

HCD Comment	Response
<p>1. <i>Affirmatively furthering fair housing (AFFH) 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></p>	
<p><b>Goals, Actions, Metrics, Milestones:</b> While the element includes many potentially meaningful programs to affirmatively further fair housing (AFFH), generally, programs must include numeric targets in terms of housing outcomes (e.g., number of units by income group, number of persons assisted). Currently, programs describe metric types (e.g., number of cases, number of units, dollars collected) but should also have a numeric target in terms of outcomes. In addition, the element should consider additional actions to: (1) increase new housing choices and affordability in higher opportunity or higher income areas such as targeting zoning for missing middle types, (2) address displacement risk and (3) specific objectives related to place-based strategies to improve community revitalization (e.g., rehabilitation, street and mobility improvements, parks, community amenities).</p>	<p><b>Amendments to Housing Element</b></p> <ul style="list-style-type: none"> <li>• The element includes an expanded milestones and targets analysis in Figure 173 of the AFFH analysis and Program 30. <b>(PAGE 186 and Page 228)</b></li> <li>• Amendment to language in factor 4.1 to reflect higher resource and higher income areas as opposed to high resource areas. <b>(PAGE 186)</b></li> <li>• In direct response to consultation with HCD, the element now includes new programs directed at expanding housing choice in high resource areas and place-based programs to direct investments in lower resource areas or areas planned for future affordable housing sites. A summary of these <b>new</b> programs includes <b>(PAGE 231-234)</b>: <ul style="list-style-type: none"> <li>- Program 32: A program to implement an SB9 ordinance</li> <li>- Program 33: A specific target for middle housing production in the R1 zone</li> <li>- Program 34: A monitoring program for AFFH targets</li> <li>- Program 35: A place-based program for park renovations</li> <li>- Program 36: A place-based program for park renovations specific to Emery Park which is in Alhambra’s only low resource area.</li> <li>- Program 37: A place-based program to include streetscape and right-of-way improvements in low and moderate resource areas.</li> <li>- Program 38: A place-based program to make multimodal improvements along Valley Boulevard.</li> </ul> </li> <li>• Program 24 has also been amended to demonstrate synergy with new Programs 32 and 33. <b>(PAGE 222)</b></li> </ul>
<p>2. <i>An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality’s housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)</i></p>	
<p><b>Parcel Listing:</b> As stated in HCD’s prior review, the element must still list parcels by general plan designation.</p>	<p><b>Amendments to Housing Element</b></p> <ul style="list-style-type: none"> <li>• Confirmed in consultation with HCD that this has been completed in the previous draft and that this was an oversight.</li> </ul>
<p><b>Nonvacant Sites:</b> While the element discusses recent trends relative to identified sites, it should still evaluate those trends relative to assumptions in the inventory. Specifically, the element utilizes a residential redevelopment factor of 2.5 to 3 times increased capacity for sites identified toward the regional housing need allocation (RHNA) based on existing zoning. However, the analysis of development trends does appear to support these assumptions. Further, the element should include discussion of the existing uses and any conditions that impeded additional development in the planning period. For example, the element could discuss utilization of parking and whether that use impedes</p>	<p><b>Amendments to Housing Element</b></p> <ul style="list-style-type: none"> <li>• In consultation with HCD the City has provided additional clarification and analysis that supports the use of assumed redevelopment factors and other factors that address existing uses that are supported by recent development trends in analysis provided <b>(Page 244)</b>.</li> <li>• The city explored the appropriateness of removing sites that were noted in public comment as potentially having impediments. In response the city discounted the assumed capacity of the Villages project in accordance with consultation with HCD <b>(PAGE 247-248)</b>. The city has also removed site commonly referred to as the “Nissan Site”</li> </ul>

