



City Council Staff Report

From: City Manager

Report Type: ACTION ITEMS

Lead Department: Planning and Development Services

Meeting Date: April 15, 2024

Report #:2312-2450

TITLE

Joint City Council and Planning and Transportation Commission Meeting to Adopt a Resolution Amending the Comprehensive Plan by Adopting a Revised 2023-31 Housing Element. California Environmental Quality Act (CEQA): The City Council adopted a Revised Addendum to the Comprehensive Plan Final Environmental Impact Report on December 18, 2023 that, in conjunction with the Comprehensive Plan Final EIR, fully analyzes the impacts associated with adoption of the Revised 2023-2031 Housing Element.

RECOMMENDATION

Staff recommends the following actions:

Planning and Transportation Commission:

1. Review the staff responses to the State Department of Housing and Community Development (HCD) Comment Letter dated August 3, 2023 (Attachment C), as incorporated in the revised 2023-31 Housing Element (Attachment A) and recommend City Council adopt the Revised 2023-31 Housing Element.

City Council:

1. Direct staff to make any necessary changes to the Revised 2023-31 Housing Element (Attachment A) and authorize staff to make minor revisions based on any further non-substantive changes required by HCD.
2. Adopt a Resolution (Attachment B) making the findings required under CEQA and Housing Element Law, and adopting the Revised 2023-31 Housing Element as an amendment to the City's Comprehensive Plan.

EXECUTIVE SUMMARY

This report summarizes changes to the Palo Alto Housing Element in response to comments from the public and HCD, and documents compliance with State Housing Element Law.

On May 8, 2023, the Planning & Transportation Commission recommended and the City Council adopted the 2023-31 Housing Element. On June 7, 2023, the City submitted the adopted 2023-31 Housing Element to HCD for its second round of review. On August 3, 2023, the City received a comment letter from HCD requesting additional information and revisions including:

- More data and local knowledge regarding past and current fair housing patterns and trends to understand progress toward affirmatively furthering fair housing (AFFH);
- Expanded analysis of the site inventory to demonstrate viability and likelihood of redevelopment; and
- Refined program commitments with shortened timelines and quantifiable outcomes for implementation, including targeted efforts for AFFH in specific neighborhoods and special needs groups.

In response to HCD comments, City staff and consultants revised the text of the Housing Element (see redlined/highlighted edits in Attachment A). The HCD comment letter is provided as Attachment C and a matrix summarizing how staff and consultants addressed these comments is provided in Attachment D.

Staff is requesting that:

- First, the PTC review the staff responses to HCD comments, and recommend the City Council adopt the amendments to the 2023-31 Housing Element with the proposed responses.
- Second, the Council adopt a resolution making all findings required by State Housing Element Law and adopting the Revised 2023-31 Housing Element, with any additional revisions it deems necessary.

BACKGROUND

Overview

The Housing Element is the City's plan to provide housing for its current and future residents. It is the only element of the City's Comprehensive Plan that requires certification by the State. The Housing Element covers a period of eight years between 2023 and 2031. The deadline to adopt a compliant Housing Element for the 6th Cycle Housing Element was January 31, 2023.

As part of the Housing Element, the City needs to plan for its "fair share" of housing for the 6th Cycle planning period. The City must plan for its regional housing needs allocation (RHNA) of 6,086 units. In addition, the Element must include programs that increase housing production in the City. Over the last three years, the City has evaluated and updated its draft

Housing Element for the 2023-31 planning period. A history of City events and actions is available online at www.paloaltohousingelement.com.

Regional Housing Need Allocation (RHNA)

Per State law requirements, the Housing Element contains information about the City's housing needs, constraints to building housing, available housing sites, an explanation of City resources for supporting housing development, as well as goals, policies and programs that will help address the City's share of regional housing needs as identified by the Association of Bay Area Governments (ABAG). The City's housing needs are quantified in the RHNA, which includes housing targets at all income levels. As shown in Table 1, the minimum RHNA requirement for Palo Alto in the 2023-31 planning period is 6,086 homes across four income levels.

Table 1: City of Palo Alto 2023-31 RHNA Requirement

<i>Income Level</i>	<i>Very Low Income</i>	<i>Low Income</i>	<i>Moderate Income</i>	<i>Above Moderate Income</i>	<i>Total</i>
Area Median Income (AMI)	<50% AMI	50-80% of AMI	80-120% AMI	>120% AMI	
Units	1,556	896	1,013	2,621	6,086

Housing Element Document Requirements

The Housing Element identifies and analyzes existing and projected housing needs and establishes goals, policies, quantified objectives, and scheduled programs for the preservation, improvement, and development of housing across income levels. It identifies areas in the City where new housing may be built and estimates how many housing units could be built on specific sites. Furthermore, it helps the City plan for future housing needs of all residents at all income levels, including emergency shelters, special housing for the elderly, persons with disabilities, large families, and unhoused residents.

