

Comment Reference	HCD Section	HCD Comment	HCD Examples	Tracking Note for HCD
A	Housing Needs, Resources, and Constraints			
A.1		<i>Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2...shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)</i>		
A.1.1		Fair Housing Enforcement and Outreach: While the element describes the City as having not been found in violation of fair housing laws, it should also describe how the City proactively complies with existing fair housing laws and regulations.	For additional information, please see pages 28-30 on HCD's Affirmatively Furthering Fair Housing (AFFH) Guidance Memo at https://www.hcd.ca.gov/community-development/affh/docs/AFFH_Document_Final_4-27-2021.pdf .	Edits to address this comment were made in Appendix A. Appendix A, subsection A.7, heading "Compliance with State Fair Housing Law" has been updated to state how the City complies with the laws listed (P. A-87 to A-88).
A.1.2		Integration and Segregation: The element reports some data on income at the regional (City compared to Region) and local level (areas within the City compared to each other) but should also analyze the data for patterns and trends over time, particularly at the regional level. An analysis should address trends over time, coincidences with other components of the assessment of fair housing and incorporate local data and knowledge and other relevant factors.	Examples of local data and knowledge include service providers, nonprofit developers, local foundations and city officials. Other relevant factors include zoning and land use; state and federal investments including transportation; lack of applying for state and federal resources and demographics and market conditions.	Edits to address this comment were made in Appendix A. Revisions to integration and segregation related to income and racial characteristics are addressed on pages A-14 to A-33. Integration and segregation related to special needs groups is located on pages A-45 to A-60. Our analysis ties these trends at the regional and local levels to disparities in access to opportunity on pages A-60 to A-68.
A.1.3		Disparities in Access to Opportunity: While the element reports data on disparities in access to education, economic, and environmental opportunities, it should also address disparities in access to transportation opportunities, including accessibility and combined transportation and housing costs experienced by protected groups.	Please refer to page 35 of the AFFH guidebook (link: https://www.hcd.ca.gov/community-development/affh/docs/AFFH_Document_Final_4-27-2021.pdf).	Edits to address this comment have been made in Appendix A. Appendix A has been revised to provide further analysis on transit disparities (P. A-67, and housing and transportation costs for special needs group (P. A-41 to A-56).
A.1.4		Disproportionate Housing Needs (Substandard Housing Conditions): While the element included some data regarding housing conditions, it must also identify any concentrations of substandard housing units or concentrations of older units in need of rehabilitation at the local level.		Edits to address this comment have been made in Appendix A. Appendix A has been revised to provide further analysis of substandard housing and/or concentrations of units in need of rehabilitation (P. A-79 to A-80).
A.1.5		Identified Sites and AFFH: While the element provides some analysis regarding how sites affirmatively further fair housing, it should quantify the number of units by income category and location such as the northern and southern portions of the City. Then, the element should evaluate the impacts of identified sites on existing patterns, including addressing any isolation of the regional housing need allocation (RHNA) by income group, lack of identified sites by income groups in any areas of the City and whether the identification of sites improves or exacerbates existing patterns of socio-economic characteristics.		Edits to address this comment have been made in Appendix C, Section C.6. A full AFFH analysis of sites has been added to this appendix (P. C-75 to C-101).
A.1.6		Contributing Factors to Fair Housing Issues: Upon a complete analysis of AFFH, the element should re-assess and prioritize contributing factors to fair housing issues.		Edits to address contributing factors have been made in Chapter 2 and Appendix A. Chapter 2 (P. 2-3) and Appendix A (P. A-90 to A-93) were updated to include revised contributing factors.
