County of Santa Clara
HOUSING ELEMENT UPDATE

2023-2031

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How to Use the Housing Element Update

A Housing Element is a planning document required by California state law as part of the local government's General Plan. The Housing Element is intended to address the current and future housing needs of a community, including the development, preservation, and improvement of housing for all income levels.

The California Department of Housing and Community Development (HCD) sets forth specific requirements for the Housing Element, including an assessment of housing needs, identification of sites suitable for housing development, and policies to promote affordable housing. The Housing Element must be updated every eight years to reflect changing community needs and to ensure that the local government is meeting its goals for housing production.

The Housing Element plays a critical role in California's efforts to address its housing crisis by providing solutions to affordability and quality in housing. By requiring local governments to plan for housing growth and development, the Housing Element helps ensure that California's communities can provide a range of housing options for residents at all income levels.

The 2023-2031 update to the County of Santa Clara Housing Element is divided into the following chapters:

Chapter 1: Overview of Housing Element Update 2023-2031

Chapter 2: Housing Needs and Production

Chapter 3: Fifth Cycle Performance Review and Sixth Cycle Housing Strategies and Policies

Chapter 4: County Housing Strategies, Policies, and Programs

How the Housing Element is used will vary greatly based on the user. This section gives some general suggestions based on different users. Please also review the Frequently Asked Questions section, for general questions about the Housing Element.

County Officials

As an elected or appointed official, you have a duty to oversee the development, preservation, and improvement of housing for members of your community. This includes future members of the community and those of varying income levels, abilities, ages, and backgrounds.

Professional staff employed by the County will also need to be familiar with the Housing Element to implement the goals, strategies, policies, and programs it contains.

The Housing Element contains goals and policies to guide you in your work to ensure that these goals are met while still allowing for an appropriate level of local control. Some of the key sections County officials should be familiar with include:

- **Chapter 2**: 2.04b Development Capacity Analysis.

- **Chapter 3**: 3.05 Sixth Cycle Housing-Related Strategies and Policies

- **Chapter 4**: County Housing Strategies, Policies, and Programs.

Homeowners

As a current or future homeowner, you may want to know how the Housing Element impacts you and your housing choices. The Housing Element contains information about housing-related programs for both first-time home buyers as well as current homeowners.

For those individuals looking to become first-time home buyers, the County has several programs that may be of assistance, including:

- **Chapter 4**: Program 1.02 - Limited Equity Housing Cooperative Projects (LEHCs).

- **Chapter 4**: Program 1.04 - Empower Homebuyers SCC.

- **Chapter 4**: Program 1.05 - Mortgage Credit Certificate (MCC) Program.

- **Chapter 4**: Program 1.06 - Below Market Partnership Program.

- **Chapter 4**: Program 1.31 – Minor Home Repair and Maintenance.

Existing homeowners can find several programs and policies that can assist them as well. Some of these programs may include additional information on how to add an Accessory Dwelling Unit (ADU) and/or Junior Accessory Dwelling Unit (JADU), programs to assist in home repair or maintenance, and information on how to keep your home safe from wildfires. Chapter 4 describes a number of these policies and programs including:

- **Chapter 4**: Program 1.31 – Minor Home Repair and Maintenance.

- **Chapter 4**: Program 2.07 - Streamline Accessory Dwelling Unit (ADU) Processing.

- **Chapter 4**: Program 2.18 - Training and Support to Homeowners Aging in Place.

- **Chapter 4**: Program 2.22 – Educate homeowners in high fire risk areas of hazards.

Please see Chapter 4 for the full list of programs and policies.

Landlords/Tenants

The County of Santa Clara has housing programs geared at assisting tenants as well as landlords, including:

- **Chapter 4**: Program 1.18 - Tenant/Landlord Dispute Mediation Services.

- **Chapter 4**: Program 1.19 - Eviction Diversion Program.

Please see Chapter 4 for the full list of programs and policies.

Developers

Coordination with housing developers, especially affordable housing developers, is crucial to seeing more housing built in Santa Clara County. Developers can use the Housing Element to learn more about the sites identified for additional housing development. They can also take advantage of some of the County's on-going efforts to free up additional land for residential development such as: Program 2.12 - Update Zoning Ordinance for Re-use of Non-Residential Buildings to Residential. Some sections of the Housing Element that may be of interest to developers include:

- **Chapter 2**: Housing Needs and Production

- **Chapter 4**: County Housing Strategies, Policies, and Programs

Affordable Housing Advocates

The provision of affordable housing is critical for the continued vitality of the Bay Area. The County of Santa Clara has partnered with affordable housing developers in the past and will continue to provide support through a number of programs and funding mechanisms. To learn more about past projects, as well as future opportunities, please read the following sections:

- **Chapter 2**: 2.04b Development Capacity Analysis.

- **Chapter 3**: 3.03 Review of County's Investment in Countywide Housing Efforts During Fifth Cycle and Beyond.

- **Chapter 3**: 3.05 Sixth Cycle Housing-Related Strategies and Policies.

- **Chapter 4**: County Housing Strategies, Policies, and Programs.

Special Housing Needs

Part of the role of the Housing Element is to plan for a variety of housing types for a wide variety of individuals and circumstances. This includes looking at situations such as housing for agricultural workers, Seniors, individuals with disabilities, and temporary housing. To learn more about these programs and policies please visit the following sections of the Housing Element:

- **Chapter 3**: Sixth Cycle Housing-Related Strategies and Policies.

- **Chapter 4**: County Housing Strategies, Policies, and Programs.

Members of the Community

Community engagement is a key part of the Housing Element update process. Throughout the process, the County of Santa Clara has reached out to community members like you for your input and feedback. Thank you for your participation in the Housing Element process and for your continued interest. To learn about how public input was incorporated into the Housing Element, please refer to the following section:

- **Chapter 1:** Community Participation and Outreach.

Housing Element FAQ

What is the purpose of a Housing Element?

The purpose of a Housing Element is to address the current and future housing needs of a community, including the development, preservation, and improvement of housing for all income levels.

What are the requirements for a Housing Element?

The requirements for a Housing Element include an assessment of housing needs, identification of sites suitable for housing development, and policies to promote affordable housing. The Housing Element must be updated every eight years and approved by HCD.

The main categories or types of information and analysis required in a Housing Element update are:

- Identification and analysis of existing housing needs and projected housing needs;

- A statement of goals, objectives, strategies, and policies relating to the maintenance, preservation, improvement, and development of housing;

- An analysis of the capacity of the existing General Plan and Zoning Ordinance to meet projected needs; and,

- A summary of housing programs and a five-year schedule of implementation measures.

The 2023-2031 update serves four additional important purposes:

- To document local housing needs in the context of existing County land use and growth management policies;

- To affirmatively further fair housing throughout Santa Clara County;

- To explain important components of planning policies in Santa Clara County, which has urban growth management policies that guide urban housing development to occur within cities and Urban Service Areas (USAs) to preserve open space and promote rural land use densities outside cities; and

- To document the many other ways, in addition to the approval of residential development, by which the County contributes significantly to meeting local and countywide housing needs.

- Who is responsible for preparing a Housing Element?

- Local governments are responsible for preparing a Housing Element. In this case, the County of Santa Clara is responsible for the preparation and update of the Housing Element for the unincorporated areas of the county.

How often does a Housing Element need to be updated?

A Housing Element needs to be updated every eight years. HCD will release a detailed timeline of when Housing Elements need to be submitted to HCD and approved for compliance with State law.

How does a Housing Element address affordable housing?

A Housing Element addresses affordable housing through policies that promote the production of affordable housing, such as permit streamlining and zoning reform. It also acknowledges the use of public funds (such as Measure A) to help subsidize the development of affordable housing.

How does a Housing Element address the needs of different income levels?

A Housing Element addresses the needs of different income levels by identifying the housing needs of all income levels and developing policies to promote the production and preservation of housing for all income levels. The Regional Housing Needs Allocation (RHNA) identifies housing production targets for a range of income brackets—ensuring that the County plan for housing at all income levels.

What role do public participation and community input play in the preparation of a Housing Element?

Public participation and community input are critical in the preparation of a Housing Element. Local governments are required to engage with the community in the development of the Housing Element, through public meetings and other outreach efforts, and the County of Santa Clara held numerous on-line and in-person events. Section 1.08 highlights the Community Engagement plan and all of the efforts that went into meeting with the community and integrating their feedback into the final draft of the Housing Element.

How are housing needs assessed in a Housing Element?

Housing needs are assessed in a Housing Element through an analysis of demographic data, population projections, and housing market data. In the case of the County of Santa Clara, the Association of Bay Area Governments (ABAG) developed the methodology to assess the housing need in the region, and then assigned a certain number of projected units to each member jurisdiction. This is called the Regional Housing Needs Allocation (RHNA).