The Housing Element contains several mandated sections including: Executive Summary; Introduction; Housing Needs; Housing Resources; Housing Constraints; and Housing Plan (includes Housing Element programs). Additionally, Appendix C in the Housing Element contains the City's analysis of Affirmatively Furthering Fair Housing (AFFH). AFFH is a new State requirement that mandates each jurisdiction take meaningful actions to further fair housing to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. The Housing Element, including the site inventory and programs, must be reviewed through the filter of AFFH requirements.

Housing Element Submittal to HCD

The City has twice submitted the 2023-31 Housing Element to HCD for its required review and both times HCD has requested modifications. The City first submitted a draft of the 2023-31 Housing Element on December 23, 2022. HCD provided comments on March 23, 2023. The City responded to these comments and the PTC subsequently recommended and the City Council adopted the revised 2023-31 Housing Element on May 8, 2023. On June 7, 2023, the City submitted this adopted 2023-31 Housing Element to HCD for their review. Although the City believes its May 8, 2023 Housing Element substantially complies with all requirements of state law, on August 3, 2023, the City received a comment letter from HCD requesting additional modifications.

This current submittal includes all the required components of Housing Element Law and responds to HCD's comments as well as public comments received since the May June 2023 submittal. Comments from individuals and organizations are provided and summarized in Appendix B of the Housing Element along with a description of how staff revised the Housing Element in response to these comments.

ANALYSIS

HCD Comments & City Responses

In its August 3, 2023 letter, HCD determined that the City's Adopted 2023-2031 Housing Element addresses many statutory requirements, but expressed a perspective that revisions were necessary to comply with State Housing Element law. HCD's comments generally fell into four chapters, which are highlighted in Table 2. Comments and the proposed revisions (redlined/highlighted in Attachment A) are summarized below and detailed in the response matrix in Attachment D.

Table 2: Summary of HCD Comments and City's Revisions

<i>HCD Comment</i>	<i>Response</i>
Affirmatively Furthering Fair Housing (AFFH) (Appendix C)	
Provide more local data and knowledge that complements State and federal data sources (e.g., Census) and to explain factors contributing to Racially Concentrated Areas of Affluence (RCAA)	Expanded history of Palo Alto and specifically why so much of the city is categorized as an RCAA. Described changes in land use policy and programs to overcome past patterns of RCAA and inequities.
Analyze trends related to disparities in access to opportunities (in housing and beyond) and expand programs and policies to address shortcomings.	Expanded analysis of disparities in access to housing, schools, transit, jobs, and related indicators and refined programs to improve equity in access to opportunities. Expanded matrix to document how specific Programs from Ch. 5 further fair housing; targeted programs to certain geographic locations and special needs populations to support fair housing.

Link sites inventory selection with improvements to fair housing, especially for low-income households.	Added discussion of the benefits of socio-economic diversity; the GM/ROLM focus area creates housing opportunities at all income levels. Added matrix of selected Programs that address fair housing and added geographic targeting to focus resources in specific neighborhoods and/or populations.
Resources/Site Inventory (Chapter 3)	
Explain why selected sites are likely to develop and at affordability levels indicated in the Inventory.	Bolstered site criteria with data from precedent projects from Palo Alto and surrounding communities. Added building permit history, revised status and affordability levels for pipeline projects. Described recent rezonings associated with Program 1.1.
Confirm conservative realistic capacity assumptions and assess likelihood of residential development in zones where 100% non-residential uses are allowed.	Emphasized increase in office vacancy rates and reduction in new office starts and added more site-specific analyses based on precedent projects.
Expand non-vacant sites analysis to assess potential constraints to redevelopment.	Expanded discussion of site suitability criteria and examples of recent projects that exemplify those criteria. Refined criteria and modified site inventory to ensure that sites meet multiple selection criteria.
Expand discussion of opportunities for emergency shelters in ROLM(E) zoning district.	Expanded discussion of recent redevelopment trends in this zone.
Constraints (Chapter 4)	
Study impacts on land use controls in all zoning districts in the sites inventory. Analyze impacts on other policies and trends such as fees, timing, approval certainty on ability to achieve maximum densities.	Added site test analyses for remaining zoning districts, and discussion of program implementation to address potential impacts on housing costs, feasibility, timing, and approval certainty.
Analysis of cost and financial feasibility related to permit procedures and processing.	Expanded analysis of City fees and processing procedures and timelines on project feasibility; added examples of fees assessed on recent projects; expanded discussion of Palo Alto's fees compared to nearby jurisdictions' fees and the difference between fees assessed on ADUs, apartments, and condos.
Identify on- and off-site infrastructure improvement requirements on housing supply and affordability.	Added discussion of improvement requirements related to subdivisions, building, zoning and public works requirements.

