

#	Chapter	Topic	HCD Comment 7/14/2025	HCD Comment 9/17/2025	HCD Comment 11/13/2025	Section / Page Number	Response / Revisions
1	AFFH	Racial/Ethnic Areas of Concentration of Poverty (R/ECAP)	While the element includes general discussion about R/ECAPs, it should specifically analyze these areas including patterns and changes over time, neighborhood characteristics and conditions, comparisons to other neighborhoods in terms of quality of life (e.g., housing and neighborhood conditions, infrastructure, streets, sidewalks, safe routes to schools, parks, schools, community amenities) and incorporate local data and knowledge and other relevant factors (see below).	analyze characteristics and conditions, comparisons to other neighborhoods in terms of quality of life (e.g., housing and neighborhood conditions, infrastructure, streets, sidewalks, safe routes to schools, parks, schools, community amenities)	conditions, comparisons to other neighborhoods in terms of quality of life (e.g., housing and neighborhood conditions, infrastructure, streets, sidewalks, safe routes to schools, parks, schools, community amenities)	Racially and Ethnically Concentrated Areas of Poverty (R/ECAP); 126-133	<p>Analyzed the R/ECAP areas for patterns and changes over time by including maps of the non-White population over time and maps of the population below the poverty line over time. Noted that both the non-White population and population experiencing poverty have increased over time in the R/ECAP areas, likely due to concentration around resources and high density housing opportunities. Referenced several programs that will address the geographical concentration of more affordable housing in an effort to prevent further segregation.</p> <p>Added comparison of neighborhood characteristics and conditions, including housing and neighborhood conditions, infrastructure, streets, and sidewalks.</p> <p>Included analysis and neighborhood comparison of conditions for sidewalks, water and sewer infrastructure, schools, and other amenities. Noted that the City is just beginning the safe routes to schools study and will have updates as this research progresses, but overall, there is not a neighborhood with known concentrations of substandard sidewalk conditions.</p>
2	AFFH	Disparities in Access to Opportunity	The element should expand the analysis for residents' access to opportunity. The element includes some discussion regarding access; however, it could evaluate the proposed sites inventory's impact on improving access to opportunity. The element could discuss the proposed sites in relation to location of jobs and other uses to promote transportation mobility along with place based strategies toward community revitalization. The discussion around transportation access could also be expanded to include the frequency of routes in areas proposed in sites inventory and any planned future improvements during the planning period. The element could also discuss access to education in proposed areas and whether any disparities exist between concentration of sites and existing neighborhoods. Based on the outcomes of an expanded analysis, programs could be added to further access to a variety of opportunities.	Yes	Yes	Disparities in Access to Opportunities; 134-153	<p>Noted that the sites inventory will improve access to opportunity as 218 of the 223 sites are within a mile of a transit stop. By providing opportunity for higher income residential development near transit stops, the lower income population will be able to live in areas with direct transit access to economic hubs, job opportunities, and other resources that are available in the downtown area. Added a map of the jobs proximity index and discussed site proximity to high job opportunity areas. Analyzed high quality transit areas proximity to RHNA sites and discussed place based strategies toward community revitalization. Notes frequency of transit routes in areas proposed in sites inventory and any planned future improvements during the planning period. Added a map or high quality schools in proposed areas and noted that there are not notable disparities between concentration of sites and existing schools.</p> <p>Included significant local knowledge provided by City staff regarding history of disinvestment and the City's intention to reinvest in lower opportunity neighborhoods.</p>
3	AFFH	Disproportionate Housing Needs, including Displacement	The element should discuss patterns of housing conditions and persons experiencing homelessness relative to accessing opportunities. The element should evaluate areas with higher concentrations of vacancy, units in need of rehabilitation, and other characteristics impacting conditions. The element should also be revised to include an evaluation of trends of persons experiencing homelessness like areas of concentration of encampments; access to transportation, services, programs and other opportunities. Upon analysis, the element should add or modify programs to address the needs of persons experiencing homelessness beyond what's been identified in Program D-1 (Incentives and Assistance for Lower-Income and Special Needs Housing) and Program D-2 (Coordination with Local Agencies for Special Needs Households).	should discuss disproportionate impacts and whether services are targeted to areas of higher need	Yes	Disproportionate Housing Needs; 153-169	<p>Added maps to show the patterns of persons experiencing homelessness relative to accessing opportunities. Included an evaluation of trends of persons experiencing homelessness including a map of areas of concentration of encampments, demographics of the homeless population, access to transportation, services, programs and other opportunities.</p> <p>Included data from code enforcement on the nature and location of code enforcement cases over the past 2 years. Added a map of substandard housing cases and analyzed the distribution in the City. Noted that there is an even distribution of substandard housing cases in the City, and there is no neighborhood with notably more substandard conditions when compared to other surrounding neighborhoods.</p>
