

**Draft Response Table
January 2024**

“Initial Revisions” – Informally Provided to HCD on 12/24/23 and Reviewed by TC on 1/16/24, Based on HCD’s 12/01/23 Comment Letter
“Further Revisions” – Based on HCD’s 1/18/24 Informal Preliminary Review Matrix and direction from Town Council and HEAB

Comment Number	Prior HCD Finding	Page #	Prelim Review	HCD Preliminary Review Notes	HCD Feedback Summary	Staff’s Responses
Affirmatively Furthering Fair Housing						
#1a.	<u>Income and Racial Concentration Area of Affluence (RCAA)</u> : The element now includes actions to promote an inclusive community; however, the element must provide specific analysis of income and RCAA at a regional level (town compared to the broader region) to better formulate appropriate policies and programs. The analysis should at least address trends, conditions, coincidence with other fair housing factors (e.g., race, highest resource, overpayment), effectiveness or absence of past strategies (e.g., lack of publicly assisted housing and lack of multifamily zoning), local data and knowledge and other relevant factors.	A-69	~/No	Minimal analysis added; should address trends, coincidence with other factors (e.g., income, TCAC), past strategies and effectiveness such as result of North 40 in the prior planning period, zoning, land use and other factors. These analyses should be incorporated into contributing factors.	<p><i>Verbal feedback provided by the HCD reviewer via a Zoom meeting held on 1/18/24 with staff and the Town’s Housing Consultants:</i> The Town’s consultants had questions regarding this note. The HCD reviewer to provide additional written direction regarding this note.</p> <p><i>Further communication from HCD reviewer via email on 1/19/24:</i> RCAA: The Town must expand the analysis of what has contributed to being a RCAA including zoning, land use, past investment or lack of investment, local opposition to housing types. For example, you can include the North 40 lawsuit on a project that had higher density with affordability. Additionally, include the TCAC scores within this analysis. Following the complete analysis of the RCAA the town should re-evaluate contributing factors to see if there are other contributing factors needed to be identified or need to be reprioritized.</p>	<p>Initial revisions highlighted in blue in the Draft Revised Housing Element:</p> <ul style="list-style-type: none"> Additional narrative regarding race, ethnicity, and income trends for Los Gatos was added on page A-71 Appendix A. In addition, discussion of zoning, including the Town’s Zoning Map was added on page A-76 of Appendix A, as well as a narrative describing implementation programs included in the Housing Element which facilitate the creation of affordable housing units on pages A-72 of Appendix A. <p>Further revisions highlighted in green in the Draft Revised Housing Element:</p> <ul style="list-style-type: none"> Expanded analysis has been added of what has contributed to being a RCAA including historic land use patterns and restrictive covenants as they relate to the current RCAA trend in the Town on Page A-72 of Appendix A. Narrative was added to Page A-72 of Appendix A describing the success of the North 40 Phase I development which added affordable senior housing units to the Town’s housing stock. TCAC scores have been added and discussed on Page A-71 of Appendix A. Contributing factors have been re-evaluated and Housing Mobility has been prioritized as a high priority on Pages A-18, A-19, and A-21 of Appendix A.
#1b.	<u>Contributing Factors to Fair Housing Issues</u> : Based on a complete analysis, the element should re-assess and prioritize contributing factors to fair housing issues. For example, the Town is wholly a RCAA, highest resource and highest median incomes in contrast to the rest of the region. As a result, fair housing issues such as the lack of affordable housing and segregation from the rest of the region should be a high priority.	A-18	~	Re-assess based on a complete analysis	<p><i>Verbal feedback provided by the HCD reviewer via a Zoom meeting held on 1/18/24 with staff and the Town’s Housing Consultants:</i> The Town’s consultants had questions regarding this note. The HCD reviewer to provide additional written direction regarding this note.</p> <p><i>Further communication from HCD reviewer via email on 1/19/24:</i></p>	<p>Initial revisions highlighted in blue in the Draft Revised Housing Element:</p> <ul style="list-style-type: none"> Additional narrative describing fair housing as an issue in Town was provided on page A-16 and A-17 of Appendix A (RCAAs). Fair housing was also modified on A-16 and A-17 of Appendix A, to be a high priority for the Town. <p>Further revisions highlighted in green in the Draft Revised Housing Element:</p>

					Following the complete analysis of the RCAA the town should re-evaluate contributing factors to see if there are other contributing factors needed to be identified or need to be reprioritized.	<ul style="list-style-type: none"> Summary of RCAA discussion was added to contributing factors on Page A-19 and a contributing factors matrix was added on Pages A-20 and A-21 of Appendix A. Contributing factors have been reassessed and Housing Mobility has been prioritized as a high priority on Pages A-18, A-19, and A-21 of Appendix A.