Expand discussion of potential constraints of Retail Preservation Ordinance and Tree Protection Ordinance on housing.	Updated analysis of Tree Protection Ordinance based on recent changes and clarified Retail Preservation Ordinance exemptions for most housing sites (except Downtown, Cal Ave, El Camino nodes)
Housing Programs (Chapter 5)	
Clarify commitments to specific housing outcomes and deliverables.	Refined commitments to specific outcomes and timelines (not just studies). Focused dates on the first half of the planning period, where feasible, to maximize impact.
Complete sites analysis (see Sites Inventory comments above), adding/refining programs as needed, and clarify compliance with Surplus Lands Act.	Expanded sites analysis as indicated above, and confirmed compliance with Surplus Lands Act for City-owned sites.
Specify commitments to removing constraints to housing for persons with disabilities.	Revised fee waiver programs and alternative housing programs to reduce impact fees and reduce processing timelines.
Complete fair housing analysis (see AFFH comments above) and refine related programs to affirmatively further fair housing.	Expanded fair housing programs; added targeted outreach and programming to specific neighborhoods and special needs populations to focus affordable housing opportunities, services, and outreach

Updates to Chapter 3: Resources/Site Inventory

The revised Housing Element reflects several changes to the Site Inventory as a result of proposed projects, HCD's comments and questions, and letters submitted by public commenters. City staff and consultants re-analyzed the Site Inventory to ensure that sites were viable as opportunity sites and that the realistic capacity analysis considered existing uses and potential constraints. As a result, City staff removed several sites from the list that may be less feasible during this planning cycle and added others that are more viable. A summary of changes to the Site Inventory is provided in Table 3 (strikeouts indicate the previous totals).

Table 3: Changes to Palo Alto Site Inventory (May 2023 vs. April 2024), by Income Level

	<i>Very Low</i>	<i>Low</i>	<i>Moderate</i>	<i>Above Moderate</i>	<i>Total</i>
RHNA	1,556	896	1,013	2,621	6,086
Credits					
Entitled Units	133 108	144 82	100 23	490 239	867 452
ADUs	153	153	153	53	512
Remaining RHNA	1,270 1,295	599 661	760 837	2,078 2,329	4,707 5,122
Opportunity Sites					
Planned Units	83	83	86	553	805

Multi-family Allowed	0	0	95 67	159 177	254 244
Rezone Completed	1,091 1,009	1,092 1,010	778 815	2,118 1,907	5,079 4,741
<i>Subtotal</i>	<i>1,091 1,092</i>	<i>1,092-1,093</i>	<i>873 968</i>	<i>2,277 2,637</i>	<i>5,333 5,790</i>
Total Units (Credits + Opportunity Sites)	2,766 2,681		1,126 1,144	2,820 2,929	6,712 6,754
Total Unit Surplus	314 229		113 131	199 308	626 668
Total % Buffer	17 12%		16 15%	10 13%	13%

Attachment E identifies specific sites, by address and APN, that have been added, modified, or deleted from the Inventory since the previous version of the adopted Housing Element. *In addition to* this list in Attachment E, staff and consultants have made several updates to the Inventory to:

- Adjust the distribution of household income levels achievable on sites appropriate for lower income households from 75% low income and 25% moderate income, to 80% low income and 20% moderate income, to meet the RHNA and even out the buffer above the RHNA for each income level. This threshold is still appropriate since the City has a track record of developing 100% affordable projects.
- Correct errors in the Assessor and City database such as existing uses, floor area ratio, and existing unit count.
- Moving proposed projects from pipeline of "entitled units" to "planned units" (see Table 3)

The Inventory in Appendix D of the Housing Element reflects the latest inventory, which meets the RHNA across all income levels and provides a buffer of approximately 13% potential units over the required RHNA.