A.2		<i>Analyze any special housing needs such as elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter.</i>		
A.2.1		Special Needs Households : The element reports data and includes a generic discussion of housing challenges faced by special needs households. However, the element must analyze the housing needs of special needs households for each special need group including seniors, farmworkers, large households, persons with disabilities including developmental disabilities and persons experiencing homelessness. An analysis should address household characteristics, trends, local knowledge such as service providers, existing resources and strategies and the magnitude of the gap in addressing those housing needs. In addition, for farmworkers, the analysis may utilize past farmworker housing studies and other studies generally applicable to their special housing needs.	For example, the element could utilize a recent study conducted by the University of California at Merced that is available at https://clc.ucmerced.edu/sites/clc.ucmerced.edu/files/page/documents/fwhs_report_2.2.2383.pdf . Based on the outcomes of the analysis, the element should add or modify programs to address this special housing need in the region.	Edits to address this comment were made in Appendix A. Appendix A has been revised to include further analysis of special needs households as guided by the HCD comment (P. A-41 to A-59).

A.3 An inventory of land suitable and available for residential development, including vacantsites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a de

<p>A.3.1 <u>Progress in Meeting the RHNA:</u> Table C-2 (p. C-2) currently has a placeholder for "Units permitted between June 30, 2023 and December 31, 2023 ". While jurisdictions in the AMBAG region may credit units permitted, entitled, approved, or built (pipeline) since June 30, 2023, the element must demonstrate the affordability and availability of pipeline units in the planning period. Affordability should be demonstrated based on anticipated or actual rents, sales prices, or other mechanisms ensuring affordability (e.g., deed restrictions). Availability or likelihood of pipeline units being built in the planning period should address status, remaining steps, and any known barriers to development in the planning period, including other relevant factors such as the likelihood of an application or entitlement discontinuing toward development.</p>		<p>Edits to address this comment were made in Appendix C.</p> <p>Appendix C has been revised to update Table C-2, to include updated numbers for units permitted between June 30, 2023 and December 31, 2023 based on pipeline projects (P. C-2).</p>
<p>A.3.2 <u>Realistic Capacity:</u> The element must calculate the realistic residential capacity on identified sites and, generally, account for land use controls, site improvements and typically built densities and affordability. However, the element may utilize minimum densities. The element appears to utilize minimum densities based on Program 3.1.G (Housing Priority Overlay Zoning). However, Program 3.1.G should be revised to clearly commit to establishing minimum densities and apply for all identified sites utilizing minimum densities.</p> <p>In addition, given the City is utilizing an overlay and several sites appear with zoning that allow 100 percent nonresidential uses, the calculations of residential capacity should account for the likelihood that sites will utilize the overlay and include a residential component.</p>	<p>For example, several sites appear to utilize minimum densities but are not proposed with the overlay zone. Otherwise, the element provides a list of sites of approved projects from the 5th cycle planning period with relevant information such as total units built, density calculations, and affordability. However, the average density of completed developments is lower than 33 du/ac, and none of the projects included units affordable to lower- and moderate-income households. As a result, the element should either provide additional supporting information that accounts for land use controls and site improvements (e.g., heights, floor area ratio (FAR), lot coverages, parking, interior courtyard) or rescale assumptions to better align with recent trends.</p> <p>For example, to demonstrate the likelihood of utilizing the overlay, the element could discuss interest from property owners or developers. To demonstrate the likelihood of a residential component, the element could examine all development in the relevant zones and how often a residential component occurs.</p>	<p>Edits to address this comment were made in Appendix C and Chapter 2.</p> <p>Appendix C has been revised to include a clear realistic capacity analysis for each individual site. This analysis includes accounting for adjustment factors such as land use controls, site improvements, typical densities, and affordability (P. C-14; P. C-20 to C-71).