

# Notice of Determination

## Appendix D

**To:**

Office of Planning and Research  
 U.S. Mail: \_\_\_\_\_ Street Address: \_\_\_\_\_  
 P.O. Box 3044 1400 Tenth St., Rm 113  
 Sacramento, CA 95812-3044 Sacramento, CA 95814

County Clerk  
 County of: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 \_\_\_\_\_

**From:**

Public Agency: City of East Palo Alto  
 Address: 1960 Tate Street  
East Palo Alto, CA 94303

Contact: Amy Chen  
 Phone: (650) 853-3189

Lead Agency (if different from above): \_\_\_\_\_  
 Address: \_\_\_\_\_

Contact: \_\_\_\_\_  
 Phone: \_\_\_\_\_

***SUBJECT: Filing of Notice of Determination in compliance with Section 21108 or 21152 of the Public Resources Code.***

State Clearinghouse Number (if submitted to State Clearinghouse): 2014092027

Project Title: EIR Addendum for East Palo Alto 2023-2031 Housing Element (Vista 2035)

Project Applicant: City of East Palo Alto

Project Location (include county): City of East Palo Alto, San Mateo County, CA

**Project Description:**

The East Palo Alto Housing Element 2023-2031 (Housing Element Update) includes the City's overall Housing Workplan, which addresses the City's identified housing needs, including the regional housing need (RHNA), and includes goals, policies, and programs related to housing. The Housing Element Update (6th Cycle, or RHNA 6), part of the General Plan, is a comprehensive review and update to the previous Housing Element which covered the 5th Cycle 2015-2022 planning period. +

This is to advise that the City of East Palo Alto has approved the above  
 Lead Agency or  Responsible Agency)

described project on March 19, 2024 and has made the following determinations regarding the above  
 (date)  
 described project.

1. The project [ will  will not] have a significant effect on the environment.
2.  An Environmental Impact Report was prepared for this project pursuant to the provisions of CEQA.  
 A Negative Declaration was prepared for this project pursuant to the provisions of CEQA.
3. Mitigation measures [ were  were not] made a condition of the approval of the project.
4. A mitigation reporting or monitoring plan [ was  was not] adopted for this project.
5. A statement of Overriding Considerations [ was  was not] adopted for this project.
6. Findings [ were  were not] made pursuant to the provisions of CEQA.

This is to certify that the final EIR with comments and responses and record of project approval, or the negative Declaration, is available to the General Public at:

<https://www.cityofepa.org/housing/page/housing-element-update-1>

Signature (Public Agency):  Title: Director

Date: March 19, 2024 Date Received for filing at OPR: March 20, 2024

**City of East Palo Alto**  
**2023-2031 Revised Housing Element (6<sup>th</sup> Cycle)**

**CEQA Addendum**

Addendum to EIR SCH No. 2014092027

*Prepared for*  
City of East Palo Alto  
1960 Tate Street  
East Palo Alto, CA 94303

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**February 2024**

**Kimley»»Horn**

# Table of Contents

<b>Summary of Findings and Conclusions</b>	<b>1</b>
<b>Introduction</b>	<b>5</b>
<b>Project Description</b>	<b>6</b>
<b>Environmental Analysis and Findings</b>	<b>8</b>

## Attachments

- A. East Palo Alto 2023-2031 Housing Element Program Review and Environmental Matrix
- B. East Palo Alto General Plan Update Final EIR, August 2016

# East Palo Alto Revised Housing Element

## CEQA Addendum – Summary of Findings and Conclusions

### Project Description Summary

The City of East Palo Alto Revised Housing Element 2023-2031 (Housing Element Update) includes the City’s overall Housing Workplan, which addresses the City’s identified housing needs and includes goals, policies, and programs concerning housing and housing-related services. A central component to the plan is the City’s approach to addressing its share of the regional housing need (RHNA). The Housing Element Update (6<sup>th</sup> Cycle, or RHNA 6) is a comprehensive review and update to the previous Housing Element which covered the 5<sup>th</sup> Cycle 2015-2022 planning period (RHNA 5).

As a required element of the General Plan, the Revised Housing Element is an integral component of the General Plan which shares land use and housing assumptions. Material changes to the General Plan (and Housing Element) are considered a “project” under the California Environmental Quality Act (CEQA).

