



DATE: **February 14, 2023** AGENDA ITEM NO. 7.A

TO: Planning Commission

FROM: Christina Paul, Principal Policy Planner
Heather Hines, Special Projects Manager

SUBJECT: Presentation and Discussion of comments received from the California Department of Housing and Community Development on the City's Draft Housing Element for the 6th cycle planning period

RECOMMENDATION

It is recommended that the Planning Commission receive a presentation about California Department of Housing and Community Development (HCD) (Attachment A) comments on the City of Petaluma's Draft Housing Element (Attachment B) and discuss and provide feedback on the comments and policy items outlined below. The Planning Commission's feedback, in concert with feedback received from the General Plan Advisory Committee (GPAC) on February 16, 2023, will be forwarded to the City Council for consideration during their February 27, 2023, review to provide policy guidance for City's final 6th cycle Housing Element.

As discussed below, the final Housing Element and its accompanying environmental review document will be presented to the Planning Commission at its March 14, 2023, meeting, at which time the Commission will be asked to make a formal recommendation to the City Council. Final discretion to approve the Housing Element and direct final submission to HCD for certification is with the City Council and is currently scheduled for consideration at their March 20, 2023 meeting.

A more robust review of the Housing Element process and associated requirements was presented to the Planning Commission in September 13, 2022, the staff report from that meeting is attached for reference as helpful as background for the discussion on February 14th (Attachment C).

BACKGROUND

The City's Draft 6th cycle Housing Element was discussed by the General Plan Advisory Committee (GPAC) at each of its meetings between March and June 2022, and reviewed by Planning Commission September 13, 2022 and City Council on October 3, 2022 (Attachment D). Concurrently, the draft Housing Element was available for public review for 30-days between August 28th and September 29th as required by state law. The City received 8 comment letters during the review period, which are available at Attachment G for reference. Additional

information on public outreach related to the Housing Element is contained in Attachment D. Subsequently, the draft Housing Element was submitted to HCD in late October 2022 for the required 90-day review period prior to local adoption.

On January 27, 2023, the City received the State's formal response to the Draft Housing Element (Attachment A), which included requests for data and clarification, as well as policy suggestions for the City to consider when updating their final Housing Element for local adoption and submission to HCD for certification. The purpose of tonight's presentation to the Planning Commission is to provide a status update on the Housing Element and receive Planning Commission feedback on the specific policy items in order to inform subsequent City Council direction.

A locally adopted Housing Element brings the City into substantial compliance with State Housing Element laws. Remaining milestones to adopt a final Housing Element and submit to HCD include:

- February 14: Presentation to and feedback from the Planning Commission to inform final Housing Element
- February 16: Presentation to and feedback from the General Plan Advisory Committee (GPAC) to inform final Housing Element
- February 27: City Council consideration and direction to inform the final Housing Element
- March 14: Planning Commission consideration and recommendation to City Council on final Housing Element and associated environmental analysis
- March 20: City Council consideration and adoption of final Housing Element and associated environmental analysis
- On or before March 31: Submission of locally adopted 6th cycle Housing Element to HCD for 60-day review and certification

DISCUSSION

The City submitted a full draft of its Housing Element to HCD on October 3, 2022. This initial submittal started the statutory 90-day HCD review period. Staff and the consultant team reached out to HCD during their review period to invite early discussion about initial questions or comments in advance of the required formal HCD comment letter. On January 10, 2023, HCD requested several clarifications, which the City responded to by publicly posting a revised draft of the Housing Element with clarifications and additions in track changes (Appendix E) on January 20, 2023. These edits provided clarifications or additional data but did not include policy changes.

On January 27, 2023, (day 90 of the 90-day review period) the City received HCD's formal comment letter on the draft Housing Element. The comment letter is not a rejection of the City's Housing Element, but rather HCD input for the City to consider as the Final Housing Element is prepared for City Council approval and submittal to HCD for ultimate certification. Many comments in the HCD letter requested additional data or clarification, while a couple suggested policy modifications to proposed housing programs. The comments suggesting policy modifications are the main focus for discussion with the Planning Commission at its February 14, 2023 meeting.