</p> <p>City staff are no longer utilizing a Housing Priority Overlay Zone. Instead, the City has committed to establishing a minimum density of 33 du/ac for the base zoning of all Commercial Zoning Districts (SC, RC, and CC) and the Multi-Family Residential (R-4) Zoning District. Without establishing a minimum density, the Commercial Districts permit 0-22 du/ac and the Multi-Family Residential district permits a maximum of 33 du/ac unless enabling a maximum of 44 du/ac with affordable units (P. C-8).</p> <p>Chapter 2 has been revised to update Program 3.1.G, which has been revised to eliminate the Housing Priority Overlay Zone, and instead establishes implementation procedures and monitoring for the establishment of a minimum density of 33 du/ac to the base zoning for Commercial Districts and the Multi-Family Residential District (P. 2-21).</p> <p>This intention is rooted in enabling the construction of more residential units, rather than enabling larger units at a lower yield.</p> <p>Appendix C has been further updated to include a list of pipeline projects that utilize a minimum density of 33 du/ac in the Commercial District (P. C-16 to C-17). As well as, a list of projects that developed during the 5th Cycle, utilizing similar densities in the Commercial District (P. C-11 to C-13). These projects include</p>

A.3.3	<p>Suitability of Nonvacant Sites: The element identifies nonvacant sites to accommodate the RHNA and includes a site-by-site description. However, in many cases, the element only briefly mentions existing conditions such as what could be built, structure type and the improvement to land value tier. In addition, except for sites where owner interest in residential development in the planning period is expressed, the element should evaluate the extent existing uses impede additional development.</p> <p>In addition, for your information, the element relies on nonvacant sites to accommodate 50 percent or more of the housing needs for lower-income households, which triggers requirements to make findings based on substantial evidence that the existing use is not an impediment and will likely discontinue in the planning period. Absent findings (e.g., adoption resolution) based on substantial evidence, the existing uses will be presumed to impede additional residential development and will not be utilized toward demonstrating adequate sites to accommodate the RHNA.</p>	<p>For example, the evaluation should address (a) any existing leases or other contracts or conditions that would perpetuate the existing use or prevent redevelopment of the site for additional residential development; (b) existing regulatory framework, including incentives and potential barriers such as heights, FARs and interior courtyard requirements; (c) existing versus allowable floor area; (d) indicators of turnover such as vacancy, for sale or frequent changes in use; (3) the viability of the existing use and impacts of relocation or continuing the use and (4) any other relevant factors that may preclude or promote redevelopment.</p>	<p>Edits to address this comment have been made in Appendix C.</p> <p>Appendix C has been revised to include a section addressing nonvacant sites to accommodate 50 percent or more of the housing needs for lower-income households (P. C-10 to C-14). Additionally, a section has been added to provide context for projects that were completed during the 5th cycle and recent development trends in the Commercial District (P. C-11 to C-13). The majority of the City's sites are located in the Commercial District, where underutilized sites are most likely to develop in the eight-year planning cycle.</p> <p>The City's Municipal Code requires that all newly constructed second story floor area, including area in new buildings, remodeled buildings and replacement, rebuilt or reconstructed buildings, shall be occupied by residential dwellings only and shall not be used for any commercial use (CMC 17.14.050F). This requirement has not been an impediment to commercial development, and instead has resulted in the addition of several residential second story units. Many sites included in the Sites Inventory include property owner development intentions for second story residential additions.</p>
A.3.4	<p>City-Owned Sites: The element identifies City-Owned sites to accommodate the RHNA but also appears to indicate that redevelopment may not be likely. Specifically, the element mentions for Sites 1 (Sunrise Center North) and 2 (Sunrise Center South) that the City is only interested if the parking needs can be met and for Site 4 (City Public Works) the element discusses the City's interest if housing is feasible. The element should address the status of each of the City-Owned sites, necessary steps for entitlement and issuing building permits and any known barriers to development in the planning period.