RHNA methodology adopted by ABAG and approved by HCD intends to achieve five primary objectives: increase housing supply and mix of housing types; promote infill development and

socioeconomic equity; promote improved intraregional jobs-housing relationship; balance disproportionate household income distributions; and affirmatively further fair housing.

What is the role of the state government in the review and approval of a Housing Element?

The state government reviews and approves Housing Elements to ensure they comply with state law and meet the state's housing goals. HCD provides guidance and technical assistance to local governments in the preparation of the Housing Element.

Chapter 1: Overview of Housing Element Update 2023-2031

1.01 Introduction

This document serves as the Housing Element Update to the Santa Clara County General Plan for the planning period of 2023-2031 (2023 Update) and is Appendix No. 4 of the General Plan. The Housing Element is one of seven mandated elements of a jurisdiction's General Plan. Its content requirements are more detailed, extensive, and complex than other mandated elements within the General Plan. This document addresses the housing-related subject matter required under State law.

This 2023 Update is organized into four chapters:

Chapter 1: Overview of Housing Element Update 2023-2031

Chapter 2: Housing Needs and Production

Chapter 3: Fifth Cycle Performance Review and Sixth Cycle Housing Strategies and Policies

Chapter 4: County Housing Strategies, Policies, and Programs

The 2023 Update primarily uses the same organizational structure as that of the 2015 Housing Element Update (2015 Update), an approach consistent with State Department of Housing and Community Development (HCD) preferences and guidelines. This technique allows the review of the 2023 Update to qualify for streamlined review, facilitating comparison with the previous update for purposes of the State's review, and provides for continuity from one update to the next. The content of the 2023 Update is based on the State's publication *"Building Blocks for Effective Housing Elements"* and related checklists provided for the purpose of locating content and relating it to the various requirements set forth in State law.

The main categories or types of information and analysis required in a Housing Element update are:

- Identification and analysis of existing housing needs and projected housing needs;

- A statement of goals, objectives, strategies, and policies relating to the maintenance, preservation, improvement, and development of housing;

- An analysis of the capacity of the existing General Plan and Zoning Ordinance to meet projected needs; and,

- A summary of housing programs and a five-year schedule of implementation measures.

The 2023 Update serves four additional important purposes:

- To document local housing needs in the context of existing County land use and growth management policies;

- To affirmatively further fair housing throughout Santa Clara County;

- To explain important components of planning policies in Santa Clara County, which has urban growth management policies that guide urban housing development to occur within cities and Urban Service Areas (USAs) to preserve open space and promote rural land use densities outside cities; and

- To document the many other ways, in addition to the approval of residential development, by which the County contributes significantly to meeting local and countywide housing needs.

1.02   Executive Summary

Planning Period for Current Update
This section provides an executive summary of key information and findings of the 2023 Update.

County Produced Housing Consistent with Regional Housing Need Allocation and Forecast for the 2015 Update
From 2015 through the end of 2022, 3,214 housing units were produced in the unincorporated county. This level of production meets and exceeds the 277 units assigned for the 2015-2022 planning period (fifth cycle) Regional Housing Needs Allocation (RHNA) by 2,937 units. In the 2015 Update, the County forecasted that permits would be issued for 2,082 units through 2022. Chapter 2

includes detailed information about the County's housing production in the last planning cycle.

Changes to Policy Direction and Strategies Proposed in 2023 Update
The Housing Element Update is a part of, and is required to be consistent with, the County's General Plan, including the countywide growth management policies, health and transportation elements, and relevant portions of other elements. The goals, strategies, policies, and implementation measures described in the 2023 Update are consistent with, and promote the goals and policies of, the overall General Plan. **However, with a RHNA assignment that has increased 1,028 percent from the previous cycle, from 277 units to 3,125 units, the County will need to make a few meaningful changes to the County's General Plan policies.** Furthermore, the County has added new strategies and policies to meet the challenges of present and future climate change impacts and to remedy long-standing systemic discrimination in housing policies and the inequitable outcomes of such policies.

The primary shift in the County's General Plan is to modify long-standing policies that confer long-range planning responsibilities for urban unincorporated pockets within the USAs (also known as unincorporated "islands") to the associated city jurisdiction. In October 2023, the County modified its General Plan to allow long-range planning for housing in these areas, especially where the city does not have a plan for annexation during a specific Housing Element planning period.

Aside from these necessary modifications, the existing housing strategies and policies are effective, and they provide a broad and comprehensive framework to guide planning and decision-making related to housing issues in the unincorporated county during the period of 2023-2031. Chapter 2 includes detailed information about

the County's completed, ongoing, and new housing strategies and policies.

Regional Housing Needs Allocation Description

The County's RHNA is based on a model and assumptions about projected growth in housing need determined by the regional Council of Governments, in this case the Association of Bay Area Governments (ABAG). The RHNA assignment for the unincorporated areas of the county for the 2023-2031 planning period is 3,125 housing units, a dramatic increase from the 277 units allocated for the previous, 2015-2022 planning period. This increase is due to the RHNA methodology developed by ABAG, which includes three important components:

1. The baseline allocation based on ABAG's Plan Bay Area 2050 Final Blueprint;

2. Factors and weights for allocating units based on income categories (Access to High Opportunity Areas and Jobs Proximity); and,

3. Equity Adjustment based on the approach developed by ABAG's Housing Methodology Committee.

Figure 1.1 shows the RHNA assigned to the County, by affordability categories.
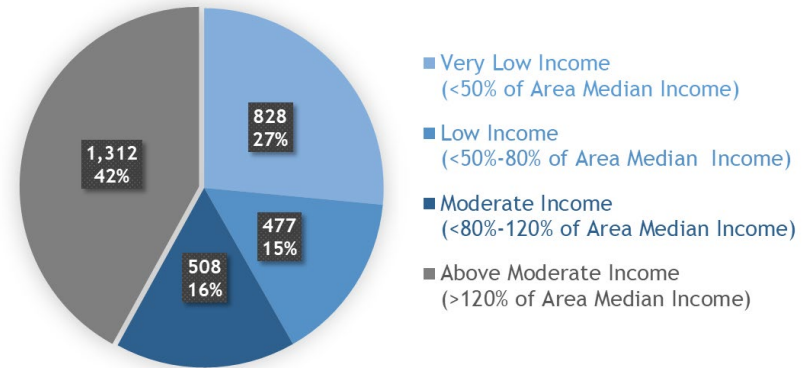
Figure 1.1 RHNA County Assignment

County Capacity to Meet RHNA and Accommodate Necessary Housing

The 2023 Update includes detailed information and analysis to determine whether housing capacity exists within the existing General Plan and Zoning Ordinance to accommodate projected needs and production obligations assigned through the RHNA. Based on an evaluation of general housing capacity within urban unincorporated areas, combined with capacity on Stanford University lands as defined under the Stanford Community Plan and 2000 General Use Permit, the County has identified sites providing 110 percent more capacity than is required under the RHNA. This extra capacity is necessary to ensure that if one or more large sites identified at Stanford or within the City of San José USA do not result in housing development projects during the 2023-2031 planning period, the County will still have enough capacity to accommodate its RHNA target. The County expects that by selecting sites sufficient to meet twice its RHNA target, it will ensure development

opportunities remain available throughout the planning period, especially for lower- and moderate-income households, pursuant to Government Code Section 65863 (the No Net Loss Law). Chapter 3, section 3.05, and Appendix A includes the County sites inventory and more information on the County's ability to meet its RHNA assignment. Chapter 3, Section 3.03 includes more information on ABAG's process for determining the County's RHNA and Projected Housing Need.

Existing Housing Needs

Chapter 3 provides detailed demographic and other statistical information required by housing element law and the State's *Building Blocks for Effective Housing Elements*. The primary purpose is to describe and assess existing housing needs for the unincorporated area population. The existing needs analysis is distinct and separate from the RHNA target for projected housing needs, based on projected population and economic growth.

