



CITY OF DEL REY OAKS

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DATE: March 25, 2025

TO: Honorable Mayor and City Council Members
John Guertin, City Manager

FROM: Denise Duffy, Troy Lawson, DD&A, Planning Consultants 6th Cycle Housing Element

SUBJECT: City of Del Rey Oaks 6th Cycle Housing Element Update, Status Report

Revised Adopted 6th Cycle Housing Element Update

Background: The City Council adopted the 6th Cycle Housing Element Update by resolution on December 13, 2023. The adoption was completed prior to the Housing Community Development (HCD) statutory deadline for 6th cycle (December 15, 2024) and submitted to HCD on December 14, 2023. Per HCD requirements, HCD conducted the mandatory 60-day review period. HCD concluded their review of the adopted Housing Element and submitted their comments to the City on February 12, 2024. City staff and the consultant team provided updates on the HCD comments to the City Council on March 26, 2024, and April 23, 2024. The March and April 2024 Packets included the HCD Comment Letter from February 12, 2024. The HCD Comment Letter was also made available online.

City presentations regarding revisions to the Housing Element were conducted on September 24, 2024, and October 30, 2024. The 2024 Revised 6th Cycle Housing Element Update and the Notice of Availability of the document were posted on the City's website prior to submitting the document to HCD for informal review on October 18, 2024.

City documentation on previous Housing Element drafts, HCD letters, public comment letters, the adopted December 2023 Housing Element, and the September 2024 Revised Housing Element Update are available on the City's Housing Element website: <https://www.delreyoaks.org/commdev/page/housing-element>.

Discussion and Presentation

HCD conducted an informal review of the 2024 Revised Housing Element Update and provided preliminary review comments on January 16, 2025. The following tables summarize comments and suggested revisions; the full comment sheet is also included as an attachment to this Staff Report. Note a number of the items in the HCD review chart identified areas where the 2024 Revised Housing Element Update met HCD requirements and thus, these areas do not require further changes.

The tables included and attached to this staff report provide an overview of HCD review comments and changes identified to address HCD comments on the 2024 Revised Housing Element Update.

Table 1, Items Identified for Revision per HCD, provides a summary review of those HCD comments requesting revisions, and key program area changes¹. Key Program revisions are also shown in **Attachment A**, Summary of HCD Review Revisions. For a full review of the HCD Preliminary Review, please see **Attachment B**, HCD Informal Draft Preliminary Review Table.

Table 1. Items Identified for Revision per HCD

HCD Preliminary Review Reference	Key Programs or Changes Identified
Housing Characteristics and Needs RE: Special Needs Households	Appendix A Affirmatively Furthering Fair Housing (AFFH) <ul style="list-style-type: none"> Minor change to add local information.
Sites Inventory and Analysis RE: Parcel Listing	Chapter 3.0 Housing Needs and Resources <ul style="list-style-type: none"> Minor change to revise numbers in Tables 3-7, 3-8, and 3-8a.
Sites Inventory and Analysis RE: Availability of Infrastructure (Water Capacity)	Program C.4 Ensure the Availability of an Adequate Water Supply to Serve the Long-Term Housing Needs of the City <ul style="list-style-type: none"> Minor change to add a timing action.
Sites Inventory and Analysis RE: Availability of Infrastructure (Water and Sewer Access)	Program C.9 Commit to Extension of Needed Infrastructure and Utilities <ul style="list-style-type: none"> Minor change to add a timing action.
Page 3, Sites Inventory and Analysis RE: Accessory Dwelling Units (ADU) (Incentives)	Program C.2 Encourage the Construction of Accessory Dwelling Units <ul style="list-style-type: none"> Add ADU incentives and include additional action timing/dates and Add specific geographic targets.
Zoning for a Variety of Housing Types RE: Emergency Shelters (Suitability)	Chapter 4.0 Housing Constraints <ul style="list-style-type: none"> Minor change to add resources in the vicinity of the City.
Governmental Constraints RE: Local Processing and Permit Procedures	Program C.3 Mitigating Constraints, Include additional action and timing.
Governmental Constraints RE: Publicly Identified Sites	New Program C.10 Work with the Selected Developer to Construct Housing and Extend Utilities <ul style="list-style-type: none"> Add new program requested.
Housing Programs: Assist in Development RE: Farmworkers	Include farmworkers in Programs related to special needs populations.
Housing Programs: AFFH	Program A.2 Develop Mixed Use Zoning Designation <ul style="list-style-type: none"> Add incentives, expand geographic area and revise target metrics.
	Program A.3 Small Lot Residential in New Subdivisions