#1c.	<p><u>Goals and Actions:</u> As noted above, the element must include a complete analysis of affirmatively furthering fair housing (AFFH). The element must be revised to add goals and actions based on the outcomes of a complete analysis.</p> <p>In addition, while the element includes some actions toward AFFH and enhancing housing mobility (e.g., choices and affordability), actions should be added, numeric targets should be increased, and geographic targeting should be fine-tuned to better promote inclusive neighborhoods throughout the Town. This is particularly important since over 80 percent of the lower-income regional housing need allocation (RHNA) is isolated in two census tracts. As noted in HCD’s prior review and the assessment of fair housing, the Town is wholly a racially concentrated area of affluence, highest resource and highest median incomes in contrast to the rest of the region.</p> <p>These conditions and circumstances warrant significant and robust actions (not limited to the RHNA) to promote housing mobility and increasing housing choices and affordability throughout the Town, including lower-density neighborhoods. Actions should be added and revised with aggressive numeric targets and geographic targets throughout the Town, including lower-density neighborhoods. Examples include creating more housing choices and affordability in single-family neighborhoods beyond complying with law (e.g., SB 9, ADUs) such as missing middle housing types, targeting affordable housing funding, homesharing, more than one unit of converted space within a single-family structure, increased multifamily capacity, enhanced efforts on religious institutional sites and other alternative land use and financing strategies.</p>	10-43-10-50-10-65-10-66	~/No	<p>See Programs J, L, O, Q, T, AV</p> <p>Program J should clarify that capacity will be increased (not just zoning text), development standards will be adjusted to facilitate maximum densities and increase the objective (~150 units) or add strategies (religious institutional, JADU plus, SB 10)</p> <p>Consider adding JADU plus to ADU HCV homesharing program and increasing objective.</p> <p>Program AV should go beyond complying with SB 9 (marketing, modification to development standards)</p> <p>For all housing mobility actions (Programs J, L, O, Q, T, AV), geographic targeting should be revised to clarify town-wide including highest median income areas and numeric targets should be reflected with geographic targeting (e.g., 100 units townwide and 50% in highest median income areas).</p>	<p><i>Verbal feedback provided by the HCD reviewer via a Zoom meeting held on 1/18/24 with staff and the Town’s Housing Consultants:</i> Staff and the Housing Consultant clarified with the HCD reviewer that the comment is regarding the text of Program J to add clarifying language that development standard will be modified to allow for maximum densities to be achieved.</p>	<p>Initial revisions highlighted in blue in the Draft Revised Housing Element:</p> <ul style="list-style-type: none"> Modifications to Implementation Program J on page 10-46 of Chapter 10 were made to include actions that aim to facilitate a range of housing types, including small multi-unit housing in low to medium designations. Additionally, a separate action within Implementation Project J calls for creating opportunities for other housing types (tiny homes and co-housing). <p>Further revisions highlighted in green in the Draft Revised Housing Element:</p> <ul style="list-style-type: none"> Program J on Pages 10-46 and 10-47 of Chapter 10 was modified to include clarifying text that, if necessary, development standards will be modified to facilitate a development at the maximum density and the quantified objectives were increased as specified. Program Q on Page 10-53 of Chapter 10 was modified to commit to developing and adopting objective standards to go beyond State law and allow more than one JADU on a property. Program Q on Page 10-53 of Chapter 10 was modified to include a homesharing program that will provide roommate matching and assist homeowners in renting out ADUs and JADUs. Program AV on Page 10-75 of Chapter 10 was modified to include narrative describing how the Town’s SB 9 currently exceeds State’s law, an annual monitoring of SB 9 projects based on the Housing Element projection, and justification for the quantity objective of 96 SB 9 units over the eight-year planning period. Implementation Programs J, L, O, Q, T, and AV were modified to include geographic targeting language with a numeric target on Pages 10-79 through 10-81 of Chapter 10.