Table 1.1: Summary Capacity to Meet RHNA Allocation

Location	Affordable Units Share	Affordable Units			Above Moderate Income (>120% of Area Median Income)	Total
		Very Low Income (<50% of Area Median Income)	Low Income (<50%-80% of Area Median Income)	Moderate Income (<80%-120% of Area Median Income)		
San Jose	**33%**	**739**	**370**	**384**	**3,025**	**4,518**
Fruitdale/Santa Clara Valley Medical Center	100%	186	69	45	-	300
Pleasant Hills	16%	228	114	114	2,394	2,850
Hostetter Station	58%	325	187	200	514	1,226
Parkmoor/Burbank Neighborhood	18%	-	-	14	62	76
Alum Rock/East Foothills	17%	-	-	10	48	58
Cambrian Park	13%	-	-	1	7	8
Stanford	**50%**	**336**	**252**	**252**	**840**	**1,680**
Quarry Sites	50%	196	147	147	490	980
Escondido Village	50%	140	105	105	350	700
ADUs	**25%**	**-**	**-**	**92**	**276**	**368**
Total		**1,075**	**622**	**728**	**4,141**	**6,566**
RHNA Assignment		*828*	*477*	*508*	*1,312*	*3,125*
Surplus Units		*247*	*145*	*220*	*2,829*	*3,441*
% of RHNA Target		*130%*	*130%*	*143%*	*316%*	*210%*

Section 3.02 documents unincorporated area housing needs through a series of tables and analyses based on available population, demographics, and housing data. Section 3.03 provides detailed analysis of housing capacity in relation to the RHNA target for projected housing needs. Section 3.04 documents recent unincorporated housing development, and Section 3.05 further describes issues relating to housing development potential for the unincorporated areas. The conclusion of Chapter 3, Section 3.05, is that the County has the capacity to accommodate the projected housing needs in the unincorporated area, as determined by ABAG.

Evaluation of Governmental and Non-Governmental Factors and Constraints

Section 3.06 provides a broad review and evaluation of governmental factors that influence housing production and affordability. The section provides an overview of many topics, including land use policies and regulations referred to generally as "land use controls," impact fees, accessory dwelling unit provisions, building codes, development and site improvement standards, fees and exactions, processing and permitting procedures, special needs housing, and code enforcement, among other subjects.

The County's overall conclusions are that, in general, the County's policies, regulations, permit processes, and related factors support housing development in the unincorporated areas. However, certain areas are identified as areas where the County can further streamline development review or increase housing development in the county. These areas include:

- Additional housing on the Stanford campus for graduate students, staff, faculty and other workers; and

- Updating the County General Plan policies to allow the County to plan for housing within urban unincorporated pockets that are

within the USA of an adjacent city and slated for future annexation.

Section 3.07 describes non-governmental factors influencing the production of housing, such as national and regional economic conditions, land costs, financing and mortgage industry trends, general labor and material costs, and similar information of relevance to the region and unincorporated Santa Clara County.

Compilation of Housing Programs, Projects, Studies, and Activities

Lastly, the Housing Element provides an overview of the most important housing programs, projects, studies, and activities intended to promote housing supply, rehabilitation, preservation, affordability, and a variety of other related goals and objectives, including programs that affirmatively further fair housing (AFFH). This compilation is contained in Chapter 4 of the 2023 Update and is based upon and modified from the 2015 Update.

Chapter 4 documents the County's significant role in providing housing, especially affordable housing, despite only having land use authority over the limited amount of urban housing development that occurs within unincorporated areas. The County's significant involvement in housing-related programs and its long-standing philosophy and commitment to regional solutions to housing needs is evident in the program summaries provided in Chapter 4. Most of the programs and activities in which the County participates provide important funding and services throughout the cities and unincorporated areas alike, meeting the needs of residents across jurisdictional lines.

The County has included an Assessment of Fair Housing (AFH) as Appendix L, which is intended to provide a holistic look – informed by data, maps, community input, and policy analysis – into the trends and factors affecting access to housing and opportunity on the basis

of protected characteristics under federal and state fair housing laws. The Housing Element must include such an AFH component as a result of Assembly Bill (AB) 686, a law passed by the California Legislature in 2018 to incorporate a duty to affirmatively further fair housing into state law.

1.03 Terminology Used in the 2023 Update

For purposes of the 2023 Update, the terms "County of Santa Clara" and "County" refer to the governing body and not the geographic area.

The terms "unincorporated Santa Clara County" and "unincorporated county" refer to the geographic area under the jurisdiction and land use authority of the County of Santa Clara. The terms "Santa Clara County" and "county" refer to the geographic region that consists of unincorporated areas of Santa Clara together with the 15 cities located within Santa Clara County. The terms "countywide" and "county as a whole" are synonymous with "Santa Clara County."

The terms urban unincorporated "pocket" and "island" refer to unincorporated urban areas within USAs and surrounded by city boundaries, awaiting annexation by the surrounding city jurisdiction.

Lastly, the term "Urban County" consists of all unincorporated areas as well as the following jurisdictions that participate jointly in the HOME and Community Development Block Grant programs: Campbell, Los Altos, Los Altos Hills, Los Gatos, Monte Sereno, Morgan Hill, and Saratoga.

1.03a Terms and Acronyms

- **ABAG:** The Association of Bay Area Governments. ABAG is the Council of Governments and regional planning organization for the jurisdictions of the nine counties of the San Francisco Bay Area. ABAG is now organizationally merged with the Metropolitan Transportation Commission (MTC).

- **ACS:** American Community Survey. The ACS is a Census Bureau product that provides yearly demographic information, to supplement the decennial Census.

- **AFFH:** Affirmatively Furthering Fair Housing. The Federal Fair Housing Act requires HUD and recipients of federal funds from HUD to affirmatively further the policies and purposes of the Fair Housing Act.

- **AFH:** Assessment of Fair Housing. Jurisdictions are required to prepare an Assessment of Fair Housing, which is a plan that examines barriers that people face in obtaining and keeping housing and measures that our jurisdictions can take to reduce these barriers and promote equal opportunity in housing.

- **AMI:** Area Median Income, as used for Federal and State funding purposes. For jurisdictions in Santa Clara County, including the unincorporated county, the Area Median Income in 2022 is $168,500 for a household of four.

- **DoF:** State Department of Finance. The DoF provides population estimates and projections by city and by county.

- **HCD:** The State Department of Housing and Community Development. HCD reviews each jurisdiction's housing element for compliance with State housing law.

- **HUD**: U.S. Department of Housing and Urban Development.

- **MTC:** Metropolitan Transportation Commission. The MTC is the Bay Area region's transportation planning, coordinating, and financing agency. MTC is now organizationally merged with ABAG.

- **N/A:** "Not Applicable"

- **NDA**: "No Data Available." Table cells marked with "NDA" are statistics that are not reported by the source agencies at the city or unincorporated area level of detail.

- **RHNA**: The Regional Housing Needs Allocation. The RHNA is the projected housing need for jurisdictions, as allocated to each jurisdiction by ABAG.

- **SOI**: Sphere of Influence. A planning boundary outside of a city's legal boundary (such as the city limit line) that designates the city's probable future boundary and service area as determined by the Local Agency Formation Commission (LAFCO). Factors considered in a sphere of influence review focus on the current and future land use, the current and future need and capacity for service, and any relevant communities of interest.

- **USA**: Urban Service Area. Delineates areas currently annexed and provided with urban services; or areas that a city intends to annex in order to develop and provide urban services, as determined by LAFCO.

1.04   Housing Policy and Development in Relation to Smart Growth General Plan Policies and Climate Change Policies

The County's housing-related policies reflect a smart growth approach to land use and development. The cities, County, and LAFCO have developed and implemented a system of urban growth management that has been in place since the early 1970s. Cities are generally responsible for planning and accommodating urban growth and development, including higher-density housing, within cities and their USAs. Outside the USAs, the unincorporated rural areas are intended to remain in farmland, open space, natural resource protection, and low-density land uses that support the rural resource base. In these areas, the allowed density of development is low by necessity, due to the lack of urban services, and minimum lot sizes for subdivision are typically five acres or larger.

Since the previous update to the Housing Element, the County has embarked on a significant planning effort to preserve agricultural lands and operations as a means of bolstering regional resilience to the effects of climate change. This effort began with the development and adoption of the Santa Clara Valley Agricultural Plan (Ag Plan), which studied the local effects of sprawl development and trajectory of farmland loss in the region. The Ag Plan concluded that local greenhouse gas emissions increased by nearly 77 times when rural unincorporated farmland was developed. [1] This massive increase in emissions could be attributed to the increase in vehicle miles travelled (VMT) resulting from rural low-density residential development. The Ag Plan further concluded that, in addition to avoiding increased VMT as a result of residential sprawl, agricultural preservation in the county would also provide a rich opportunity for climate resilience. The County determined that the management of local agricultural lands can be optimized to sequester significant amounts of atmospheric carbon into the soil and provide enhanced climate resilience in the form of improved watershed management, wildlife habitat conservation, fire hazard mitigation, flood plain protection, groundwater recharge, erosion control, pest and disease management, and air quality regulation. Through the implementation of the Ag Plan, the County has revised and redoubled its

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[1] See Ag Plan Appendix G, Steve Shaffer (2016).

commitment to preventing sprawl development and to advancing smart growth policies from an affirmative rural land use perspective.

