

#	HCD Comment	Project Team Response
A	The element must provide a cumulative evaluation of the effectiveness of past goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female-headed households, farmworkers, and persons experiencing homelessness).	We have revised the document to include a cumulative evaluation of the effectiveness of programs in meeting special housing needs on page 389.
B1.1	Fair Housing Enforcement and Capacity: While the housing element includes a summary of fair housing enforcement and outreach capacity at the county level, it must also quantify and evaluate complaints at the City level. In addition, the element should discuss how the City complies with existing fair housing laws and regulations, any past fair housing lawsuits, consent decrees or other related legal matters.	Added how the City complies with applicable fair housing laws and added statement that there are no past/pending lawsuits or legal issues regarding fair housing.
B1.2	Patterns and Trends: While the element reports general information and data, it must analyze this data for trends over time, patterns across census tracts, and coincidence with other components of the assessment of fair housing that go beyond general statements. Additionally, the element must broaden its regional analysis. For example, the element could compare the City with neighboring counties such as Kings, Kern, and Fresno County.	Added comparisons to Fresno and Kern Counties in the Regional Trends section throughout the AFFH analysis.
B1.3	Racially Concentrated Areas of Poverty/Affluence): The element identified one census tract that qualified as a R/ECAP and a total of three census tracts that qualified as RCAA's; however, the element should evaluate the factors that contribute to this outcome. This analysis should utilize local data knowledge and other relevant factors to achieve a comprehensive analysis. For example, the element could examine past land use practices, investments, and quality of life relative to the rest of the City and region and then formulate appropriate programs to promote more inclusive communities and equitable quality of life. Based on a complete analysis, the City can consider additional actions (not limited to the Regional Housing Need Allocation (RHNA)) to promote housing mobility and improve new housing opportunities throughout the City.	Added additional discussion of R/ECAP and RCAs.
B1.4	Disproportionate Housing Needs Including Displacement: The element must evaluate patterns and needs related to housing conditions and people experiencing homelessness. For housing conditions, the element should evaluate whether any neighborhoods or areas have a higher need of rehabilitation and replacement than other areas. For persons experiencing homelessness, the element should examine disproportionate impacts on protected characteristics (e.g., race, disability) and patterns of need, including access to transportation and services. The analysis should utilize local data and knowledge from service providers and code enforcement officials. Pending a complete analysis, the element should highlight any gaps in addressing the need and integrate policies and programs to effectively overcome disparities in addressing the City's housing stock and unsheltered population.	Added details on race/ethnicity of homeless population and added comment requesting additional information on geographic trends and needs of the homeless population (pages 328-331). Expanded discussion on substandard housing.

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B1.5	Identified Sites and Affirmatively Furthering Fair Housing (AFFH): Based on the City's site location relative to all components of the fair housing analysis, the City must identify additional sites to AFFH. The element mentions that most sites, including those for lower-income households, are in areas of high and highest resource; however, there are still large concentrations of lower-income units near lower-resource, (low-income) census tracts that have high concentrations of Hispanic/Latino residents, including in the City's Downtown. While the City's multifamily zones are limited, the element should identify additional innovative strategies to effectively promote housing mobility and integration throughout the City. For example, missing middle unit types can be used as a tool to promote additional units throughout the City.	We have added Program 2.7 to address and encourage missing middle housing. In addition to evaluating and revising development standards and adopting incentives, we have added an action within the program committing the City to identifying vacant parcels in low-density single-family areas, particularly in high resource areas, with potential for multi-family missing middle housing development, and contacting property owners to discuss site constraints and opportunities for additional density or reduced development standards to incentivize development of missing middle housing. The goal for this action is to engage 25 property owners each year.
B1.6	Contributing Factors: The element identifies many contributing factors to fair housing issues but must prioritize these factors to better formulate policies and programs and carry out meaningful actions to AFFH.	Assigned low/medium/high priority to contributing factors.