Sites Inventory, Analysis and Adequate Sites						

#2a.	<p><u>Small Sites:</u> The element identifies several sites with parcels less than a half-acre (p. D-13) that have common ownership and, in some cases, expressed interest to redevelop the site. For small sites with expressed interest in redevelopment, the element should clarify that the expressed interest is also in consolidating the sites. For the remaining sites (Sites D-2 and D-5), the element should explain the circumstances leading to the potential for consolidation such as necessity to consolidate due to access, feasibility, shape, or site planning flexibility. Based on the outcomes of this analysis, the element should add or modify Program K (Lot Consolidation) to further promote lot consolidation, if appropriate.</p>	D-2	Yes		<p><i>Verbal feedback provided by the HCD reviewer via a Zoom meeting held on 1/18/24 with staff and the Town's Housing Consultants: No further revisions requested by HCD.</i></p>	<p>Initial revisions highlighted in blue in the Draft Revised Housing Element:</p> <ul style="list-style-type: none"> Additional narrative added to page D-11 of Appendix D, describing property owner interest in developing multiple parcels as a single parcel, how the sites share access, parking, and the conduciveness to redevelopment as a single parcel given the lot shape and configuration. <p>Further revisions highlighted in green in the Draft Revised Housing Element:</p> <ul style="list-style-type: none"> No further revisions requested by HCD.
#2b.	<p><u>Electronic Sites Inventory:</u> For your information, while the Town has submitted an electronic sites inventory as part of this submittal, pursuant to Government Code section 65583.3, the Town must submit an electronic sites inventory with its adopted housing element. Please see HCD's housing element webpage at https://www.hcd.ca.gov/planning-andcommunity-development/housing-elements for a copy of the form and instructions. The Town can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance</p>	N/A	FYI		<p><i>Verbal feedback provided by the HCD reviewer via a Zoom meeting held on 1/18/24 with staff and the Town's Housing Consultants: No additional feedback. For information only.</i></p>	N/A
#2c.	<p><u>Adequate Sites Programs:</u> As noted in the prior review, if necessary to make appropriate zoning available to accommodate the lower-income RHNA, programs must be revised to meet all requirements pursuant to Government Code section 65583.2, subdivisions (c), (h) and (i). The element includes Programs D (Program By Right Zoning Text Amendment to Accommodate RHNA), AR (General Plan Amendment) and AS (Adequate Sites for Housing) to address these requirements. With respect to sites identified in prior planning periods, the element meets statutory requirements, but these actions must be completed by January 31, 2024. With respect to a shortfall of adequate sites to accommodate the lower-income RHNA, the element includes Programs AR and AS. However, the Programs commit to the appropriate zoning given the rezoning occurs after the statutory deadline of January 31, 2023. HCD understands the Town completed the rezoning after the statutory deadline and, therefore, the rezoning must meet all by right requirements pursuant to Government Code section 65583.2, subdivisions (h) and (i). Based on a cursory review, the rezoning does not appear to meet these requirements. As a result, these programs must</p>	Not Found	No/?	<p>Revisions? HEOZ Ordinance</p>	<p><i>Verbal feedback provided by the HCD reviewer via a Zoom meeting held on 1/18/24 with staff and the Town's Housing Consultants: Staff and the Housing Consultant clarified with the HCD reviewer to provide the projected public hearing dates for the HEOZ Ordinance amendment.</i></p>	<p>Initial revisions highlighted in blue in the Draft Revised Housing Element:</p> <ul style="list-style-type: none"> On January 24, 2024, the Planning Commission will consider and make a recommendation on proposed amendments to the Housing Element Overlay Zone (HEOZ) Ordinance in response to the by right requirements pursuant to Government Code section 65583.2, subdivisions (h) and (i), as well as the minimum density requirements of Government Code section 65583.2, subdivision (h). The Town Council will consider the proposed HEOZ amendments at a future date. <p>Further revisions highlighted in green in the Draft Revised Housing Element:</p> <ul style="list-style-type: none"> Program AQ on Page 10-70 of Chapter 10 was modified to include the projected date for the adoption of the amended Housing Element Overlay Ordinance.

