assessment, list of bullets page 3-14, as a new bullet.

- **White Residents:** Appendix K contains a detailed analysis of integration and segregation locally and within the region. Portions of the appendix are included in the body of Housing Element Section 3, subsection 3.4 Affirmatively Furthering Fair Housing (AFFH), subsection (c) Woodside Fair Housing Assessment, list of bullets page 3-14 as follows: “In 2019, 79.0 percent of Woodside’s population was White while 0.9 percent was African American, 7.3 percent was Asian, and 9.1 percent was Latinx. People of color in Woodside comprise a proportion below the overall proportion in the Bay Area as a whole. Since 2000, the percentage of residents in Woodside identifying as White has decreased and by the same token the percentage of residents of all other races and ethnicities has increased by 10.7 percentage points. Taken altogether, the data on changing demographics over the years, the dissimilarity index, the neighborhood segregation typologies, and the diversity index point to Woodside having low segregation but low diversity within the Town.”

Summary:

Recommended revision/addition to Section 3, subsection 3.4 Affirmatively Furthering Fair Housing (AFFH), subsection (c) Woodside Fair Housing Assessment, list of bullets page 3-15, as a new paragraph following the bullets: **“In summary the Town experiences low levels of racial and economic diversity, disability, and female headed households compared to the County. The aging of the population and the large percentage of female headed households below the poverty line are potential areas of concern for future policies regarding fair housing, integration, and segregation.”**

c) Racial/Ethnic Areas of Concentration of Poverty and Affluence

HCD Comment

This comment recognizes information that was included in the element regarding Racially and Ethnically Concentrated Areas of Poverty (R/ECAP) but requires additional information regarding concentrated areas of affluence (local and regional), the reasons for the affluence including past land use practices, lack of public investment in affordable housing; and add policies that promote inclusion, housing mobility and new housing choices.

Woodside Response

- **Concentration** - Section 1.2 Woodside Demographics – Characteristics & Trends in the Housing Element, and Appendix B Housing Needs Report, contains information about racial and income concentration in Woodside and compared to the region as set forth in Table 1-2 Population by Race, Table 1-4 Households by Household Income Level, and accompanying explanatory text (**Pages: 1-4; 1-6**).

Recommended revision/addition: add on Page 1-6 just above Table 1-4, the following text: **“According to State Department of Housing and Community Development data and maps, the Town has a predominance of higher income households compared to the region and is a Racially Concentrated Area of Affluence with high concentrations of higher income White residents.”**

- **Analysis of Concentration**

Racial -The Housing Element Section 3.4 Affirmatively Affirming Fair Housing, subsection b. History of Segregation in the Region – describes the historic patterns of discriminatory real estate practices that contributed to the racial concentration in Woodside. (**Page 3-12**). Notwithstanding this historic pattern Appendix K Fair Housing Assessment, Section II Integration and Segregation, Dissimilarity, and Isolation Indices states that on a scale of 0-100 (0 equals perfect integration and 100 equals complete segregation); Woodside has values of 0-39 generally indicating low segregation. Woodside has a lower Dissimilarity Index value of 16 compared to the Bay Area average of 43. (**Appendix K**).

Land Use - the Town has historically retained a low-density character due to a combination of infrastructure and environmental constraints, conservation of open space/wildlife habitat, and providing regulations that allow land suitable to accommodate medium to large domestic animals (e.g., horses) within the densely populated region. Environmental constraints are described in the Housing Element

Section 3.6 Sites Inventory and Assessment to Accommodate Housing Units including “very high fire hazard zones, steep topography, limited access to sewer, and environmentally protected habitats (e.g., stream corridors that contain habitats for endangered or threatened species such as the San Francisco Garner Snake and California Red legged Frog) that are widespread throughout the Town of Woodside. Housing development in Woodside is additionally constrained by geologic conditions such as known and inferred earthquake faults, including the San Andreas Fault, and active landslide areas in the Western Hills.” This text is geographically illustrated in Map NH2 Fault Zones, Map NH 3 Flood Zones and Map LUE Western Hills and Environmentally Sensitive Areas. **(Pages 3-21 to 3-23).**

Investment in Affordable Housing/Inclusive Community – The Town has amended its Municipal Code to support the creation of ADU’s as a source of affordable housing that is feasible with the area’s high land cost. Discussion of ADU’s is found in Housing Element Section 3.8 a. Strategies to Meeting RHNA Cycle 6, Accessory Dwelling Units and Junior Accessory Dwelling Units. These units are discussed in various sections of the element as a means of increasing housing opportunity and mobility, and creating inclusive affordable housing geographically dispersed throughout the community. **(Page 3-32).** Further, in the Cycle 5 Housing Element the Town created a Multi-Family Overlay Zone for the Cañada College site to allow higher density development with greater affordability for teachers and students **(Page 3-34).**

Policies for New Housing Choices – Section 3.8 of the Housing Element also discusses additional actions to promote housing mobility and new housing choices with its discussion of SB 9 lot splits and rezoning of three parcels for higher density. **(Pages 3-32 to 3-34).**

d) Disparities in Access to Opportunity

HCD Comment

This comment recognizes information already provided on opportunity disparities but states there is a lack of qualitative and quantitative support. The comment seeks additional information regarding factors contributing to education access, high economic opportunity scores with low employment, geographic difference in economic opportunity in the western portion of the Town (including impacts to protected classes), access to transportation, reasons for low Town scores on environmental outcomes, and access to opportunity for disabled persons.

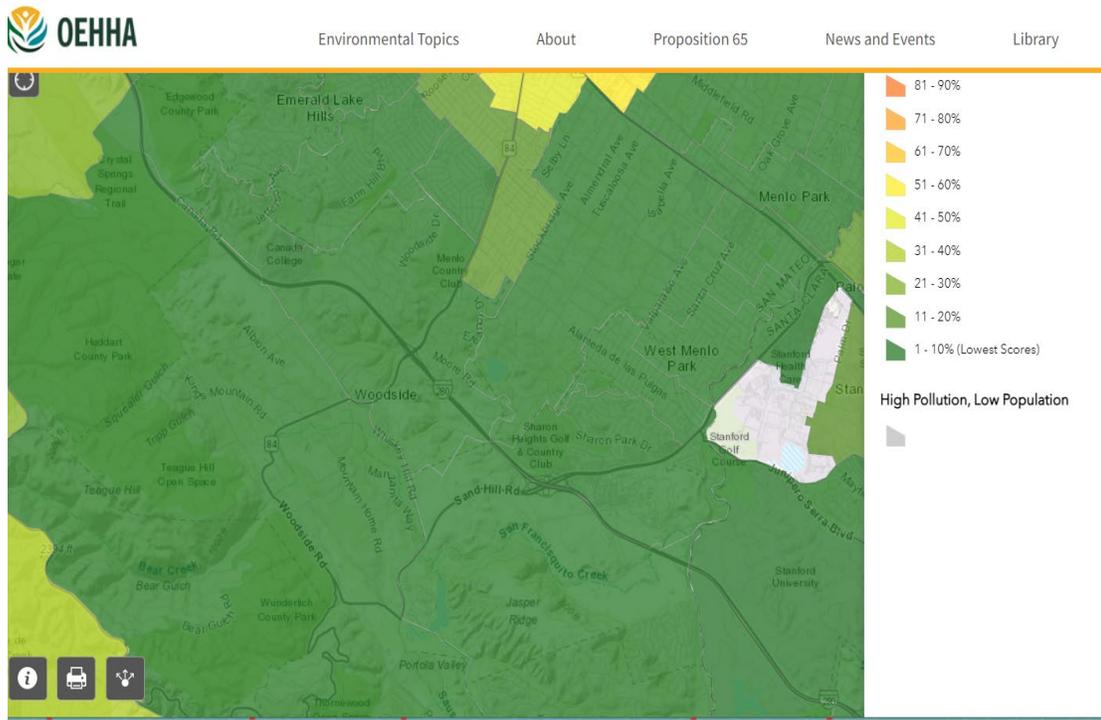
Woodside Response

- **Education Access** –Appendix K, Section K4 – Disparities in Access to Opportunity – describes the racial characteristics and percentage of students receiving free or reduced lunch benefits of the four school districts serving Woodside and compares that data to the County-wide districts data. Factors that contribute to the disparity for which data is provided in this appendix include: 1) students that are learning English, with data presented on low math and English scores, and higher rates of absenteeism; and 2)

lower rates of college admission and higher rates of high school dropouts for non-white students. Policy solutions to these disparities are the purview of the school districts **(Page Appendix K Page 41)**.