B2.1	Farmworkers: While the element includes data on seasonal and permanent farmworkers, it should also analyze housing needs and characteristics to better formulate policies and programs. An analysis should address housing challenges and conditions, present strategies, and resources to meet the need, and provide an assessment of gaps in resources for farmworkers within the City. The element should enhance existing policies and programs based on a revised analysis. Furthermore, while trends seem to point to a decline in farmworkers in Visalia, the element should continue to consider the presence of farmworkers from the broader areas (county-wide) and those employed seasonally, including within the City's boundaries.	We have added information on housing needs and characteristics from the UC Merced Farmworker Health Study (see pages 77-78).  We have added an action to Program 5.9 committing the City to adopting incentives for farmworker housing by 2026.  We have added a Program 5.10 to further address farmworker housing needs and conditions.
B3.1	Progress toward the RHNA: As you know, the City's RHNA may be reduced by the number of new units built or approved since June 30, 2023; however, the element must demonstrate the affordability of units in the planning period based on actual sales price, rent level, or other mechanisms ensuring affordability (e.g., deed restrictions). While the element provides affordability assumptions based on deed restrictions for projects listed on P. 131, the element doesn't demonstrate affordability for the remaining projects in (Table 55) of the element. In addition, the element must discuss the availability or likelihood that units will be built in the planning period and should account for remaining steps in the entitlement process, any barriers to development, phasing, anticipated build-out horizons, market conditions, and other relevant factors to demonstrate their availability in the planning period.	Adjusted the affordability of the pending and approved projects in Table 55.

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B3.2	<p>Realistic Capacity: While the element provides conservative assumptions for buildout, realistic capacity assumptions must still account for all land use controls and site improvements. In addition, the element should demonstrate how trends, factors, and evidence in Table 57 led to capacity assumptions in Table 59. For example, projects used to make capacity determinations seem limited to the City's R-1-5 and R-M-2 zones and generally do not account for the City's higher-density zones and commercial zones. Moreover, the City seems to use capacity assumptions in Table 62 that are higher than Table 59. The element should validate capacity assumptions in both tables. Lastly, the element assumes 55 percent capacity for nonresidential zones. While this capacity assumption is conservative, the element provides no support for these assumptions. For example, the element could examine all development activity within the nonresidential zones, assess how often residential development occurs, and then adjust the calculation of residential capacity along with relevant policies, and programs. Moreover, the element should commit to a mid-cycle assessment of residential development in zones that allow 100 percent nonresidential usage and make adjustments, as appropriate, to capacity assumptions. Based on observable trends, the City may need to identify additional sites to meet the RHNA.</p>	<p>Added more comparison to pipeline and development trend projects to justify the realistic allowable density. Including examples of allowable densities in different zones.</p> <p>Additional section was added to discuss the likelihood of residential uses developing in nonresidential zones. This includes a new table with all residential uses developed in nonresidential zones over the past 5 years.</p> <p>We have added a mid-cycle assessment of residential development in zones that allow 100 percent nonresidential usage to Program 9.3, as well as a commitment to recalculate capacity assumptions and rezone land, as appropriate, should any shortfall occur.</p>
B3.3	<p>Suitability of Nonvacant Sites: The element must include an analysis demonstrating the potential for redevelopment of nonvacant sites. The analysis shall consider factors including the extent to which existing uses may constitute an impediment to additional residential development, the City's past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites. For example, the element lists various factors (e.g., age of structure, improvement to land value ratio, and FAR) to indicate the potential for redevelopment in the planning period; however, the element should evaluate development trends or provide recent experience in redevelopment of structures based on those factors.</p>	<p>Additional section included that details the site selection criteria for nonvacant sites. This includes additional analysis on all nonvacant sites selected for the sites inventory and which criteria they meet.</p> <p>We have added Program 2.6 committing the City to adopt incentives to encourage redevelopment of nonvacant sites.</p>

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B3.4	<p>City-Owned Sites: The element should analyze the suitability and availability of City-Owned sites to meet the RHNA in the planning period. The analysis should discuss the status, anticipated steps for development including disposition, any known barriers to development and other relevant factors to development in the planning period. Based on a complete analysis, the element should add or modify programs to comply with the Surplus Land Act, commit to numerical objectives, including affordability, aligned with assumptions in the inventory, and a schedule of actions to facilitate development. A schedule of actions may include coordination with appropriate entities, including potential developers, disposition of the land, zoning, funding, facilitating other entitlements and issuing permits. Lastly, the program should identify and make alternative sites with zoning of equivalent capacity and density by a specified date if sites are not made available by a date early in the planning period.</p>	<p>City of Visalia to provide the status of these sites.</p> <p>We had added Program 1.6 addressing City-owned Sites and compliance with the Surplus Land Act</p>