¹ Table 1 and Attachment A show only those areas where HCD requested revisions. These will also be presented at the March 25th City Council meeting.

HCD Preliminary Review Reference	Key Programs or Changes Identified
	<ul style="list-style-type: none"> Minor changes to add actions and metrics and geographic targeting.
	Program B.1 Develop Inclusionary and Affordable Housing Requirements <ul style="list-style-type: none"> Revised to add objectives and expand metrics.
	Program B.3 Utilize Housing Choice Vouchers and Affordable Housing Outreach <ul style="list-style-type: none"> Minor change to add geographic targeting.
	Program B.7 Preferential Housing for Teachers and Local Educational Employees <ul style="list-style-type: none"> Revised to add actions for outreach and monitoring.
Page 8, Housing Programs: AFFH	Program D.1 Promote Fair Housing by Providing Educational and Referral Materials <ul style="list-style-type: none"> Minor change to add outreach action and metrics.
	Program D.7 Adopt Universal Design Element for New Development <ul style="list-style-type: none"> Minor change to add metrics.
	Program D.10 Assist in the Development of Housing for Extremely Low Income (ELI) Households <ul style="list-style-type: none"> Minor change to add metrics.
	Program E.1 Assist in Rehabilitating Housing <ul style="list-style-type: none"> Minor change to add timing and metrics.

The primary focus of the Revised Adopted 6th Cycle Housing Element Update is to meet HCD requirements and address specific comments in their preliminary review. The City has also reached out to HCD and received clarification on certain comments and requested changes.

HCD has agreed to continue its informal review of the changes to the Revised Housing Element Update. The City and Planning Consultants will provide updated revisions of the Housing Element to HCD after the March 25, 2025 City Council meeting and additional review by the City. After HCD reviews the Revised Adopted 6th Cycle Housing Element Update Program Revisions, HCD staff may provide additional informal comments to assist in the City's objective of achieving Housing Element compliance.

Consideration and Public Participation

- Receive the presentation.
- Open the matter to public comments.
- Discuss any City Council comments.

Note: There is no action associated with this presentation.

Next Steps:

The City anticipates receiving additional feedback and informal comments by HCD within the next one to two months. Once HCD informal review is complete, additional specific changes may be requested by HCD. City staff and the consultant team will meet with HCD to discuss their comments and complete draft revisions if needed. Once revisions are confirmed, the City will post the update on the City's website, update and receive any needed input from the City Council and Planning Commission, and then formally submit the Revised Housing Element Update for consideration by HCD for compliance. After receiving a letter from HCD finding the Housing Element Update is in substantial compliance, a public meeting will be held for the City Council to formally adopt the Revised 6th Cycle Housing Element Update.

Attachments:

Attachment A: Summary of HCD Review Revisions, March, 2025

Attachment B: Informal Draft Preliminary Review Table Submitted to the City Submitted by HCD