4	AFFH	Disproportionate Housing Needs	The element includes some general information on persons experiencing homelessness and housing conditions but should also evaluate those needs, impacts and patterns within the City, such as areas of higher need. For homelessness, the element should examine disproportionate impacts on people with protected characteristics (e.g., race, disability) and patterns of need or areas with higher concentrations of persons experiencing homelessness, including access to transportation, services and programs. For housing conditions, the element should discuss any areas of potentially higher needs of rehabilitation and replacement. The element should utilize local data and knowledge such as service providers and code enforcement officials to assist this analysis.	Housing condition analysis is limited to ACS data and should discuss patterns (areas with higher rehab needs) based on local knowledge	Yes	Disproportionate Housing Needs; 153-169	<p>Added maps noting the areas with higher concentrations of people experiencing homelessness to show the patterns of persons experiencing homelessness relative to accessing opportunities. Included an evaluation of trends of persons experiencing homelessness including a map of areas of concentration of encampments, access to transportation, services, programs and other opportunities. Added data on demographics of the homeless population regarding race, disability, and familial status.</p> <p>Included data from code enforcement on the nature and location of code enforcement cases over the past 2 years. Added a map of substandard housing cases and analyzed the distribution in the City. Noted that there is an even distribution of substandard housing cases in the City, and there is no neighborhood with notably more substandard conditions when compared to other surrounding neighborhoods.</p> <p>Described the programs the City is including to address substandard housing and promote housing rehabilitation in the City.</p> <p>Included significant local knowledge provided by City staff regarding history of disinvestment and the City's intention to reinvest in lower opportunity neighborhoods.</p>
5	AFFH	Local Data and Knowledge and Other Relevant Factors	While the element incorporates some local data and knowledge and other relevant factors, it should expand use of this information to better understand the patterns and trends of socioeconomic concentrations and disparities in access to opportunities. Local data and knowledge and other relevant factors should complement federal, state, and regional data. For example, the element could utilize information from city officials, local and regional advocates and service providers and can geographically analyze historical land use and investment practices or other information and demographic trends. The element should also discuss local geographic barriers or constraints (e.g., river, highway, railroad) and the relationship between socioeconomic status and trends. Based on the outcomes of a complete analysis, the element should revise or add to programs as appropriate.	Local data and knowledge and other relevant factors should be used to examine disparities in access to opportunity and differences between neighborhoods in terms of quality of life; See HCD's local data and knowledge guide.	Yes	Affirmatively Furthering Fair Housing; 91-193	<p>Utilized information from city officials, local and regional advocates and service providers to geographically analyze historic patterns of disinvestment, areas the City is reinvesting in, local transportation improvements regarding transit, roads, and sidewalks, local ADA improvements, major employers, safe routes to schools, and place-based improvements.</p> <p>Added comparison of neighborhood characteristics and conditions, including housing and neighborhood conditions, infrastructure, streets, and sidewalks.</p> <p>Included data from code enforcement on the nature and location of code enforcement cases over the past 2 years. Added a map of substandard housing cases and analyzed the distribution in the City. Noted that there is an even distribution of substandard housing cases in the City, and there is no neighborhood with notably more substandard conditions when compared to other surrounding neighborhoods.</p> <p>Described the programs the City is including to address substandard housing and promote housing rehabilitation in the City.</p>
6	AFFH	Contributing Factors to Fair Housing Issues	Based on the outcome of a complete analysis, the element should reassess and prioritize contributing factors to fair housing issues then formulate appropriate policies and programs.	Revise as appropriate upon a complete analysis	Depends on complete analysis	Fair Housing Issues, Contributing Factors, and Meaningful Action; 171-193	Revised the programs and policies to address contributing factors to fair housing issues based on revised analysis.

#	Chapter	Topic	HCD Comment 7/14/2025	HCD Comment 9/17/2025	HCD Comment 11/13/2025	Section / Page Number	Response / Revisions
7	Needs Analysis	Population and Employment	The element should utilize current population estimates to better understand recent trends. To address this requirement, the element could utilize current population estimates from the California Department of Finance, available at https://dof.ca.gov/Forecasting/Demographics/Estimates/estimates-e5-2010-2021/ .	Yes	Yes	Population Trends; 32-33	Updated current population estimates to utilize the 2025 population estimates from the California Department of Finance to better illustrate recent trends.
