

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

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November 3, 2022

Rob Eastwood, Director  
Community Development Department  
City of Campbell  
70 North First Street  
Campbell, CA 95008

Dear Rob Eastwood:

**RE: City of Campbell's 6<sup>th</sup> Cycle (2023-2031) Draft Housing Element**

Thank you for submitting the City of Campbell's (City) draft housing element update received for review on August 5, 2022 along with draft revisions on October 26, 2022. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. Our review was facilitated by conversations on September 20 and 27, 2022 with you; Stephen Rose, Senior Planner; and your consultants, Geoff Bradley and Sung Kwon. In addition, HCD considered comments from several stakeholders and members of the community, pursuant to Government Code section 65585, subdivision (c).

The draft element addresses many statutory requirements; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). The enclosed Appendix describes the revisions needed to comply with State Housing Element Law.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government fails to adopt a compliant housing element within 120 days of the statutory deadline (January 31, 2023), then any rezoning to make prior identified sites available or accommodate the regional housing needs allocation (RHNA), including for lower-income households, shall be completed no later than one year from the statutory deadline. Otherwise, the local government's housing element will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i). Please be aware, if the City fails to adopt a compliant housing element within one year from the statutory deadline, the element cannot be found in substantial compliance until rezones pursuant to Government Code section 65583, subdivision (c) (1) (A) and Government Code section 65583.2, subdivision (c) are completed.

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City must continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available while 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.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: <https://www.opr.ca.gov/planning/general-plan/guidelines.html>.

HCD appreciates the hard work and dedication you; Stephen Rose, Senior Planner; and your consultants, Geoff Bradley and Sung Kwon provided in preparation of the City's housing element and looks forward to receiving the City's adopted housing element. If you have any questions or need additional technical assistance, please contact Shawn Danino, of our staff, at [shawn.danino@hcd.ca.gov](mailto:shawn.danino@hcd.ca.gov).

Sincerely,



Paul McDougall  
Senior Program Manager

Enclosure

## APPENDIX CITY OF CAMPBELL

The following changes are necessary to bring the City's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD's website at <https://www.hcd.ca.gov/hcd-memos>. Among other resources, the housing element section contains HCD's latest technical assistance tool, *Building Blocks for Effective Housing Elements (Building Blocks)*, available at <https://www.hcd.ca.gov/building-blocks> and includes the Government Code addressing State Housing Element Law and other resources.

### **A. Review and Revision**

*Review the previous element to evaluate the appropriateness, effectiveness, and progress in implementation, and reflect the results of this review in the revised element. (Gov. Code, § 65588 (a) and (b).)*

Special Housing Needs: As part of the review of programs in the past cycle, the element must provide an evaluation of the effectiveness of goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female headed households, farmworkers, and persons experiencing homelessness). While the element includes some general reporting such as the City's website including links to homeless services (p. III.A-6), it should still evaluate whether programs were effective, individually and cumulatively, and add or modify programs appropriately.

### **B. Housing Needs, Resources, and Constraints**

1. *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).)*

Enforcement and Outreach: While the element describes some outreach and capacity to enforce fair housing laws, it should also address compliance with existing fair housing laws as well as any past or current fair housing lawsuits, findings, settlements, judgements, or complaints.

Racially Concentrated Areas of Affluence (RCAA): The element identifies that "much of the city is identified as within a Racially Concentrated Area of Affluence," (p. H-II-63) but should also include specific analysis to better formulate appropriate programmatic response. This analysis should utilize local data and knowledge and other relevant factors. For example, the element could examine past land use practices, investments, quality of life relative to the rest of the City and region and then formulate appropriate programs to promote more inclusive communities and equitable quality of life. For

example, the City should consider additional actions (not limited to the Regional Housing Needs Allocation (RHNA)) to promote housing mobility and improve new housing opportunities throughout the City.

Disparities in Access to Opportunity: The element provides information on the access to opportunity through the TCAC opportunity map but must also provide a complete local and regional analysis of patterns and trends for all components. A comprehensive analysis should include the local and regional disparities of the educational, environmental, and economic scores through local, federal, and/or state data. It should also analyze persons with disabilities as well as access to transit. Please refer to page 35 of the Affirmatively Furthering Fair Housing (AFFH) guidebook (<https://www.hcd.ca.gov/community-development/affh/index.shtml#guidance>) for specific factors that should be considered when analyzing access to opportunities as it pertains to educational, employment, environmental, transportation, and any other relevant factors.