Item from Previous HCD Letter (only those sections with revisions requested shown):	Page # from Oct 2024 HEU	HCD Comment
Housing Characteristics and Needs		
<u>Special Needs Households:</u>	2-14-, A-13, A-21-, A-46-, A-56-	Include gap analysis (available resources compared to need) for persons with disabilities, large households, and ELI households, quantified (e.g., number of units) where possible.
Sites Inventory and Analysis		
<u>Parcel Listing:</u>	3-15-, 3-24-	Element should still reconcile affordability breakdown of Sites 1 and 1a indicated in Table 3-7 with new construction objectives in Table 3-8 and 3-8a (Quantified Objectives).
<u>Availability of Infrastructure (Water Capacity):</u>	7-19-	Program C.4 should commit to rezoning within six months if the City is not on track to provide adequate supply for the identified sites.
<u>Availability of Infrastructure (Water and Sewer Access):</u>	3-18, 4-42, 7-20	Program C.9 should include discrete timing for <u>applying</u> for funding and <u>construction</u> of utility extension.
<u>Accessory Dwelling Units (ADU) (Incentives):</u>	7-16-	<p>Program C.2 now commits to making standardized plans available, but should include discrete timing for implementation.</p> <p>The Program commits to adopting additional incentives if needed, after mid-cycle review, but should commit to such incentives prior to the mid-cycle review and include discrete timing for implementation of each action.</p> <p>Metrics should be revised to target affordability.</p>
Zoning for a Variety of Housing Types		
<u>Emergency Shelters (Suitability):</u>	4-24-	Add what services are available nearby (services, libraries, grocery stores, health care, etc.)
Governmental Constraints		
<u>Local Processing and Permit Procedures:</u>	7-18	Program C.3 should specify for multifamily housing in zones intended to permit multifamily housing and should be implemented earlier in the planning period.
Housing Program s: Sites		
<u>Publicly Identified Sites:</u>	3-13	Element should still include a Program to work with/outreach to the selected developer on a regular basis, as well as grant incentives, fee waivers, priority processing, and financial assistance.
Housing Program s: Assist in Development		
<u>Farmworkers.</u>	N/A	Given the importance of farmworkers and the regional needs, the element must include significant actions to specifically address the needs of farmworkers.
Housing Program s: AFFH		

<p><u>Revisions and Additions to Programs related to Affirmatively Further Fair Housing:</u></p>	<p>7-7</p>	<p>Program A.2 (Mixed Use):</p> <ul style="list-style-type: none"> • Metrics should go beyond RHNA (e.g., identify xxx sites for xxx number of units) • Should specifically target areas with underutilized commercial zones (e.g., Census Tract/Block x) • Add action to develop incentives for mixed-use development on underutilized commercial sites <p>Program A.3 (Small Lot Development):</p> <ul style="list-style-type: none"> • Include additional actions to facilitate small lot development <p>Program B.1 (Develop Inclusionary Requirements)</p> <ul style="list-style-type: none"> • Metrics should go beyond required affordability per RHNA <p>Program B.3 (HCV):</p> <ul style="list-style-type: none"> • Should specifically target areas with existing single-family housing (e.g., Census Tract/Block x) <p>Program B.7 (Preferential Housing for Teachers)</p> <ul style="list-style-type: none"> • Include additional actions and efforts including incentives to facilitate development of housing, and objectives (e.g., number of units) <p>Program C.2 (ADU Incentives):</p> <ul style="list-style-type: none"> • Include additional incentives (e.g., developing a city-wide registry, conducting an annual ADU survey, affirmative marketing outside of the City, additional incentives, and outreach to ADU permit recipients) • Target areas with existing single-family housing <p>Program D.1 (Fair Housing Outreach):</p> <ul style="list-style-type: none"> • Add metrics <p>Program D-7 (Universal Design)</p> <ul style="list-style-type: none"> • Add metrics <p>Program D-10 (Assist in Development)</p> <ul style="list-style-type: none"> • Metrics should specify number of units for ELI and special needs populations <p>Program E.1 (Rehabilitation)</p> <ul style="list-style-type: none"> • Increase metric • Add timing for applying for and accessing funding <p>Additional note: Add 1-2 strong housing mobility actions (e.g., promoting a city-wide affordable rental registry, requiring affirmative marketing outside of the City and coordinating with regional entities)</p>
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ATTACHMENT B TO CITY COUNCIL MEETING March 25, 2025

HCD Comments on City of Del Rey Oaks October 2024 Housing Element Informal Draft Preliminary Review