8	Needs Analysis	Population and Employment	In addition, while the element includes a brief discussion of employment by industry, the analysis should also include discussion of major employers, jobs to housing fit (e.g., wages compared to housing affordability), and past and emerging employment trends.	Yes	Yes	Employment Trends; 37-43	Included discussion of major employers, wages compared to housing affordability, and past and emerging employment trends.
9	Needs Analysis	Extremely Low-Income (ELI) Households	The element includes some basic information regarding ELI households such as the number of households, overpayment and projected housing needs. However, given the unique and disproportionate needs of ELI households, the element must include analysis to better formulate policies and programs. For example, the element could analyze the disproportionate characteristics of tenure, cost burden, overcrowding and other household characteristics compared to other income groups then examine the availability of resources to determine gaps in housing needs.	Yes	Yes	Extremely Low Income Housing Needs; 83-87	<p>Added that the extremely low income population does not experience disproportionately high levels of overcrowding in the City. In fact, the moderate income population experiences the highest levels of overcrowding for owner households, and the low income population experiences the highest levels of overcrowding for renter households. While extremely low income renters do experience notably higher rates of overcrowding compared to extremely low income owners, these households still experience overcrowding below the average for households of this tenure.</p> <p>Analyzed the disproportionate characteristics of tenure, cost burden, and overcrowding compared to other income groups and noted available of resources to determine gaps in housing needs. Noted that while ELI households do experience high levels of cost burden, indicating the need for more ELI residential developments overall, overcrowding is not a prominent issue, and there is not a significant need for the availability of larger households for the extremely low income population.</p>
10	Needs Analysis	Housing Costs	The element includes information on sales prices and rental information from the American Community Survey but should also reflect current market conditions for sales prices utilizing additional data sources (e.g., Zillow, Apartments.com).	Yes	Yes	Rental Prices; 56-59	Included current market conditions for rental and sale prices utilizing Zillow and Apartments.com and analyzed affordability of existing housing stock based on income trends and average rental costs.
11	Needs Analysis	Special Housing Needs	While the element quantifies the City's special needs populations, including persons with developmental disabilities, it should also discuss challenges faced by the population, housing situation for individuals (e.g. independent, living with parents, etc.), and effectiveness of policies and programs to address housing needs.	should identify and analyze housing situations (e.g., independent, living with parents) – see DDS data	Yes	Developmental Disabilities; 79-80	<p>Discussed challenges faced by the population with a developmental disability, including the need for specialized care, lower income housing, and independent living difficulties. Included data on what percent of the population with a disability have independent living difficulties. As ADUs may serve as a caregiver unit for this population, the element now references several programs to incentivize and promote ADU development.</p> <p>Added DDS data on housing situation. Noted that 89 percent of the developmentally disabled population at the Central Valley Regional Center does not live independently. 10,804 of the 37,966 identified by DDS are under the age of 22, which may indicate that some independent living difficulty is due to age and not solely disability.</p>
12	Needs Analysis	At-Risk Preservation	The element lists a few housing developments at-risk of converting to market rate uses in the ten-year period. However, HCD records indicate Knox Park/Sunrise Madera Plaza and Madera Villa may also be at-risk in the ten-year period. The element should reconcile this information and if units are at-risk in the ten-year period, the element should add or modify programs as appropriate. HCD will send additional information under separate cover.	Reconciled?	Updates to Program C-1 necessary to reflect updated numbers	Preservation of Units at Risk of Conversion; 63-67	Updated Table 32 to reconcile projects at risk of conversion. Revised Program C-1 with updated at-risk numbers
13	Sites and Resources	Realistic Capacity	The estimate of the number of units for each site must be adjusted as necessary, generally based on land use controls and site improvements and typical densities of residential developments at a similar affordability level. While the element lists recent projects at built densities, it should also account for affordability and whether exceptions to zoning were granted. Further, the analysis should consider outliers and similarities to identified sites, particularly for multifamily zones. For example, one R3 zoned site was built at 124 percent of maximum allowable densities on a site much smaller than most identified sites to accommodate the lower-income regional housing need allocation (RHNA). The analysis should exclude this atypical density. Further, with an anticipated increase in densities (50 units per acre), assumed densities (40 units per acre) may not reflect future typically built densities. To address these circumstances and to better manage No Net Loss Law (Gov. Code, § 65863), the element should consider rescaling capacity assumptions (e.g., 60-70 percent of maximum allowable densities).	