To satisfy and exceed their RHNA allocation, the City prepared a parcel-specific land inventory that includes sites capable of accommodating the assigned RHNA allocation through a variety of methods. For the eight-year planning cycle, the City’s 6<sup>th</sup> Cycle RHNA allocation is 829 additional housing units, including: 159 moderate-income units, 410 above moderate-income units, 165 very low-income units, and 95 low-income units. The City’s Sites Inventory significantly exceeds the City’s RHNA 6 units in all income categories with buffers of 152% for Very Low-Income Units, 420% for Low-Income Units, 101% for Moderate-Income Units and 133% for total units. These units represent fully entitled projects or projects with active developer interest and a pending application.

### Prior CEQA Analysis

#### City of East Palo Alto General Plan Update Final Environmental Impact Report

A Final Environmental Impact Report (EIR) was certified by the East Palo Alto City Council in August 2016. This document (SCH #2014092027) analyzed the impacts of implementing the Vista 2035 General Plan land use plan, goals, and policies. Similar to most general plan CEQA documents, this EIR was prepared at a programmatic level of detail, anticipating gradual buildout and implementation of specific projects over time. See **Attachment B: East Palo Alto General Plan Update Final EIR**.

The last cycle of the Housing Element was adopted in May 2015. The General Plan acknowledges that the Housing Element, while a required element of the General Plan, is a stand-alone section that requires more regular updates. As the General Plan and Housing Element were prepared on a similar timeline, the basic assumptions for housing units for the 2015 Housing Element were included in the General Plan and its associated environmental review.

## CEQA Analysis in this Document

The City of East Palo Alto has determined that an Addendum to the previously certified General Plan EIR is the appropriate level of CEQA review for the current (2023) update to the Housing Element. This Addendum has been prepared pursuant to CEQA Section 21166 and CEQA Guidelines Sections 15162 and 15164. The City has prepared a comparison of the housing assumptions of the General Plan and prior (2015) Housing Element, to assess if the prior environmental documentation and findings are adequate and whether any further environmental review or documentation is required for the current update.

For analysis purposes, this Addendum recognizes the previously certified EIR as the baseline by which the current project is compared, as that certified EIR provides the policies, programs and mitigation measures that accompany the original approval. **Attachment A, East Palo Alto 2023-3031 Housing Element Update Program Review and Environmental Matrix**, provides additional supporting analysis to demonstrate that changes to the Housing Element Update's programs and programs will not create or exacerbate environmental impacts as identified in the General Plan EIR. The critical test is to determine if the proposed changes, their impacts and the related consequences of future housing development would necessitate "major revisions" to the 2016 General Plan Final EIR.

### No Subsequent Review is Required per CEQA Section 21166 and Guidelines Section 15162

Public Resources Code Section 21166 and CEQA Guidelines Section 15162 identify the conditions requiring subsequent environmental review. After a review of these conditions, the City has determined that no subsequent EIR is required for this project. This is based on the following findings and analysis:

**a) *Are there substantial changes to the Project involving new or more severe significant impacts that would require major revisions to the prior EIR?***

No. The 1,933 new housing units programmed and inventoried in the Housing Element Update is consistent with (and below) the 2,519 new units assumed within the buildout assumptions of the General Plan. In areas of the City where housing intensification is allowed in exchange for community benefits (such as within the Westside Area Plan), that intensification has been (or will be) addressed within project-specific CEQA review as part of the development review process. Because the anticipated level of housing development and the locations for that development (per the adopted Land Use Plan) are not significantly different than those analyzed in the prior EIR, the update will not result in more significant impacts beyond those identified in the EIR and no revisions to the EIR are necessary.

**b) *Are there substantial changes in the conditions which the Project is undertaken involving new or more severe significant impacts?***

No. There are no substantial changes in the conditions assumed in the General Plan and General Plan EIR. The project will not significantly increase the amount or direction of new

housing planned in the City compared to the analysis and assumptions in the certified General Plan EIR, as detailed within this addendum.

Furthermore, physical environmental conditions in the City of East Palo Alto have not substantially changed since certification of the General Plan EIR in 2016. The City is largely built out and the majority of new residential development that is either proposed, in the entitlement process or otherwise considered a “pipeline” project (such as the Ravenswood/4 Corners Specific Plan) are consistent with the residential development pattern identified in the General Plan Land Use Plan.