Previous Letter Finding	Page #	Prelim Review	Notes
Affirmatively Furthering Fair Housing			
<u>Local Data and Knowledge, and Other Relevant Factors</u> : HCD's prior review found that the element should include local data, knowledge, and other relevant factors to better describe and analyze fair housing conditions throughout the City. The element was revised to state that there is no concentration of income types, race and ethnicity, or poverty within the jurisdiction, and there is no disparity in access to education, employment, transportation, or healthy environments (p. A-45). However, the element must also utilize local data and knowledge to better describe and analyze any concentrations of disability, familial status, and disproportionate housing needs, such as cost burden and overcrowding. Please refer to HCD's October 18, 2023 review for additional information.	A-64	Yes	
Housing Characteristics and Needs			
<u>Special Needs Households</u> : HCD's prior review found that the element must be revised to include an analysis of the existing needs and resources for each special need group. While the element was revised to include analysis for some special need groups, the element must still include an analysis of resources and proposed programs to address the magnitude of need for persons with disabilities, large households, extremely low-income (ELI) households, and farmworkers.	2-14-, A-13, A-21-, A-46-, A-56-	~/No	Include gap analysis (available resources compared to need) for persons with disabilities, large households, and ELI households, quantified (e.g., number of units) where possible
Sites Inventory and Analysis			
<u>Parcel Listing</u> : HCD's prior review found that the element must identify the anticipated affordability level of the units for each site identified in the sites inventory. While the element was revised to include Table A-24, it must resolve discrepancies between anticipated affordability levels and total anticipated capacity for each site . In addition, the element should reconcile information relating to realistic site capacity and anticipated affordability	3-15-, 3-24-	~/No	Element should still reconcile affordability breakdown of Sites 1 and 1a indicated in Table 3-7 with new construction objectives in

throughout the element, including but not limited to Tables 3-4 (Site Inventory), 3-6 (Quantified Objectives), A-24 (Affirmatively Furthering Fair Housing (AFFH) Sites Inventory), and the electronic sites inventory.			Table 3-8 and 3-8a (Quantified Objectives)
<u>Shortfall of Sites</u> : The element inconsistently discusses whether the City has a shortfall of sites. For example, the element occasionally notes that the City addressed its unaccommodated need from the last planning period and therefore does not have a shortfall. However, the element still includes Program A-1 (Accommodate the City's regional housing need allocation (RHNA)) committing to rezoning sites pursuant to required shortfall requirements under Government Code section 65583.2, subdivisions (h) and (i). The element must reconcile this information and clearly discuss whether the City has addressed its unaccommodated need from the prior planning period and has sites with adequate zoning to address the 6th cycle RHNA. Based on a complete analysis, the element may need to include or modify programs as necessary.	3-2-, 3-9-, 3-14, 3-15-, 3-26, 5-1, 7-6-	Yes	
<u>Availability of Infrastructure (Water Capacity)</u> : HCD's prior review found that the element should clarify total water and sewer capacity for sites to accommodate the RHNA, including any potential limitations. While the element stated that the City reasonably assumes that it can accommodate residential units to meet RHNA from the Marina Coast Water District (MCWD) groundwater sources within the 6,160 residential unit limit, this statement seems to be largely based on a calculation of remaining capacity as of May 2019. The element should include an updated calculation of remaining capacity as of the start of the planning period. The element must also clarify whether there is sufficient water set-aside to accommodate the projected number of Accessory Dwelling Units (ADU).	4-33-, 4-43	Yes	
<u>Availability of Infrastructure (Water Capacity) (cont.)</u> : While Program C.4 was revised committing to secure water entitlements for development on Former Fort Ord sites, the program should commit to additional actions to support water augmentation efforts with discrete timelines for implementation throughout the planning period . The program should also commit the City to annually monitor the availability and supply of water within the MCWD service district and commit to identifying alternative sites and rezoning within six months if the City is not on track to provide adequate water supply for the identified sites.	7-19-	~/No	Added annual monitoring and rezoning alternative action, but should commit to rezoning within six months if the City is not on track to provide adequate supply for the identified sites
<u>Availability of Infrastructure (Water and Sewer Access)</u> : The element clearly states that the water and sewer utility lines will need to be extended to provide access to the RHNA sites. However, the element inconsistently discusses the	3-18, 4-42, 7-20	~/No	Program C.9 should include discrete timing for applying for