Is the City anticipating any products at 40 units per acre or nearby in similar cities? Yes; Program A-3		Realistic Capacity; 265-271	<p>When determining the average projected yields to use for the RHNA sites, any recent project that achieved over 100 percent yield was reduced to a maximum of 100 percent in an effort to address any significant outliers. This resulted in an average yield of 69 percent in the R1 zone, 46 percent in the R2 zone, 87 percent in the R3 zone, and between 55 percent and 87 percent in the various PD zones. The estimated yields used for the RHNA sites take a further discount from these averages to account for new zoning trends and potential site constraints.</p> <p>Updated Table 89 to show how the outliers were accounted for in the yield determinations.</p> <p>Added analysis of recent regional high density projects was conducted to demonstrate the regional developer interest in high density development. As the City of Madera does not currently have a zone that will reach the 50 du/ac proposed for the R-3 zone, the analysis includes development in the nearby communities of Fresno, Merced, Turlock, Clovis, and Dinuba. Included a table of several recent developments in the region between 40 and 50 du/ac, at both market rate and affordable, indicating that not only is there a regional trend that supports development at this density, but that lower income development is feasible and likely.</p> <p>Noted in Program A-3, that the City will track the unit count and income/affordable assumed on parcels included in the sites inventory, actual units constructed and their affordability levels as parcels are developed, and net change in capacity after development and summary of capacity in meeting the remaining RHNA, and adjust assumptions as appropriate to manage and mitigate any net loss.</p>
14	Sites and Resources	Availability and Accessibility of Infrastructure	The element includes some discussion of the availability of infrastructure to serve new units and demonstrates adequate total water capacity; however, the element should also demonstrate adequate total sewer capacity (existing and planned) to accommodate the RHNA.	Yes	Yes	Infrastructure; 278-280	Reiterated that there is adequate total sewer capacity (existing and planned) to accommodate the RHNA. The largest focus of the 2024/2025 CIP was to advance sewer and water projects. This effort was driven by not only an aging sewer and water system, but also by a \$23,000,000 grant received by the City for sewer improvements. While the City currently has enough sewer capacity to accommodate the RHNA, they are also pursuing several sewer improvement projects.

#	Chapter	Topic	HCD Comment 7/14/2025	HCD Comment 9/17/2025	HCD Comment 11/13/2025	Section / Page Number	Response / Revisions
15	Sites and Resources	Environmental Constraints	The element includes some discussion of environmental constraints of identified sites but should also address other constraints and conditions that preclude development on identified sites in the planning period. Examples of other constraints and conditions include shape, access, contamination, easements, property conditions, likelihood of disposition of rights of way, Williamson Act contracts, conservation easements, environmental overlays and airport compatibility.	Easements? Environmental overlays? Other known conditions that preclude development?	shape, access, contamination property conditions Williamson Act contracts airport compatibility Add no other known conditions that preclude development	Environmental and Infrastructure Constraints; 273-281	<p>Stated that to the best of staff's knowledge, the included sites do not have historic uses that would require environmental remediation prior to conversion of residential uses (dry cleaning, historic industrial like gas/oil processing, etc.). There are no other known conditions that preclude development.</p> <p>Indicated that the sites have been evaluated for likelihood of development based on shape, access, and property conditions. Any properties with significant constraints posed by these factors were not included in the RHNA sites inventory. Any environmentally protected areas such as vernal pools were also excluded.</p> <p>Added description and maps of contamination areas, Williamson act, and the airport and indicated that there are no constraints posed to the development of the RHNA sites.</p> <p>Noted that there are agricultural preserves, farmland security zones and conservation easements within the City's Sphere of Influence. These are primarily in the southwest area of the sphere or influence, where there are rural residential parcels and the General Plan precludes infrastructure expansion and intensification. None of these are prevalent to any extent or located within areas that "preclude" development, or the City's ability to meet our RHNA.</p>
16	Sites and Resources	Electronic Site 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 for technical assistance.	Nothing submitted as of 9/17; submit with adopted	Nothing submitted as of 9/17; submit with adopted	N/A	The City will submit the electronic sites inventory to HCD upon adoption.