The County has also developed "Silicon Valley 2.0," which consists of a [Climate Change Preparedness Decision Support Tool](#), a [Climate Adaptation Guidebook](#), and [high-resolution maps](#) showing areas throughout the county that are vulnerable to extreme heat, riverine flooding, sea level rise, storm surge, and wildfire. These resources support the entirety of the county with climate risk assessment, adaption, and resilience planning. The County expects that the impacts of climate change will increasingly impact the location of residential development in the region, and that the County will increasingly bolster and rely upon its smart growth land use policies.

Within the USAs in the county, the urban unincorporated islands have long been identified by the cities, the County, and LAFCO for eventual annexation and incorporation. This policy reinforces the role of cities to plan for and accommodate new urban development within USAs. As the islands have been annexed, the unincorporated population has decreased by 37% from 1970-2010, while the total county population has increased by nearly 67%. Given the inevitable land use control by the City over these areas, the County policies have accorded indirect long-range planning authority in advance of annexation. Cities have therefore been responsible for planning infill development and higher-density housing in the USAs. Proposals by property owners for development of individual parcels within USAs also trigger the opportunity for the corresponding city to annex the property.

The methodology used by ABAG for determining the sixth cycle RHNA included and analyzed urban unincorporated pockets as the planning responsibility of the County, despite the expectation that

those parcels will need to be annexed to gain access to sewer and water services, which the County does not provide. Given the County's longstanding collaborative policies with the cities and LAFCO, the County appealed ABAG's methodology, but the appeal was denied.[2] Therefore, by necessity, the County's approach to site selection for the 2023 Update reflects a departure from previous planning periods. Although annexation continues to be an expected prerequisite to any significant development within urban pockets, the County will now begin to plan for the projected housing needs in these areas. As needed and to accommodate this cycle's RHNA assignment, the County has amended its General Plan in October 2023 to enable such long-range planning for urban development in the unincorporated islands. More information on ABAG's approach to the urban pockets in its RHNA methodology is provided below in Section 1.06.

1.05　The County's Special Role in Housing Production

Within the context of regional, long-standing growth management and smart growth policies, the County's primary role in housing development has been providing financial and technical assistance to create more affordable, below-market rate housing and special needs housing through the County's Office of Supportive Housing (OSH). Although the County's role in issuing permits for affordable and multi-family housing development is limited, the County makes other significant contributions to housing affordability and development that are in line with AFFH guidelines, including, but not limited to:

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[2] [ABAG appeal documents linked here](#).

- funding for construction, rehabilitation, and preservation of affordable and supportive housing for special needs populations;

- providing rental subsidies to special needs populations;

- creating and assisting shelters with operating funds;

- providing financing for first-time and low-income homebuyers;

- offering and funding services to address housing discrimination and landlord-tenant dispute resolution;

- generating opportunities for new housing on surplus County-owned lands; and

- facilitating housing-related advocacy and education.

The County works in concert with non-profit organizations and local agencies, such as the Santa Clara County Housing Authority, to actively provide a wide variety of housing assistance countywide, not only within the unincorporated areas under the County's planning jurisdiction. These efforts include funding for non-profit affordable housing developers and local agencies to construct affordable housing, maintain affordable rents, and loans for rehabilitation. The County is also a significant funder of housing for residents who have special needs and receive other supportive services from the County, which include seniors and people with mental illnesses, substance abuse disorders, and HIV/AIDS. The County funds and provides emergency shelters, transitional and supportive housing, and housing for other special needs populations countywide. More information on the County's programs supporting housing production is provided in Chapter 4.

1.06 ABAG Allocation Methodology and Unique Aspects of County Planning

ABAG's housing allocation methodology and procedures apply to all nine Bay Area counties and 101 cities. In past cycles, the RHNA targets assigned to cities included the projected development of areas within the cities' Spheres of Influence (SOI), including unincorporated areas under the jurisdiction of counties. However, in a change of course, ABAG based the final RHNA methodology for this cycle on present-day jurisdictional boundaries instead of SOI and areas expected to be annexed. This change has the effect of significantly increasing the urban areas appropriate for higher-density development falling under the County's RHNA obligation, due to the existence of unincorporated islands slated for annexation and city development. This is how the County's sixth cycle RHNA target grew by 1,028% from the fifth cycle target.

ABAG, through an ad hoc Housing Methodology Committee comprised of local elected officials, staff, and other stakeholders, elected to use a RHNA allocation method titled "*High Opportunity Areas Emphasis & Job Proximity*." This model incorporates household data from the [Plan Bay Area 2050 Final Blueprint](), the region's comprehensive land use, transportation, and housing plan, prepared by ABAG. A central feature of Plan Bay Area is the targeting of growth and infrastructure investment in existing developed areas near jobs and transit (Priority Development Areas, or PDAs). Plan Bay Area's focus on PDAs generally supplements and complements Santa Clara County's countywide urban growth management policies. The final RHNA methodology adopted by ABAG and approved by HCD intends to achieve five primary objectives: increase housing supply and mix of housing types; promote infill development and

socioeconomic equity; promote improved intraregional jobs-housing relationship; balance disproportionate household income distributions; and affirmatively further fair housing.[3]

Of the 441,176 total housing units assigned to the Bay Area region by the State, the County was allocated 3,125 units, which are further broken down by income category. In the past, ABAG's RHNA methodology generally allocated growth and housing need within a city's SOI to that city, resulting in a low RHNA target for the County, corresponding only to those unincorporated areas that are not within a city's SOI or within a City's USA boundaries within a SOI. Historically, such methodology and its low allocation to the County have been appropriate given the County's limited role in approving and issuing permits for new housing development in urban areas. This approach was consistent with the County's General Plan policies, which have thus far provided that cities in Santa Clara County plan for and annex areas appropriate for urban development, particularly those lands within USAs, where development is already most feasible.

ABAG's new approach to RHNA methodology requires the County to plan for development in the urban unincorporated pockets. The more rural areas of the unincorporated county are not suitable for significant increases to the housing stock, due to the lack of municipal infrastructure like water and sewer service, but also due to the increased VMT, traffic, and emissions associated with sprawl development.

A notable exception to the County's General Plan policies is Stanford University's unincorporated Community Plan Area, which is for the most part located within Palo Alto's SOI and USA but has not and will not be annexed into Palo Alto because of a 1985 land use policy agreement among the City of Palo Alto, the County, and Stanford University setting forth that academic land uses and lands held in reserve for future academic uses shall remain unincorporated. This agreement has resulted in the County having the long-range planning and permitting authority for the campus. Consequently, the responsibility of identifying housing opportunities and planning for growth and development on Stanford's academic lands appropriately resides with the County.

Housing element law requires that cities and counties take responsibility to plan for housing on lands under their planning authority and regulatory control. The County's 2023 Update therefore focuses on the unincorporated areas, in terms of population and demographic data and housing capacity and development potential – including, now, urban unincorporated pockets. However, the County has long recognized that housing needs and issues are regional in nature and require regional solutions. Therefore, the County has and will continue to administer most of its housing programs, activities, and projects on a countywide basis, not only for the unincorporated areas under its planning jurisdiction.

1.07   Sustainable Communities Strategy and Plan Bay Area

The Bay Area's implementation of Senate Bill (SB) 375 is its Sustainable Communities Strategy, which is an important component of Plan Bay Area 2050. Plan Bay Area 2050 provides for regional growth through 2050 and beyond by focusing on transportation infrastructure investment and housing capacity within the region's PDAs. PDAs are areas where local jurisdictions believe there is

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capacity and demand for focused growth in population and infrastructure. Most PDAs are centered around existing transportation infrastructure. Relatively little growth is expected or planned for in the peri-urban [4] or rural areas of the region. However, ABAG and the State recognize that for households to be successful, there is a strong need for access to opportunities. These opportunities may not be available in the defined PDAs. To that end, the State has mapped High Opportunity Areas, where jurisdictions are encouraged to add additional housing, particularly affordable and diverse housing unit types. [5]

In Santa Clara County, the High Opportunity Areas cover primarily high-income jurisdictions and neighborhoods. These areas only partially overlap some of the urban unincorporated pockets within USAs. Three significant unincorporated areas that the County has identified for housing development during the 2023-2031 cycle are High Opportunity Areas:

- Stanford University campus
- Cambrian Park
- Hostetter Station

In addition, the Pleasant Hills site is adjacent to a High Opportunity Area and is significant enough in size to support affordable and diverse housing types. The County will seek a greater share of affordable housing within new development in these areas. More detailed information on these sites can be found in the site inventory, Appendix A.

In addition to the High Opportunity Areas and PDAs, Plan Bay Area 2050 provides eight strategies to improve housing across the Bay Area, using ABAG's "Hx" convention for housing strategies:

H1. Further strengthen renter protections beyond State law.

H2. Preserve existing affordable housing.

H3. Allow a greater mix of housing densities and types in Growth Geographies.