While impacts resulting from specific housing development projects would occur, such impacts will be addressed through the Final EIR’s mitigation measures, policies and programs of the Housing Element Update, existing laws, and regulations, and/or the City’s development review processes (including project-specific CEQA review). No major revisions to the previously certified EIR are required with these procedures in place.

- c) ***Is there new information of substantial importance, which was not known and could not have been known at the time of the previous EIR that shows the Project will have a significant effect not addressed in the previous EIR; or previous effects are more severe; or, previously infeasible mitigation measures are now feasible but the applicant declined to adopt them; or mitigation measures considerably different from those in the previous EIR would substantially reduce significant effects but the applicant declines to adopt them?***

No. While there is new information of substantial importance available today regarding housing and development in East Palo Alto that was not available in 2016, that information will not affect the findings and conclusions of the previous EIR or result in considerably different mitigation measures or mitigating policies. Information considered new and important includes the City’s current RHNA allocation (increasing from 467 units in the 5<sup>th</sup> cycle to 829 units in the 6<sup>th</sup> cycle) and the processing and/or approval of major development projects such as Woodland Park/Euclid Improvements on the Westside (+444 units), and intensification of the Ravenswood/4 Corners Specific Plan from 835 units assumed in 2015 to 1,350 to 1,600 units being considered in the specific plan update that is now under evaluation.

These circumstances will not affect the previous EIR because these projects (and others) are generally consistent with General Plan policies and land use plan, and these projects are subject to their own environmental review processes that have (or will) identify addition mitigation measures specific to those projects. For these reasons, this information will not result in environmental effects or mitigation that are significantly different or more severe than documented in the prior General Plan EIR.

- d) ***If no subsequent EIR-level review is required, should a subsequent negative declaration be prepared?***

If a subsequent approval does not trigger the CEQA Section 21166 factors, CEQA Guidelines Section 15162(b) states that the lead agency “shall determine whether to prepare a

subsequent negative declaration [to an EIR], an addendum, or no further documentation.” Guidelines Section 15164 provides that an addendum to an EIR can be prepared “if some changes or additions are necessary.” An addendum should include “a brief explanation . . . supported by substantial evidence” of why a subsequent EIR was not deemed necessary but there is no required form for an addendum.

This addendum and documentation provide the basis and rationale as to why subsequent environmental review (EIR or negative declaration) is not required. The primary reason is that the Housing Element Update serves to meet or exceed regional housing needs, the housing units assumed in the update are consistent with General Plan buildout and General Plan policy, and separate project-specific environmental (CEQA) review has already (or is currently underway) for specific development projects that are proposing new housing units.

## Conclusion

This Addendum has been prepared pursuant to CEQA Guidelines Section 15164 based on the supporting documentation and reasoning provided herein and included in Attachment A. Through the approval of this Addendum, the City determines that the changes to the General Plan (as proposed by the current Revised Housing Element) do not require a subsequent or supplemental EIR or Negative Declaration under Public Resources Code Section 21166 or CEQA Guidelines Sections 15162 and 15164.

As provided in Section 15164 of the CEQA Guidelines, this Addendum need not be circulated for public review, but shall be considered with the prior environmental documents before making a decision on the current project.

For any action or approval to be taken by the City on the proposed project, this Addendum shall be considered together with the previously certified Vista 2035 General Plan Final EIR (Attachment B). All documents are available from the City of East Palo Alto Community Development Department.

# East Palo Alto Housing Element Update

## EIR Addendum – Supporting Information and Analysis

### Introduction

#### Lead Agency

The City of East Palo Alto (City) has assumed the lead agency role under the California Environmental Quality Act (CEQA) and is responsible for preparing this environmental review document (Addendum) for the proposed update to the City’s 6<sup>th</sup> Cycle Housing Element Update (HEU).

This document has been prepared in conformance with CEQA (California Public Resources Code [“PRC”] §21000 et seq.), the State CEQA Guidelines (California Code of Regulations [CCR], Title 14, §15000 et seq. (“CEQA Guidelines”), and the rules, regulations, and procedures for the implementation of CEQA.

CEQA requires all public agencies to consider the environmental consequences of projects for which they have discretionary authority. For the purposes of CEQA, the term “project” refers to the whole of an action, which has the potential for resulting in a direct physical change or a reasonably foreseeable indirect physical change in the environment (CEQA Guidelines §15378[a]).