17	Zoning for a Variety of Housing Types	Employee Housing	Employee Housing: The element must demonstrate zoning is consistent with the Employee Housing Act (Health and Safety Code, § 17000 et seq.), specifically, sections 17021.5, 17021.6 and 17021.8. Section 17021.5 requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. Section 17021.6 requires employee housing consisting of no more than 12 units or 36 beds to be permitted in the same manner as other agricultural uses in the same zone. Section 17021.8 requires that a development is subject to a streamlined, ministerial approval process and is not subject to a conditional use permit (CUP) if the development is an eligible agricultural employee housing development. The element briefly states employee housing is permitted in UR zones when they are incidental to a permitted or conditional use. This does not appear in compliance with the Employee Housing Act. For example, employee housing for six or fewer persons should be permitted as a single-family structure; meaning permitted in all zones that permit single-family uses. Further, the analysis does not mention zones that allow agricultural uses. Finally, the element does not address Section 17021.8. Based on a complete analysis, the element should add or modify programs.	Yes	Yes	Farmworker Housing; 225	The element was revised to substantiate that the City's municipal code is in compliance with the Employee Housing Act, including permitting of housing for six or fewer employees, farmworker housing, and streamlined approval of farmworker housing. No program revisions are necessary.
18	Zoning for a Variety of Housing Types	Emergency Shelters	Emergency Shelters: The element mentions emergency shelters are permitted by right in the C2 zones and briefly discusses available capacity. However, the element should also: (1) clarify emergency shelters are permitted without discretionary review; (2) explain whether the current definition of emergency shelters is consistent with state law; (3) discuss the suitability of capacity, including parcel sizes and proximity to transportation and services; and (4) list and evaluate development standards, including parking requirements.	Program B-1 Should clarify shelters are permitted without discretionary action Program B-1 should amend the definition	Yes; Program B-1	Emergency Shelters; 221-223 Program B-1; 324-325	<p>Confirmed that emergency shelters are permitted without a conditional use permit and are only subject to development standards that apply to other residential or commercial development within the C-2 zone. Revised Program B-1 to include the revision of emergency shelter standards to base parking on staff levels only.</p> <p>In February, 2025 the zoning ordinance was amended to ensure the definition of emergency shelter is consistent with state law. Specifically, emergency shelters are defined as housing, as defined in California Health and Safety Code Section 50801, with minimal supportive services for families or individuals experiencing homelessness, where occupancy is limited to six months or less. Medical assistance, counseling, and meals may be provided.</p> <p>Clarified that Emergency shelters are permitted without any discretionary review or action.</p> <p>Added to Program B-1 that the definition of Emergency Shelter will be amended to note that For purposes of the definition, "emergency shelter" shall include other interim interventions, including, but not limited to, a navigation center, bridge housing, and respite or recuperative care.</p>
19	Zoning for a Variety of Housing Types	Transitional and Supportive Housing	Transitional and Supportive Housing: The element briefly mentions transitional and supportive housing are permitted as residential uses in appropriate residential zones. However, the element should clarify that the residential uses are permitted in all zones allowing residential uses and, if necessary, add or modify programs to comply with statutory requirements.	Yes	Yes	Transitional/Supportive Housing; 224-225	Specified that transitional and supportive housing are permitted uses in the PD, C-1, C-2, C-R, C-N, and I zones and are permitted uses with an administrative plan review in the RA, R-1, R-2, and R-3 zones. The Administrative Plan Review is the City's approval process for ministerial projects. The transitional and supportive housing residential uses are permitted in all zones allowing residential uses with no additional requirements beyond what is required for traditional residential development in the same zone. This was adopted as part of the zoning code update in February, 2025.
20	Zoning for a Variety of Housing Types	By-Right Permanent Supportive Housing	By-Right Permanent Supportive Housing: The element explains statutory requirements to permit by right permanent supportive without discretionary actions among other provisions but should also demonstrate compliance with these requirements explicitly in local zoning.	AB 2162 has provisions beyond non-discretionary approval (e.g., parking, size thresholds, processing); the element does not demonstrate compliance with these requirements and programs should be added or modified	Yes	Transitional/Supportive Housing; 224-225 Program B-1; 324-325	<p>Noted that transitional and supportive housing are permitted uses in the PD, C-1, C-2, C-R, C-N, and I zones and are permitted uses with an administrative plan review in the RA, R-1, R-2, and R-3 zones. The Administrative Plan Review is the City's approval process for ministerial projects. The transitional and supportive housing residential uses are permitted in all zones allowing residential uses with no additional requirements beyond what is required for traditional residential development in the same zone. This was adopted as part of the zoning code update in February, 2025.</p> <p>To ensure compliance with AB 2162, as a part of Program B-1, parking requirements for supportive housing projects within one-half mile of a transit will be revised so that no minimum parking requirement is imposed.</p>

#	Chapter	Topic	HCD Comment 7/14/2025	HCD Comment 9/17/2025	HCD Comment 11/13/2025	Section / Page Number	Response / Revisions
21	Zoning for a Variety of Housing Types	Mobile Home Parks	Mobile Home Parks: The element should address whether zoning, development standards and permit procedures are available to encourage and facilitate mobile home parks.	Analysis should expand on zoning requirements for mobile home parks, including development standards	Yes	Manufactured Homes and Mobile Homes; 220-221	<p>Noted that mobile homes are permitted with an administrative plan review without a conditional use permit and are only subject to development standards that apply to other residential or commercial development.</p> <p>To further encourage and facilitate mobile home parks, the City allows a 20 percent density bonus for mobile home parks that limit residency based on age requirements for housing older persons.</p> <p>Included the revised mobile home park definition.</p> <p>Emphasized that manufactured and mobile homes must meet the same standards as a conventional single family dwelling in regards to parking, building setbacks and other zoning requirements. The City of Madera allows State licensed mobile home parks, and does not place any further development standards or zoning restrictions on mobile homes.</p>