The discussion below includes HCD comments taken verbatim from their letter with staff's suggested response to each comment in italics. These draft responses and Planning Commission and GPAC feedback will be presented to the City Council for consideration and direction for incorporation into the final Housing Element. It is recommended that the Planning Commission focus primarily on the policy items outlined below and provide feedback on the proposed responses for the City Council's consideration and direction when developing the final Housing Element for local approval and submission to HCD for certification.

HCD Comment Letter on Draft Housing Element

The two page cover letter transmitting HCD's draft Housing Element comments states that "the following changes are necessary to bring the City's housing element into compliance with Article 10.6 of the Government Code." The Appendix outlines HCD comments for City consideration and incorporation into the final Housing Element. Each comment is included below verbatim. Staff responses are in italics below each comment. Those items with larger policy implications for focused feedback from the Planning Commission are noted in bold text.

Housing Needs, Resources, and Constraints (verbatim from the letter from HCD)

1. 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).)

Accessory Dwelling Units (ADUs): While the element now adds information regarding ADU permits issues in 2022 to establish a baseline for ADU assumptions during the planning period, the element must also incorporate ADUs permitted in 2018 (five ADUs). Per HCD's Sites Inventory Memo, jurisdictions may opt to use trends in ADU construction since January 2018 to estimate new production; currently, the element estimate production beginning with 2019 ADU permit information. The element must reconcile this information and add 2018 ADU permitting information to estimate production for the planning period.

The Draft Housing Element projected ADU production based on the average of annual ADU permits issued by the City between 2019 and 2022. Only five ADU permits were issued in 2018, which was a significant outlier from the other years and therefore was not originally included in the average. In response to this comment, staff will adjust the ADU capacity calculation to include the 2018 permit numbers. This change will result in an average projected ADUs per year of 16, which is a decrease from the previous average cited of 18 ADUs per year. This change will be reflected throughout the Housing Element. Because of the buffer provided in capacity calculations overall, this slight decrease is not anticipated to individually necessitate a change to the overall demonstration of meeting capacity for the assigned 6th cycle Regional Housing Needs Allocation (RHNA).

Realistic Capacity: The element appears to assume residential development on sites with zoning that allow 100 percent nonresidential uses. While the element mentions the identified sites represent a substantial opportunity for housing and the area is adjacent to, or within, the

Downtown Core, it must still account for the likelihood of non- residential uses. The element should include analysis based on factors such as development trends, performance standards, or other relevant factors. For example, the element could analyze all development activity in these nonresidential zones, how often residential development occurs, and adjust residential capacity calculations, policies, and programs accordingly.

Many of the sites identified in the site inventory in the Draft Housing Element are within areas designated and zoned for a mix of uses, particularly in the downtown core. HCD is expressing a concern that the properties in Petaluma's downtown core that allow non-residential development as well as residential (such as in the MU and T zoning districts) may develop with solely commercial development. To justify the Downtown core sites on the sites inventory, the City needs to present additional data about the number of applications received in the last 3-5 that proposed solely commercial development in the Downtown core versus applications received that proposed mixed use or residential development. Based on initial review of application data, it appears that about 80% of applications received in the last 3-5 years within the Downtown core have included a residential component. This supports the capacity projection shown in the sites inventory. Along with providing this data in response to HCD's comment, staff will also reference several developments Citywide that initially declined to accommodate residential but have returned to the City to consider incorporating residential into the existing commercial context (examples include Deer Creek Village and the Target Shopping Center). This information will further support the conclusion that there is a local market trend to incorporate residential into the commercial land use context.

Suitability of Nonvacant Sites: The element lists various factors (e.g., age of structure, improvement to land value ratio, existing density versus potential density) utilized to indicate the potential for redevelopment in the planning period (p. C-0); however, it should support the validity of these factors. To support these factors, the element should evaluate development trends or recent experience in redevelopment relative to the factors. For example, the element could utilize Table C-6 (Trends to Determine Realistic Density) and list the values of the factors for prior uses. The element must be able to make a connection between past redevelopment and sites listed in the inventory by citing similar characteristics by describing existing uses, development trends, market conditions, and development incentives.