H4. Build adequate affordable housing to ensure homes for all.

H5. Integrate affordable housing into all major housing projects.

H6. Transform aging malls and office parks into neighborhoods.

H7. Provide targeted mortgage, rental, and small business assistance to Equity Priority Communities.

H8. Accelerate reuse of public and community-owned land for mixed-income housing and essential services.

To the extent feasible and appropriate, the County endeavors to further these strategies through this 2023 Update and future updates to the County Housing Element.

1.08   Community Participation and Outreach

Community participation and outreach played a critical role in the development of the 2023 Update. An iterative engagement program ensured stakeholders, community representatives, and members of the public were given opportunities to review project progression and provide input to influence the development of core components

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[4] The term "peri-urban" refers to an area surrounding an urban area, where urban development meets countryside, in contract to suburban areas.

[5] The State mapping tools used to delineate different levels of opportunity is available here.

of the plan. Consultation with stakeholders and the broader community began in June 2022 and concluded in Spring 2023.

Extra care was taken to engage a diverse range of community members representing various economic and cultural backgrounds. To reach a broad cross-section of the community, advertisements were placed on social media in Spanish, Simplified and Traditional Chinese, and Vietnamese. The County also provided interpretation services at both public meetings. All stakeholder organizations consulted throughout the process were encouraged to serve as project champions and to communicate engagement opportunities through their networks (see the full list of stakeholder organizations further in this chapter). These organizations included housing advocacy groups, seniors' groups and other community-based organizations representing vulnerable populations. Additionally, community-based organization CARAS was onboarded to conduct surveys and an in-person listening session with Spanish-speaking residents and farm workers in the southern portion of the county. The online survey collected demographic information from participants through an optional question. The results can be found on page 42.

The project's phased engagement approach is demonstrated in Figure 1.2 and described in detail below.

Figure 1.2: Housing Element Update Community Participation and Outreach Process

Phase 1
Information Gathering
Q2 2022
Community & Stakeholder Workshops, Community Survey

Phase 2
Draft Policies
Q3 2022
Community & Stakeholder Workshops

Phase 3
Public Release
Q1 2023
Draft Housing Element Release for 30-Day Public Comment

1.08a   Phase 1: Information Gathering

The purpose of Phase 1 was to understand current conditions through information gathering with stakeholders and the public. Engagement included a series of two stakeholder workshops, two community workshops, and a community survey. Feedback from the community was used to identify opportunities and challenges that could be addressed in the Housing Element Update. Participant feedback informed the County's review of previous housing strategies and helped to identify new strategies for discussion in Phase 2.

1.08b   Phase 2: Draft Policies

In Phase 2, the project team returned to stakeholders and the community with draft strategies and policy goals developed based on the information gathered in Phase 1. The project team hosted two stakeholder workshops, one community workshop, and one listening session. Participants were asked to provide feedback to refine the strategies and policy goals prepared by the project team. Feedback was used to inform the development of the draft Housing Element Update document for public review in Phase 3.

1.08c   Phase 3: Public Release

The third phase of outreach occurred following the release of the draft Housing Element Update. The public review and comment period began on March 21, 2023, and lasted 30 days, as required under State law. During this time, mailers were sent to all property owners within 300 feet of parcels identified in the site inventory. All comments received during this period were reviewed and considered carefully by County staff. Where appropriate, clarifications and additional information were incorporated into this document in response to public comments. Such amendments were made during the 10-day period following public comment, as required under State

law. A table summarizing the public comments can be found in Appendix J.

1.08d   Additional Engagement

Community feedback from similar Santa Clara County projects has also been considered. These projects are the Stanford Community Plan and Let's Talk Housing. While separate from the Housing Element engagement process, housing-related input from these projects has been considered by County consultants and staff.

Stanford Community Plan (SCP): Stanford lands within unincorporated Santa Clara County are governed by policies in the Stanford Community Plan (SCP). Development within the SCP area is currently regulated under the 2000 General Use Permit (GUP). Through several outreach efforts conducted in association with a new General Use Permit application, it was brought to the Board of Supervisors' attention that updates to the SCP are necessary. Despite Stanford withdrawing its GUP application in 2019, the County is currently proceeding with revisions to the SCP to, among other goals, support housing development on campus. The final SCP update will be completed along with the Housing Element Update.

The SCP includes chapters that guide the development of the Stanford academic lands, such as, Growth and Development, Land Use, Housing, Circulation, Open Space, Resource Conservation, and Health and Safety. Many of these chapters include strategies, policies, and implementation measures supporting housing development. As such, the updates to the SCP refer to the County's Housing Element and this 2023 Update.

Outreach efforts and public meetings regarding the SCP are listed in Table 1.2:

Table 1.2: Outreach Efforts and Public Meetings

MEETING	AUDIENCE(S)
Community Outreach Meetings 2020 September 3, 22, October 1, 21, 22, November 10, 12, December 3, 7 2021 March 18, April 15 2022 April 26, May 19, May 25	General public and stakeholder and interest groups
Housing, Land Use, Environment, and Transportation Committee (HLUET) Meetings 2020 May 19, June 18, October 15 2021 February 16, May 27, August 12, November 9 2022 February 17, May 19, September 15	HLUET Committee, general public, stakeholders, and interest groups (opportunity provided for written and spoken comment)
Planning Commission Meetings 2020 November 19 2022 May 26, July 14, August 4, August 31, October 27	Planning Commission, general public, stakeholders, and interest groups (opportunity provided for written and spoken comment)
Board of Supervisors Meetings 2020 February 11, October 20 2022 September 27, October 18, December 13	Board of Supervisors, general public, stakeholders, and interest groups (opportunity provided for written and spoken comment)

Let's Talk Housing: On August 11, 2021, the Santa Clara County Planning Collaborative held a virtual countywide community meeting to provide an opportunity for community members to learn more about upcoming Housing Element updates and gain a better understanding of how they can participate in the preparation process. The meeting was targeted towards community members

living in the Cities of Gilroy and Morgan Hill, and unincorporated areas of the county.

During the meeting, staff from the Santa Clara County Planning Collaborative provided an overview of the Housing Element followed by breakout rooms for Gilroy, Morgan Hill, and the County, where each jurisdiction could speak towards the current state of housing, RHNA targets, and goals for the jurisdiction's upcoming respective Housing Element updates. Timelines for the County's 2023 Update were also shared.

1.09   Communication Methods

Communication to promote the 2023 Update, raise awareness, and encourage participation, was a critical component of the engagement program. The communication methods utilized are set forth below in Table 1.3.

Table 1.3: Communications Methods

DATE	MEDIA	PURPOSE
June 27, 2022	Nextdoor* Facebook* Twitter Instagram Stories	Prepare community for upcoming outreach meetings and promote webpage
July 1, 2022	County of Santa Clara Press Release to Media Distribution List and County Webpage	Community encouraged to participate in the process from July – September 2022
July 14, 2022	Nextdoor* Facebook* Twitter	Promote Community Workshops No. 1 (July 19) & No. 2 (July 21)
September 5, 2022	Facebook* Twitter Instagram	Promote Community Meeting No. 3 (Sept 7)

DATE	MEDIA	PURPOSE
July 8, 2022 July 19, 2022 July 21, 2022	E-Blast (issued to participants registered for updates through the project website)	Promote Community Workshops No. 1 (July 19) & No. 2 (July 21)
August 31, 2022 September 2, 2022 September 7, 2022	E-Blast (issued to participants registered for updates through the project website)	Promote Community Meeting No. 3 (Sept 7)
Ongoing	Project Website*	Provide a schedule of upcoming meetings and events

Notes communications offered in Simplified Chinese, Spanish, and Vietnamese

1.10   Engagement Methods

Community participation and outreach was implemented through a multi-method approach to maximize opportunities for involvement from local stakeholders and a broad cross-section of the community. Recognizing comfort level with in-person meetings following the COVID-19 pandemic, most of the public engagement was completed virtually. The following section describes the engagement methods

used to involve the public in the development of this Housing Element Update.

1.10a   Project Website

The project website serves as the central portal for all Housing Element Update information. The landing page provides a concise overview of the project purpose and information about what the Housing Element is intended to accomplish. The website also

includes tabs to navigate to important information, such as, upcoming events, descriptions of major components to the update, data on housing trends in the county, links to previous Housing Element updates and the survey and registration form.

Social media posts, emails, and presentations all directed members of the community to the website for updated project information.

1.10b   Stakeholder Workshops

The County of Santa Clara compiled a list of stakeholders representing service providers, housing advocates, affordable housing developers, government agencies, county departments, environmental advocates, and more. The County also included stakeholders involved in the Applicant Roundtable (representing the County's most frequent applicants), stakeholders suggested by the County Office of Supportive Housing, and elected and/or appointed

officials and their representatives. Stakeholders were invited to a series of workshops to provide feedback to the project team at key milestones. Formal invitations were issued to stakeholders prior to each workshop to encourage participation. Attendees were asked to act as ambassadors for the project, sharing community meeting opportunities through their networks. Approximately 52 organizations were represented at the stakeholder workshops and are listed below.