22	Constraints Analysis	Land Use Controls	<p>The element includes some discussion of local land use controls and their impact on local housing production; however, the element should specifically analyze minimum lot sizes, setbacks and open space requirements. The analysis should consider land use controls independently and cumulatively with other land use controls and address any impact on cost, supply, housing choice, affordability, timing, approval certainty and ability to achieve maximum densities and include programs to address identified constraints.</p> <p>In addition, the element lists various Planned Development zones, and these zones do not appear to have fixed development standards and subject development to a precise development plan. The element should discuss whether the Planned Development process is required and analyze the absence of fixed development standards and precise development plan as a constraint on development.</p>	<p>Program B-6</p> <p>Should address minimum lot sizes as a constraint</p> <p>Are there areas on the zoning map that are mapped with PD that do not have approved precise plans? If not, then are PDs optional? If so, are fixed development standards available?</p>	<p>Yes; Programs A-2 and B-6</p> <p>Yes; Program B-1</p>	<p>Development Standards; 205-213</p> <p>Planned Development Zones/Precise Plans; 240-241</p> <p>Program B-6; 326</p> <p>Program A-2, 320-321</p> <p>Program B-2, 325</p>	<p>The element was revised to include a full analysis of residential development standards including an addition of a minimum lot size, discussion of cumulative standards, and additions regarding open space requirements. Program B-6 was revised to include the revision of the setback requirement for 3 or more story buildings and open space requirement in the R3 zone.</p> <p>The element was revised to include additional detail regarding the PD/precise plan process and to substantiate that the process allows for increased flexibility and is not a constraint on housing development.</p> <p>Program B-2 was amended to include a revision to PD standards to allow developments to default to existing residential development standards of zones that allow the same density, or, establish baseline development standards for PD zones. Additionally, Program A-2 was revised to add the following "As a part of the rezoning plan, review and revise minimum lot sizes to ensure that they can facilitate the maximum density on all parcels."</p>
23	Constraints Analysis	Local Processing and Permit Procedures	The element should address public comments on this draft submittal and discuss compliance with the Permit Streamlining Act and intersects with CEQA and timing requirements, including streamlining determinations and add or modify programs as appropriate.	Upon a complete application, does the city make a determination whether CEQA streamlining is available?	Yes	<p>Public Participation; 1-2</p> <p>Public Outreach; 91-95</p> <p>Permit Procedures and Processing Time Frames; 235-236</p> <p>State Streamlining (Permit Streamlining Act, SB 35); 243</p> <p>Program B-3; 325</p>	<p>The element notes in two places that no public comments were received on the draft submittal during the 30-day public review period.</p> <p>The City notes compliance with SB 35 and includes Program B-3 for compliance with the permit streamlining act and SB 35.</p> <p>The element includes a discussion of compliance with the Permit Streamlining Act.</p> <p>The following clarification was added regarding CEQA: Upon receipt of a complete application, the City makes a determination regarding the appropriate level of CEQA documentation and determines whether CEQA streamlining is available. CEQA exemptions are done on an administrative staff level.</p>
24	Constraints Analysis	On/Off-Site Improvements	The element should be revised to include a discussion of requirements for on-/off-site improvements as conditions of approval for development. The discussion should include typical off-site improvements including whether improvements are typically beyond street frontage, and if so, whether this is part of a comprehensive or planned comprehensive program. In addition, the element should evaluate the cost impacts of on-/off-site improvements on total development costs.	<p>should analyze cost impacts on total development costs; what is threshold for improvements value? Contribution to total cost of housing development?</p> <p>Do rehabs trigger improvements? Impacts on lower income owner-tenure households? Program to offset costs?</p>	Yes	On and Off Site Improvements; 226-227	<p>Included a discussion of requirements for on-/off-site improvements as conditions of approval for subdivision development. Listed required improvements including storm drainage, sewer and water, electric, telephone, and cable facilities, and utilities. Noted that the requirements for on- and off-site improvements are not beyond the typical requirements in the region, and do not pose a specific undue financial burden that would constrain development. Some requirements may be waived for lower income residential households in an effort to lower costs and remove constraints to affordable housing development.</p> <p>Included more description of the on-and off-site improvement requirements. Analyzed cost impact on total development and noted that the improvements require less than 5 percent of the overall project cost in most cases. Developers have not indicated that on and off site improvements are a constraint to lower income housing development.</p>
25	Constraints Analysis	Housing for Persons with Disabilities	The element excludes group homes for seven or more persons from some residential zones (e.g., RA zone) and subjects the use to a conditional use permit, 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.	<p>Program B-1</p> <p>Program should commit to allow in all zones allowing residential uses and only subject to requirements of residential uses of the same type in the same zone</p>	Yes; Program B-1	<p>Group Homes/Residential Care Facilities; 218-219</p> <p>Program B-1; 324-325</p>	Program B-1 was revised to include the removal of the CUP requirement for small and large group homes in residential zones. B-1 was revised to include the following action: Allow group homes for seven or more persons in all zones allowing residential uses subject only to requirements of residential uses of the same type in the same zone.