Updates to Chapter 5: Programs

Building on HCD comments on the Programs, specified in Table 2, and working in collaboration with HCD, City staff and consultants made several additional changes to Chapter 5: Programs to optimize program implementation, strengthen implementation, and focus fair housing efforts. City staff took a critical and realistic look at which programs would likely be most effective, in light of available staff resources and budget for consultant resources. Based on feedback from HCD, staff added geographic targeting objectives to relevant programs to focus program efforts in specific neighborhoods and special needs populations to improve fair housing. Next, staff proposed places to eliminate, consolidate, or revise programs accordingly. The most substantive program changes proposed are as follows:

- Program 1.1 - Rezoning to Meet RHNA: Revised to increase density and related standards on parcels associated with the new "El Camino Real Focus Area," between Page Mill Road and Matadero Avenue. The City Council adopted an ordinance

implementing Program 1.1 in December 2023, thereby meeting the statutory deadline of January 31, 2024 to complete rezonings required to meet the RHNA.

- Program 3.3 - Streamlined Review for 100% Affordable Housing: Revised to simplify process requirements for 100% affordable housing projects. While many such projects will continue to utilize State streamlining bills, this will allow projects that are not eligible for State streamlining an alternate (local) processing path. Program revisions also establish priority processing of affordable housing projects, above other projects, when it comes to staff resources and hearings, regardless of submission date.
- Program 3.6 - Expedited Project Review: Consolidated to focus expediting opportunities: define pre-application advisory meetings with City staff and the ARB to get early feedback; and allow streamlined review processing (i.e., one ARB study session) for projects that meet objective standards.
- Program 4.1 - Replacement Housing: Revised to acknowledge new statutory requirements that both residential and non-residential redevelopment projects replace existing dwelling units.
- Program 4.5 - Labor Practices: Added program to develop a list of local labor unions and apprenticeship programs on the City's website and encourage developers and contractors to hire local labor, based on prior Council direction.
- Program 6.6 - Fair Housing (San Antonio Area Plan): Added program component to prepare an area plan for the San Antonio Road Corridor, including the ROLM/GM Focus Area. This will include collaboration with local organizations and residents to facilitate neighborhood planning that integrates housing with safe multi-modal transportation and provides access to amenities, parks and open space, placemaking improvements, and mitigations for environmental impacts.
- Global Changes: Added targeted efforts for program implementation to certain neighborhoods and locations in the city as well as certain special needs population. This geographic targeting is intended to focus affordable housing opportunities, services, and outreach to further fair housing.
- Removed Programs:
 - Lot Consolidation (formerly 1.6): This program was not needed because the City was not relying on the lot consolidation program to meet the RHNA or reduce constraints.
 - Replacement Requirements (portion of 4.1): Based on recent changes to State law, commercial projects must now replace existing protected dwelling units that are being demolished. The removed program would have been largely duplicative of the new state law.
 - Funding Opportunities (formerly 5.2): Consolidated with a similar program; see Program 2.1.

HCD Review

Staff met with HCD staff over a series of meetings in February and March 2024 to review draft revisions in response to comments outlined in the August 3, 2023 HCD comment letter. City staff believe the revised Housing Element (Attachment A) incorporates changes that fully respond to the comments in HCD's August 2023 letter, and that it meets all statutory requirements. Accordingly, staff believe the revised Housing Element is appropriate for adoption and are hopeful that HCD will certify this version. Even in the absence of certification from HCD, the City may still assert that both this version and the previously adopted Housing Element are substantially compliant.

The attached resolution for the City Council's consideration also aims to provide some flexibility as the Housing Element nears certification by HCD. Specifically, adoption of this resolution would authorize City staff to:

1. Make non-substantive changes if requested by HCD as part of their formal review without necessitating re-adoption of the Housing Element by the City Council.
2. Take additional actions to achieve certification. This may include rescinding the Revised Housing Element from HCD's formal review if doing so would cut down on HCD's 60-day review time and allow for a faster turnaround to make any substantive changes requested by HCD.

Traffic Level of Service Analysis

While transportation level of service (LOS) is no longer a topic requiring analysis under the California Environmental Quality Act (CEQA), it is still relevant to understanding potential operational impacts (e.g., delay) and mitigations (e.g., stop signal and signal timing). In addition to the CEQA analysis described below, Hexagon Transportation Consultants analyzed the potential impacts of buildout of the Housing Element sites inventory, policies, and programs on the City's transportation service levels. This includes LOS for the roadway, as well as travel by pedestrians, bicyclists, and transit users.