- **Economic Opportunity Access-** Appendix K, Section K4 analyzes Town employment including the top employment industries, the jobs to household ratio (including a comparison to the County ratio), and low unemployment. The analysis indicates high out-commuting and retired households as the causes for high economic opportunity scores with low employment. Data is also presented from the State Tax Credit Allocation Committee (TCAC) Economic Opportunity Score (consisting of factors such as poverty, adult educational attainment, employment, job proximity, and home value) of .75 for the Town as a whole and .25 for the western part of town. The factors that go into the score (which are listed in this section) are the explanation for the score, i.e., the Town as a whole has lower rates of poverty, higher rates of educational attainment, low unemployment rates, and high home values. The explanation for the high score in comparison to the low employment opportunities is explained by the high rate of commuting to employment which is stated in this section. The lower score for the western area is stated in the appendix as the area west of the town, not the western portion of the town. The area west of the town is unincorporated area consisting of regional parks (Huddart and Wunderlich) and very low-density housing. Similarly, the western portion of town is low-density residential. The lack of population in these areas explain the lower score as factors that comprise the score are based on population characteristics. As these areas are parkland or a Very High Fire Hazard Area, it is inappropriate to add policies that would increase the population thereby raising the low score. **(Pages Appendix K, Page K-41)**.
- **Transportation** –This topic is discussed in Appendix K Section K4, Transportation, and discusses the bus and paratransit services that are provided to Woodside by the San Mateo County Transit District. Seniors are served by both services. Private ride sharing services such as Uber and Lyft are also a good resource for seniors, although current usage data for Woodside residents is not available. **(Page Appendix K Page K-43)**.
- **Environmental Outcomes-** This topic area includes geographic areas vulnerable to sources of air and ground pollution, and is discussed in Appendix K4, Environment. The scores are TCAC scores based on the CalEnviroScreen 4.0 Indicators. The original Appendix K, submitted to HCD in July 2022 states Woodside “scores moderately to poorly on environmental outcomes...” which is the basis for the HCD comment reflecting that language. However, in reviewing the CalEnviroScreen 4.0 data this information is not correct, rather the majority of the Town is rated at the lowest category of 1 to 10%, with small portions the 11 to 20% and 51 to 60% categories, which means lower potential exposure to pollution sources. (See Figure 1, the new 4.0 version map is the same). The new Appendix K now states : “...all of Woodside and most of its immediate surroundings scored More Positive Environmental Outcomes with very little difference in each block group’s score.” Since the environmental outcome is actually positive it will not be necessary to discuss the factors contributing to a poor score. **(Appendix K, Page K-42)**

Figure 1. Excerpt From CalEnviroScreen Map 3.0



- Opportunity Access for Persons with Disabilities** -This information is provided in Appendix K, Section K4. Data provided includes information on the most common disabilities consisting of ambulatory, hearing, and independent living. The data shows no unemployment of persons with disabilities. Since the predominant disabilities are associated with the senior population, the existing polices in the draft Element for senior housing address this area (Page Appendix K Page K-44)).

e) Disproportionate Housing Needs and Displacement

HCD Comment

This comment recognizes the data showing good stability for protected classes that might experience housing needs due to cost burden, overcrowding, homelessness, and substandard housing, compared to the County; but states the analysis must include displacement risk due to the Town’s affluence, and potential disasters (fire, flood, and earthquake).

Woodside Response

- Affluence** - Appendix K, Section K5 – Disproportionate Housing Needs and Displacement Risk –describes the high housing cost for both housing values and rent levels. Further, the section describes the 28% of households that are burdened by high housing costs and the higher impact of this burden on Hispanic households than White households. Large households have a smaller rate of cost burden at 12% of the

households. It seems self-evident that cost burdened households are at higher risk of displacement due to the Town's higher housing costs supported by its higher levels of affluence, but a sentence to that effect could be added to this section of the appendix if appropriate (**Page Appendix K, Page K-48**).

- **Disaster Risk** – This topic is discussed in Housing Element Section 3.6 Sites Inventory and Assessment to Accommodate Housing Units, which includes the following: “very high fire hazard zones, steep topography, limited access to sewer, and environmentally protected habitats (e.g., stream corridors that contain habitats for endangered or threatened species such as the San Francisco Garner Snake and California Red legged Frog) that are widespread through the Town of Woodside. Housing development in Woodside is additionally constrained by geologic conditions such as known and inferred earthquake faults, including the San Andreas Fault, and active landslide areas in the Western Hills.” This text is geographically illustrated in Map NH2 Fault Zones, Map NH 3 Flood Zones and Map LUE Western Hills and Environmentally Sensitive Areas. Disaster risks are discussed in further detail in the General Plan Natural Hazards and Safety Element with several illustrative maps. All of these risk factors could lead to displacement on a temporary or permanent basis as discussed in Appendix K (**Appendix K, Page K-60**).

Recommended revision to the Housing Element: add the following sentences to Section 3.6 Sites Inventory and Assessment to Accommodate Housing Units, to the end of the last paragraph prior to subsection a): “Further information on areas unsuitable for housing due to natural features that create the potential for natural disasters can be found in the General Plan Natural Hazards and Safety Element.”

f) Sites Inventory

HCD Comment

“...include an analysis demonstrating whether sites identified to meet ...RHNA are distributed throughout the community in a manner that affirmatively furthers fair housing.” HCD states the analysis should address the income categories the sites will address and how the location of the sites will improve or exacerbate integration/segregation. HCD asks that policies are included to promote an inclusive and equitable community.

Woodside Response

- **Site Distribution** - Appendix G, Table G-2 Proposed RHNA Plan, lists the sites that are suitable for housing development by income category and in comparison to the RHNA. The map in **Figure G-2 Housing Sites and Environmental Constraints**, depicts the geographic distribution of these sites throughout the community demonstrating a dispersal of housing opportunity that enhances integration of income groups and avoids concentration of affordable housing (**Page: all of Appendix G**).

Recommended revisions to the Housing Element: add the following sentence to Section 3.6 Sites Inventory and Assessment to Accommodate Housing Units, subsection d) Affirmatively Furthering Fair Housing, on page 3-27 to the end of the paragraph prior to Figure 3-9: **“This geographic dispersion of new units avoids concentration of affordable units in one area and promotes integration and access to opportunities and resources.”**

- **Policies-** Housing Element Section 3.9 Housing Program and Action Plan – Guiding Principles, Goals, Policies, and Programs, sets forth as Guiding Principal #1 a policy to provide adequate housing for all protected classes and lists all the classes. Goal H1 and Policy H1.2 encourages development of ADU’s and JADU’s as affordable housing (**Page 3-42**).

Recommended revision: add to Policy H1.2 - Promote ADUs and JADUs as an Opportunity for Affordable Housing – the following: **“to Promote an Inclusive and Equitable Community.”**

g) Contributing Factors

HCD Comment

List contributing factors to fair housing issues, such as community opposition, lack of affordable housing, etc.

Woodside Response

Recommended revision: add a new subsection “d.” to Section 3.4 Affirmatively Furthering Fair Housing titled **“Contributing Factors to Fair Housing Issues”** and add the following text: **“One of the major methods of creating affordable housing in Woodside is through development of ADUs. Resident survey information concerning ADUs demonstrates strong support for this approach. The Town will continue to support ADU creation supplemented by rezoning of three sites for higher density housing and supporting higher density housing at the Cañada College site. Potential contributing factors that may make these solutions to the lack of affordable housing difficult to implement include the following:**

- **Limited local job opportunities.**
- **Limited access to frequent and widespread public transportation.**
- **Lack of access to sewer infrastructure.**
- **Limitation on density from existing zoning.**
- **Difficulty in obtaining public or private financing to offset the costs of affordable units.**
- **Timing of the Cañada College capital improvement program.**
- **Limited site capacity due to environmental constraints such as fault zones, fire hazards, and slopes.**

These factors are addressed by the discussion of sites in Section 3.8- Strategies to Meeting RHNA Cycle 6, and policies in Section 3.9- Housing Program and Action Plan – Guiding Principles, Goals, Policies, and Programs.”

h) Goals, Actions, Metrics and Milestones

HCD Comment

HCD comments on what the element must include are summarized as follows:

- Goals and actions based on a complete analysis.
- Goals and actions must address contributing factors to fair housing issues.
- Actions must have specific commitment, milestones, metrics, and geographic targeting.
- Address as appropriate housing mobility, new housing choices, affordability in high opportunity areas.
- Place based strategies for community preservation.
- Displacement protection.

Woodside Response

This section is discussed in Section 3.9- Housing Program and Action Plan – Guiding Principles, Goals, Policies, and Programs (**Page 3-42**). The following responses use the word “policies” to mean principals, goals, programs, and actions. The narrative policies in Section 3.9 are summarized in Table 3-5-Action Plan for Program Implementation (**Page 3-57**).