26	Constraints Analysis	Approval Times	The element must identify the typical length of time between receiving approval for housing development and the submittal of application for building permits and discuss any hindrances on construction of the RHNA.	Further revisions to come	Should specifically discuss time between approval and application for building permit, hindrance on constructing RHNA and add or modify programs based on analysis	Permit Procedures and Processing Time Frames; 235-236	<p>Added building permit issuance data to existing examples and added two additional permitting examples. Updated Program A-4 to coordinate with developers to ensure no hindrances arise between planning approvals and building permits and construction.</p> <p>Added examples of average time between approval and application for a building permit. The three projects that have not received a building permit are still within that average approval issuance time frame. Noted that the amount of time between project approval and building permit application does not typically hinder construction of units.</p>
27	Housing Programs	Housing Programs	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:	Depends on a complete analysis	Depends on a complete analysis	Housing Sites and Resources; 264-315	The element was revised to include a complete sites analysis, including an expanded explanation of yields, assessment of environmental constraints, assessment of availability of infrastructure, and realistic capacity.
28	Housing Programs	Program B-1 (Zoning Ordinance Updates: Single Room Occupancy (SRO))	The Program should identify zones that will allow the use and commit to establish or modify development standards and permit procedures to encourage SRO development.	SRO standards adopted in Q1 2025; send for reference; discuss standards for SROs in government constraints	Yes	<p>Program B-1; 324-325</p> <p>SROs; 221</p>	<p>The City completed this Program in February 2025. SROs are allowed in the PD, C-1, C-2, and C-N zone. A comprehensive set of standards for SROs was adopted with the amendments.</p> <p>An analysis of the newly adopted SROs was added in the constraint section. Standards are designed for health and safety and do not constitute a constraint on SRO development.</p>

#	Chapter	Topic	HCD Comment 7/14/2025	HCD Comment 9/17/2025	HCD Comment 11/13/2025	Section / Page Number	Response / Revisions
29	Housing Programs	Program B-2 (ADU Ordinance Update)	The Program should commit to discrete timing (e.g., within six months) to respond to and revise the ordinance upon comments from HCD.	Yes	Yes	Program B-2; 325	The program was revised to include revisions to the ADU Ordinance within 6 months of any comments received by HCD.
30	Housing Programs	Program D-3 (Priority Water and Sewer Service	As noted on page 232, the element should commit to establish a written procedure to grant priority service to development with units affordable to lower-income households by a specified date.	Yes	Yes	Program D-3; Page 332	The element was revised to include a timeline of Q1 2027 for the prioritization policy.
31	Housing Programs	Lot Consolidation	Given some identified sites appear to assume consolidation, the element should include a program to establish incentives to promote the consolidation of sites.	Proactive program should be added to establish incentives	Remove "consider"	Size; 272 Program A-4, 321-322 Appendix B: RHNA Sites Inventory; ii	As noted in the Sites Chapter and in Appendix B, the sites inventory is not utilizing consolidation to meet size requirements for lower income housing. While the elements does note that some of the selected sites have a likelihood of developing together, we are not assuming consolidation. To encourage lot consolidation and facilitate developments that require lot consolidation, the following was added to Program A-4: Additionally, the City will support developments that require lot consolidation. The City will provide technical assistance to projects that require lot consolidation for development. The City will review its lot consolidation procedures and adopt a set of one or more incentives that encourage lot consolidation efforts, including but not limited to fee waivers and expedited processing.