	<p>clearly commit to meet all by-right requirements by January 31, 2024.</p> <p>In addition, please be aware, 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 Town 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</i> (2023) 90 Cal.App.5th 193, 307 Cal.Rptr.3d 64.</p>					
Governmental Constraints						
#3a.	<p><u>Land Use Controls:</u> HCD’s prior review found that the Town must list and evaluate development standards in the North Forty Specific Plan and High Density Residential and Commercial designation. In response, the Town has now listed development standards by each zoning district but should also analyze those development standards for impacts on housing supply and cost and most importantly, the ability to encourage maximum densities without exceptions. For example, lot coverages, heights, and setbacks in the Multifamily Residential (RM) zone; and lot coverage heights and guest parking requirements in the North Forty Specific Plan could be constraints. Based on the outcomes of a complete analysis, the element should add or modify programs to include specific commitment to review and revise these development standards as necessary.</p>	C-1 C-5 10-62	?	<p>RM parking program? Guest parking reduced?</p> <p>Guest parking and lot coverage in the North Forty Specific Plan analyzed?</p>	<p><i>Verbal feedback provided by the HCD reviewer via a Zoom meeting held on 1/18/24 with staff and the Town’s Housing Consultants:</i> Staff and the Housing Consultant clarified with the HCD reviewer that Program AA had been previously modified to address the guest parking requirements.</p>	<p>Initial revisions highlighted in blue in the Draft Revised Housing Element:</p> <ul style="list-style-type: none"> Additional narrative added on pages C-8 and C-9 of Appendix C to identify the increased development standards, such as building height and lot coverage for sites within the HEOZ. The Housing Element already includes an action to develop standards to achieve maximum density, including reducing parking requirements. The Town does not have a trend of meeting the maximum density, which is primarily due to developer preference. Additional narrative added to Implementation Program J on page 10-46 of Chapter 10 to identify a new action to establish a maximum average unit size. <p>Further revisions highlighted in green in the Draft Revised Housing Element:</p> <ul style="list-style-type: none"> N/A. Staff and the Housing consultant verbally clarified with the HCD reviewer on January 18, 2024, that Program AA had been previously modified to address the guest parking requirements. Program D on Page 10-44 of Chapter 10 was modified to include language that the guest parking requirements and development standards will be modified to facilitate achieving the maximum densities.
#3b.	<p><u>Local Processing and Permit Procedures:</u> The element now discusses decision-making bodies and lists approval findings for the Architecture and Site Application. However, the element should also analyze these processes to better inform programs to address identified constraint. For example, the element mentions the decision-making body depends on the scope of the application. The element should explain</p>	10-62	No/?	<p>See Program AQ</p> <p>Program should remove or modify Findings 4 and 6 of the architectural and site process.</p> <p>Scope trigger for approval body analyzed? Addressed?</p>	<p><i>Verbal feedback provided by the HCD reviewer via a Zoom meeting held on 1/18/24 with staff and the Town’s Housing Consultants:</i> Staff and the Housing Consultant clarified with the HCD reviewer that staff will explore new text in Program AQ to address modifying the findings 4 and 6 of the</p>	<p>Initial revisions highlighted in blue in the Draft Revised Housing Element:</p> <ul style="list-style-type: none"> Portions of the constraints section located within Appendix C specifically identify approval findings that may be considered subjective, and; therefore, Implementation Program AQ on pages 10-70 through 10-71 of Chapter 10 has been modified to include language to address subjective approval findings.