B3.5	<p>Large Sites: While the element states large sites will only use ten acres of buildable acreage to accommodate lower-income RHNA, it must still provide analysis regarding the development of housing for lower-income households on large sites where the acreage of the parcel exceeds ten acres. Absent sufficient evidence that sites of equivalent size with affordability were successfully developed during the planning prior planning period or other evidence that demonstrates the suitability of these sites, the large sites are deemed inadequate to accommodate housing for lower-income households. For example, the element should describe the characteristics of anticipated development on identified large sites, including opportunities and timing for specific-plan development, further subdivision, parcelling, site planning or other methods to facilitate appropriately sized sites that encourage the development of housing affordable to lower-income households. Based on the outcomes of this analysis, the element should add or modify programs.</p>	<p>Additional section and analysis added for all sites over 10 acres and their intended uses.</p> <p>We have revised Program 3.17 to include incentives to encourage the development of Large Sites.</p>
B3.6	<p>Infrastructure Availability: The element should clarify if there is sufficient infrastructure capacity to accommodate the RHNA. In addition, if the City is dependent on the expansion of a water treatment facility to accommodate the RHNA, the element must include a program committing to actions and a timeline to make sufficient infrastructure available to accommodate the RHNA.</p>	<p>Added clarifying statement about infrastructure and RHNA capacity.</p>

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B3.7	<p>Annexation Required to Accommodate RHNA: If the City must rely on annexation to accommodate its regional housing need, the element must include a program committing to completing the annexation. In addition, the element must also include an evaluation of the suitability of the annexed sites, including the following information:</p> <ul style="list-style-type: none"> <li>•consistency with LAFCO policies;</li> <li>•actions to pre-zone prior to annexation;</li> <li>•descriptions of the zone, density, development standards and design requirements;</li> <li>•the anticipated housing capacity allowed by each site;</li> <li>•timeline to complete annexation which is early enough in the planning period to facilitate development of annexed sites (e.g., within the first two years of the planning period);</li> <li>•analysis of the suitability and availability of sites including identification of any known barriers to development in the planning period such as conservation easements or conditions under Williamson Act contracts; and</li> <li>•if necessary, demonstrate compliance with the requirements of the adequate sites program requirements of Government Code section 65583.2, subdivisions(h)and (i).</li> </ul> <p>Instead of relying upon annexation, the City may utilize other sites within existing City boundaries. For example, nonvacant sites or existing nonresidential zoned sites within the current City boundaries could be re-zoned to appropriate residential zoning designations and densities to accommodate the regional housing need. Or existing residential zoned sites within the current City boundaries could be re-zoned to residential zoning designations with higher densities to accommodate the regional housing need. If choosing these alternatives, the element must describe the suitability of these sites and include programs committing to completing the rezoning early in the planning period (e.g., within three years of the beginning of the planning period). For additional information, see the <i>Building Blocks</i> at <a href="https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/inventory-of-land-suitable">https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/inventory-of-land-suitable</a>.</p>	<p>We have added the required information to the discussion of Annexation Sites. Please see pages 185 and 186.</p> <p>We have added Program 1.7 to address annexations. The program details the remaining steps in the annexation process and commits the City to zone appropriate acreage within lower income annexation sites in compliance with Government Code section 65583.2(h) and (i).</p>
B3.8	<p>Previously Identified Nonvacant and Vacant Sites: If nonvacant sites identified in a prior adopted housing element or vacant sites identified in two or more consecutive planning periods, the sites are inadequate to accommodate housing for lower-income households unless:</p> <ul style="list-style-type: none"> <li>•The site's current zoning is appropriate for the development of housing affordable to lower-income households by either including analysis or meeting the appropriate density and</li> <li>•The site is subject to a housing element program that requires rezoning within three years of the beginning of the planning period to allow residential use by right for housing developments in which at least 20 percent of the units are affordable to lower-income households. (Gov. Code, § 65583.2, subd. (c).)</li> </ul>	We have added the appropriate language to Program 1.1.