HCD is asking for more background data to support the proposed redevelopment of sites in the site inventory. The consultant team is gathering assessor data to respond to this inquiry and will incorporate the additional information into the final Housing Element.

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.

Comment is noted and the City will provide the excel database and GIS shapefiles as part of the final Housing Element when it is submitted to HCD for final review and certification.

Permitted Uses – Single Room Occupancy (SRO) Units: Table B3 (page B-16) and subsequent analysis describes permitted uses for a variety of housing types but do not

address how single room occupancy (SROs) units are allowed. The element must include a description of how the uses are allowed and conformity with applicable state laws.

Petaluma's Implementing Zoning Ordinance does not currently allow traditional SROs (buildings with private bedrooms and shared bathroom and kitchen facilities) as a land use. While SROs could be considered synonymous with permanent supportive housing projects like the Studios at Montero, which is the adaptive re-use of the former America's Best Value Inn in northeast Petaluma, each of Montero's small units has its own bathroom and kitchenette but shares other services/resources in common areas. Historically, SROs have typically consisted of small furnished rooms with shared kitchen and bath facilities that are rented monthly. Contemporary SROs are more commonly made up of small efficiency units that include kitchen and bath facilities in each unit. Deed-restricted projects like the Studios at Montero are obviously affordable to lower-income groups but even non-deed-restricted SROs could be considered affordable by design.

The City has remained diligent in finding the flexibility to allow permanent supportive housing projects such as Studios at Montero and Meridian at Corona Station, and it has leaned on provisions in state law to facilitate the approval of these projects (AB 2162, local Declaration of Shelter Crisis, etc.). However, to address the comment from HCD, Petaluma would need to commit to updating the Implementing Zoning Ordinance to define SROs and specify in what zones SROs are permitted.

Staff Recommendation: SROs could be conceptualized as relatively dense multi-family developments made up of efficiency units with shared facilities. Existing zoning districts such as the MU zones, as well as the high-density residential zones such as R4 and R5, currently allow multi-family residential product at higher densities, which is more in keeping with the density and development pattern of an SRO.

*As proposed, modifications to address this comment commits the City to amending the Implementing Zoning Ordinance to permit SROs in multi-family and non-residential zoning districts where multi-family housing is also permitted. **Does the Planning Commission support this modification to clarify and expand the discussion of SROs as part of the City's effort to create a wide range of housing opportunities? (This modification is required to remain in compliance with State law and is not yet included as a tracked edit in the Housing Element Draft (Appendix F)***

2. 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. The analysis shall also demonstrate local efforts to remove governmental constraints that hinder the locality from meeting its share of the regional housing need in accordance with Government Code section 65584 and from meeting the need for housing for persons with disabilities, supportive housing, transitional housing, and emergency

shelters identified pursuant to paragraph (7).

Land-Use Controls: While the element describes development standards and some land use controls, it must also analyze those land use controls for impacts on housing supply (number of units), costs, financial feasibility, timing, approval certainty, and ability to achieve maximum densities without exceptions (e.g., conditional use permits, variance, planned development).

This comment from HCD requests additional analysis about land use controls' impacts on housing supply. Veronica Tam from the Raimi Team is developing appropriate language to respond to this question and to provide the detail requested. This comment is requesting additional language and not policy change per se and will be included in final document for responsiveness to HCD comments.

In addition, the element (page B-10) states the minimum open space requirement could preclude the development of multifamily rental apartments but does not commit to addressing this constraint in Program 7. Therefore, the element must include actions that commit the City to remove this constraint.

The current requirement for usable open space in multi-family residential development is based on the zoning district. In the R4 zoning district, there is a requirement for 300 square feet per unit, while in the R5 district, the requirement increases slightly to 400 square feet per unit but allows common open space to satisfy the requirement. In Mixed Use zones, the requirement is significantly less at 30 square feet per unit. The comment from HCD is requiring the City to commit to removing this development constraint. [Note: The Implementing Zoning Ordinance defines usable open space as “the aggregate area of side and rear yards, patios, and balconies and decks having a depth of not less than three (3) feet and area not less than 30 square feet, on a building site or building, which is available and accessible to the occupants of the building or building site for purposes of active and/or passive outdoor recreation. This area is exclusive of driveways, areas for off-street parking and services, and ground level areas with a width of less than five feet or maximum dimension of under ten feet. At least seventy-five percent of the usable private open space shall have a slope of ten percent or less.” (Section 28.020(U))]