Disproportionate Housing Needs, including Displacement risk: The element provides some discussion on cost burdened households and overcrowding. However, the element must evaluate trends and patterns within the City, with regards to overpayment, substandard housing and persons experiencing homelessness. This analysis should utilize local data and knowledge and other relevant factors (Please see pages 24 and 25 of HCD's Guidance at <https://www.hcd.ca.gov/planning-and-community-development/affirmatively-furthering-fair-housing>). For example, the element could utilize information from the City's code enforcement to evaluate patterns of housing conditions or could contact service providers regarding patterns (areas of higher need) of persons experiencing homelessness and availability of services. Based on the outcomes of this analysis, the element should add or modify programs as appropriate.

Identified Sites and AFFH: While the element provides some analysis of the identified sites and socio-economic concentrations, the element must analyze the identified sites with regards to the City's RCAAs. In addition, the element should analyze the lack of units in higher opportunity or income areas, including census tracts in the Northwest and Southeast portion of the City, including two of the City's census tracts labeled highest opportunity areas by the Tax Credit and Allocation Committee (Figure IV-5), which appear to have no identified sites or opportunity sites. A complete analysis should fully assess how the site inventory is expected to improve and/or exacerbate fair housing conditions, including any isolation of the RHNA. This analysis should address the location, number of units by income group, magnitude of the impact, and could consider topics such housing choice (not limited to the RHNA) in other areas of the City, existing or proposed anti-displacement policies, place-based investments, and how such strategies will improve fair housing conditions when paired with the identified sites. Based on the outcomes of this analysis, the element should add or modify programs as appropriate.

Contributing Factors to Fair Housing Issues: Based on the outcomes of a complete analysis, the element should re-evaluation and prioritize contributing factors to fair housing issues.

Goals, Priorities, Metrics, Actions & Milestones: While the element includes general metrics for some programs, 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, milestones, geographic targeting and metrics or numerical targets and, as appropriate, address housing mobility enhancement, new housing choices and affordability in higher opportunity or income areas (throughout the City), place-based strategies for community preservation and revitalization and displacement protection.

The element may, for example, commit to a firm date by which it will establish development standards for smaller housing types, including bungalow courts. The element may also, for example, as discussed on the September 27, 2022 call, revise Program H-1m to make a specific commitment for establishing development standards for small units including missing middle housing types that are feasible in higher opportunity or income areas. To improve housing opportunities for persons experiencing homelessness or lower-income households employed in the City, the City may, for example, commit to identifying supportive housing projects in the City as part of Project Homekey and provide a date by which sites will be identified and by which the City will apply for funding. The City may also, for example, revise Program HE-6.D to make specific commitments to improve pedestrian safety and active mobility as a way to increase disparities in access to opportunity. Additionally, the element should commit to assessing and revising programs through a mid-cycle review. Please see HCD's AFFH memo for more information: [https://www.hcd.ca.gov/community-development/affh/docs/affh\\_document\\_final\\_4-27-2021.pdf#page=23](https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf#page=23).

2. *Include an analysis of population and employment trends and documentation of projections and a quantification of the locality's existing and projected needs for all income levels, including extremely low-income households. (Gov. Code, § 65583, subd. (a)(1).)*

*Include an analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition. (Gov. Code, § 65583, subd. (a)(2).)*

*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. (Gov. Code, § 65583, subd. (a)(7).)*

Extremely Low-Income (ELI): While the element briefly quantifies ELI households but should specifically analyze their housing needs, including tenure, overpayment, available resources and strategies, effectiveness of past program and the magnitude or disproportionate impacts on housing needs. Then, the element should add or modify programs as appropriate.

Housing Cost: While the element includes estimated rents for residents, it utilizes American Community Survey (ACS) data. The element should supplement census data with other sources (e.g., local knowledge).

Overpayment: The element must quantify and analyze the number of lower-income households overpaying by tenure (i.e., renter and owner).