- **Policies Based on Analysis** – All of the policies are based on the numerous studies in appendices A to K.
Recommended Revision: add a column to Table 3-5 Titled “Analysis/Factor” and add for each policy the analysis appendix the policy is based on (e.g., Appendix B)
- **Contributing Factors**
Recommended revision: add the contributing factor the policy addresses where appropriate in the new Table 3-5 column for Analysis/Factor (add the factors discussed above to the bottom of the table and number them to allow use of the number in the column).
- **Commitment, Milestones, Targeting, Metrics** – The policies start with more general goal statements and work toward more specific actions for each goal as set forth in Table 3-5 (**Page 3-57**). Each specific action is described in the program column and is a commitment to implement demonstrated by the other columns describing the responsible department or agency, funding source, program measures, targets, and implementation timing.
- **Mobility, Choices, Affordability** – The policies set forth in Section 3.9 Housing Program and Action Plan are a suite of programs designed to address broader housing mobility, encourage development of more housing choices, and create more housing affordability throughout the community which as a whole is a high opportunity area (**Page 3-42**).
- **Place Based Strategies** – Per HCD Building Blocks: “Place-based strategies to encourage community conservation and revitalization involves approaches that are focused on conserving and improving assets in areas of lower opportunity and concentrated poverty such as targeted investment in neighborhood revitalization, preserving or rehabilitating existing affordable housing, improving infrastructure, schools, employment, parks, transportation, and other community amenities.” As discussed throughout the needs, resources, and constraints portions of the element, Woodside does not have areas of concentrated poverty, low resources and opportunities, affordable housing resources in need of rehabilitation, or a deficiency of schools and parks in good condition. The conditions and strategies described in HCD Building Blocks do not have application to Woodside.

- **Displacement Protection** – Per HCD Building Blocks: “Protecting existing residents from displacement comprises strategies that protect residents in areas of lower or moderate opportunity and concentrated poverty and preserves housing choices and affordability.” As discussed in the section above these conditions and improvement strategies do not have application to Woodside.

2. Analysis of Population and Employment Trends/Quantification of Needs for All Income Levels

HCD Comment

For extremely low-income households (ELI), quantify existing/projected ELI households and their housing needs including tenure and overpayment.

Woodside Response

Recommended Revisions: add the following text to Section 1.0 Introduction, subsection, c. Housing and Household Characteristics, as a new section at the end after the subsection on Special Needs Residents starting on Page 1-13:

Extremely Low-Income Households (ELI)

Number of Households - Housing Element Introduction Section 1.2 Woodside

Demographics, Table 1-4 Household Income Levels, shows the percentage of extremely low-income households (less than 30% of Area Median Income-AMI) at 8% compared to 13.3% for the County and 14.7% for the Bay Area (Page 1-6). The 8% ELI Woodside households is comprised of approximately 144 households (1799 total households). HCD’s Housing Element guidance notes that jurisdictions may use their RHNA for very low-income households to calculate their projected extremely low-income households at 50% of the very low-income allocation. The Cycle 6 RHNA allocation to Woodside for extremely low-income households is 45 using 50% of the very low-income households allocation. Therefore, the Town will need to plan for an additional 45 ELI households housing needs over the next eight-year planning cycle.

ELI Housing Needs – These households can be negatively impacted by the following factors:

- **Cost burden** – Is defined by a household paying more than 30% of its income on their housing payment. This is particularly important for ELI households as their discretionary income is limited. Per Figure 26-Cost Burden by Tenure, in Appendix B – Housing Needs Data Report (Page 39), six percent of renters are cost burdened (compared to 11.6% for ownership). This burden falls more heavily on lower income households. The Figure 27 – Cost Burden by Income Level (Page 40) - indicates 96% of ELI households are experiencing cost burden.
- **Displacement** – This risk is discussed on Page K-52– Displacement Risk of Appendix K - Woodside Fair Housing Assessment, and shows eight percent of Woodside residents moved in the past year (compared to 12% County-wide) and the Urban Displacement Project does not identify any Woodside areas as “Sensitive Communities” vulnerable to displacement.
- **Housing condition**- Appendix K - Woodside Fair Housing Assessment, Page K-60 states fewer than 1% of households are living in units considered substandard.

- **Overcrowding - Appendix K - Woodside Fair Housing Assessment, Page K-49 states there are no households experiencing overcrowding.**
- **Affordable unit availability- Per Table G-2 Cycle 6 Proposed RHNA Plan (Page Appendix G-12) the Town will have sufficient housing production over the eight-year planning period to house the projected number of ELI households."**

3. Household Characteristics

Overpayment

HCD Comment

Analyze the number of households overpaying by tenure.

Woodside Response

See Figure 26-Cost Burden by Tenure, in Appendix B – Housing Needs Data Report, (Page 39), and text addition in the prior Section 2 response.

Housing Conditions

HCD Comment

Include analysis of housing conditions in addition to the federal data on plumbing and age of housing.

Woodside Response

Per information from the Town Building Division there are approximately six units in need of rehabilitation. Due to the expensive nature of the community's housing stock, housing in poor condition is not a significant issue.

Recommended revision: add a second sentence to Housing Element H6.2.d – Utilize Rehabilitation Programs- "The Town website contains information about County rehabilitation programs under the Housing Resources page."

4. Residential Development Land Inventory

RHNA Progress

HCD Comment

Reduction of RHNA by units approved/under construction since June 2022; and clarify Table 3-5 pipeline units are current applications or basis of assumptions that units are in the pipeline.

Woodside Response

Recommended revision: Add footnote to Table 3-4 explaining status of pipeline units.

Sites Inventory

HCD Comment

Include calculation of units in whole number increments, demonstrate potential development capacity for parcels with existing uses, identify sufficient sites for above moderate income in Tables 3-5 and G-1. **[renumbered to 3-4 and G-2]**

Woodside Response

Recommended revisions: Per a new sites analysis by Dyett and Bhatia (Appendix G) the number of units in Tables 3-4 and G-2 are revised to show sufficient units to satisfy above moderate- income RHNA allocation as shown in Table 1. The new analysis is detailed in the revised HCD Excel Site Inventory spreadsheet. These tables are reformatted to simplify the data presentation.

Table 1. Revised Table 3-4 Proposed RHNA Plan

	Low and Very Low Income	Moderate Income	Above Moderate Income	Total
Current Zoning Sites				
Vacant Single-Family Sites			105	105
Non-Vacant Single-Family sites			44	44
Pipeline Projects	6	3	21	30
Cañada College	75			75
ADUs @ 15 units annually	72	36	12	120
Rezoning Sites				
773 Cañada Site @ 20 units/acre		16		16
High Rd. @ 20 units/acre	11	5		16
Raymundo @ 20 units/acre	12	5		17
Total	176	65	182	423
RHNA Allocation - Base	142	52	134	328
RHNA Buffer @ 20%	28	10	27	65
Total RHNA + Buffer	170	62	161	393
Surplus/Deficit	+6	+3	+21	+30

Cañada College Site

HCD Comment

Clarify if there is an existing development application or analyze feasibility of new residential development including affordability assumptions, College plans and timing, restrictions of units to students/faculty, and actions that facilitate approvals.

Woodside Response

Housing Element Section 3.8 Strategies to Meeting RHNA Cycle 6, Subsection d. Higher Density Housing, describes the prior units approved for the College site, the Town's rezoning of the site for multi-family development, and the planned allocation of an additional 75 units to be included in a new San Mateo College District (District) master plan for all college campuses (Page 3-34). There is no pending application for these new units. The units will be restricted to student and

family and employee housing. The Housing Element already has policies to facilitate development by streamlining the application approval process and supporting the development (Page 3-48).

Recommended revision: add the following text to the Higher Density Zoning section of the Housing Element on Page 3-34: **“In July 2022, the San Mateo County Community College District adopted the 2022 Districtwide Facilities Master Plan (FMP), which was developed to guide short- and long-term planning for the District’s three campuses. The District is now actively seeking funding for student and family housing at its campuses. As a first phase, the District is in the process of applying for a State grant to support housing at the College of San Mateo campus. If successful, the District would move to a second phase to obtain grant funding to support student and family housing at one of its other two campuses, including Cañada College. The second phase application submittal could take place as soon as July 2023. The District has indicated that 75-80 units at Cañada College is a reasonable assumption.”**

Realistic Capacity

HCD Comment

Provide support for residential build out assumptions including land use controls, utility availability, past residential trends, and likelihood of 100% commercial development on commercial property included as potential housing sites.

Woodside Response

The detailed HCD Excel Sites Inventory spreadsheet includes this information.

Small and Large Sites

HCD Comment

Demonstrate suitability of sites less than a half-acre or larger than 10 acres, and non-vacant sites, to accommodate lower income housing.