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B3.9	Environmental Constraints: While the element generally describes potential environmental constraints, it must still describe any other known environmental or other conditions that could impact housing development on identified sites in the planning period (e.g., shape, access, contamination, easements, conditions, compatibility).	Section added on environmental constraints on the Sites Inventory sites.
B3.10	Electronic Sites Inventory: For your information, pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD. Please see HCD's housing element webpage at <a href="https://www.hcd.ca.gov/community-development/housing-element/index.shtml#element">https://www.hcd.ca.gov/community-development/housing-element/index.shtml#element</a> for a copy of the form and instructions. The City can reach out to HCD at <a href="mailto:sitesinventory@hcd.ca.gov">sitesinventory@hcd.ca.gov</a> for technical assistance.	Noted. We will provide the form with our next submission.
B3.11	• <i>Emergency Shelters</i> : The element should clarify whether emergency shelters are permitted without discretionary action, discuss status (vacant vs nonvacant) and reuse or redevelopment opportunities, proximity to services, and list and evaluate development standards and capacity as potential constraints. In addition, the element must comply with the requirements of Chapter 654, Statutes of 2022 (AB 2339). For more information, please see HCD's guidance at <a href="https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/ab2339-notice.pdf">https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/ab2339-notice.pdf</a> .	We have revised the analysis of emergency shelters beginning on page 89. The analysis includes findings/standards required of emergency shelters and identifies constraints within them. We have also added an analysis of compliance with AB 2339.  We have added actions to Program 5.2 committing the City to updating the zoning code for compliance with AB 2339.
B3.12	• <i>Low Barrier Navigation Centers (LBNC)</i> : LBNC's shall be a use by-right in zones where multifamily and mixed uses are permitted, including non-residential zones permitting multifamily uses pursuant to Government Code section 65660. While the element provides information on how LBNC's are allowed, the City conditional use permit (CUP) requirement in non-residential zones is not in compliance with state law; therefore, the City must add a program as appropriate.	We have revised our analysis to identify this constraint (see page 93).  We have also added an action to Program 5.8 committing the City to allows LBNCs by right (without conditional use or other discretionary permit) in nonresidential zones permitting residential uses.
B4.1	Land Use Controls: The element must identify and analyze the impact of all relevant land use controls as potential constraints on a variety of housing types in all zones that allow residential uses, including commercial zones open to residential uses. The analysis should address any impacts on cost, supply, housing choice, feasibility, timing, approval certainty, and ability to achieve maximum densities and include programs to address identified constraints. Specifically, the element should analyze minimum lot size, and height requirements in multifamily, commercial, and mixed-use zones. For example, in the R-M-3 zone, minimum lot requirements require a two-acre minimum. Requiring such a large lot size could pose a constraint on multifamily development. Lastly, the element should evaluate current parking standards (p. 101) as a constraint and include a program to mitigate the constraint.	We have added cumulative analyses of development standards by zone type, beginning on pages 104-105. We have identified the lot size requirement for the R-M zones as a constraint within the analysis, and have added an action to Program 5.8 committing the City to revise the zoning code in response to this constraint.  Related to parking: We have identified parking requirements as a constraint to the development of studios, 1-bedroom units, and affordable mf housing (see pages 106-107). Program 5.8 commits the City to updating parking requirements for these housing types to no more than one space per unit.