	the scope, resulting decision-making body and impacts on approval timing and certainty. In addition, the element lists approval findings and concludes some findings may be constraints then modifies Program AQ (Zoning Code Amendments) to amend approval findings (considerations). But the element should discuss which approval findings may be constraints to better inform implementation of Program AQ.				Architecture and Site application process to modify/remove the subjective findings. Staff will add additional narrative describing the deciding body for a mixed use or multi-family project.	<p>Further revisions highlighted in green in the Draft Revised Housing Element:</p> <ul style="list-style-type: none"> Program AQ on Page 10-70 of Chapter 10 was modified to remove Findings 4 and 6 of the Architecture and Site review process for a multi-family or mixed-use project. Clarifying text added to Page C-41 of Appendix C that the Planning Commission is the deciding body for a multi-family or mixed-use project.
#3c.	<u>Programs:</u> As noted above, the element requires a complete analysis of potential governmental constraints. Depending upon the results of that analysis, the Town may need to revise or add programs and address and remove or mitigate any identified constraints. In addition, programs should be revised, as follows:		TBD	Depends on complete analysis.	See below.	See below.
	<u>Program D (Additional Capacity for the North Forty Specific Plan):</u> The Program should also commit to establish or modify development standards to facilitate achieving maximum densities, regardless of the level of affordability and should specify to either remove the unit cap or increase the unit cap to allow maximum build out of each parcel, including State Density Bonus Law or other circumstances that might warrant increasing allowable densities.	10-41	~/No/?	<p>No action included to modify development standards?</p> <p>No action to remove cap. Commitments should also not implement the cap to allow maximum build out of each parcel or other circumstances warranting increasing allowable densities.</p>	<p><i>Verbal feedback provided by the HCD reviewer via a Zoom meeting held on 1/18/24 with staff and the Town's Housing Consultants:</i> Staff and the Housing Consultant clarified with the HCD reviewer that staff will explore modifying North Forty Specific Plan to include a policy that the development standards to be consistent with the response in comment #3a. Specify that additional units resulting from density bonus, SB 330, or other applicable State laws will not count toward the North Forty Specific Plan unit cap.</p> <p><i>Further communication from HCD reviewer via email on 1/19/24:</i> Program D should be revised to remove unit cap or clarify that the unit cap will not be implemented to allow maximum build out of each parcel or circumstances warranting allowable densities.</p>	<p>Initial revisions highlighted in blue in the Draft Revised Housing Element:</p> <ul style="list-style-type: none"> Modification of the language to Implementation Program D on page 10-43 and page 10-44 of Chapter 10 to include an action to amend the North Forty Specific Plan to include a policy, specifying that additional units resulting from density bonus, SB 330, or other applicable State laws will not count toward the unit cap. <p>Further revisions highlighted in green in the Draft Revised Housing Element:</p> <ul style="list-style-type: none"> Program D on Page 10-44 of Chapter 10 was modified to include language that the guest parking requirements and development standards will be modified to facilitate achieving the maximum densities. Program D on Page 10-43 of Chapter 10 was modified to include language describing that the housing unit cap will not prevent developments the ability to reach the maximum allowable density plus the additional units due to density bonus and other applicable regulations and providing a timeline for modifying the unit cap is it is found to be a constraint to housing production.