Woodside Response

A new map of sites depicting sites for new housing by income group has been added as Figure G-2 Housing Sites and Environmental Constraints in Appendix G, Page G-2.

Zoning for Lower Income Households

HCD Comment

Identify sites to accommodate lower income households based on factors such as market demand, financial feasibility and development experience. For communities with density standards of 20 units per acre the analysis is not required. Woodside does not meet the 20 units per acre standard with proposed densities of 10 units per acre for affordable housing sites, and the element does not include the supporting analyses for the lower density. If rezonings are not completed by January 31, 2023 the element must include programs for rezoning including meeting by right requirements.

Woodside Response

The first draft of the Housing Element (July 2022) included sites proposed for rezoning at 10 units per acre for affordable housing. For the revised second draft the Town Council has changed the

proposed density to 20 units per acre consistent with Government Code Section 65583.2 eliminating the need to provide the analysis that would have been required for the lower density initially proposed. Policy H3.2a for rezoning of sites has been amended to revise the density to 20 units per acre. Table 5 – Action Plan for Program Implementation, has the date for rezoning deadline as December 31, 2023. Regarding by right approvals see new policy H4.3 Other Special Needs Housing for approval standards for various types of special needs housing. See also discussion in Section 2 – Sites Analysis of this memorandum for discussion of applicability of by right approvals per Government Code Section 65583.2(h) and (i).

Town Owned Sites

HCD Comment

Element must include additional discussion of each site regarding densities, capacity, constraints and schedule for disposition and compliance with the Surplus Land Act (SLA).

Woodside Response

See revised Appendix G – Adequate Sites Inventory for discussion of the site characteristics. The schedule for disposition of the sites and compliance with the SLA are set forth in Policy H 3.2a in the policies section of the Element and the Action Plan Table 3-5.

Suitability of Non-Vacant Sites

HCD Comment

Include analysis demonstrating development potential of these sites. If the element relies on these sites for more than 50% of the RHNA for lower income households demonstrate existing uses are not a constraint.

Woodside Response

The analysis of these sites is found in the revised Appendix G – Adequate Sites Inventory. This includes exiting structures, development trends, infrastructure support, and environmental constraints. All of the non-vacant sites are assumed to meet moderate and above moderate income RHNA categories.

SB 9 Sites

HCD Comment

Analyze experience, trends and market conditions that support lot split assumptions. Provide information that existing uses on sites are not an impediment to lot splits. Provide information on existing zoning controls or planned controls or amendments to encourage lot split development.

Woodside Response

Recommended revision: add the following paragraph as a new second to last paragraph in Section 3.8 Strategies for Meeting Cycle 6 RHNA, subsection b – SB9 Units: “In response to the enactment of SB 9, the Town adopted Ordinance 2022-624 (amended by Ordinance 2022-625), and Resolution 2021- 7464 establishing subdivision, zoning, and design standards for ministerial approval of SB 9 lot splits. A significant number of existing lots in Woodside

cannot be divided under existing minimum lot size requirements. Therefore, SB 9 lot splits can result in ministerially approved smaller parcels, making it substantially easier and more attractive for property owners to subdivide their lots and construct smaller units that will be more affordable. In the past year since the State's approval of SB 9, there has been some interest expressed from property owners in SB 9 lot splits in Woodside. SB 9 is a new state law, so there is minimal recent experience on how many SB 9 lot split applications might be received, so the Table 3-4 Proposed RHNA Plan does not include units produced from SB9 lot splits.

Recommended revision: Add to the policy H2.1 Provide Opportunities for Varied Housing Types two new sub sections: "c. Provide information to property owners on SB9 lot split standards, and survey their interest in pursuing lot splits, as part of the annual information postcards mailed for ADU information in Policy H1.2.a"; and "d. Review the SB 9 ordinance to allow homes with size limitations similar to ADU limits in the ADU ordinance.

Replacement Housing Requirements

HCD Comment

Sites identified as affordable housing sites for RHNA units with existing units that are affordable and are removed for new units cannot be counted for RHNA unless the Town has an adopted policy regarding replacement housing per Government Code Section 65915(c)(3). This State regulation applies to units created using the density bonus provisions of the Government Code.

Woodside Response

Although the Town has not adopted an ordinance to implement the density bonus provisions of State law, the law applies. The sites that are identified for affordable units through rezoning for higher densities, and the Cañada College site do not have existing affordable units that would be removed requiring replacement housing.

Accessory Dwelling Units (ADUs)

HCD Comment

The element projects 20 ADUs per year. Clarify the assumptions for this rate of production. Include policies that incentivize affordable ADU's. Commit to monitoring ADU production if not meeting targets and implement additional actions to meet RHNA if ADU production is less than estimated. Several areas of the Town's existing ADU ordinance are not compliant with State law and a program should be added to amend the ordinance.

Woodside Response

The Town Council decided at its January 31, 2023, meeting to reduce the number of ADU's produced annually from 20 to 15 which is the historical average per Appendix I – ADU Production in Woodside. Per Government Code 65583.1 HCD is allowed to consider prior ADU production for identifying future ADU production: "The department may also allow a city or county to identify sites for accessory dwelling units based on the number of accessory dwelling units developed in the prior housing element planning period whether or not the units are permitted by right, the need for these units in the community, the resources or incentives available for their development, and any other relevant factors, as determined by the department." This reduction to 15 ADUs annually responds to the HCD comment regarding

assumptions for the previous production rate of 20 ADU's annually. Since the assumed production rate for the planning period is now equal to the historic rate no assumptions for the previous higher rate are needed.

The Housing Element already includes incentives for ADU production per Policy H1.3- Continue to Remove Barriers to Constructing ADUs and JADUs (**Page 3-44**). The Town held a series of workshops in Fall 2022 to provide information to residents on how to apply for ADU approvals per the Town's ADU ordinance. Seventy three percent (73%) of the residents attending expressed interest in developing an ADU or JADU. Policy H2.2a has been added to the Housing Element to provide information on rental housing availability including ADU's.

Recommended revision, add policy: "H1.2d Periodically amend the ADU ordinance to be consistent with State law and recommendations from HCD."

Previously Identified Nonvacant and Vacant Sites

HCD Comment

These sites must be rezoned within one or three years at appropriate by right densities for developments with at least 20% affordable units for lower income households. If these sites were included in the prior planning period, they must be identified and planned for rezoning.

Woodside Response

The Cañada College site was previously identified in the prior Housing Element and was rezoned for multi-family housing. Three new sites in the Cycle 6 Housing Element are scheduled for rezoning within one year of the adoption of the new Housing Element per Policy H3.2 – Rezone Properties Allowing Increased Housing Density (**Page 3-49**).

Infrastructure

HCD Comment

Demonstrate existing or planned infrastructure to support the RHNA units, and for sites with inadequate infrastructure analyze the constraints and impacts on the RHNA sites.

Woodside Response

The utilities serving the sites are set forth in the HCD Excel Site Inventory spreadsheet of housing sites and are discussed in Appendix G Adequate Sites Inventory. All sites are adequately served by utilities with the exception of sewer. Most parcels rely on septic tanks or leach fields for sanitary waste disposal. Policies for coordinating with utility providers to serve development are set forth in Section H5-2 Provide Adequate Utilities (**Page 3-54**).

Recommended revision - add the following text to the end of the section Identifying Adequate Sites (Page 3-29): "The 773 Cañada site requires a connection to an existing sewer district. The estimated cost of installing sewer for 773 Canada is \$125,000 which is a minor cost for a development estimated to cost \$16 million (at \$500 per square foot development cost as estimated by Appendix F-1, excluding land cost). For the ADU/JADU units assumed in Table 3-4 Proposed RHNA Plan, the sites will have existing infrastructure serving the existing residence that will serve the ADUs as well. The cost of expanding septic tanks or leach fields to accommodate ADUs will vary on a parcel-by-parcel basis and cannot be defined as a constraint at this time."

The Raymundo Drive site has potential seismic constraints that may affect the project design but may not reduce the number of units that could be developed. Raymundo Drive also has an estimated cost of \$2.6 million for connection to the sewer system, which may reduce the land value but will not preclude development of the site. Given that the Town owns the site, land cost is not a constraint to develop housing.

Per Government Code Section 65589.7 the Town will provide a copy of the Housing Element to all utility service providers following its approval by the Town Council. Utility providers are required to prioritize service to developments that provide affordable housing."

Environmental Constraints

HCD Comment

Describe environmental constraints that could impact identified housing sites including the Farm Hill open space covenant and the High Road site.

Woodside Response

The Town Council removed the Farm Hill site from the RHNA list of sites due to constraints posed by the open space covenant on the site. The Housing Element Section 3.8 Strategies to Meeting RHNA Cycle 6, Subsection d. Higher Density Housing (**Page 3-32**) describes the new development sites and their respective environmental constraints.