The Housing Element is an update to the City's Comprehensive Plan; therefore, this analysis examined transportation changes resulting from the updated Housing Element compared to transportation service resulting from the Comprehensive Plan as a whole. Then, the analysis determined whether there were any new or more severe impacts and whether additional mitigations would be required. In short, LOS resulting from the Housing Element is generally similar to what was identified in the Comprehensive Plan and Comprehensive Plan EIR in terms of impacts and mitigations. The differences between the Comprehensive Plan EIR analysis and the Housing Element analysis are primarily attributable to changes in the travel demand model in the intervening years since the Comprehensive Plan EIR was completed and less to impacts associated with the Housing Element.

The LOS results are summarized below and detailed in the memo in Attachment F:

- The Housing Element LOS analysis produces generally the same results as the previous 2030 Comprehensive Plan analysis. This is not surprising given the modest increase in housing units compared to what was evaluated for the Comprehensive Plan and alternatives in the Comprehensive Plan EIR.
- The Comprehensive Plan EIR analysis suggested that seven intersections could operate at deficient LOS (D and E), as a result of implementation of the Comprehensive Plan. By comparison, the Housing Element analysis finds a potential reduction in the number of deficient LOS intersections, from seven to four, primarily because of updates to the travel demand model and the change in vehicle miles travelled (VMT) policy (not due to the Housing Element project per se)
- The Housing Element analysis suggests some potential reduction in transit use, increase in biking and walking, and no substantive change in automobile use; again, these potential changes are primarily due to changes in the travel model and VMT policy and not attributable to the impacts of Housing Element implementation per se.
- The City must continue to implement Comprehensive Plan transportation policies (e.g., transportation demand management [TDM] measures) as mitigation measures for both the Comprehensive Plan and the Housing Element update

Consequences for Non-Compliance

The deadline for Bay Area jurisdictions to adopt a compliant Housing Element was January 31, 2023. Consequences for noncompliance include jurisdictions facing the possibility of loss of local housing land use discretion, housing grant ineligibility, and fines.

More recently, there has been statewide discussions about a “builder’s remedy” in the Housing Accountability Act (HAA) and jurisdictions with non-compliant Housing Elements. In short, the builder’s remedy refers to a provision of the Housing Accountability Act that restricts the ability of a jurisdiction that does not have a compliant housing element to deny certain affordable housing projects even if the projects are inconsistent with local zoning or general plan regulations. Staff previously provided a discussion of the builder’s remedy on the Council’s November 7, 2022 agenda.¹ The City has received seven applications explicitly invoking the “builder’s remedy” as of as of March 20, 2024. In the event the City adopts a Housing Element and denies a housing project for non-compliance with local regulations prior to receiving certification from HCD, a court would likely determine the adequacy of the City’s Housing Element.

TIMELINE

The Housing Element update process has been underway for three years. Table 4 shows the significant milestones that have been achieved, leading up to preparation of this (third) version of the Housing Element. Concurrent with the preparation of the Housing Element, the City has

¹ <https://www.cityofpaloalto.org/files/assets/public/agendas-minutes-reports/agendas-minutes/city-councilagendas-minutes/2022/20221107/20221107pccsm-amended-linked-q.a-2.pdf>

already completed some of the programs, notably, adopting zoning changes to meet the City's RHNA (Program 1.1) and allowing by-right approval of non-vacant sites identified as opportunity sites in the 5th and 6th cycle Housing Elements (Program 1.3).

Table 4: 2023-31 Housing Element Progress Milestones

<i>Milestone</i>	<i>Date</i>
Formation of HE Working Group (HEWG)	February 2021
PTC consideration of HE sites	February 2022
Council approval of HE sites	April 2022
PTC consideration of HE programs	August 2022
Council approval of HE programs	October 2022
Public Review HE released	November 2022
HE #1 submitted to HCD for 90-day review	December 2022
PTC consideration of draft HE (version #1)	March 2023
HCD Comment letter #1 received	March 2023
PTC & Council adoption of HE (version #2)	May 2023
Adopted HE submitted to HCD for 60-day review	June 2023
HCD Comment letter #2 received	August 2023
PTC & Council consideration of Revised HE (version #3)	April 2024

NEXT STEPS

If the City Council adopts the Revised 2023-2031 Housing Element, City staff will make any required revisions to the Housing Element based on Council direction. The City then has 30 days from adoption to submit the Housing Element to HCD; it is anticipated that HCD would review the revised Housing Element within 60 days following submittal.