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B4.2	Local Processing and Permit Procedures: While the element outlines decision-making criteria and offers a general overview of processing timeframes, it should describe and analyze processing times and the procedures for a typical single-family and multifamily development that is consistent with zoning. The analysis should address the approval body, the number of public hearings, if any, approval findings, and any other relevant information. In addition, the analysis should address impacts on housing cost, supply, timing, and approval certainty.	The required data is provided in tables 48 and 49. We have added an analysis of this data to page 117 under the heading "Typical Processing Times"
B4.3	In addition, the element indicates multifamily development in zones permitting multifamily development require a CUP for projects greater than 80 units. The element must analyze the CUP process as a potential constraint on housing supply and affordability. The analysis should identify findings of approval for the CUP and their potential impact on development approval certainty, timing, and cost. The element must demonstrate this process is not a constraint or it must include a program to address and remove or mitigate the CUP requirement. For additional information, see the <i>Building Blocks</i> at <a href="https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/processing-and-permitting-procedures">https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/processing-and-permitting-procedures</a> .	We have included a program action committing the City to raising the CUP threshold to 200. Please see Program 1.3. We brought this to the attention of HCD during a Zoom meeting on November 9, 2023, and HCD staff informally indicated that this action sufficiently addresses this comment.
B4.4	In addition, the element should clarify how approval certainty is facilitated for residential projects in the OC and CMU zones. Currently, the element mentions projects in these zones are evaluated on a per-project basis in the absence of development standards (p. 85).	We have revised the analysis of zoning for multifamily housing types beginning on page 86.
B4.5	Finally, the element should discuss compliance with the Permit Streamlining Act and intersections with CEQA and timing requirements, including streamlining determinations and add or modify programs as appropriate.	We have added a discussion of compliance with the Permit Streamlining Action and CEQA timing requirements to page 118.  We have also added Program 5.11 committing the City to adopt a process that ensures compliance with the Permit Streamlining Action and CEQA timing requirements.
B4.6	Fees and Exaction: The element should describe and analyze fees as a proportion of the development costs for both single-family and multifamily housing. Based on the outcomes of the analysis, the element should include programs to address identified constraints.	We have added the required analysis under the heading Development Fees and other Exactions on page 121.
B4.7	Housing for Persons with Disabilities (Reasonable Accommodation): The element describes the City currently has a procedure for requesting and granting reasonable accommodation for persons with disabilities; however, the element should also describe approval findings and the process for providing reasonable accommodations.	We have updated the analysis of reasonable accommodation on pages 124 and 125. In response to potential constraints, we have revised Program 5.8 to include commitment to amending the Municipal Code to provide a ministerial process for approving reasonable accommodation requests, including objective findings for approval.
B4.8	Zoning and Fees Transparency: The element must clarify its compliance with new transparency requirements for posting all zoning, development standards, and fees for each parcel on the jurisdiction's website pursuant to Government Code section 65940.1(a)(1)(A) and (B)).	We have added text clarifying compliance under the heading "Zoning and Fees Transparency" on page 124.

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B5.1	Permit Times and Request for Lesser Densities: The element must include analysis of requests to develop housing at densities below those identified in the site inventory; and the length of time between receiving approval for a housing development and submittal of an application for building permits. The element must address any hinderance on the development of housing and include programs as appropriate.	We have included required analyses under the heading "Requests to Develop Below Identified Densities and Approval Times" on page 132.
C1.1	To have a beneficial impact in the planning period and achieve the goals and objectives of the housing element, programs must have discrete timing (e.g., at least annually or by 2025) and specific commitment to housing outcomes and refrain from language such as "explore" while also having discrete timing (e.g., at least annually or by January 2024). The following programs should be revised: <ul style="list-style-type: none"> <li>• Program 1.3: Conditional Use Permit Process</li> <li>• Program 1.4: Housing Education</li> <li>• Program 2.5: Incentives for Infill Affordable Housing</li> <li>• Program 3.2: Multiple Family Developments</li> <li>• Program 3.11: City Incentives for Affordable Housing</li> <li>• Program 3.15: Promoting Accessory Dwelling Units</li> <li>• Program 3.17: Planning for Large Sites</li> <li>• Program 5.9: Special Needs Housing Outreach and Incentives</li> <li>• Program 7.2: Socio-economic Segregation and Concentrations of Low Resources Areas</li> <li>• Program 7.3 Improve Place-Based Strategies</li> </ul>	We have revised each of these programs to include additional details and objectives, as appropriate.