Zoning for a Variety of Housing Types

HCD Comments

- Emergency Shelters – Clarify they are allowed in the Community Commercial (CC) zone, capacity of zone, and development standards.
- Transitional and Supportive Housing – demonstrate compliance with State law allowing this use in all residential zones.
- By-right Permanent Supportive Housing – demonstrate compliance with State Law allowing this use in all multi-family residential and mixed-use zones.
- Low Barrier Navigation Centers – demonstrate compliance with State law allowing this use by-right in multi-family and mixed-use zones.
- Single Room Occupancy Units (SRO) – describe where SRO's are allowed.
- Farmworker Housing- demonstrate compliance with State law concerning how farmworker housing is permitted.
- Manufactured Housing- Describe if these units are allowed in a single-family zone on a permanent foundation.
- ADUs – Add program to update ADU ordinance once HCD comments on the ordinance have been received by the Town.

Woodside Response

Recommended revision: Add a new subsection to Section 3-6 (Page 3-20) Housing Element Section Sites Inventory and Assessment to Accommodate Housing Units titled "g. Special Needs Housing" with the following text: "Government Code Sections 65583 (c) (4)(A), (c) (1) and 65583.2(c) require the assessment of zoning and site availability for a variety of special needs housing including emergency shelters, transitional housing, supportive housing, low barrier

navigation centers, single room occupancy units, farmworker housing, and manufactured housing. Emergency shelters, transitional housing, supportive housing, and low barrier navigation centers are forms of housing for the homeless, some with accompanying services that assist with employment training, substance abuse counseling, and transition to permanent housing.

Per Section 1.2 - Homelessness - Woodside has almost no homeless residents. In 2017 and 2019, when the most recent “snapshot” surveys were conducted, no homeless persons were found to be living in Woodside (down from 2 in 2015, and 6 in 2013). However, State housing laws require cities to provide zoning that supports these housing types. The following is an analysis of the zoning and site availability for each of these housing types.

- Emergency Shelters – Are a permitted use in the Community Commercial (CC) zone (Municipal Code Section 153.100 Zoning Districts, Table A-1 Permitted Uses in Residential and Commercial Zoning Districts). The areas with this zoning are developed with commercial buildings and the opportunity for establishing a shelter would be within a vacant tenant space already constructed to commercial development standards. Parking for these existing commercial uses support what would be needed for shelter employees.
- Transitional/Supportive Housing – Is permitted in all single-family residential zones per Municipal Code Section 153.100 Zoning Districts, Table A-1 Permitted Uses in Residential and Commercial Zoning Districts. There are no special restrictions for this type of housing different from the restrictions and standards of the single-family residential zoning districts. Supportive housing includes group homes.
- By-Right Permanent Supportive Housing – Per Government Code Section 65583.2 by-right housing means housing that is permitted without discretionary approvals and does not require CEQA analysis. Per Government Code Section 65651 by-right supportive housing must be allowed in multi-family zones if certain restrictions regarding affordability are met. The current zoning per Municipal Code Section 153.100 Zoning Districts, Table A-1, does not allow supportive housing in the Multi-Family Residential Development Overlay (MFRD) zone. The Housing Element contains a new policy in Policy 4.3 – Provide for Emergency Shelter and Transitional Housing- to amend the Municipal Code to allow supportive housing as a by-right use in the MFRD zone provided the conditions for affordability per State law are met.
- Low Barrier Navigation Centers – is another form of supportive housing that provides supportive services. Navigation centers typically provide longer terms of stay than emergency shelters, making them more like supportive housing, and they are considered a form of supportive housing for the purpose of zoning compliance. These facilities are also a by-right use for multi-family zones per Government Code 65660. This use will be added to the new Policy 4.3.
- Single Room Occupancy (SRO) units – Are similar to a hotel use and are often a converted hotel or motel. No such facilities are present in Woodside and are not listed as a permitted or conditionally permitted use. Per Section 153.107 of the Municipal Code “Uses not listed in the table under any case category, shall not be permitted under this chapter unless the *Planning Commission* determines that the *use* is similar to

the *uses* listed in the table.” For the purpose of a Planning Commission determination, SRO facilities will be considered a commercial use allowed in the Community Commercial zone. New policy 4.3 will include a program to amend the Municipal Code to add SRO units as a permitted use in the Community Commercial zone.

- **Housing for Farmworkers** – The Employee Housing Act, Health and Safety Code Section 17021.5, requires housing for six or fewer employees to be treated as a single-family residence and a permitted use. Housing of up to 12 units or 36 beds are a permitted use in zones that allow agricultural uses. Policy 4.3 will include a provision for the definition of a single-family home to include farmworker housing for up to six employees. Agricultural uses are permitted in all residential and commercial zones except multi-family residential. Policy 4.3 will describe farmworker housing as permitted use in all zones except multi-family residential.
- **Manufactured Housing** – Is a permitted use in all single-family zones.”

5. Analysis of Governmental and Nongovernmental Constraints for Housing of All Income Levels

Land Use Controls

HCD Comment

The Housing Element must analyze:

- Land use controls as constraints on a variety of housing types.
- Land use controls effect on cost, feasibility, densities, timing, and approval certainty.
- Past and present efforts/programs to remove constraints.
- Development standards for the multifamily MFRD zone.
- Densities and uses allowed in each zone.
- Zones that meet the default density requirements.
- By-right residential uses in the Community Commercial zone.
- Constraints for the Special Conservation Planning (SCP) zone and impact on development.
- Measure J height restrictions impact on development and program to amend.

Woodside Response

Recommended revision: Add a new Section 3.5 to the Housing Element (and renumber subsequent sections) titled **“Governmental and Nongovernmental Constraints on Housing”** and add a first sentence: **“The following is a description and analysis of the various potential constraints on the production of a variety of housing types to meet the housing needs of all income levels as required by Government Code 65583(a)(5). Where appropriate policies to overcome the constraints are included.**

- **Land Use Controls Constraints** – Appendix F - Housing Development Constraints, Development Costs, and Zoning Analysis – provides an analysis of constraints due to land use controls. As explained in Section 3.6 Sites Inventory and Assessment to Accommodate Housing Units – substantial portions of the community are affected by natural hazards including fault traces, landslides, severe fire hazards, streams, and

flooding. These hazards combined with State open space and environmental preservation goals, and historic community values for a low-density environment discussed in the Wildland Urban Interface section of Appendix F, support the low-density zoning limitations with single family residences.

- Land Use Controls Effect on Cost/Feasibility/Timing – Appendix F and Appendix F-1 also have information on development cost and the limitations on housing development based on high land and construction costs. High construction costs are found throughout the Bay Area and are due to high labor and materials costs that cannot be significantly lowered by local housing policy. High land costs in Woodside are partly a function of a desirable environment due to the beauty of the area and its low density, combined with quality schools and proximity to high paying employment. Increasing density of zoning throughout the community could decrease per unit land cost but is inconsistent with environmental goals and constraints. Per Policy H2.1a - Provide Opportunities for Higher Density Housing with Access to High Resource Areas – the Town will rezone three sites for higher density housing and has previously established a multifamily zone allowing higher densities. The Town’s ADU and SB9 ordinances are a form of density increase throughout the community within the context of existing zoning as they add additional units in all zones regardless of zoning lot size minimums. Appendix F has information regarding the timing for development approvals and the time frames for Woodside are comparable or better than other San Mateo County jurisdictions and indicate a reasonable expectation of approval certainty. Woodside development fees are comparable to other San Mateo jurisdictions as a percentage of development costs.
- Past and Present Programs to Remove Governmental Constraints – The ADU, SB9, and Multifamily Residential Development (MFRD) overlay district ordinances are previously adopted policies for removing density constraints. The ADU ordinance will be amended to be consistent with state law. Additional new policies for removing constraints are the modification of regulations and expediting permits for ADUs set forth in Policy H1.3; rezoning properties for higher density in Policy H3.2; incentivizing higher density housing in Policy H3.3; and providing adequate utilities per Policy H5-2.
- Density and Development Standards – Density and development standards for each zone are discussed in Appendix F.

The MFRD zone currently provides for a density of 18 units per acre. Allowed uses are multifamily residential and ADUs. Development standards are summarized in Table C of Section 153.110 of the Municipal Code. **Policy H3.2b will be added to Policy H3.2 Rezone Properties to Allow Increased Housing** to revise the MFRD zone unit maximum density to 2,200 square feet per unit (from current 2,400 square feet per unit) to meet Government Code Section 65583.2 regarding the default density of 20 units per acre for housing affordable to lower income households. The other standards in the MFRD zone including setbacks, height, and pervious area are appropriate.