<p>additional development. Also, the City should consider and address public comments regarding the potential of redevelopment on some identified sites and finally, the element should include a program to re-evaluate the effectiveness of identified nonvacant sites in facilitating additional housing development and take measures (e.g., rezoning), as appropriate within a specified time (e.g., within six months)</p> <p>In addition, the element still 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. While the resolution of adoption includes the appropriate findings, any changes to the analysis should be reflected in future re-adoption of the element.</p>	<p>which was noted by the public to include a proposed use that non-housing (<b>Housing Site Inventory</b>).</p> <ul style="list-style-type: none"> <li>• The City has revised Program 19 (Rezoning) to include a commitment to further measures including rezoning based on the findings of a Nonvacant Site Development Feasibility Study (Program 20) that will be completed within two years of adoption. <b>(PAGE 218-219)</b></li> <li>• Upon readoption the city will update its resolution to reflect findings based on substantial evidence that existing uses are not an impediment on nonvacant sites.</li> </ul>
<p><b>Electronic Sites Inventory Form:</b> Pursuant to Government Code section 65583.3, subdivision (b), the City must utilize standards, forms, and definitions adopted by HCD when preparing the sites inventory. Please see HCD’s housing element webpage at <a href="https://www.hcd.ca.gov/community-development/housing-element/index.shtml">https://www.hcd.ca.gov/community-development/housing-element/index.shtml</a> for a copy of the form and instructions. The City can reach out to HCD at <a href="mailto:sitesinventory@hcd.ca.gov">sitesinventory@hcd.ca.gov</a> for technical assistance. Please note, upon adoption of the housing element, the City must submit an electronic version of the sites inventory with its adopted housing element to <a href="mailto:sitesinventory@hcd.ca.gov">sitesinventory@hcd.ca.gov</a>.</p>	<p><b>Amendments to Housing Element</b></p> <ul style="list-style-type: none"> <li>• Confirmation with HCD that this can be completed upon final certification.</li> </ul>
<p><b>Accessory Dwelling Units (ADUs):</b> The element notes the accuracy of the City’s ADU records but still must reconcile those numbers with HCD records, particularly for reporting years 2018 and 2020. In addition, while the element notes the uptick in recent applications, it still is assuming almost double the number of recently permitted ADUs and the element should rescale the assumptions to an appropriate assumption (50-60 ADUs per year). In addition, Program 26 (ADU) commits to adding site capacity if ADUs are not tracking within 25 percent of assumed capacity once in the planning period. However, the Program should consider a much higher benchmark (e.g., 75 percent) and commit to take appropriate action, if necessary, every two years.</p>	<p><b>Amendments to Housing Element</b></p> <ul style="list-style-type: none"> <li>• The City has provided to HCD an inventory of their data on ADU applications and permits to reconcile discrepancies between its research used to inform the element and official HCD records through the annual APR process.</li> <li>• The element has been updated to include the actual number (instead of projected) of applications and permitted ADUs through the end of 2022. This resulted in an increase to 227 application and 109 ADUs permitted in 2022. <b>(PAGE 257)</b></li> <li>• Despite the increase in ADU permitting velocity observed over the last two year, which has averaged 91 ADUs annually, the element has revised its ADU target downward from 75 to 60 units annually. This assumption is 65 percent of the recent trend. <b>(PAGE 258)</b></li> <li>• The element now clarifies a monitoring program an every two-year commitment to action if ADU production is not tracking toward progress. <b>(PAGE 223)</b></li> </ul>
<p><b>Programs:</b> As noted above, the element does not include a complete site analysis; therefore, the adequacy of sites and zoning was 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.</p> <p>In addition, Program 22 (City-Owned land) should include numeric objectives, including affordability, consistent with assumptions in the</p>	<p><b>Amendments to Housing Element</b></p> <ul style="list-style-type: none"> <li>• The element adds clarity that the Alhambra Golf Course lease runs through the planning period and that it is not likely to be a viable site for housing because of this existing use. It maintains that the City will continue to consider the golf course for housing redevelopment if conditions change or in future cycles. <b>(PAGE 221)</b></li> <li>• The element now includes a specific target production of 92 lower income units on exiting city-owned land. It also commits to making the city-owned Water Lots available for development by 2025-26. <b>(PAGE 221)</b></li> </ul>