Persons Experiencing Homelessness: The element provides some analysis of persons experiencing homelessness and describes some facility capacity in the County ( Table II-25). However, given the magnitude of the need and the significant increase in the Point in Time Count between 2019 and 2022, the City should evaluate resources and strategies, gaps in addressing needs and formulate appropriate strategies to address the unmet need. For example, the element could identify and evaluate capacity for permanent supportive housing, or other housing types, for example Single Room Occupancies (SROs), within the City, to evaluate needs and address unmet needs through program actions.

3. *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).)*

Small Sites: The site inventory currently includes 64 sites that are less than 0.5 acres, including several sites with existing housing (p. H-IV-30 and Table A). Sites smaller than a half-acre in size are deemed inadequate to accommodate housing for lower-income housing unless it is demonstrated that sites of equivalent size and affordability were successfully developed during the prior planning period or unless the housing element describes other evidence to HCD that the site is adequate to accommodate lower-income housing (Gov. Code, § 65583.2, subd. (c)(2)(A).). The element identifies several site groupings with potential for consolidation. However, the element must also evaluate whether those sites are suitable to accommodate housing for lower-income households and add or modify programs as appropriate. For example, the element could list past consolidations by the number of parcels, number of owners, zone, number of units, affordability and circumstances leading to consolidation and then relate those trends to the identified sites or could explain the potential for consolidation on a site-by-site basis. Based on the outcomes of the analysis, the element should modify policies and programs, including a specific commitment to ensure that maximum densities can be accommodated on all sites in the inventory.

Large Sites: The inventory includes several sites over ten acres, including one 16.4-acre site with an operating commercial shopping center. While the element clarifies there is interest from the property owner, it should analyze the suitability of these sites to accommodate housing for lower-income households or rescale assumptions. The City described its strategy for “carving out” portions of some larger parcels, where some portions of parcels can be developed while maintaining other existing residential and commercial uses. However, the City should clarify the timeline and procedure by which these carveouts will occur. For example, the element should

discuss any recent developments of similar size and affordability, opportunities for parceling, phasing or site planning and generally address how housing affordable to lower-income households will occur given typical state funded developments are approximately 50 to 150 units then rescale assumptions if necessary and add or modify programs as appropriate.

City-Owned Sites: The element identified two City-Owned sites to accommodate 231 housing units; however, must analyze the suitability and availability of those sites for development in the planning period, including how the sites will be available (e.g., surplus or lease), any known barriers, an anticipated schedule and other relevant factors. In addition, the element should include a program with numerical objectives that ensure compliance with the Surplus Land Act, provides incentives and actions along with a schedule to facilitate development of City-owned sites. Actions should include outreach with developers, issuing requests for proposals, incentives, fee waivers, priority processing, financial assistance and alternative actions if the sites do not become available at a reasonable point in the planning period (e.g., 2028).

Suitability of Nonvacant Sites: The element must include analysis demonstrating the potential for additional development on nonvacant sites and describes existing property owner interest (p. H-IV-21). While the element mentions underutilized sites were identified based on interest in development, structure/site conditions and development on adjacent sites with similar characteristics, it must support the validity of these factors in demonstrating the potential for redevelopment. For example, the element currently lists prior uses in recent development activity but could also discuss how the recent trends support the various factors. In addition, the element could consider additional factors such existing versus allowable floor area and reflect those values in the sites inventory. Finally, the element should account for the extent existing uses impede additional residential development including market demand for the existing use and existing leases or contracts that would perpetuate the existing use or prevent additional residential development.

The housing element relies upon nonvacant sites to accommodate more than 50 percent of the RHNA for lower-income households. As a result, the housing element must demonstrate existing uses are not an impediment to additional residential development and will likely discontinue in the planning period. (Gov. Code, § 65583.2, subd. (g)(2).) For your information, absent findings in the resolution as part of adoption 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.

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/planning-and-community-development/housing-elements> for a copy of the form and instructions. The City can reach out to HCD at [sitesinventory@hcd.ca.gov](mailto:sitesinventory@hcd.ca.gov) for technical assistance.