</p>	<p>For example, the element should discuss the potential for meeting the parking needs of Sites 1 and 2 and the feasibility of Site 4. Based on the outcomes of this analysis, the element should either remove the sites or add or modify programs (See Finding B2 below)</p>	<p>Edits related to this comment were made in Appendix C and Chapter 2.</p> <p>Appendix C has been revised to clearly state the City's interest and development intentions for Sites #1 and #2 (Sunset Center North and South Parking Lots). This includes the City's intentions to develop housing over podium parking. Anticipated funding for the development of podium parking has also been clarified in the individual sites analyses.</p> <p>Chapter 2 has been revised to update Program 1.1.B to give clear commitments in regard to the Surplus Land Act process (P. 2-6).</p> <p>The analysis for Site #3 (Vista Lobos) has been updated to include more specific details regarding the City's intention for development, including the use of the City's Bonus Density to enable a higher density of 44 du/ac for affordable units.</p>
A.3.5	<p>Alternative Adequate Sites: The element may utilize a variety of methods to identify adequate sites and utilizes two methods (Hospitality Employee Housing and Overnight Visitor Accommodation). While the element lists several properties that could utilize the incentive programs, it should also discuss the potential for utilizing the program, recent development trends, interest or other relevant factors supporting assumptions or rescale assumptions in the planning period.</p> <p>Furthermore, the element should list potential receiving sites for the transfer of development rights and analyze their suitability for development or redevelopment in the planning period.</p> <p>Finally, the element should include a program to evaluate the effectiveness of these programs, including progress aligned with assumptions in the inventory, and, if development is not occurring as assumed, take alternative action by a specified date to maintain adequate sites, including but not limited to additional incentives and rezoning additional sites with appropriate zoning.</p>	<p>For example, the element may utilize a method similar to accessory dwelling units (ADU) based on past trends.</p>	<p>Edits to address this comment have been made in Appendix C and Chapter 2.</p> <p>Appendix C has been revised to clarify the City's intentions for the use of Overnight Visitor Accommodation sites to a) encourage lower income housing for employees by incentivizing the development of a single unit upon receiving building permits for remodel/repair of these sites; and b) to encourage the transfer of development rights for multi-family rental residence at Overnight Visitor Accommodation sites that meet eligibility criteria (P. C-72 to C-74).</p> <p>Chapter 2 has been updated to revise Program 1.3.B and Program 1.3.D to include clear mid-cycle objectives and actions should the program not receive interest (P. 2-8 and P. 2-10).</p>

<p>A.3.6 Zoning for Lower-Income Households: The element must demonstrate adopted densities appropriate to accommodate housing for lower income households. For communities with densities that meet specific standards (at least 20 units per acre for Carmel), no analysis is required (Default Density). (Gov. Code, § 65583.2, subd. (c)(3).) Otherwise, an analysis must demonstrate appropriate densities based on factors such as market demand, financial feasibility, and development experience within identified zones. To address this requirement, the element should clearly identify which zones and allowable densities are being utilized to accommodate the lower-income RHNA. If utilizing existing zoning, the element should either meet the Default Density standard or demonstrate the appropriate densities based on the factors noted above. If utilizing planned zoning, (e.g., City-owned sites, Housing Priority Overlay, SB 10), the element must include a program(s) rezoning sites to meet all by-right requirements pursuant to Government Code section 65583.2, subdivisions (h) and (i). This rezoning should not be limited to senior housing (e.g., Site 10 – Carmel Foundation).</p> <p>In addition, please be aware, that the recent California appellate decision in <i>Martinez v. City of Clovis</i> found that while overlays can be used in a rezone, when the base zone allows residential development, both the base zone and the overlay zone must comply with the minimum density requirements of Government Code section 65583.2, subdivision (h). The City may need to adjust its rezoning strategy if the underlying zoning for sites that will be rezoned allows minimum densities less than 20 dwelling units per acre. <i>Martinez v. City of Clovis (2023) 90 Cal.App.5th 193, 307 Cal.Rptr.3d 64.</i></p>		<p>Edits to address this comment have been made in Appendix C and Chapter 2. Please note: Site number have changed since the prior draft.</p> <p>Appendix C has been revised to include a section clarifying which zones are intended to accommodate lower-income housing, as well as their default densities (P. C-8). Also included, is clarifying information regarding which strategies are being utilized to accommodate lower-income housing including, Surplus Land Act, SB 10, and utilizing a newly established minimum density.</p> <p>No sites are intended to be rezoned, with the exception of Sites #5 (First Church of Christ Parking Lot), #6 (American Red Cross), and #10 (American Legion). These sites are intended to utilize SB 10. Full details are provided in Appendix C. Chapter 2 has also been revised to update Program 1.3.1, which establishes and monitors the regulatory process to enable SB 10 for these sites (P. 2-12 to 2-13).</p> <p>Chapter 2 has been revised to update Program 3.1.G, as previously noted (P. 2-21).</p>