Participating Organizations:

- Adobe Services
- Allied Housing
- Bay Area Building Industry Assn.
- Boys & Girls Club of Silicon Valley
- Burbank Community Association
- CARAS
- Charities Housing
- City of Gilroy
- City of Morgan Hill
- City of Santa Clara
- County of Santa Clara Agricultural Division
- County of Santa Clara Dept. of Aging and Adult Services
- County of Santa Clara Dept. of Planning and Development
- County of Santa Clara Dept. of Public Health
- County of Santa Clara Office of the County Counsel
- County of Santa Clara Office of Supportive Housing

- Habitat for Humanity East Bay/Silicon Valley
- Housing Choices
- Housing Trust Silicon Valley
- Latinos United for a New America
- Law Foundation of Silicon Valley
- MH Engineering
- MidPen Housing
- Midpeninsula Regional Open Space District
- Milligan Land Company
- New York Life
- Rebuilding Together Silicon Valley
- Ruggeri-Jensen-Azar
- San Antonio Hills Homeowners Assn.
- San Martin Neighborhood Assn.
- Santa Clara County Housing Authority
- Santa Clara County LAFCO
- Santa Clara Valley Open Space Authority

- County of Santa Clara Office of Sustainability
- County of Santa Clara Parks and Recreation Dept.
- Dividend Homes
- Eden Housing
- Gilroy Dispatch
- Gilroy Historical Society
- Green Foothills
- Greenbelt Alliance
- Silicon Valley at Home (SV@Home)
- Silicon Valley Coalition for the Unhoused
- Silicon Valley Independent Living Center
- Silicon Valley Leadership Group
- South Bay YIMBY
- Stanford University
- West Valley Community Services

All workshop materials – including the presentation slide decks, meeting recordings, and meeting summaries – were posted to the project website for public review. All summaries were translated into Spanish, Simplified Chinese, and Vietnamese, with some translated into Tagalog. Summaries of the stakeholder workshops can be found in Appendix B.

1.10c Community Workshops

Three community workshops were hosted over the course of the engagement program, to invite members of the community to provide input in Phase 1 (Q2 2022) and Phase 2 (Q3 2022). Community workshops were advertised through stakeholder partners, the County's social media channels (Facebook, Nextdoor, Instagram, and Twitter), and the County website. Interpretation services were made available at all community workshops in Spanish, Vietnamese, Cantonese, and Mandarin. Email invitations were issued to those who registered for updates on the project website. A total of 97 participants attended community workshops over the course of the engagement program.

All workshop materials were also made available on the project website for public review. All summaries were translated into Spanish,

Simplified Chinese, and Vietnamese, with some translated into Tagalog. Summaries of the workshops can be found in Appendix B.
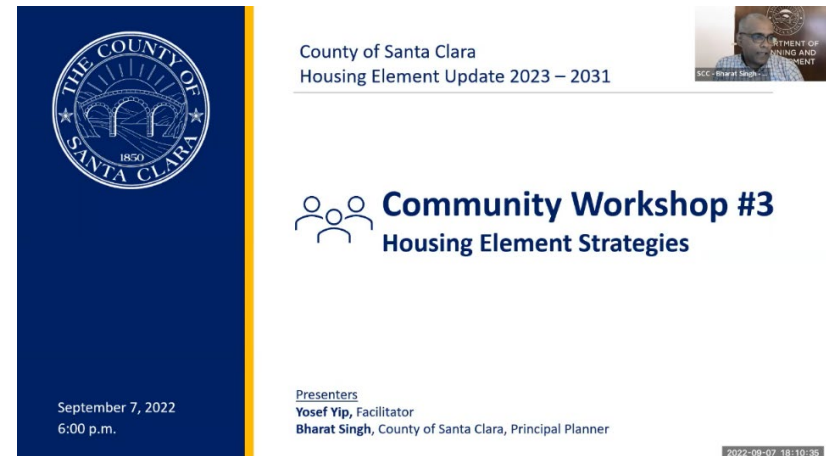
1.10d Community Survey

A community survey was available on the project website from June 21 to August 17, 2022, to seek information on community housing priorities as part of *Phase 1: Information Gathering*. The survey asked participants to rate a series of housing priorities for the 2023 Update on a rating scale also known as a Likert scale. Participants were able to add additional housing priorities not included in the survey for consideration. The survey was provided in English, Chinese (simplified and traditional), Spanish, and Vietnamese. A total of 167 survey responses were collected. Results of the survey are found under Online Survey Results on page 42.

1.10e Community-Based Organizations

Community Agency for Resources, Advocacy and Services (CARAS) was contracted to support the County in outreach to Spanish-speaking residents and farmworkers in South Santa Clara County. Established in 2014, CARAS provides supportive services to the community including housing assistance programs, such as rental and deposit assistance to low-income families, especially those on the verge of eviction. In addition to housing programs, CARAS provides youth case management services, public benefit navigation services, community financial literacy training, expungements of criminal records, combatting housing discrimination and community forums addressing legal barriers to re-entry. CARAS also plays a role in supporting undocumented community members in learning about their rights, available resources, and information on current immigration policies.

CARAS's involvement in the 2023 Update included the following outreach initiatives:

- Promoting the County of Santa Clara Housing Element on social media platforms;

- Administering and promoting the community survey;

- Facilitating a listening session for community members at the CARAS office; and

- Participating in community and stakeholder workshops.

Efforts were made to partner with Vietnamese American groups and associations within the county, including the Vietnamese American Service Center. However, responses from the contacted groups and associations were not received. To encourage participation from Vietnamese and other non-English-speaking community members, promotional efforts, the community survey, and meeting summaries were translated into Simplified Chinese, Spanish, and Vietnamese. Additionally, interpretation services were provided at community workshops in Cantonese, Mandarin, Spanish, and Vietnamese.

1.11   Outreach Events

Table 4 below provides the Stakeholder and Community Workshops hosted over the duration of the Housing Element Update's engagement program. The table identifies the dates of the workshops, presentation focus, and purpose of discussion.

Stakeholder meetings were inclusive of various organizations operating in both incorporated and unincorporated Santa Clara County. The list of stakeholders was developed by the County and was inclusive of housing developers, housing advocacy organizations, and a host of community-based organizations. All participating groups have been listed previously in this chapter.

Community meetings were open to the general public. Advertising was conducted via social media and through invitations issued to stakeholders and through the project website's listserv. Stakeholders were encouraged to invite their networks to attend and participate.

Table 1.4 Stakeholder and Community Workshops

EVENT	DATE	WORKSHOP FOCUS
Phase 1		
Stakeholder Workshop No. 1	July 6, 2022	Presentation delivered to stakeholders to introduce the 2023 Update.

EVENT	DATE	WORKSHOP FOCUS
		Input sought on priority opportunities and challenges to be addressed through the 2023 Update.
Community Workshop No. 1: Rural Focus	July 19, 2022	Presentation delivered to community members in rural areas of unincorporated Santa Clara to introduce the 2023 Update. Discussion structured to identify priority housing opportunities and challenges in rural communities to be addressed through the 2023 Update.
Community Workshop No. 2: Urban Focus	July 21, 2022	Presentation delivered to community members in urban areas and urban service areas in unincorporated Santa Clara to introduce the 2023 Update. Discussion structured to identify priority housing opportunities and challenges in urban communities to be addressed through the 2023 Update.
Special Stakeholder Workshop: Development Focus	August 2, 2022	Special meeting seeking input from the development and housing advocates on methods to streamline and/or simplify the development process. Presentation delivered to review government and non-government related factors creating barriers to housing production.
Phase 2		
Stakeholder Workshop No. 2	August 17, 2022	Presentation delivered to review strategies from the previous update to the Housing Element (2015 – 2022) identifying priority areas where new strategies are needed. Discussion seeking feedback on how previous strategies could be updated to address current and forecasted

EVENT	DATE	WORKSHOP FOCUS
		conditions. Input sought to get participant suggestions for new strategies related to housing production, housing affordability, access to housing, homelessness, and climate change.
Stakeholder Workshop No. 3	August 29, 2022	Presentation to review policy goals to address six priority housing challenges: housing production, housing affordability, access to housing, AFFH, homelessness, and climate change. Discussion focused on confirming or refining proposed policy goals and seeking ideas on new policy goals to address the priority housing challenges.
Community Workshop No. 3	September 7, 2022	Presentation to review feedback heard to-date, provide a refresh on the 2023 Update, introduce policy goals to address six priority housing challenges: housing production, housing affordability, access to housing, AFFH, homelessness, and climate change. Discussion focused on confirming or refining proposed policy goals and seeking ideas on new policy goals to address the priority housing challenges.
CARAS Listening Session	October 24, 2022	A listening session hosted by CARAS and the County for Spanish-speaking community members and farmworkers in south county. A brief presentation provided information on the 2023 Update and sought feedback on five priority policy goals.