*Staff Recommendation: Suggested language to address this comment would create a new item under Program 7 to say that the City will study usable open space requirements for comparable housing types in the region and reduce the open space requirements to align with regional trends and to ensure that the maximum allowable density in each zoning district can be achieved. While this does not commit the City to a specific reduction, it does commit the City to reducing the amount of usable open space required for multi-family projects in an effort to reduce development constraints and to align with other jurisdictions in the region. **Does the Planning Commission support this modification?***

Furthermore, the element (pages B-10 and B-11) clarifies covered/uncovered parking requirements for multifamily residential projects. However, the element does not fully describe the requirement for a project to provide an overall ratio of at least 1.5 spaces per

unit as a potential constraint to smaller-unit residential projects. Therefore, the element should analyze this parking requirement and add or modify programs to address this constraint.

This HCD comment identifies Petaluma's current parking requirement of at least 1.5 spaces per multi-family unit as a constraint on residential development. This same issue has been identified and discussed by the Planning Commission, Pedestrian and Bicycle Advisory Committee, and City Council in the context of desired holistic changes to the City's private parking requirements. Staff is currently working on a comprehensive evaluation of parking, including both available public parking and required private parking, to inform the desired code changes.

Staff Recommendation: To address the comment from HCD, staff proposes modifying Program 5 language in the draft Housing Element to read "By December 2023, update onsite parking regulations to reduce barriers to housing development and to support the City's affordable housing development and climate goals. Specifically, remove the 1.5 space per unit requirement for small units and replace that requirement with parking standards based on unit size (micro units, studio/efficiency units, and one-bedroom units) and location relative to transit and amenities."

*The proposed modification is in keeping with previous policy discussions with the Planning Commission. **Does the Planning Commission support this modification as written?***

Local Processing and Permit Procedures: While the element (page B-28) describes typical planning application and processing timelines, it should also describe the approval body, the number of public hearings, if any, and any other relevant information. The analysis should address impacts on housing cost, supply, timing, and approval certainty.

This comment is requesting additional data related to local procedures for processing development applications. Staff and the consultant team are compiling the necessary data to respond to the inquiry which will be included in final document.

Constraints on Housing for Persons with Disabilities: While the element modifies Program 7 to permit residential care facilities for seven or more persons in residential zones subject to a conditional use permit (CUP) with findings that promote objectivity and certainty, the element does not address the current requirement for residential care facilities to be permitted on an upper floor or behind a ground floor street fronting use in the MU1A, MU1B, MU1C, C1, and C2 zones. This requirement is a constraint on housing for persons with disabilities being built and the element must add or modify a program to remove this constraint.

While the current IZO allows residential care for seven or more clients only on upper floors in the MU1A, MU1B, MU2, C1, and C2 mixed use and commercial zoning districts. Additionally, existing regulations only permit residential care facilities for adults or the chronically ill on upper floors or behind ground floor street fronting uses. These restrictions could create a barrier to the production of housing for persons with disabilities, and HCD is

stating that the City must eliminate or modify the IZO to remove the constraint.

*Staff Recommendation: Proposed language to address the comment augments the previous language that the City would “evaluate the constraint and amend the Zoning Code to mitigate this constraint to facilitate the development of additional types of residential care facilities” by adding “Specifically, residential care facilities for seven or more persons will be conditionally permitted in residential zones, mixed use, and commercial zones, subject to findings for approval that are objective and provide certainty in outcomes. Requirements that these uses be placed on upper floors and behind a ground floor street fronting use will be removed. These revisions are in accordance with the State interpretation of Affirmatively Furthering State Housing legislation.” **Does the Planning Commission support this revision as written?***

3. An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, the cost of construction, the requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Government Code section 65583.2, and the length of time between receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality’s share of the regional housing need in accordance with Government Code section 65584. The analysis shall also demonstrate local efforts to remove nongovernmental constraints that create a gap between the locality’s planning for the development of housing for all income levels and the construction of that housing.