	<u>Program V (Housing opportunities for Persons living with Disabilities):</u> Given the importance of promoting housing access for persons with disabilities, the Program could be modified with a date earlier in the planning period (e.g., by December 2024).	?	No/?	Revisions?	<p><i>Verbal feedback provided by the HCD reviewer via a Zoom meeting held on 1/18/24 with staff and the Town's Housing Consultants:</i> Staff and the Housing Consultant clarified with the HCD reviewer that the timeframe for Program V on Page 10-55 had been previously addressed.</p>	<p>Initial revisions highlighted in blue in the Draft Revised Housing Element:</p> <ul style="list-style-type: none"> Modification of the timing of completion for Implementation Program V on page 10-57 of Chapter 10 to be done earlier in the planning period. <p>Further revisions highlighted in green in the Draft Revised Housing Element:</p>

						<ul style="list-style-type: none"> N/A. Staff and the Housing consultant verbally clarified with the HCD reviewer on January 18, 2024, that the timeframe for Program V on Page 10-57 had been previously addressed.
	<p><u>Program AA (Reduce Parking Standards):</u> The Program currently commits to “Initiate a study to determine specific updates...” While initiating a study and making a determination are important steps by themselves, these actions do not result in outcomes. The Program should clearly commit to amending the municipal code. For example, the Program could commit to: “Initiate a study and outreach, including with developers, and amend the Municipal Code, as follows:...”</p>	10-53	Yes		<p><i>Verbal feedback provided by the HCD reviewer via a Zoom meeting held on 1/18/24 with staff and the Town’s Housing Consultants:</i> No further revisions requested by HCD.</p>	<p>Initial revisions highlighted in blue in the Draft Revised Housing Element:</p> <ul style="list-style-type: none"> Modification of the language to Implementation Program AA on page 10-59 of Chapter 10 to include a defined action. <p>Further revisions highlighted in green in the Draft Revised Housing Element:</p> <ul style="list-style-type: none"> No further revisions requested by HCD.
	<p><u>Program AQ (Zoning Code Amendments):</u> The Program commits to apply the Housing Element Overlay Zone (HEOZ) to identified sites and modify development standards. HCD understands this action has been completed. Based on a cursory review of the Town’s Ordinance 2347, some development standards such as heights may be a constraint on achieving maximum densities. As a result, this Program should commit to monitor and evaluate these development standards, including outreach with the development community, and making adjustments, as appropriate, by a specified date.</p>	10-61	~/No	<p>Include a timeline when amendments will be completed, if necessary (e.g., 6 months).</p>	<p><i>Verbal feedback provided by the HCD reviewer via a Zoom meeting held on 1/18/24 with staff and the Town’s Housing Consultants:</i> Staff and the Housing Consultant clarified with the HCD reviewer to modify the text of Program AQ to commit to monitoring and evaluating the HEOZ development standards and adjusting as necessary if any standards are identified to be a constraint. Staff received clarification from HCD to specify the projected public hearing dates for the Housing Element Overlay Zone (HEOZ) Ordinance amendment.</p>	<p>Initial revisions highlighted in blue in the Draft Revised Housing Element:</p> <ul style="list-style-type: none"> Modification of the language to Implementation Program AQ on page 10-70 and Page 10-71 of Chapter 10 to commit to monitoring and evaluating the HEOZ development standards and making adjustments as necessary. Additional edits were made to commit to modifications to the open space and parking requirements within Implementation Program AQ based on feedback received from HCD on December 13, 2023. <p>Further revisions highlighted in green in the Draft Revised Housing Element:</p> <ul style="list-style-type: none"> Program AQ on Page 10-70 of Chapter 10 was modified to describe a timeline of when amendments to the development standards of the Housing Element Overlay Zone would be completed, if necessary.