1.12   Summary of Feedback

Over the course of the engagement program, recurring themes emerged from the feedback received the series of stakeholder workshops and community workshops, and the community survey. These recurring messages from participant feedback have been grouped into eight key themes. Each theme is described below with an explanation of how the County is addressing each issue in the 2023 Update.

1.12a   Housing Affordability

Stakeholders and members of the community challenged the County to consider the definition of housing affordability to address the housing needs of people with extremely low-income (ELI), seniors on fixed income, and people living with chronic illness. Participants noted the County should prioritize, streamline, and incentivize the development of units that are affordable across a range of income levels. Stakeholders cited reducing requirements, taxes, and exactions, to make affordable housing development more feasible. New affordable housing ought to be in areas with amenities and services and dispersed throughout the County to avoid concentrations of poverty. Policies ought to be developed to support low-income residents through anti-displacement initiatives and expanded tenant protections like stricter rent control, rent subsidies, tax credits, just cause eviction policies, and tenant right to counsel.

Response to Feedback: The policies under Strategies 1, 2, and 3 address the support for housing affordability. The existing policies (HG1-3, HG1-4, HG1-5, HG3-1, and HG3-2) prioritize funding for building more very low- and low-income housing. Under Strategy 2, the County has policies to work with other jurisdictions and non-government entities to facilitate the building of affordable housing across the jurisdictions in the county. The opportunity sites identified

for the 2023-2031 planning period are dispersed across the county to avoid concentration and many of them are in areas determined by the State to be High Opportunity Areas.

1.12b   Access to Housing

Participants noted that diverse housing types and informational resources are needed to improve access to housing in the county. Policies are needed to promote creative housing solutions, such as the adaptive reuse of underutilized warehouses and office buildings for residential development and streamlining and incentivizing affordable ADU development and microhomes. Programs are needed to promote the development of housing that considers universal design standards for seniors and people with disabilities. The County can also play an important role in providing information and education to those in need of affordable housing options or access to financial and legal aid.

Response to Feedback: The existing and updated policies under Strategies 1 and 4 will improve access to housing. Updates to policies under Strategy 7 (Ending Homelessness) and Strategy 6 (Special Needs Housing) also address these concerns.

1.12c   Housing Production / Supply

Participant feedback highlighted the need to streamline the development process to facilitate housing development with incentives, particularly for affordable housing. Suggestions included policies for land dedication, zoning overlays, rezoning, percentage-based affordable housing dedications, and funding for affordable housing development. The County can also consider reducing processing times, fees, and exactions, rounds of application reviews, and pre-development meetings, to reduce developer expenses related to development timelines and the application process. Some participants recommended changes to the County's General Plan to

allow for development through conforming zoning and revised densities. Dialogue and collaboration with LAFCO and city jurisdictions were also suggested to ease the annexation process and stimulate development in the cities' USAs. Finally, some suggested that the County could tailor incentives to sites deemed desirable for affordable housing development or consider partnerships with community developers.

In addition to new development, participants encouraged the County to consider programs and policies to preserve the existing affordable housing stock. Options include retrofit programs and rebates for property owners to keep affordable units and rental units in a state of good repair. The County should also conduct research to analyze threats to the existing housing stock and respond with safeguards tailored to address such threats.

Response to Feedback: Significant updates to policies under Strategy 1 (Balanced Housing Supply) will allow for the County to plan for housing within urban unincorporated pockets and help to address housing supply concerns within the jurisdiction of the unincorporated county.

1.12d Homelessness

The County received feedback regarding programs and policies that can address homelessness. Input centered around support programs to assist with re-entry and transition back into stable housing. A case management approach can also be utilized as a key protective measure to address chronic homelessness in the community. The Community Plan to End Homelessness can also provide assistance to the County and should be integrated into the Housing Element Update.

Response to Feedback: Strategy 7 (Ending Homelessness) has been significantly updated to add new policy directions and planning effort to reduce homelessness countywide.

1.12e Services

Participants noted that infrastructure and community services are needed to support the development of new housing within this Housing Element cycle. Sufficient municipal services are needed to accommodate housing in unincorporated areas of the county. This includes drinking water, wastewater treatment, and stormwater management infrastructure. Some participants raised incidents of recent sewage runoff in Morgan Hill and San Martin as a particular concern. A range of transportation options are also needed to support new housing development and reduce reliance on personal vehicles. This requires the County to coordinate with transit providers to increase service in newly developed areas and to allocate funds towards the creation of cycling and pedestrian facilities.

Several comments were received related to the need for soft services to support new development. Soft services can range from support (e.g., social services, healthcare, and community services) to amenities (e.g., grocery stores and recreation facilities). Development should be in proximity to parks and open spaces for the well-being of residents. Finally, the County heard about the need for development to occur in the proximity of employment areas to facilitate opportunities for residents to easily commute to and from work.

Response to Feedback: Policies HG1-6 & HG1-7 under Strategy 1 address access to services and amenities in neighborhoods that have historically had low public infrastructure investments.

1.12f   Environment & Climate Change

Feedback highlighted the importance of protecting the environment, reducing contributions to climate change, and planning for climate resiliency. Several participants urged the County to focus development in existing urbanized areas to avoid the conversion of valuable natural habitat, open space, and agricultural land into residential uses. For some, allowing more development in communities like Gilroy and Morgan Hill is a concern as it may stimulate unintended growth. New development should also avoid fire- and flood-prone regions of the county. Stakeholders and the community suggested that the County consider policies that direct new development to be energy-efficient and adhere to green development standards to reduce greenhouse gas (GHG) emissions. Such policies should apply to new development, renovations, and existing buildings. Resilience and climate change adaptation were also suggested by participants who encouraged the County to consider policies to address climate and environmental justice for communities of color and low-income populations.

Response to Feedback: Strategy 10 has been added to the 2023 Update to address housing and climate change, including reducing risks from extreme weather and reducing the GHG footprint of new and existing housing.

1.12g   Equity

Participant feedback indicated that the Housing Element Update should make efforts to address inequity and unequal access to housing in the county. For example, some expressed the County should apply AFFH policies created by HUD. The policies should seek to rectify injustices related to economic segregation, racial segregation, and historic redlining in various communities in the county (e.g., Burbank and Seven Trees). Racism in housing should be addressed specifically and not covered under blanket terminology

related to discriminatory practices. It was also recommended that the County create policies to provide housing or housing support programs for formerly incarcerated people and undocumented immigrants.

Response to Feedback: Strategy 5 has been updated with new policies that will identify key neighborhoods in need of improved access to amenities and services in those communities. The County will also support other jurisdictions in implementing fair housing programs through the Office of Supportive Housing.

1.12h   Farmworker Housing

Stakeholders and community members noted that farmworker housing is critical to supporting the county's agricultural economy. Suggestions included providing streamlined permitting and financing to support the development of farmworker housing in proximity of agricultural operations. Along with farmworker housing production, community feedback included suggestions to ensure that services such as water and sanitary infrastructure are extended to rural areas to support increased farmworker housing.

Response to Feedback: During the previous Housing Element cycle, the County significantly streamlined the planning approval process for agricultural employee housing and expanded the available options for establishing such housing in unincorporated areas. Strategy 8 addresses the ongoing need for such housing by maintaining and expanding the supply of homes available to farmworkers.

1.13   Online Survey Results

A community survey was launched simultaneously with the project website to collect insights from the community and register participants for the email list to receive updates on upcoming meetings.

Figure 1.3: Housing Issues Priority Rating Exercise (average scores out of five from 167 responses)

The simple survey, taking less than ten minutes to complete, asked participants to rank the importance of six predetermined housing issues and provide information on any additional housing issues to be addressed in the 2023 Update. The survey also asked for optional demographic information to assist in understanding the reach to various communities. The survey was made available in Simplified Chinese, Spanish, and Vietnamese. Three participants completed the survey in Vietnamese, one participant completed the survey in Simplified Chinese, and 48 participants completed the survey in Spanish as a part of CARAS's efforts to reach the Spanish-speaking communities in the southern parts of the county.

In total, 167 surveys were completed. The following illustrates the results of the survey.

1.13a   Survey Summary of Housing Priorities

Participants were asked to evaluate the importance of six predetermined housing challenges facing the county. The question provided a scale of one to five to rate the individual priority of each listed challenge. One indicated the least amount of priority and five indicated the highest level of priority. Figure 1.3 shows the results of the exercise.