timing of these infrastructure improvements. The element must demonstrate available or planned capacity and access for water and sewer during the planning period. The element should be revised to discuss the timing and any potential constraints with the implementation of infrastructure extensions. Additionally, the element must include or modify programs with firm commitments, timelines, and milestones to completing these infrastructure improvements.			funding and construction of utility extension
<u>Environmental Constraints</u> : The element was revised to clarify that there is adequate land without residential restrictions on Site 1 to accommodate the RHNA. However, the element should discuss any additional steps needed to initiate development in these areas including whether Department of Toxic Substances Control (DTSC) approval and other mitigation efforts are needed. Based on a complete analysis, the element may need to include or modify programs to facilitating development on these sites such as assisting developers and applicants in obtaining the appropriate approvals. Additionally, the element was revised to include the Environmental Impact Report (EIR), which identified various mitigation actions to address biological constraints and hazards on former Fort Ord sites. However, the element should include programs and commitments to supporting and implementing the mitigation measures as identified in the EIR.	3-13-, 3-16, 7-22	~/Yes	
<u>Accessory Dwelling Units (ADU) (Incentives)</u> : HCD's prior review found that given the City's reliance on ADUs to address the RHNA, the element must include strong policies that commit to facilitating and incentivizing ADUs including affordability. While the element included Program C.2 (Encourage the Construction of ADUs), which commits the city to waive or reduce development fees and expedite permit processing, the element generally does not address this requirement. For example, the program commits to "explore" the availability of standardized plans for ADUs; however, it should commit to more specific and measurable actions to provide pre-approved plans. Other strategies could include providing additional homeowner/applicant assistance tools, developing information packets to market ADU construction, pursuing funding opportunities, and targeted advertising of ADU development opportunities. In addition, programs for ADUs should be revised with quantified metrics that also target affordability .	7-16-	No	<p>Program C.2 now commits to make standardized plans available, but should include discrete timing for implementation</p> <p>The program now commits to adopt additional incentives if needed, after mid-cycle review, but should commit to such incentives prior to the mid-cycle review and include discrete timing for implementation of each action</p> <p>Metrics should be revised to target affordability</p>
<u>Accessory Dwelling Units (ADU) (Monitoring)</u> : As found in HCD's prior review, the element must commit to monitoring ADU production and affordability throughout the course of the planning period and implement additional actions if the City is not meeting target numbers anticipated in the housing element. If	7-16-	Yes	

necessary, additional actions, should be taken in a timely manner (e.g., within six months). The degree of additional actions should be in stride with the degree of the gap in production and affordability. While the element included Program C.2 (Encourage the Construction of ADUs) to monitor the production and affordability of ADUs, this program should specifically commit to identifying alternative sites and rezoning within six months if the City is not meeting the anticipated target numbers for their RHNA.			
<u>Accessory Dwelling Units (ADU) (ADU Ordinance)</u> : While the element included a program committing to updating the City's ADU ordinance to be compliant with state law, the program must be revised with a timeline for implementation. Additionally, as found in HCD's prior review, the element must commit to revising the ordinance to allow ADUs in all zones that allow residential including nonresidential zones e.g., mixed-uses and commercial.	3-23, 4-6, 4-12, 7-16	Yes	Program C-2
Zoning for a Variety of Housing Types			
<p><u>Emergency Shelters</u>: HCD's prior review found that the element must address all requirements under AB 2339 (2022). The element was revised to include a program committing to addressing all the requirements. However, the element must still provide an analysis of how the City addresses these requirements. This includes demonstrating the appropriateness of sites, zoning, and capacity to accommodate emergency shelters, as follows:</p> <p>Based on a complete analysis, the element must add or modify programs to demonstrate compliance with these requirements.</p>	4-24-	~	See below
<u>Emergency Shelters (cont.) (Zoning)</u> : The element states that emergency shelters are permitted with in the C-1 zone but must still indicate whether the City permits emergency shelters without discretionary action and whether the C-1 zone allows for residential uses.	4-24, 7-26	Yes	
<u>Emergency Shelters (cont.) (Capacity)</u> : The element must analyze the available capacity in the C-1 zone to adequately accommodate the city's most recent point-in-time count. For example, the element should discuss available acreage in the C-1 zone, including typical parcel sizes and the presence of reuse opportunities.	4-24-	Yes	
<u>Emergency Shelters (cont.) (Suitability)</u> : The element must demonstrate the suitability of sites and the identified zone. For example, to demonstrate the suitability of sites, the element should address whether sites are vacant or nonvacant. If sites are generally nonvacant, the analysis must address the extent existing uses impede additional development. For example, to	4-24-	~	C-1 sites are within a mile of transit stops and community services; What services are available nearby (services, libraries, grocery stores, health care, etc.)