If HCD determines the City's revisions address all the comments in the HCD review letter, HCD may issue a "substantial compliance" letter to the City confirming compliance with the requirements of state law. Alternatively, if HCD believes only minor revisions are required, it may issue a letter stating that if the City revises the Housing Element as outlined in HCD's responses, the Housing Element substantially complies with the State Housing Element requirements. Finally, if HCD believes significant revisions are required, it could simply issue further comments without any indication regarding compliance with State law.

Staff believe the Housing Element document before the Council fully responds to all of the comments in HCD's August 3, 2023 letter and that it meets all statutory requirements. Accordingly, staff believe the Housing Element is appropriate for adoption and anticipates HCD will confirm its compliance with State law. As noted above, even in the absence of a substantial compliance letter from HCD, the City may still assert that its Housing Element is substantially compliant.

FISCAL/RESOURCE IMPACT

This action has no fiscal impact. However, the implementation of the Housing Element will require significant staff or consultant resources to complete rezones, program implementation, and prepare studies. Generally, all tasks will need to be completed within the first few years of Housing Element adoption. This will involve greater staff resources and the use of consultants for the studies. Budget requests related to these activities will be reflected in the annual budget development process.

STAKEHOLDER ENGAGEMENT

The Housing Element update process included substantial public outreach and engagement opportunities. The City formed the Housing Element Working Group (Working Group), a 17-member group that advised the City Council with the Housing element update. The Working Group represented a demographic cross-section of the City. The Working Group included renters, affordable housing residents, seniors, persons of color, a representative from the unhoused community, and an affordable housing developer.

There were other outreach efforts to educate the community about the Housing Element update effort and to receive community input. In addition to the project's webpage, the City conducted an online survey with 430 respondents, hosted three community workshops and held over 30 public meetings (includes Working Group, Council Ad-hoc, PTC, and City Council). Additionally, staff had numerous presentations with civic groups, meetings and calls with members of the public and developers to address questions and provide information.

Since the June 2023 draft Element, City staff has met with representatives from Palo Alto Forward, in addition to property owners and developers. Appendix B of the Housing Element provides a more detailed breakdown of each of the public meetings as well as summaries of other community engagement efforts. City staff was also able to meet with its HCD reviewer over a series of meetings in February and March 2024 to discussed proposed revisions in response to HCD's comments.

The Palo Alto Municipal Code requires notice of this public hearing to be published in a local paper. Notice of a public hearing for this project was published in the Daily Post on April 3, 2024, which is more than 10 days in advance of the meeting. Interested parties were sent the public notice via electronic mail. Notice of the public hearing was also posted on the City's Housing Element website at www.paloaltohousingelement.com.

In addition, as required by State law, the attached revised draft Housing Element (and any future revisions) must be made available for public review for at least seven days before any action can occur. The minimum 7-day public review period for the revised Housing Element starts on April 4, 2024 and concludes on April 15, 2024. The revised draft was available online at www.paloaltohousingelement.com.

ENVIRONMENTAL REVIEW

The subject project has been assessed in accordance with the authority and criteria contained in the California Environmental Quality Act (CEQA), the State CEQA Guidelines, and the environmental regulations of the City. Specifically, the City, acting as the lead agency, has prepared an Addendum to the 2017 Palo Alto Comprehensive Plan Environmental Impact Report (Comp Plan EIR) for the 2023-2031 Housing Element.

The City Council adopted a resolution that considered a revised Addendum to the Comp Plan EIR on December 18, 2023, as part of the rezoning required to meet the RHNA and Program 1.1 of the Housing Element.² This Addendum analyzed potential impacts of the updated Site Inventory, including the El Camino Real Focus Area. Since the action in December 2023, a few sites have been removed from the Site Inventory as a result of additional analysis, which modestly reduces the total number of units that projected during the planning period and the potential impact under CEQA. No further environmental review or action is required at this time.

ATTACHMENTS

Attachment A: Clean and Strikeout/Underlined Draft 2023-31 Housing Element, April 2024

Attachment B: Draft Resolution to Adopt Housing Element

Attachment C: HCD Comment Letter, August 3, 2023

Attachment D: Matrix of HCD Comments and City Responses

Attachment E: Changes to Site Inventory (May 2023 vs. April 2024)

Attachment F: Transportation Level of Service Analysis

APPROVED BY:

Jonathan Lait, Planning and Development Services Director

² https://paloaltohousingelement.com/wp-content/uploads/2024/02/Palo-Alto-Housing-Element_Revised-EIR-Addendum_November-2023.pdf