C2.1	As noted in Finding B3, the element does not include a complete site analysis; therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types.	We have added rezone requirements related to previously identified lower income vacant and nonvacant sites to Program 1.1.
C2.2	As a reminder, the element must be revised to include a program to comply with the requirements of the Surplus Land Act. Program goals and objectives must commit to numerical objectives, including affordability, aligned with assumptions in the inventory, and a schedule of actions to facilitate development. In addition, programs to facilitate large lot development must be included. For example, the element can include programs to facilitate and incentivize lot splits.	We have added Program 1.6 to address compliance with the Surplus Land Act.  We have revised Program 3.17 (Large Sites), to provide additional actions facilitating large lot development.
C3.1	In Visalia, 18 percent of renter households are considered overcrowded. While proposed policy and program actions support larger unit types, program metrics, and objectives should be enhanced commensurate with the need. For example, Program 5.6 can go beyond facilitating the construction of 16 units per year.	We have increased the objectives related to large households under Program 5.6 (in combination with Program 5.9).
C4.1	As noted in Findings B4 and B5, 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.	Noted.
C4.2	In addition, Program 1.3 (Conditional Use Permit Process) should be revised to eliminate replace or modify the CUP requirement for projects above 80 units. While the element commits to reviewing this process on an annual basis, CUP processes affect the cost and timing of affordable projects and therefore should be treated as a constraint to housing.	No change necessary. We've raised the threshold to 200 and HCD has informally approved this action.

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C5.1	<p>As noted in Finding B1, the element must include a complete analysis of AFFH. The element must be revised to add goals and actions based on the outcomes of a complete analysis, including listing and prioritization of contributing factors to fair housing issues. Goals and actions must significantly seek to overcome contributing factors to fair housing issues and must include quantifiable metrics and milestones for evaluating progress on programs, actions, and fair housing results. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have specific commitment, milestones, geographic targeting and metrics or numeric objectives and, as appropriate, must address housing mobility enhancement, new housing choices and affordability in higher opportunity areas, place-based strategies for community preservation and revitalization and displacement protection.</p>	<p>Noted.</p> <p>We have added Program 2.7 to promote and encourage missing middle housing and housing mobility.</p> <p>New Housing Choices and Affordability in higher opportunity areas: see Programs 3.2, 3.6, 3.10, 3.11, and 3.17.</p> <p>Place-Based Strategies for Revitalization: emphasized in Programs 7.2 and 7.3.</p> <p>Displacement: we have added an action to Program 7.1 committing the City to adopting an anti-displacement strategy.</p>
C6.1	<p>Program 5.8 (Municipal Code Updates): Accessory Dwelling Units (ADU) must be permitted in all zones that allow residential uses. In addition, and in the interim, until the City adopts an ADU ordinance compliant with state law, the element should commit to defer to state ADU and Junior Accessory Dwelling Unit (JADU) laws.</p>	<p>We have added the required language to Program 5.8.</p>
D1.1	<p>As a reminder, public participation in the development, adoption, and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City must continue to engage the community, including organizations that represent lower-income and special-needs households, by making information regularly available and considering and incorporating comments where appropriate. Moreover, the City's consideration of public comment shall not be restricted by the findings in this review. Lastly, the element must be revised to include how feedback was considered and incorporated into the draft element following the City's second community workshop.</p>	<p>Noted.</p> <p>We will continue to seek and incorporate input from residents, stakeholders, and organizations that represent lower-income and special needs households.</p> <p>We have updated the public input summary in the Introduction to include a description of how feedback from Workshop #2 was incorporated into the Housing Element. Please see page 24.</p>

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