<p>A.3.7 Environmental Constraints: While the element discusses environmental constraints, it should also address any other conditions that could preclude development in the planning period.</p>	<p>Examples of other conditions include shape, access, contamination, relocation, title conditions, historic preservation and easements.</p>	<p>Edit to address this comment have been made in Appendix C.</p> <p>Appendix C has been revised to list environmental constraints as they apply for each individual site (P. C-21 to C-71).</p>
<p>A.3.8 Infrastructure: The element describes infrastructure limitations in the City. However, it must also demonstrate sufficient total dry utility capacity (existing and planned) to accommodate the City's RHNA for the planning period. (Gov. Code, § 65583.2, subd. (b).)</p> <p>In addition, while the element includes Programs 1.2.A (Water Distribution Prioritization for Affordable Housing) and 1.2.B (Address Infrastructure Constraints) to maintain and augment the existing water supply, the program should be revised to include discrete timelines for implementation throughout the planning period.</p>		<p>Edits to address this comment have been made in Appendix B, Appendix C, and Chapter 2.</p> <p>Appendix B, section titled, "Water Supply," is also included in the housing element to describe the City's water supply status and efforts to provide sufficient water for new residential development. (P. B-1 to B-3)</p> <p>Appendix C has been revised to include a section addressing dry utility capacity for the Sites Inventory, as well as detailing infrastructure capacity for each individual site (P. C-14).</p> <p>Chapter 2, Programs 1.2.A and 1.2.B, are also included to address priority water services for affordable developments and the City's commitment to improving infrastructure (P. 2-6 and 2-7).</p>
<p>A.3.9 Electronic Sites Inventory: For your information, pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD. Please see HCD's housing element webpage at https://www.hcd.ca.gov/community-development/housing-element/index.shtml#element for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical</p>		

A.3.10	<p><u>Zoning for a Variety of Housing Types:</u></p> <ul style="list-style-type: none"> • Emergency Shelters: While the element provides general information on emergency shelters, it must also describe how it complies with the requirements of Assembly Bill 2339 (2022). Among other changes, this amendment to Government Code section 65583, subdivision (a)(4) expands the definition of “emergency shelters,” specifying the type of zoning designations that must be identified to allow emergency shelters as a permitted use without a conditional use or discretionary permit and demonstrate the appropriateness of sites to accommodate emergency shelters, including analyzing proximity to transportation and services. The element must add a program committing to compliance with these requirements within one year of adoption. • Employee Housing: The element indicates the City does not have agriculturally designated land and therefore is not required to identify any zones to provide farmworker housing. The Employee Housing Act (Health and Safety Code § 17000 et seq.), specifically, sections 17021.5 and 17021.6. Section 17021.5 requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. Section 17021.6 requires employee housing consisting of no more than 12 units or 36 beds to be permitted in the same manner as other agricultural uses in the same zone. The element must either demonstrate consistency with these requirements or include programs to amend zoning as appropriate. For additional information and sample analysis, see the Building Blocks at https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/farmworkers. 		<p>Edits to address this comment have been made in Appendix A, Appendix B, and Chapter 2.</p> <p>Appendix A has been revised to address employee housing and farmworker housing (P. A-56 and A-57) and a new program (1.3.F) was added to Chapter 2 (P. 2-11).</p> <p>Appendix B has been revised to address transitional/supportive housing requirements (P. B-23 and B-24). Additionally, Appendix B has been revised to address the suitability of emergency shelters in the City (P. B-24 and B-25), and references Program 1.3.J (P. 2-13), which establishes an amendment to the Municipal Code to define emergency shelters and clarifies they are permitted by-right in the CC, SC, and RC zones, which allow residential uses.</p> <p>Chapter 2 has been revised to include Program 1.3.F, which establishes an amendment to the Municipal Code to meet State requirements for employee housing (P. 2-11 and 2-12). Additionally, Program 3.3.A has been added, which establishes an amendment to the Municipal Code to meet State requirements for transitional/supportive housing (P. 2-22). Program 1.3.J has been added to Chapter 2 to address emergency shelter requirements in compliance with AB 2339 Statutes of 2022 (P. 2-13).</p>