## Zoning for a Variety of Housing Types:

- *Single Room Occupancy (SRO) Units:* The City categorizes SROs under the definition of rooming and boarding houses, “that are rented to between 3 to 5 persons for profit...”(p. H-II-109). The City should analyze this definition as a possible constraint. In addition, the City allows SROs in only certain zones and requires a Conditional Use Permit (CUP) in all zones allowed. The element should demonstrate zoning, development standards, including parking, and permit procedures encourage and facilitate SROs or add or modify programs as appropriate.
- *By-right Permanent Supportive Housing:* While the element states that supportive housing is permitted in all residential zoning districts by right (p. H-II-109), supportive housing shall be a use by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses pursuant to Government Code section 65651. The element must demonstrate compliance with these requirements and include programs as appropriate.
- *Emergency Shelters:* The element was revised to state that emergency shelters are allowed by-right in a “portion of the M-1 zone” and states that the area is “well served by transit and commercial services” (p. H-III-107). However, the element must also identify and analyze any development standards (e.g., spacing, parking, concentration requirements) and other requirements imposed on emergency shelters. Lastly, the element must describe compliance with Government Code section 65583, subdivision a)(4)(A) or include a program to comply with this requirement. For your information, pursuant to Government Code section 65583, subdivision a)(4)(A), parking requirements should be limited to allowing sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone.
- *Accessory Dwelling Units (ADU):* HCD records indicate permitted ADUs of 5 in 2018, 8 in 2019, 54 in 2020, and 38 in 2021, figures that are inconsistent with those in the element. The element should reconcile these numbers either in the element or Annual Progress Reports (APRs) and adjust assumptions as appropriate.

After a cursory review of the City’s ordinance, adopted August 16, 2022, HCD discovered some areas which are inconsistent with State ADU Law. HCD will provide a complete listing of ADU non-compliance issues under a separate cover. As a result, the element should add a program to update the City’s ADU ordinance to comply with state law.

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 persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building*



*codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures... (Gov. Code, § 65583, subd. (a)(5).)*

Land Use Controls: The element must identify and analyze all relevant land use controls impacts as potential constraints on a variety of housing types. The analysis should analyze land use controls independently and cumulatively with other land use controls. The analysis should specifically address requirements related to parking for small units including SROs and missing middle housing types; height limits particularly in multifamily zones; maximum lot coverages; minimum lot areas; minimum site sizes; public and private open space requirements; lot coverage and limits on allowable densities. The analysis should address any impacts on cost, supply, feasibility, timing, approval certainty and ability to achieve maximum densities and include programs to address identified constraints. Finally, pursuant to public comments, the City must make a firm commitment to reduce its parking requirements across residential zones.

Processing and Permit Procedures: The element identifies that most developments are subject to a Site and Architectural Review and lists various finding, most notably “The project will aid in the harmonious development of the immediate area”. The element then mentions this is similar to other jurisdictions but should evaluate the impacts of the finding on housing supply (number of units), cost, timing, feasibility and particularly approval certainty and then add programs to address identified constraints.

Persons with Disabilities: The element describes the City’s reasonable accommodation process and lists its factors for consideration (pp. H-II-141), including the potential impact on surrounding uses. The element then notes this factor can be addressed by evaluating alternatives to addressing the needs of persons with disabilities. First, a factor such as impact on surrounding uses is essentially a conditional use finding and a reasonable accommodation procedure should be a unique exception process, instead using factors such as whether the accommodation poses a fundamental alternation of zoning and land use – a far different standard that should be employed in a manner to promote access to housing opportunities for persons with disabilities. Second, the surrounding use factor appears to be employed in a manner that seeks to alter requests and fit with the surrounding areas as opposed to considering the exception request. For these reasons alone, the element should identify this finding as a constraint and modify Program H-5g (Reasonable Accommodation) to remove the constraint early in the planning period (within two years).

In addition, the element indicates group homes for seven or more persons are allowed in all residential zones but subjects group homes to a conditional use permit (CUP), unlike other similar uses. The element should specifically analyze these constraints for impacts on housing supply and choices and approval certainty and objectivity for housing for persons with disabilities and include programs as appropriate.