The Special Conservation Planning (SCP) zone has a minimum lot size of five to 10 acres. This zoning category is reserved for areas of high environmental sensitivity (Fire

zone, earthquake zone, streams, soil instability, flooding) as discussed in Appendix F (Page F-6) and are not appropriate for higher density development.

The Community Commercial (CC) zone is intended for commercial rather than residential uses, however single-family, supportive, transitional, and emergency shelter housing residential uses are permitted. This is a non-discretionary permit process but not by-right (CEQA analysis is still required). There is a limited amount of commercial zoning in the community and these areas are not significant opportunities for residential use.

Measure J height restrictions are set forth in Appendix F. The measure was a citizen initiative that has limited application to parcels zoned commercial that front on Woodside Road. There are no plans to seek an amendment to this policy constraint because it is uncertain whether voters would approve the amendment, and because the limitations apply to so few parcels that it only minimally affects the Town's ability to promote housing development.

- Fees, Exactions and Transparency– Woodside fees for single-family and small multifamily (ADUs) are set forth in Appendix F. These fees are shown on a per unit basis, as a percentage of development cost, and compared to other jurisdictions in San Mateo County. Building permit fees for ADUs were recently reduced to encourage ADU development. Per the Town's Fee Schedule development fees (entitlement planning fees and building fees) are either flat fees or based on estimated building value, so the per unit fees for large multi-family units will be the approximately the same as ADU unit estimates. Fees are available on the Town website per the transparency requirements of Government Code Section 65940.1 with a link to the fees in the Planning Department section.
- Local Processing and Permit Procedures –Development approval for single-family and multifamily residential units require Architectural and Site Review Board (ASRB) review. Applications for ASRB review are available on-line with information on submittal requirements. Development standards are clearly described in the zoning ordinance. These permits take a reasonable amount of time to obtain as set forth in Appendix F Table F4 Permit Processing Times (Page F-5), and therefore do not create uncertainty for approval. The permit costs as a percentage of the development cost are reasonable in comparison with other San Mateo County cities as set forth in Appendix F Table F-3, (Page F-4).
- Compliance With State Density Bonus Law - Government Code Section 65915 sets forth the requirements for approval of density bonuses that may be requested if a portion of a project is affordable to low-and-moderate income households. Per new program H3.3.c (within policy "Incentivize Higher Density Housing") the Town will develop a Density Bonus ordinance in 2024 setting forth the standards and application of density bonuses per State law.
- On/Offsite Improvements – Subdivision improvement requirements are set forth in Chapter 152, Article X of the Municipal Code. Modifications to the standards may be approved by the Planning Commission if it finds the alternative standards are in the public interest. The minimum street widths in Section 152.115 Table A are reasonable

with 40-foot minimum width for rural roads, 60 foot minimum for collectors, and 80 foot minimum for arterials. Sewage disposal for most of the town consists of septic tanks and drain fields which is a lower cost solution than sewer. Geotechnical, grading, and erosion control requirements are consistent with the Town's hilly terrain. Overall, on/offsite improvement requirements do not add unreasonable costs that would constrain the supply and affordability of housing.

- Codes and Enforcement – Building and Zoning codes are set forth in Chapters 150 and Chapter 153 of the Municipal Code. The Town periodically adopts the most recent version of the State Building Codes. The adopted code includes Chapter 7A – Materials and Construction Methods for Exterior Wildfire Exposure which may add to the cost of construction but is required due to the substantial risk of wildfire. Code enforcement procedures are commonly initiated in response to a complaint made to the Town and are carried out by the Town Community Preservation Officer and Town Attorney's Office, if necessary. The codes and enforcement activities are customary and do not pose constraints on housing cost and supply.
- Constraints on Housing for Persons with Disabilities – Persons with disabilities may be housed in supportive housing. The definition of supportive housing includes housing that was previously referred to as group homes providing long term housing with supportive services for persons with disabilities. Supportive housing is permitted in all single-family residential zones per Municipal Code Section 153.100 Zoning Districts, Table A-1 Permitted Uses in Residential and Commercial Zoning Districts. There are no special restrictions for this type of housing different from the restrictions and standards of the single-family residential zoning districts. The definition of family in the Municipal Code is: "An individual, or group of two or more persons occupying a *dwelling* and living together as a single housekeeping unit in which each adult resident has access to all parts of the *dwelling*." This definition allows supportive housing of groups. The Housing Element includes a program to allow supportive housing in multi-family zones per the discussion of "Zoning for a Variety of Housing Types" above.
- Other Local Ordinances – The Town does not have other ordinances that would impact the cost and supply of housing such as inclusionary requirements for affordable housing or growth controls.
- Nongovernmental Constraints – These potential constraints include land costs, construction costs, and the availability of financing. Development costs including land and construction costs are discussed in Appendix F-1. The section above: "Land Use Controls Effect on Cost/Feasibility/Timing" discusses how development costs might be reduced through land cost reductions with higher density zoning and approval of ADUs. Financing for development in Woodside is available at the same availability as the County as a whole. There are no mortgage deficient areas or underserved groups. To the extent that special governmental financing is needed for the development of affordable units at the Cañada College site, there are policies for the Town to assist the San Mateo Community College District with obtaining this financing per Policy H3.1 – Support New Independent Housing at Cañada College.

6. Analysis of Nongovernmental Constraints for Housing of All Income Levels

HCD Comment

The element generally did not address this requirement. Provide analysis of construction cost, financing availability, approval time frames, requests to develop less than anticipated in the land use inventory, and hindrances to meeting RHNA.

Woodside Response

The Housing Element will combine the analysis of governmental and nongovernmental constraints into one section with nongovernmental constraints discussed as a subsection (see above). The analysis of development cost (land and building costs) is set forth in Appendix F-1. Approval time frames are discussed in the proposed addition to the Housing Element for governmental constraints above. Requests for approval of projects with densities lower than planned has not been experienced for RHNA sites and is not anticipated to be an issue. The potential hindrances to the Town meeting its RHNA are discussed in other sections above and are addressed as needed with new policies to be added to the Housing Element.

7. Analyze Special Housing Needs and Opportunities for Energy Conservation

HCD Comment

While the element includes some information on special needs groups, it must include the following additional information:

- Number of seniors.
- Number of persons with disabilities (not just seniors).
- Analyze special housing needs for all groups.
- Analyze residential energy conservation opportunities.

Woodside Response

- **Seniors**
Recommended revision: add to Introduction Section 1, subsection on Special Needs Residents the following sentences: [as the first sentence] **“The following analysis of special needs groups is based on Appendix B Housing Needs Data Report.”** [amend the second sentence to read]: **“In Woodside the population is aging, and Appendix B Figure 2 shows approximately 1,175 seniors in Woodside or approximately 21% of the total population.”**
- **Disabilities**
Recommended revision: amend the third sentence in the special needs subsection to read: **“5.3% of residents of all ages have one or more disabilities and may require accessible housing.”**
- **All Group Needs** – The Introduction Section 1 subsection on Special Needs Residents summarizes the needs of all special needs groups, and Appendix B Housing Needs Data Report contains detailed information on all special needs groups. With the exception of the large percentage of seniors, there are few people with special needs that would suggest

policies other than existing and new zoning policies that support the establishment of special needs housing (emergency shelters, transitional and supportive housing).

- **Energy Conservation Opportunities**

Recommended revision: add a new subsection 3.7 to Section 3.0 Cycle 6 Housing Element (and renumber subsequent sections) titled “**Energy Conservation Opportunities**” and insert the following text under the heading: “**The housing needs analysis required by Government Code 65583(a) includes a requirement to analyze the opportunities for energy conservation in residential development. The Town of Woodside has adopted the most recent Title 24 CALGreen Building Code that includes energy conservation measures. Section A4.602 is a table of measures that will be implemented for new development that includes enhanced durability, construction waste reduction/recycling, pollutant controls, insulation, and Energy Star appliances. Planning policies that assist with conservation include policies to meet the RHNA housing needs for all income groups, encouraging ADUs, establishing the multifamily MFRD zone, and rezoning of properties for higher density.**”

C. Housing Programs

1. Housing Program with Implementation Timeline

HCD Comment

Programs must have specific commitments and discrete timelines. Compliance comments were made on 21 programs/policies within the element.

Woodside Response

Each of the 21 program comments from HCD are responded to in a combination of changes to the full policy language (referred to as narrative) and changes to the summary in Table 3-5 Action Plan for Program Implementation.

- **Program H2.c- Provide Public Transit**

HCD comment: Include frequency of transit information outreach.

Recommended response: Add to narrative section: “**on an annual basis**” and revise Table 3-5 implementation column to read “**annually**” instead of “on-going”.