<p>A.4 An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for perso.</p>			
A.4.1	<p><u>Land Use Controls:</u> The element must identify and analyze all relevant land use controls impacts as potential constraints on a variety of housing types (e.g., multifamily rental housing). The analysis must also evaluate the cumulative impacts of land use controls on the cost and supply of housing, feasibility, and ability to achieve minimum. The analysis should specifically address heights, FARs, lot coverage and other standards such as interior courtyards and based on the outcomes of a complete analysis, the element should include programs to address or remove the identified constraints.</p>		<p>Edits to address this comment have been made in Appendix B.</p> <p>Appendix B has been updated to evaluate the cumulative impacts of land use controls on the cost of housing, feasibility, and ability to achieve minimum densities. The analysis addresses FAR, density, height, lot coverage, interior courtyards and intra-block walkways (P. B-11 to B-19).</p>
A.4.2	<p><u>Fees and Exaction:</u> While the element describes required fees for single-family and multifamily housing development, it must analyze their impact as potential constraints on housing supply and affordability. Specifically, the element must analyze the total per unit fee cost for multifamily housing units being higher than that of total fees for single family homes as a constraint and should include programs to reduce fees for multifamily housing.</p>	<p>For additional information and a sample analysis, see the Building Blocks at https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/fees-and-exactions.</p>	<p>Edits to address this comment have been made in Appendix B.</p> <p>Appendix B has been updated to include a clear analysis of the potential constraints that fees for single-family and multi-family developments may pose on housing supply and affordability. A per unit analysis was added for multifamily housing (P. B-43 to B-45).</p>

B Housing Programs

B.1 *Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be*

A.4.3	<p><u>Local Processing and Permit Procedures:</u> The element describes some typical permitting tracks under the City's processes, including design review and conditional use permits (CUP) but should also analyze the impacts on housing cost, timing and approval certainty. The analysis should specifically address approval findings for typical development that are consistent with zoning, Forest and Beach Commission hearing and story pole requirements. The element should include programs to address or remove the identified constraints.</p> <p>In addition, while the element discusses compliance with the Permit Streamlining Act, it should also discuss intersections with the California Environmental Quality Act and timing requirements, including streamlining determinations and add or modify programs as appropriate.</p>		<p>Edits to address this comment have been made in Appendix B.</p> <p>Appendix B has been updated to clearly state the approval findings for typical development that are consistent with zoning (Pages B-34-36); and the application process, approval findings, and hearings related to the Forest and Beach Commission (P. B-35 to B-37)</p> <p>Additionally, Appendix B has been updated to clarify the Local Coastal Program's required development process, which requires the use of story poles to determine the potential obstruction of significant coastal views by proposed development (P. B-53).</p> <p>Lastly, Appendix B has been updated to discuss intersections with CEQA and processing timing requirements. (Page B-48-49)</p>