<p>inventory and a specific schedule of actions to facilitate development on the Alhambra Golf Course beyond conducting an evaluation. Steps may include discrete timing for making the site available, facilitating entitlements, and issuing building permits as well as a numeric objective, including affordability, consistent with assumptions in the inventory.</p>	
<p>3. <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 persons with disabilities... (65583, subd. (c)(3).)</i></p>	
<p><b>To address constraints on the development of housing, the element should be revised, as follows:</b></p> <p><i>Program 9 (Meeting Special Housing Needs):</i> The Program should not be limited to “family care homes” and commit to amend zoning and procedures for all groups for seven or more persons in all residential zones with objectives standards to promote approval certainty.</p> <p><i>Program 27 (Reduce Development Constraints):</i> The Program commits to establish appropriate development standards to achieve realistic densities but should instead commit to development standards to facilitate achieving maximum densities.</p> <p><i>Program 29 (Development Streamlining):</i> The Program should go beyond drafting a proposal to improve the planning review process and specifically commit to revise the process. In addition, the Program should go beyond developing objective design standards and specifically commit to establish standards. Finally, standards should not be limited to design standards but also development standards to better address subjective standards and approval findings.</p>	<p><b>Amendments to Housing Element</b></p> <ul style="list-style-type: none"> <li>• Program 9 has been amended to revise wording to include all group homes instead of “family care homes” consistent with direction from HCD. <b>(PAGE 214)</b></li> <li>• Program 27 has been amended to include a commitment to establish appropriate development standards to achieve <i>maximum</i> densities consistent with direction from HCD. <b>(PAGE 224)</b></li> <li>• Program 29 has been revised to commit to <b>establishing</b> objective design <b>and</b> development standards consistent with direction from HCD. <b>(PAGE 226)</b></li> </ul>
<p>4. <i>Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element, and the element shall describe this effort. (Gov. Code, § 65583, subd.(c)(8).)</i></p>	
<p>While the element now includes a general summary of the public participation process and has amended Program 33 to address public feedback, many comments should still be considered and incorporated as appropriate. Examples include commitment to AFFH by allowing missing middle in higher resource or higher income neighborhoods, small sites feasibility, approvals on industrial (IPD) sites, local hire program requirements as a constraint, inclusionary feasibility and how it relates to density bonus law, discretionary review reform, development standards, or mid cycle rezones in the event identified sites are not effective in facilitating additional housing development.</p>	<p><b>Amendments to Housing Element</b></p> <ul style="list-style-type: none"> <li>• Included a new section that summarizes key themes of comments received in the review process and actions taken to address relevant comments. <b>(PAGE 10-12)</b></li> <li>• Removal of the Nissan site that was identified as having a new use that would be an impediment to redevelopment. <b>(Site inventory)</b></li> <li>• Inclusion of programs to promote development of middle housing types through SB9 and a specific target for this production in the R1 zone and high resource areas. <b>(PAGE 231-232)</b></li> <li>• Revised Program 10 to limit local hire program applicability to subsidized affordable housing projects and add flexibility to ensure that the program is not a constraint on development. <b>(PAGE 214)</b></li> <li>• Clarification that the city has implemented an in-lieu fee as an alternative that includes a graduated fee based on the scale of development and a waiver for projects with fewer than 5 units. The inclusionary program also includes a commitment to monitoring and</li> </ul>

recalibrating the program if it is found to be a constraint, including offering a broader range of incentives and alternatives. **(PAGE 211-212)**

- Mid-cycle review commitments have been expanded in Program 40 individually throughout programs as appropriate. **(PAGE 235-236)**