32	Housing Programs	Farmworkers	While the element includes some actions to assist in the development and conservation of housing for farmworkers, it should expand actions with specific commitment to address farmworker housing needs. Examples of actions include proactive actions to coordinate with nonprofit developers, employers, and other related organizations, to explore or create funding and incentives, annually identify housing opportunities, pursuing strategies to integrate affordable housing and regional coordination.	Program D-1 Add more substantive actions beyond outreach necessary	Yes; Program D-1	Program A-4; 321-322 Program D-1; 330-331	Program A-4 includes outreach to developers of farmworker housing. Program D-1 was revised and expanded to include outreach specifically to farmworker employees and developers of farmworker housing to discuss and provide opportunities for development of farmworker housing, including technical assistance on applications as they are submitted. Additionally, the following efforts were added to Program D-1: Reach out to local farm employers to identify housing needs, seek funding to support development of farmworker housing. Seek partnerships with other jurisdictions in the region and other agencies, housing developers, community stakeholders, and agricultural employers/employees to explore viable options for increasing the availability of farmworker housing in suitable locations in the region. Provide technical support, offer incentives, and partner on applications for funding for farmworker housing from HCD, USDA Rural Development loans and grants, and other funding sources that may become available.
33	Housing Programs	Governmental and Nongovernmental Constraints	As noted in Finding A4, the element requires a complete analysis of potential governmental and non-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. In addition, as noted on page 216, the element should add or modify programs to revise the definition of single housekeeping units and ensure the definition does not pose a constraint to housing for persons with disabilities.	Depends on a complete analysis	Depends on a complete analysis	Definition of Family; 245 Program B-1; 324-325 Program B-6; 326	The element was revised to include a complete analysis of potential governmental and nongovernmental constraints and programs were revised as appropriate. Program B-1 was revised to note the zones SROs are allowed in and to remove the CUP requirement for group homes. Program B-6 was revised to specifically commit to revising the setback for three or more story buildings and open space requirements in the R3 zone. The element was revised to clarify that the zoning chapter of the ordinance does not have a definition of single housekeeping unit. Thus, no revisions are necessary. The prior draft of the Housing Element erroneously included a definition that is no longer applicable. There are no definitions in the City's Zoning Ordinance that pose a constraint to persons with disabilities.
34	Housing Programs	AFFH	As noted in Finding A1, the element requires a complete analysis of affirmatively furthering fair housing (AFFH). Depending upon the results of that analysis, the City may need to revise or add programs. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have specific commitment, metrics, geographic targeting and milestones and, as appropriate, must address housing mobility, new housing choices and affordability in relatively higher opportunity and income areas, place-based strategies toward community revitalization and displacement risk.	Depends on complete analysis Should add housing mobility, place based strategies toward community revitalization and displacement risk actions E-1: more substantive actions needed Grants for home rehabs, landscaping, street trees, etc; expand access to opportunity (revisit home-based occupations, low-intensity commercial uses) Add rehab/renovation program for blighted/vacant properties (HCD to send sample language) Add adaptive reuse program for special needs/ELI households (HCD to send sample language) Add program for targeted small-scale place-based strategies (HCD to send sample language)	Depends on complete analysis E-1: more substantive actions needed Grants for home rehabs, landscaping, street trees, etc; expand access to opportunity (revisit home-based occupations, low-intensity commercial uses) Add rehab/renovation program for blighted/vacant properties (HCD to send sample language) Add adaptive reuse program for special needs/ELI households (HCD to send sample language) Add program for targeted small-scale place-based strategies (HCD to send sample language)	Affirmatively Furthering Fair Housing; 91-193	The element was revised to include a full AFFH analysis. This includes the addition of local knowledge regarding concentrations of homelessness, substandard housing, access to transit, and an analysis of R/ECAPs over time. No additional program revisions are necessary resulting from the analysis. Program E-1 was expanded to include new and existing revitalization opportunities including funding prioritization, a windshield survey, home rehabilitation grants, and creation and adoption of an Adaptive Reuse Ordinance and incentives. Program E-1 was revised to highlight the City's place-based and neighborhood revitalization fee waiver program. The City supports neighborhood revitalization and redevelopment through its fee waiver program (Program B -7). This includes fee waivers for downtown development (new and remodel, façade improvements, ADA improvements, streetscape improvements), vacant and aging buildings, and non-profit buildings.