A.4.4	<p><u>Constraints on Housing for Persons with Disabilities:</u></p> <ul style="list-style-type: none"> • Reasonable Accommodation: While the element lists the required findings to approve a reasonable accommodation request, it should analyze the finding that approving the accommodation "will not result in a significant and unavoidable negative impact on adjacent uses or structures." The element must analyze how this is applied and include a program to remove subjectivity, as appropriate. In addition, the element should analyze any appeals processes, including the final decision-making body and parties who can request an appeal hearing of a reasonable accommodation request. • Conditional Use Permit: While the element commits to removing use permits for certain types of housing, the element must also fully describe the CUP approval findings for potential constraints on the development of licensed residential care facilities of seven or more persons. 		<p>Edits to address this comment have been made in Appendix B and Chapter 2.</p> <p>Appendix B has been updated to include the reviewing authority and appeals process for requests for reasonable accommodation (P. B-26 and B-27). Appendix B has also been updated to describe the CUP findings process for Residential Care Facilities (P. B-28 and B-29).</p> <p>Chapter 2 has been revised to include Program 3.2.A to amend the City's Municipal Code language (P. 2-22). Program 1.4.A has also been revised to propose the elimination of CUP for multi-family housing and community care facilities (P. 2-13 and 2-14).</p>
	<p>To achieve a beneficial impact during the planning period, programs should include, where appropriate, specific commitment toward housing outcomes and discrete timing (e.g., at least annually). Programs should be revised as follows:</p>		<p>Edits to address this comment have been made in Chapter 2.</p> <p>Chapter 2 has been updated with discrete timelines and quantified objectives. Table 2-1, Quantified Objectives, has also been updated to reflect revised program objectives (P. 2-3).</p>
B.1.1	<p><u>Program 3.1A (Mixed Use Affordable Housing):</u> This Program commits to meeting with developers and soliciting input and feedback on the City's design guidelines and approval process. However, the Program should commit to taking actions resulting from the feedback provided by the development community. For example, the Program could commit to revising the guidelines/approval process if any constraints are identified as part of the feedback received. This Program should also be modified to include a timeline or frequency for those actions.</p>		<p>Edits to address this comment have been made in Chapter 2.</p> <p>Chapter 2 has been revised to update Program 3.1.A (P. 2-18 and 2-19).</p>

B.2 *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for*

B.1.2	<p>Program 3.1F (Expedited Processing Procedures): This Program commits to developing a policy that will shorten processing times by 50 percent for affordable housing projects by offering expedited review procedures for residential projects that will clarify and refine permit processing procedures for affordable housing to shorten processing procedures. However, the Program doesn't describe specific actions to substantiate the quantified objective. This Program should consist of specific commitments, including but not limited to, the removal of the story pole requirement and the Forest and Beach Commission hearing requirement for affordable projects that would allow the City to reasonably achieve a 50 percent reduction in processing times.</p>		<p>Edits to address this comment were made in Appendix B and Chapter 2.</p> <p>Appendix B has been updated to clearly state Coastal Act requirements to provide a visual analysis for new developments within the coastal zone to determine if significant coastal views are at risk of obstruction (P. B-53).</p> <p>Chapter 2 was updated to include specific actions to substantiate the quantified objective for Program 3.1.F (P. 2-21). Story pole requirements are not addressed in this program, as they are required through the Coastal Act.</p>
B.1.3	<p>Program 3.3.D (Single-Room Occupancy (SRO) Units): While the element now commits to codifying SROs as a housing type, it should provide an implementation timeframe for this action.</p>		<p>Edits to address this comment were made in Chapter 2.</p> <p>Chapter 2 was updated to revise Program 3.3.D to provide a clear implementation timeframe for the codifying of SROs in the Municipal Code (P. 2-24).</p>
	<p>As noted in Finding A3, the element does not include a complete site analysis; therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis; the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition, the element should be revised as follows:</p>		<p>Edits to address this comment were made in Appendix C and Chapter 2.</p> <p>As previously noted, Appendix C has been updated to clarify the zoning districts and densities utilized to encourage a variety of housing types (P. C-8 and C-14).</p> <p>Chapter 2 includes several programs to amend the Municipal Code to accommodate the development of housing to meet the City's RHNA goals.</p>