demonstrate the potential for redevelopment, the analysis could evaluate a sample of representative sites, the existing uses and reuse opportunities. To demonstrate the suitability of the zone, the element should discuss the type of services and transit available, general uses in this zone and any conditions inappropriate for human habitability.			
<u>Emergency Shelters (cont.) (Definition of Emergency Shelters):</u> For your information, AB 2339 (2022) expanded the definition of “emergency shelters” to include other interim interventions, including but not limited to, navigation centers, bridge housing, and respite or recuperative care.	4-25	Yes	Program D.4
Governmental Constraints			
<u>Land Use Controls (Parking):</u> The element indicates the City requires smaller bedroom units including studios and one-bedrooms to provide 1.75 spaces per unit and are required to have one garage space. HCD’s prior review found that the element must reduce parking requirements and analyze the garage requirement. Additionally, based on a complete analysis, the element may need to include additional parking modifications. The element was revised to reduce the parking requirements for smaller bedroom units. Additionally, the element included an analysis of the garage requirements indicating that it can be a constraint on the development of multifamily housing. HCD generally finds garage requirements as a constraint to development. As such, the element should include or modify programs specifically committing to removing the garage requirements for multifamily development.	4-8, 7-18	Yes	Program C.3
<u>Local Processing and Permit Procedures:</u> HCD's prior review found that the element must analyze the conditional use permit (CUP) requirement for multifamily housing in zones intended to permit multifamily housing. The element was revised to indicate that the City will include a program committing to updating the zoning code to remove the use permit requirements for uses that are already principally permitted (p. 4-9). While the element included Program C-3 (Mitigating Constraints) committing to a zoning code update, it must specifically commit to remove or replace the CUP requirement with a procedure that does not act as a constraint on housing.	7-18	No	Added action to Program C.3 but should specify for multifamily housing in zones intended to permit multifamily housing and should be implemented earlier in the planning period
Housing Programs: Sites			

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:	N/A	FYI	
<u>Publicly Identified Sites:</u> HCD's prior review found that the element must include significant actions to facilitate and encourage development on City-Owned sites, including former Fort Ord Site. The element included a revised analysis indicating that the City released an request for proposal (RFP) and is still working to identify a developer. The element must include a schedule of actions to continue facilitating and incentivizing development on these sites . This includes a program with numerical objectives including affordability that ensures compliance with the Surplus Land Act if applicable, provides incentives and actions along with a schedule to facilitate development of this site. Actions should include outreach with developers, issuing requests for proposals, incentives, fee waivers, priority processing and financial assistance.	3-13	No	Element should still include a program to work with/outreach to the selected developer on a regular basis, as well as grant incentives, fee waivers, priority processing, and financial assistance
Housing Programs: Assist in Development			
The element was revised to include some general commitments to address housing for persons with special needs including assisting and support developers with funding applications and conducting broader outreach efforts. However, given the importance of farmworkers and the regional needs, the element must include significant actions to specifically address the needs of farmworkers that are responsive to the analysis . For example, the element could commit to proactive actions to coordinate with non-profit developers, employers, and other related organizations, to explore funding and incentives and to identify specific development opportunities. Other strategies could include developing informational materials on farmworker housing, pursuing funding, and providing technical assistance on funding applications.	N/A	No	Not addressed
Housing Programs: Constraints			
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.	N/A	FYI	
Housing Programs: AFFH			