Developed Densities: The element must be revised to analyze requests to develop housing at densities below those anticipated in the sites inventory, including hindrance on the construction of a locality’s share of the regional housing need.

This comment is requesting additional data which the consultant team is compiling to effectively respond to the comment and support the anticipated densities represented on the sites inventory. Response with additional data will be included in final draft in response to HCD comment.

4. Analyze the opportunities for energy conservation with respect to residential development. While the element provides some information on energy conservation (page B-31) by describing Building Code amendments, the element must provide a full analysis of opportunities for energy conservation.

This comment is also a data request about the City’s adopted efficiency measures such as our adoption of CalGreen Tier 1, all electric requirements, etc. Staff and the consultant team are compiling the additional data to effectively respond to the comment and will include in the final document.

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 through the administration of land use and development controls, the provision of regulatory concessions and incentives, and the utilization of appropriate federal and state financing and subsidy programs when available. The program shall include an identification of the agencies and officials responsible for the implementation of the various actions.

All programs should be evaluated to ensure meaningful and specific actions, objectives, and commitments. Multiple programs do not have any quantifiable metric to track and measure program success and must be revised to incorporate a quantifiable metric or outcome. In addition, programs containing unclear language (e.g. “Evaluate”; “Consider”; “Explore”; etc.) must be amended to include more specific and measurable actions. These programs include Program 1 (Adequate Sites for regional housing needs allocation (RHNA) and Monitoring of No Net Loss), Program 2 (Replacement Housing), Program 3 (Accessory Dwelling Units), Program 4 (Efficient Use of Multi- Family Land), Program 5 (Flexible Development Standards), Program 6 (Religious and Institutional Facility Housing Overlay), Program 7 (Zoning Code Amendments), Program 12 (Housing-Commercial Linkage Fee), Program 20 (Historic Preservation), Program 21 (Condominium Conversion), Program 25 (Adequately Sized Rental Housing for Families), Program 26 (Universal Design and Visitability), Program 27 (Housing for Farmworkers and Hospitality Workers), and Program 29 (Tenant Protection Strategies).

In addition, many program actions involve a review of existing standards, procedures, and practices, and additional actions “as appropriate”. For example, the programs should list the specific trigger for additional action for allocating resources to Program 3 (Accessory Dwelling Units) and revising the minimum open space requirement and parking requirements in Program 7 (Zoning Code Amendments). Additional programs include Program 4 (Efficient Use of Multi-Family Land), The element should review all programs with such language, and describe what action, or lack thereof, would trigger additional program changes.

HCD’s comments related to the proposed housing programs are the most relevant to the Planning Commission’s discussion as they have policy impacts in terms of commitment to both timing and scope of changes to City policy and regulations. Proposed changes to Program 7 in terms of open space requirements, parking, SROs, and residential care facilities have been presented under separate comments above. Additional changes to program language to address this comment are highlighted in Attachment F to the original draft Housing Element for the Planning Commission’s consideration and comment. In most cases more precise language is being proposed to indicate when the City will make a policy decision without committing to a specific policy shift absent a thorough analysis that would be necessary to consider the full range of impacts. In other cases, such as Program 25 (Adequately Sized Rental Housing for Families), staff is recommending more specific policy language such as “Target 20 percent of new rental units to have three or more bedrooms.”

Is the Planning Commission supportive of the proposed modifications shown in Attachment F to address HCD comments and strengthen the City's commitment to implement proposed housing programs?

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, mobile homes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing.

As noted in Finding A1, 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 the comment above HCD is noting that the department may have additional comments after the requested revisions are made to address comment A1.

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.

As noted in Findings A2 and A3, 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.

In the comment above HCD is noting that the department may have additional comments after the requested revisions are made to address comments A2 and A3.

Quantified Objectives

Establish the number of housing units, by income level, that can be constructed, rehabilitated, and conserved over a five-year time frame.

The element must include quantified objectives to establish an estimate of housing units by income category that can be conserved over the planning period. Conservation objectives could be incorporated using anticipated outcomes from Program 19 (Mobile Home Rent Stabilization).