B.2.1	<p>Shortfall of Sites to Accommodate the Lower-income RHNA: As noted in Finding A3, if rezoning is necessary, including appropriate densities, to accommodate the lower-income RHNA, programs should specifically commit to acreage, allowable densities and anticipated units. In addition, the program should specifically commit to rezoning that meets all by-right requirements pursuant to Government Code section 65583.2, subdivisions (h) and (i). Examples of by-right requirements include permitting all multifamily (not limited to senior housing) developments without discretionary action in which at least 20 percent of the units are affordable to lower-income households, 16 units per site, minimum densities and residential only performance standards. Based on the information in the element, these by-right and other program requirements should at least apply to City-Owned sites, some Housing Priority Overlay sites and SB 10 sites and Site 10 (Carmel Foundation).</p>		<p>Edits to address this comment were made in Appendix C and Chapter 2.</p> <p>As previously noted, no sites are intended to be rezoned, with the exception of three (3) sites intended to utilize SB 10 to maximize residential development potential. Please refer to row 19 in this spreadsheet for more details regarding SB 10 intentions for these sites. Details of revisions in Chapter 2 pertaining to the SB 10 sites are also included.</p>
B.2.2	<p>Minimum Densities: As noted in Finding A3, the element appears to be utilizing minimum densities to calculate residential capacity on identified sites. If so, Program 3.1.G (Housing Priority Overlay Zone) should specifically commit to establish minimum densities. Currently, the Program appears to commit to minimum densities as part of a menu of incentives. Further, the Program or another program should commit to establishing minimum densities aligned with assumptions in the inventory for all relevant zones.</p>		<p>Edits to address this comment were made in Appendix C and Chapter 2.</p> <p>As previously stated, Appendix C has been revised to include a realistic capacity analysis for each individual site. Minimum densities were used for Commercial and Multi-Family Residential zoned sites.</p> <p>Chapter 2 has been revised to update Program 3.1.G (P. 2-21). The program has been revised to eliminate the Housing Priority Overlay Zone, and instead establishes implementation procedures and monitoring for the establishment of a minimum density of 33 du/ac for the base zoning for Commercial Districts and the Multi-Family Residential District.</p>

	<p>B.2.3 City-Owned Sites: In addition to meeting various requirements described above, Program 1.1.B (City-Owned Sites) should commit to numerical objectives consistent with assumptions in the sites inventory and a specific commitment to a schedule of actions to facilitate development in the planning period, including alternative actions completed by a specified date (e.g., by 2028) if the sites will likely not develop in the planning period. Actions should include discrete timing for outreach with developers, issuing requests for proposals, incentives, assisting with funding and entitlement and issuing building permits.</p>		<p>Edits to address this comment were made in Chapter 2.</p> <p>Chapter 2 has been revised to update Program 1.1.B, to include quantified objectives that are consistent with assumptions presented in the Sites Inventory and a specific commitment to a schedule of actions to facilitate development in the planning period (P. 2-4).</p> <p>Details for each City-owned site have been included in Appendix C (P. C-21 to C-28) and reference Program 1.1.B.</p>
<p>B.3</p>	<p><i>Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for person</i></p>		
	<p>B.3.1 As noted in Finding A4, the element requires a complete analysis of potential governmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.</p>		<p>Refer to finding A4, column E for revisions made to address this comment.</p>
<p>B.4</p>	<p><i>Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, d</i></p>		
	<p>B.4.1 As noted in Finding A1, the element must be revised to add or modify goals and actions based on the outcomes of a complete analysis. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have specific commitment, metrics, and milestones as appropriate and must address housing mobility enhancement, new housing choices and affordability in high-opportunity areas, place-based strategies for community preservation and revitalization, and displacement protection.</p> <p>In addition, promoting housing mobility removes barriers to higher opportunity areas and strategically enhances access to housing choices and affordability to promote more inclusive neighborhoods, cities and regions. Among other factors, the City is wholly the highest resource community in contrast to the rest of the region. As a result, the element should include significant and robust actions with numerical targets (not limited to the RHNA) to promote housing mobility and increase housing choices and affordability throughout the City.</p>	<p>Examples include promoting more housing choices and affordability in lower density areas, religious institutional sites and enhancing ADUs and junior accessory dwelling units (JADU) and home sharing strategies.</p>	<p>Edits to address this comment were made in Appendix A.</p> <p>A "Housing Mobility Enhancement" section was added to Appendix A (P. A-67 to A-68).</p>