	<p><u>Program AW (Story Poles and Netting Policy):</u> While the Program now commits to revise Story Poles and Netting Policy Requirements; these requirements are constraints and impact housing costs; supply (number of units) and approval certainty and should be removed or replaced with cost effective measures to promote certainty for the developers and the community. Further, the element should evaluate the effectiveness of any future requirements or measures, and making adjustments, as necessary, by a specified date (e.g., by 2028).</p>	10-65-	No	<p>Scope of alternative should be expanded to all multifamily and mixed use.</p>	<p><i>Verbal feedback provided by the HCD reviewer via a Zoom meeting held on 1/18/24 with staff and the Town’s Housing Consultants:</i> Staff and the Housing consultants had questions regarding this note. The HCD reviewer to provide additional written direction regarding this note.</p> <p><i>Further communication from HCD reviewer via email on 1/19/24:</i> Program AW should be revised to include a list of visual methods the Town will allow. For example, video, visuals, or other methods. In addition, it’s important to note that the program should not be limited to going over 55 ft. This language should be removed/revise.</p>	<p>Initial revisions highlighted in blue in the Draft Revised Housing Element:</p> <ul style="list-style-type: none"> Additional narrative added to Implementation Program AW on pages 10-75 and 10-76 of Chapter 10 to describe the further modifications made to the Story Pole Policy by the Town Council on December 5, 2023. <p>Further revisions highlighted in green in the Draft Revised Housing Element:</p> <ul style="list-style-type: none"> Program AW on Pages 10-75 and 10-76 of Chapter 10 was modified to provide options for visual methods and clarify that the alternative options are available for multi-family and mixed-use projects.

Housing Programs: ADU						
#4	Program Q Accessory Dwelling Units (ADU): While the Program now commits to amend the ADU Ordinance, it must also commit to establish incentives such as modifying development standards (e.g., heights), pursuing funding; waiving fees beyond ADU law; proactive marketing and establishing points of contact to ease permitting processes. In addition, the Program commits to monitor production and affordability of ADUs annually but should also commit to making adjustments by a specified date (e.g., within six months) if production and affordability are not meeting assumptions. Further, the Program should clearly commit to options beyond incentives such as rezoning if production and affordability far differs from assumptions.	10-48-	Yes		Verbal feedback provided by the HCD reviewer via a Zoom meeting held on 1/18/24 with staff and the Town's Housing Consultants: No further revisions requested by HCD.	<p>Initial revisions highlighted in blue in the Draft Revised Housing Element:</p> <ul style="list-style-type: none"> Modification of the language to Implementation Program Q on pages 10-52 and 10-53 of Chapter 10 to include a monitoring component with a schedule to develop alternative actions. <p>Further revisions highlighted in green in the Draft Revised Housing Element:</p> <ul style="list-style-type: none"> No further revisions requested by HCD.
Public Participation:						
#5	Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the Town should continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate. Please be aware, any revisions to the element must be posted on the local government's website and to email a link to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD. HCD particularly encourages the Town to continue engaging commenters on this review. These comments contained valuable insights that can result in a more effective housing elements, especially related to programs and specific commitment. HCD's future reviews will continue to consider the extent to which the revised element documents how the Town solicited, considered, and addressed public comments in the element. The Town's consideration of public comments must not be limited by HCD's findings in this review letter.		?	Revisions?	Verbal feedback provided by the HCD reviewer via a Zoom meeting held on 1/18/24 with staff and the Town's Housing Consultants: No discussion on this comment.	<p>Initial revisions highlighted in blue in the Draft Revised Housing Element:</p> <ul style="list-style-type: none"> Town staff will continue to engage with the community regarding the Housing Element update process by maintaining the information posted on the Housing Element update website, through posting on the Town's various social media accounts, and evaluation of public comments received. <p>Further revisions highlighted in green in the Draft Revised Housing Element:</p> <ul style="list-style-type: none"> A summary of the general topics of public comments that have provided on the Housing Element update process included on Pages 10-17 through 10-18 of Chapter 10.
Other (HCD use only)						
	Public comments		TBD	Must address new public comments.	N/A.	N/A.
	Document availability		FYI		N/A.	N/A.

	Rezone timing		FYI	Can't be found in full compliance until all rezones are complete	N/A.	N/A.
	50% nonvacant resolution		FYI		N/A.	N/A.
	Electronic sites inventory		FYI		N/A.	N/A.
	Overlay		No	Program AQ HE Overlay zone	N/A.	N/A.
	Modification Authority		N/A	Informal submittal	N/A.	N/A.