- **Program H3.1.a Cañada College Housing Support–**

HCD comment: Describe resources to be provided, affordability levels, status, and timing.

Woodside response: The status of this program is described in the policy.

Recommended additional response: add to the narrative as new last sentences: “**The Town will assist the District in obtaining local non-profit, state and/or federal financing to allow a portion of the units to be affordable to very low income (50 units) and low income (25 units) persons. The specific timing of this assistance and this program will be determined with the District based on the District’s facilities master plan implementation schedule but will be within the RHNA Cycle 6 planning period.**”

- **Program H3.1.b Cañada College Development Standards Streamlining –**

HCD comment: Include affordability levels of the units.

Recommended revision: add to the narrative a second sentence: “**The target housing goals are at least 75 units of which 50 are very low income and 25 are low income to implement the Cycle 6 RHNA.**”

- **Program H3.3.a Reducing Fees for Higher Density Housing –**
HCD comment: Add commitment to housing outcomes, completion by 2022, and allowed densities.
Recommended revisions: Add second and third sentences to the narrative: **“The outcome of the review may be the reduction of fees for projects that are in multifamily (MFRD) zones, or achieve 20 units per acre, to assist with the creation of affordable units to meet the Cycle 6 RHNA. The review will be completed by the end of 2023.”** Also amend the table implementation time frame to 2023.
- **Program H3.3.b Expedite Higher Density Housing –**
HCD comment: describe density, program outreach, and application to more than ADUs.
Recommended revisions: add to the first sentence in the narrative: **“including ADUs, JADUs, and developments of 20 units per acre”** (after the words higher density housing). Add a second sentence: **“Applicants for higher density housing will be informed of this policy when inquiries are made for higher density sites and as part of the ADU page on the Town website.”** Amend the table targets column to add **“and developments of 20 units per acre”**.
- **Program H4.1.a Enable Disabilities Housing Access –**
HCD comment: state status of Reasonable Accommodation Procedure, add metrics and outreach.
Recommended revisions: Add to the narrative new sentences at the end of the paragraph: **“The Town will develop and implement a Reasonable Accommodation Procedure to inform disabled persons of their rights and remedies under the federal Fair Housing Act and Americans with Disabilities Act, including Town code exceptions and referral to County and non-profit resources for resolution of discrimination complaints, and funding resources for home modifications. The procedure will be developed and added to the existing Housing Resources website page by the end of 2023 and will be added to the annual mailout of information regarding ADUs.”**
- **Program H4.1.b Amend Zoning for Disabilities Exceptions –**
HCD comment: specify what amendments are needed, specific actions and timing.
Town response: this policy does not refer to existing code requiring amendments, rather to future amendments that may be needed to respond to changes in State law which are currently unknown.
Recommended revision: Delete the existing policy language and substitute the following language in this section: **“The Town will amend and expand the existing Municipal Code section 153.204 -Exceptions for Minor Improvements for Disabled Access – to include ADUs.”**
- **Program H4.1.c Group Homes –**
HCD comment: add group homes are allowed in all residential zones, objective standards for facilities larger than six residents, and implementation timing.
Town Response: Under the new section for transitional/supportive housing types under the Zoning for a Variety of Housing Types discussed above, supportive housing is defined to include group homes which are allowed in all residential zones.

Recommended revision: add a second sentence to the narrative: **“Group homes are considered supportive housing and are allowed in all residential districts pursuant to Welfare and Institutions Code Section 5116. Supportive housing of six or fewer residents is a permitted use in the Town’s zoning code. The Town will develop a supportive housing zoning classification in 2024 for facilities that exceed six residents as a conditional use including objective approval standards.”**

- **Program H4.2 Promote Special Needs Housing Opportunities –**

HCD comment: Programs should include persons with special needs.

Town Response: As discussed above in the zoning for a variety of housing section, the major special needs group is seniors. Policies are included for disabled and homeless as these are required housing types for zoning, but there is little data support for large family and farmworker housing policies. The following revisions reorganizes the special needs housing into one section for clarity.

Recommended revisions: Add a new **“Program H4.3 Other Special Needs Housing”**. Move the senior housing policy from the existing H4.2 section to this new section and retitle existing H4.2 to H4.3. Move the existing policy and program H4.3 Emergency and Transitional housing to the new special needs section 4.3 as subsection a.

- **Program H4.2.b Employee Housing Opportunities –**

HCD comment: Description of employees does not match state requirements; clarify compliance with Employee Housing Act; add outreach, timing, metrics, and objectives.

Town Response: The senior housing policy in this section will be moved to the special needs policy as discussed above and the title of the section will be revised to remove seniors and disabled (also Table 3-5). The remaining policies will be focused on housing for public sector employees and private sector housing for estate management such as caretakers and equestrian managers. To provide the background for the new policies that will be added to this section the recommended revision adds a new subsection **“1. Employee Housing Act”** to section 1.3 Recent State Housing Laws and Town Implementation with the following Text: **“The Employee Housing Act is set forth in Health and Safety Code Section 17000 and is administered and enforced by the San Mateo County Department of Environmental Health Services. The Act regulates housing that is provided by an employer to employees and establishes standards for the construction and maintenance of employee housing. The regulations apply to facilities housing five or more employees. The Town does not currently have employee housing facilities but has established policies in the event a private property owner desires to construct a facility.”**

Recommended revisions to the revised **“Policy H4.2 Promote Affordable Housing Opportunities for Service Personnel, Caretakers, Equestrian Managers/Employees and Public Sector Employees”** add a new subsection/program **“a. Private Sector Employee Housing - Revise the Town website Housing Resources page to provide information on the provisions of the Employee Housing Act and contact information for the San Mateo County Department of Environmental Health Services as the regulator of the law. Provide this information to property owners as part of the annual mailout for ADUs information.”** Revise Table 3-5 to be consistent.

- **Program H4.3.a Cooperate with Agencies Providing Emergency Shelter –**
HCD Comment: add specific implementation, frequency, timing, and funding that will be provided.
Woodside response: This policy is an on-going pledge of support through appropriate zoning for agencies that may wish to establish a facility. There is no Town funding pledged to support facilities.
Recommended revision: Add a second sentence to this policy: **“Support includes the permitted use zoning for these facilities in the Community Commercial zone.”**
- **Program H5. 1c Facilitate Neighborhood Preparedness –**
HCD Comment: Provide frequency, outreach, and specific actions.
Town Response:
Recommended revision: Add **annual** time frame to this policy for CERT training and add the following as a second sentence to this program: **“Include information to the annual mailout to property owners about the CERT program and preparedness resources available on the Town’s Emergency Services page.”**
- **Program H5.2.a Provide Sewer to Address Waste Disposal Failures –**
HCD Comment: Add information on frequency of information dissemination and actions to improve sewer access.
Town Response: Allocation of sewer capacity and sewer connection policies are set forth in Town of Woodside Ordinance 2022-627 and the Sanitary Sewage Master Plan. These documents are available in the Town website. The low frequency of failures does not support continuous dissemination of this information, rather it is provided as needed in response to resident inquiries.
- **Program H5.2.b Prioritize Sewer for Higher Density Residential Development –**
HCD comment: Program should prioritize affordable housing.
Woodside response:
Recommended revision: add the words **“for affordable housing”** to the policy.
- **Program H5.2.c Coordinate With Cal-Water to Ensure Adequate Water Supply –**
HCD comment: Confirm existing supply is adequate for RHNA sites, and when coordination will occur.
Woodside response: Appendix G Adequate Sites Analysis (**Page G-5**) states: “Water service and dry utilities are available throughout the community”. Additional information is available in the 2020 Urban Water Management Plan – Bear Gulch, including measures for water use and supply in drought years.
Recommended revision: Add to the implementation column for this policy in Table 3-5: **“and during the application process for developments fulfilling the RHNA.”**
- **Program H6.2 Rehabilitate the Existing Housing Stock –**
HCD comment: add metrics to all programs, provide outreach.”
Woodside response:
Recommended revisions: to the Program Measures column for policy “a.” add the words **“Number of units approved”**. Add to the same column for policy “b.” **“Number of variances approved”** Add to the same column for policy “c.” **“Number of meetings held”**. Add to the same column for policy “d.” **“Number of programs utilized”**.

Information about rehabilitation resources are on the Town website page Housing Resources.