The consultant team are developing the requested estimate of housing units by income category to be conserved over the planning period and will incorporate into response to HCD

ENVIRONMENTAL REVIEW

The California Environmental Quality Act (CEQA) requires public agencies and local governments to evaluate and disclose the environmental impacts of discretionary actions (“projects” under CEQA) including Housing Elements and to limit or avoid those impacts to the extent feasible. The laws and rules governing the CEQA process are contained in the CEQA statute (Public Resources Code Section 21000 and following), the CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 and following), and published court decisions interpreting CEQA.

There is no action before the Planning Commission on February 14, 2023; therefore, no CEQA finding is required and this meeting item is not a project under CEQA. Instead, the item is being brought forward for presentation and discussion. When the Housing Element is brought forward for Planning Commission review and recommendation on March 14, 2023, the item will be accompanied by the applicable CEQA analysis, which is currently being finalized by the consultant team.

RECOMMENDATION

It is recommended that the Planning Commission provide feedback on policy items as outlined above in bold in response to HCD’s comments on the City’s draft Housing Element. The Planning Commission’s feedback on these items will be presented to the City Council for their consideration and to inform their ultimate direction for revisions in creating the final Housing Element for adoption and submittal to the state for certification. In summary, the Planning Commission is being asked to consider proposed revisions to address HCD’s comments on the following topics:

- **Single Room Occupancy (SROs)**
- **Open space requirements for multi-family residential development**
- **Parking requirements for multi-family residential and smaller units**
- **Residential Care facilities in mixed use and commercial zones**
- **Strengthen program language as outlined in Attachment F**

PUBLIC COMMENTS

During the General Plan Update process to date, the community has provided a significant amount of housing-related input, including input received as part of the 2020 General Plan community-wide survey and the 2021 Area Meetings, Pop-ups, Visioning Workshop, GPU Youth Survey, and Latinx Focus Group. This input informed the Vision, Pillars, and Guiding Principles drafted by General Plan Advisory Committee Members and unanimously recommended to drive the subsequent planning phases of the General Plan Update.

In March and April 2022, the Planning Team conducted engagement related specifically to the Housing Element through two presentations to the GPAC on March 17 and April 21, 2022, a presentation to the Planning Commission on March 22, 2022, and the Housing Element Community Workshop on April 7, 2022. In June and July 2022, drafts of the Housing Sites Inventory and Policy Framework were presented to and discussed with the General Plan Advisory Committee (GPAC) on June 16, 2022, Planning Commission on June 21, 2022, and City Council on July 18, 2022. The feedback received to date shaped the development and refinement of the Draft Housing Element and associated appendices.

The release of the Public Draft Housing Element was posted on the General Plan website and announced in the Community Update and on City social media, via General Plan Constant Contact email list, via email to the GPAC, and via direct email to approximately 50 housing-focused stakeholders. The community was invited to provide feedback on the Public Draft via a survey on the General Plan website, which helps ensure that the planning team accurately tracks feedback, as well as via email, or at a public meeting on the Housing Element, which are listed below.

The Draft Housing Element was released on Monday, August 29, for the public review period required by the Department of Housing and Community Development. During the public review period the City held the following public meetings and engagement events:

- Planning Commission meeting: September 13th
- General Plan Advisory Committee meeting: September 15th
- Community Open House: September 20th
- City Council meeting: October 3rd
- Public online survey accepting comments during the full 30-day review period.

No additional comments have been received to date. The comments generated during the public review period through the survey, emails, and meetings noted above were compiled in the Housing Element Comment Matrix. Any additional public input will inform the changes made prior to submission to HCD and will be submitted in an amended Housing Element Appendix F Public Participation.

ATTACHMENTS:

Attachment A: HCD Comment Letter

Attachment B: Draft Housing Element

(<https://www.planpetaluma.org/housingelement>)

Attachment C: Planning Commission Staff Report, September 13, 2022

Attachment D: City Council Staff Report, October 3, 2022

Attachment E: Posted revisions to Draft Housing Element

(<https://www.planpetaluma.org/s/Petaluma-HE-2023-01-20-2023.pdf>)

Attachment F: Revisions to Housing Programs in track changes

Attachment G: Public comment letters received