While all six issues were rated relatively high, out of a maximum of five, "housing affordability" was rated the highest priority to be addressed by the Housing Element. This was followed by "Access to Housing/Homelessness" as the second highest priority, with "Diversity in Choices" and "Access to Services and Amenities" tied for the third highest priority. "Fire Safety and Climate Resilience" and "Urban Sprawl" rounded out the priorities in fourth and fifth place, respectively.
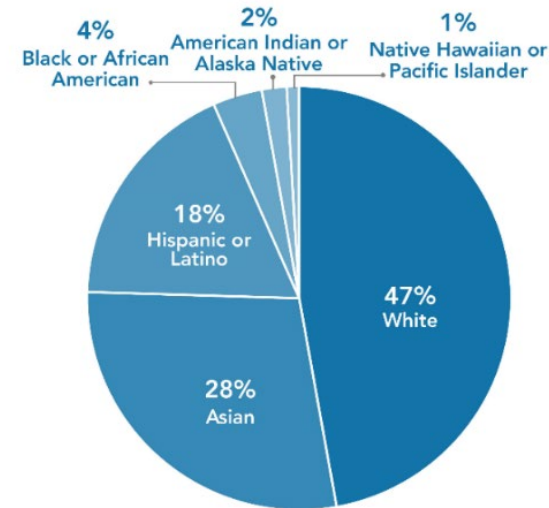

Figure 1.4. Participant Ethnicity (out of 99 responses - 20 participants chose not to answer)

1.13b Additional Housing Priorities

In addition to the ranking exercise, participants were asked to identify additional housing challenges that should be addressed through the Housing Element Update. Input from this question has been included into the key themes in Summary of Feedback.
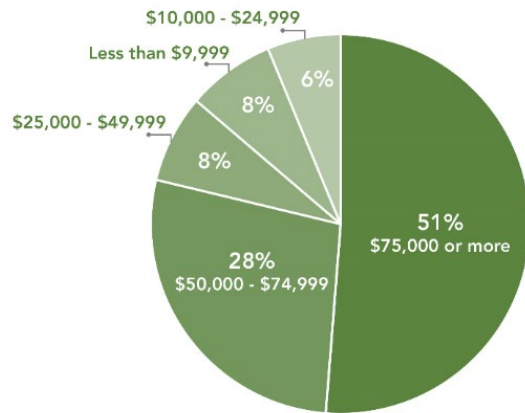
SURVEY RESPONDENT INCOME LEVEL

Figure 1.5. Participant Income level (out of 80 responses - 39 participants chose not to answer)

1.13c Participant Demographics

To conclude the survey, participants were asked to provide demographic information, including their income, ethnicity, and zip code. This information demonstrates the reach of engagement. The demographic questions were made optional to respect the privacy of participants.
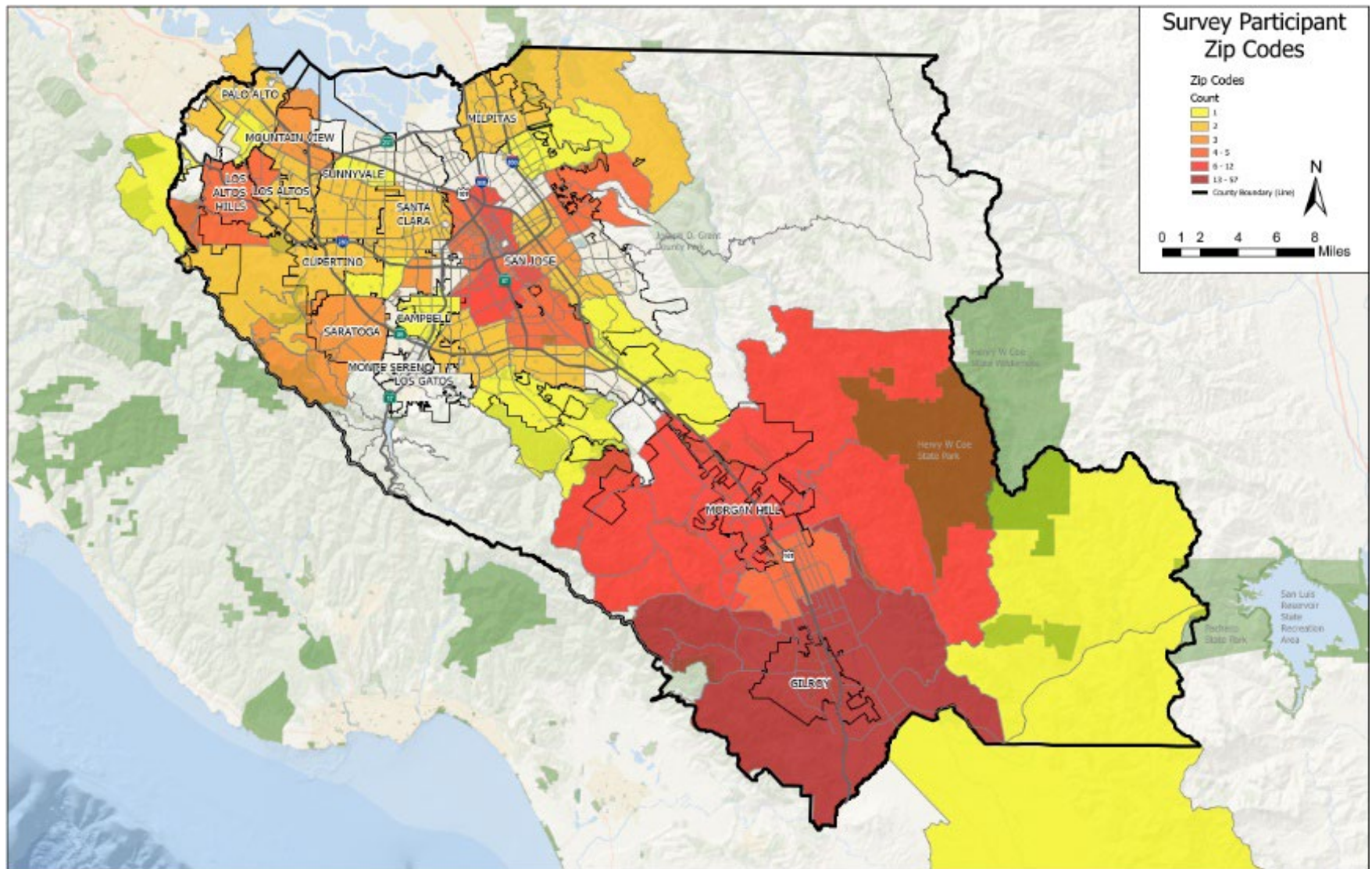
Figure 1.6: Participant Zip Codes

The majority of participants surveyed (53%) identified as persons of color, with 49% of participants making less than $75,000.00 per year. Survey participants indicated their top issues of concern were housing affordability, access to housing, and diversity in choices. Figures 1.4, 1.5, and 1.3 show the results in visual detail.

1.14 Ongoing Reporting, Referral Requirements, and Program Maintenance

In 2009, the State standardized annual reporting regarding housing development and programs. The housing production statistics and program progress data in the 2023 Update rely upon and are consistent with the County's annual Housing Element Progress Reports. County staff will continue to be engaged with monitoring and reporting requirements over the duration of the Housing Element's sixth cycle.

1.15 Consistency of the Housing Element with Other Elements of the General Plan

The Housing Element is a component of the County's General Plan and State law requires that updates to a Housing Element be consistent with other Elements of the General Plan. Housing Elements are updated more frequently than other Elements, which could lead to internal inconsistencies.

For the 2023 Update, to meet the County's RHNA target resulting from ABAG's new allocation methodology discussed above, the County will need to amend certain policies in its General Plan. Specifically, the County will need to modify its General Plan policies

that confer to cities long-range planning authority within their respective SOIs and USAs. This is especially true for urban unincorporated pockets under the County's jurisdiction, which the County will now need to plan for in order to meet its RHNA target.

Aside from the General Plan amendments that are required to accommodate ABAG's new approach to RHNA methodology, the policies included in this 2023 Update primarily update existing strategies and policies from the previous 2015 Update and are consistent with the rest of the County's General Plan. The 2023 Update does include Strategy 10: *Plan for Climate Change Impacts on Existing and Future Housing Stock*, which is a new strategy that strengthens the connection and consistency between the Housing Element and the other relevant provisions of the County's General Plan.

Additionally, under State law, every resolution amending the General Plan must contain a section attesting to an evaluation and conclusion of consistency with the General Plan. In addition to this requirement, the County will use the Annual Report process to review consistency of the Housing Element with other aspects of the General Plan as Housing Element programs are implemented and as other General Plan Elements are updated.