- **Program H6.2.b Provide Exceptions and Variances –**
HCD comment: Clarify if program requires discretionary actions and qualifications for approval.
Town Response:
 Recommended revision: add the following to the narrative of this section after the first sentence: **“Municipal Code Section 153.940 sets forth the discretionary approval process for variances by the Planning Commission. Findings for approval are listed as the basis for the Commission decision.”**
- **Program H6.2.c Evaluate Development Standards in the Western Hills –**
HCD comment: Add what will be the revised development standards by the completion date.
Woodside response:
 Recommended revision: add the words including **“minimum lot sizes”** to the first sentence. Add a second sentence: **“Complete the review by 2025.”**
- **Program H6.2.d Utilize Rehabilitation Programs –**
HCD comment: Include outreach and if information is available on website.
Woodside response: See information and revisions discussed in HCD Comment B3. above.
- **Program H6.3 Promote Sustainability Including Energy Efficiency**
HCD comment: Include outreach, timing for program a. and how efficiency will be encouraged.
Woodside response: Table 3-5 Program b. Program Measures column states information will be provided to encourage efficiency. See response above to recommended text to be added under Comment 7 Special Needs Housing and Energy Conservation.

2. Sites Analysis

HCD Comment

- The sites analysis is incomplete. Adequacy of sites and zoning not established.
- Program H2.1a Higher Density Zoning Near Freeway – program must meet by-right requirements and accommodate lower income RHNA.
- Program H3.2a Rezone Town Sites – must meet rezone requirements. Clarify if sites are the same as sites near the freeway.

Town Response:

- **Sites Analysis** - The revised HCD Excel Sites Inventory spreadsheet and Appendix G – Adequate Sites Inventory contain the information on adequacy of sites and zoning.
 Recommended revision: add additional information to Appendix G regarding suitability of sites per HCD criteria. (see additional text pages G-6 through G-9)
- **Program H2.1a Higher Density Zoning Near Freeway**
 Recommended revision: Revise the narrative of this policy to eliminate the Farm Hill site due to the open space covenant. Add information on inclusion of Town-owned sites at Raymundo Drive and High Road. Also revise the narrative to add a third sentence: **“The**

ordinance will allow the developments meeting the density standards to be a permitted use.” Revise Table 3-5 to change the completion date for the rezonings from January 31, 2023, to **December 31, 2023.**

There are two by-right provisions of Section 65583.2 that do not apply to this policy or the sites. The first provides that vacant sites used in prior planning periods as RHNA sites, but not developed, must be rezoned within three years to allow by-right approvals of developments that contain at least 20% affordable housing. The privately owned 773 Cañada site and the two Town-owned sites at Raymundo Drive and High Road have not been listed as an affordable housing sites in prior planning periods making this provision inapplicable. The second by-right provision concerns rezoning of sites for by-right development of affordable housing within three years if the affordable site inventory does not accommodate RHNA allocations for all income levels. Per the revised site inventory set forth in revised Table 3-4, sufficient units for all income categories are identified making this provision inapplicable.

- **Program H3.2a Rezone Sites-** The rezone requirements for by-right approvals are discussed in the above section.

Recommended revision – Eliminate the word “pre-adoption” Add a new second sentence: **“The ordinance will allow the developments meeting the density standards to be a permitted use.”**

3. Program for Extremely Low-Income Households

HCD Comment

The element must include a program to assist development affordable to extremely low-income households.

Woodside Response

Recommended revision: Add to Goal H3 Support Opportunities for Higher Density Housing, a new “Policy H3.4 Assist with the Development of Extremely Low-Income Housing” and add text under that subheading: “a. Assist with the development of extremely low-income housing through a variety of incentives. In addition to reducing fees and expediting permit processing as set forth in policies H3.3.a and b, consider modification of development standards (e.g., parking on a project basis), and assist non-profit developers with applications for State and federal grant, loan, and tax credit programs for project funding.”

4. Remove Governmental and Non-Governmental Constraints to Housing

Production

HCD Comment

Per HCD Findings B5 and B6 provide an analysis of constraints.

Woodside Response

See responses to Findings B5 and B6 above.

5. Affirmatively Further Fair Housing Opportunities

HCD Comment

Per B1 finding there must be a complete analysis of AFFH with policies that have specific commitments, metrics, and milestones.

Woodside Response

See above revised analysis, summary of existing policies, and recommended new policies.

6. Develop Plan to Incentivize ADUs at Affordable Rent

HCD Comment

HCD provided comments on five programs in the element.

Woodside Response

- **Program H1.1.b Outreach to Encourage ADUs**

HCD comment: Revise program to specify program timing, frequency of website update, and metrics.

Woodside Response: This policy includes the word “annually” in two places for frequency of outreach, website update, and outreach to organizations. The metric is annual.

- **Program H1.2.a Prepare and Distribute ADU Brochures**

HCD Comment: Quantify frequency of distribution.

Recommended revision: add the word “**annually**” to the first sentence.

- **Program H1.2.c Conduct ADU Workshops**

HCD Comment: Specify current status of implementation.

Woodside Response:

Recommended revision: replace the existing sentences with the following sentences to Program H1.2.c: “**The Town conducted workshops in Fall 2022 for each district.**

Information was provided on state and local ADU laws. A total of 135 residents registered for the five ADU Workshops, and, on average, 61 percent attended (82 residents). The Town Council District 2 Workshop had the highest attendance at 70%. Of the 82 attendees, the comment cards recorded interest in developing 57 ADUs and 3 JADUs.”

- **Programs H1.3.a Modify Regulations for Additional ADU’s on Properties Exceeding Two Acres; H1.3.b Remove Barriers to Construct ADU/JADUs; and H1.C.3 Reduce ADU Permit Fees**

HCD comment: The word “consider” in each of these policies is not a commitment.

Revise to commit to a specific housing outcome by a date certain.

Recommended revisions: remove the word “**consider**” in each of these policies in the narrative and Table 3-5. Add the completion date of “**by December 31, 2023**”, to the narrative and revise the dates in Table 3-5 to 2023, except for program c Reducing Town Permit Fees. For this program make the following revisions to Program H1.3.c: remove the existing sentence and substitute the following sentence: “**In 2022 the Town approved a plan to reduce certain ADU fees to remove barriers to construction. The estimated value of the fee reduction over the eight- year planning period is \$960,000.”**

- **Program H1.3.d Expedite Permitting for ADUs**

HCD comment: Provide objectives including outreach.

Woodside response: The specific objective in the policy is to reduce the processing time from 30 days to 20 days.

Recommended revision: add to the policy the following additional sentence **“This standard will be included in the annual mailed information document on ADU’s.”**

- **Program H1.3.e ADU Amnesty Program**

HCD comment: Provide proactive outreach and follow up actions.

Recommended revisions: Change the implementation date from 2020 to **2023**. Add the following sentences to the policy: **“The program will include inspection of units to provide either a completion certification for units that meet code, or list of corrections needed to meet code, with a completion certification after code improvements are completed and inspected. After the program has been approved, information on the program will be included in the annual mailed information document on ADU’s. The effectiveness of the program will be determined by the number of residents using the program.”**

D. Quantified Objectives

HCD Comment

Element must include quantified objectives for construction, rehabilitation, and conservation of housing for all income groups. See Building Blocks for guidance.

Woodside Response:

The Building Blocks HCD website has been very helpful in developing the analysis and policies in the first draft element and preparing revisions for the second draft. The requisite analysis asks for the estimated number of units likely to be created by income level. The revised RHNA Table 3-4 and revised policies discussed above comply with this requirement, and the revised estimated number of units to be created exceeds the RHNA. Given the high value well-maintained nature of existing housing in the community, the majority of units that will meet the housing needs of all income groups will be new construction, and only minor production is anticipated from rehabilitation or preservation, making the sample table in Building Blocks for quantified objectives inapplicable.

E. Public Participation

HCD Comment

In addition to the information provided, the element must include information on how all economic segments were included in the element preparation including circulation of the draft element to low and moderate- income households. The element must summarize public comments and show how they were incorporated into the element.

Woodside Response

The Housing Element Section 3.3 Public Outreach and Engagement **Pages 3-4 through 3-9** provides the information requested. All residents received a postcard informing them of the Housing Element process and information workshops. The 21 Elements group conducted workshops on Housing Elements on behalf of the local jurisdictions in San Mateo County which

is summarized in this section with a demographic breakdown of attendees of the session on Woodside. Outreach for these sessions included 30 organizations involved in affordable housing production and fair housing advocacy.

F Consistency with the General Plan

HCD Comment

Discuss how internal consistency will be maintained throughout the planning period.

Woodside Response

Recommended revision: Add a new section 1.5 to the Introduction section titled “**Consistency with the General Plan**”; and add the following sentences to that section: “**In addition to the integration of the Safety Element of the General Plan discussed in section 1.4. it is also necessary to ensure that the policies of the Housing Element are consistent with all General Plan elements. This review has occurred as part of the preparation of this Cycle 6 Housing Element, and it will be necessary to amend other elements of the General Plan to be consistent with the Housing Element policies. Ongoing consistency will be maintained as part of the annual Housing Element implementation review.**”