<p>The element was revised with some additional actions to address AFFH. However, this generally does not address HCD's prior review. First, as noted in Finding A1, the element requires a complete AFFH analysis. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues. Second, actions must be significant and meaningful enough to overcome identified patterns and trends. Third, actions must have specific commitment, metrics and milestones as appropriate. Given that most of the City is considered majority high resourced community, the element should focus on programs that promote housing mobility and encourage development of more housing choices and affordable housing throughout the community. Examples include promoting more housing choices and affordability in lower-density areas (e.g., missing middle housing types), identifying additional multifamily areas, additional religious institutional sites, enhancing ADUs, junior accessory dwelling units (JADU) or additional conversion of existing space, home sharing strategies and city-wide affordable rental registry. Furthermore, all programs must include geographic targeting and metrics to target significant and meaningful outcomes in the planning period.</p>	7-7-	No	<p>Program A.2 (Mixed Use):</p> <ul style="list-style-type: none"> • Metrics should go beyond RHNA (e.g., identify xxx sites for xxx number of units) • Should specifically target areas with underutilized commercial zones (e.g., Census Tract/Block x) • Add action to develop incentives for mixed-use development on underutilized commercial sites <p>Program A.3 (Small Lot Development):</p> <ul style="list-style-type: none"> • Include additional actions to facilitate small lot development <p>Program B.1 (Develop Inclusionary Requirements)</p> <ul style="list-style-type: none"> • Metrics should go beyond required affordability per RHNA <p>Program B.2 (Facilitate AH) revised to include metric for seeking funding</p> <p>Program B.3 (HCV):</p> <ul style="list-style-type: none"> • Should specifically target areas with existing single-family housing (e.g., Census Tract/Block x) <p>Program B.7 (Preferential Housing for Teachers)</p> <ul style="list-style-type: none"> • Include additional actions and efforts including incentives to facilitate development of
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			<p>housing, and objectives (e.g., number of units)</p> <p>Program B.8 (Home Sharing) added</p> <p>Program C.2 (ADU Incentives):</p> <ul style="list-style-type: none"> • Should include additional incentives (e.g., developing a city-wide registry, conducting an annual ADU survey, affirmative marketing outside of the City, additional incentives, and outreach to ADU permit recipients) • Metrics should specifically target areas with existing single-family housing (e.g., Census Tract/Block x) <p>Program D.1 (Fair Housing Outreach):</p> <ul style="list-style-type: none"> • Add metrics <p>Program D-7 (Universal Design)</p> <ul style="list-style-type: none"> • Add metrics <p>Program D-10 (Assist in Development)</p> <ul style="list-style-type: none"> • Metrics should specify number of units for ELI and special needs populations <p>Program E.1 (Rehabilitation)</p> <ul style="list-style-type: none"> • Increase metric • Add timing for applying for and accessing funding <p>Add 1-2 strong housing mobility actions (e.g., promoting a city-wide</p>
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			affordable rental registry, requiring affirmative marketing outside of the City and coordinating with regional entities)
Quantified Objectives			
As noted in HCD's prior review, the element must include quantified objectives to establish an estimate of housing units by income category that can be constructed, rehabilitated, and conserved over the planning period. While the element was revised to include Table 3-6, the table must still include objectives for ELI households. Additionally, HCD's prior review found that the element should include quantified objectives for rehabilitation and conservation across income categories. The element included rehabilitation objectives limited to ADUs. However, the element should increase objectives for rehabilitation and conservation beyond ADUs. For example, objectives could be increased by incorporating anticipated outcomes from the following programs: Program E.1 (Assist in Rehabilitating Housing) and Program E.2 (Continue Code Enforcement).	3-27-	~	