## C. Housing Programs

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 beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the Housing Element... (Gov. Code, § 65583, subd. (c).)*

Programs must demonstrate that they will have a beneficial impact within the planning period. Beneficial impact means specific commitment to deliverables, measurable metrics or objectives, definitive deadlines, dates, or benchmarks for implementation. Deliverables should occur early in the planning period to ensure actual housing outcomes. Several programs and actions have timelines that could be moved earlier in the planning period to ensure a beneficial impact. Examples include Programs H-1E (Preapproved ADU Plans), H-1m (Microunit Standards), H-2c (Short term Rental Ordinance), H-3e (Reuse Site Ministerial Review), and H-5t (Employee Housing).

Additionally, programs must have specific commitment to clear housing outcomes or deliverables. Several programs include actions with no description of how those actions will be implemented (e.g., “support”, “study”, “explore”, “evaluate”, etc.). Programs should be amended, to include specific commitment to a housing related outcome. Examples include Programs H-1b (Commercial Linkage Fee), H-1c (Affordable Housing Overlay Zone), H-1k (Achieve Target Densities), H-1m (Micro-unit Standards), H-2d (Workforce Housing Ordinance), H-2e (Housing Rehabilitation Loans), H-2g (Preservation of Assisted Housing), H-3a (Parking Requirement Reduction) H-5d (Shared Housing Program), H-5o (ELI Unit Development), and H-5s (City Density Bonus).

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 each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (Gov. Code, § 65583, subd. (c)(1).)*

As noted in Finding B3, 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, programs targeting development of publicly owned land (e.g., Program H-5q) should include a schedule of actions for development in the planning period consistent with the assumptions in the sites inventory, including coordination with developers, requests for proposal, facilitating entitlements, incentives, issuing building permits and compliance with the Surplus Land Act.

3. *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. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)*

As noted in Finding B4, the element requires a complete analysis of potential governmental and nongovernmental 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.

4. *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, or disability, and other characteristics... (Gov. Code, § 65583, subd. (c)(5).)*

As noted in Finding B1, the element must include a complete assessment of fair housing. Based on the outcomes of that analysis, the element must add or modify programs.

5. *The housing program shall preserve for low-income household the assisted housing developments identified pursuant to paragraph (9) of subdivision (a)... (Gov. Code, § 65583, subd. (c)(6).)*

Program H-2g states an objective to “participate in the preservation of at-risk units by providing financial and/or technical assistance” (p. H-IV-55). However, the program should make a specific and firm commitment to maintain the long-term affordability of these units, including a clear commitment of financial assistance or support of funding applications, coordination with qualified entities and support, education and assistance for tenants.

#### **D. Quantified Objectives**

*Establish the number of housing units, by income level, that can be constructed, rehabilitated, and conserved over a five-year time frame. (Gov. Code, § 65583, subd. (b)(1 & 2).)*

While the element includes quantified objectives for new construction, it should also consider quantified objectives for rehabilitation and preservation of existing affordable

housing. For your information, the quantified objectives do not represent a ceiling, but rather set a target goal for the City, based on needs, resources, and constraints.

## **E. Public Participation**

*Local governments shall make a diligent effort to achieve public participation oof all segments of the community in the development of the Housing Element and the element shall describe this effort. (Gov. Code, § 65583, subd.(c)(9).)*

While the City made efforts to include the public through workshops and surveys, moving forward, the City should employ additional methods for public outreach efforts in the future, particularly to include lower-income and special needs households and neighborhoods with higher concentrations of lower-income households. In addition, several comments questioned the lack of commitments around reducing parking minimums and ensuring the feasibility of missing middle housing types. The City should consider these comments and make adjustments as appropriate. The City should also analyze the feasibility of sites identified by members of the public, including the site of a former Elephant Bar and Fry's Electronics and make adjustments as appropriate. The City could also, for example, target higher densities around the Hamilton 880 corridor. To AFFH, the element could revise Program H-3f and commit to development of a rent stabilization ordinance that limits annual rent increases or develop a city-wide portal for affordable rentals available. Finally, to address noted jobs-housing relationships, the City could also, for example, conduct targeted stakeholder interviews or establish a committee representative of lower-income households and commuters who work inside the City in future public outreach efforts. For additional information, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/getting-started/public-participation.shtml>.