#### Statutory Requirements

CEQA Guidelines Section 15162 provides that when and EIR has been certified for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence, that:

- Substantial changes are proposed in the project that would require major revisions to the prior EIR due to new significant environmental effects;
- Substantial changes have occurred with respect to the circumstances associated with the project that would cause major revisions to the EIR due to new significant environmental effects; or
- New information of substantial importance which was not known and could not have been known at the time the previous EIR was certified show that the project would have more significant effects, more severe effects or require substantially different mitigation measures.

Guidelines Section 15164 provides that an addendum to an EIR can be prepared “if some changes or additions are necessary” to an EIR, but none of the conditions in Section 15162 are triggered. An addendum is appropriate when only minor technical changes or additions are necessary (15164(b)). An addendum should include “a brief explanation . . . supported by substantial



evidence” of why a subsequent EIR was not deemed necessary. There is no required form for an addendum, and public review of an addendum need not be circulated for public review.

## **Project Background and Previous Approvals**

The California State Legislature has identified the attainment of a decent home and suitable living environment for every resident as the State’s major housing goal. Recognizing the important role of local planning programs in the pursuit of this goal, the Legislature has mandated that all cities and counties prepare a Housing Element as part of the comprehensive General Plan. Section 65583 of the Government Code sets forth the specific components to be contained in a Housing Element. State law further requires Housing Elements be updated at least every eight years to reflect the changing housing needs of a community. As East Palo Alto’s Housing Element was last updated in 2015, this Update is for the planning period of 2023-2031.

## **Project Description**

The City of East Palo Alto Revised Housing Element 2023-2031 (Housing Element Update) includes the City’s overall Housing Workplan, which addresses the City’s identified housing needs and includes goals, policies, and programs concerning housing and housing-related services. A central component to the plan is the City’s approach to addressing its share of the regional housing need (RHNA). The Revised Housing Element 2023-2031 (6<sup>th</sup> Cycle, or RHNA 6) is a comprehensive review and update to the previous Housing Element which covered the 5<sup>th</sup> Cycle 2015-2022 planning period (RHNA 5). This update addresses all subjects required by Section 65583 of the Government Code, but also provides a focused, in-depth snapshot of the City’s changing demographics, economics, and urban characteristics. The update addresses and updates city-specific market shifts, risk of displacement, income and affordability, constraints to housing, a fair housing assessment and affirmation, detailed inventory of housing projects and sites, and a progress report from the perspective of the RHNA 5 Housing Element period. The City’s outreach and public participation process was extensive and inclusive, despite the challenges presented by COVID-19 and the effort required to reach a culturally rich community that includes a large population of non-English speakers.

To satisfy and meet their RHNA allocation, the City prepared a parcel-specific land inventory that includes sites capable of accommodating (and exceeding) the RHNA allocation through a variety of methods, including: (1) identification of additional increased capacity on existing, residentially zoned sites; (2) identification of residential property for potential rezoning to higher-density residential primary use; (3) identification of non-residential property for rezoning to residential primary use; (4) development of approved and/or anticipated projects which do not have certificates of occupancy; and (5) future development of accessory dwelling units (ADUs). The total number of units, by income category, must meet or exceed the City’s RHNA.

For the eight-year planning cycle, the City’s 6<sup>th</sup> Cycle RHNA allocation is 829 additional housing units, including: 159 moderate-income units, 410 above moderate-income units, 165 very low-income units, and 95 low-income units. The City’s Sites Inventory significantly exceeds the City’s RHNA 6 units in all income categories with buffers of 152% for Very Low-Income Units, 420% for

Low-Income Units, 101% for Moderate-Income Units and 133% for total units. These units represent fully entitled projects or projects with active developer interest and a pending application.

The number of total estimated units over the RHNA 6 period from all sites included in the Sites Inventory, also referred to as “Housing Opportunity Sites,” is summarized in **Table 1** below. These Housing Opportunity Sites serve as quantified objectives because they provide the maximum number of housing units that can be constructed and redeveloped in the City over an eight-year timeframe. For the 2023-2031 housing cycle, the City’s quantified objectives for construction are 1,794 units, with 704 of those being affordable to East Palo Alto residents (very low income or low income).

<b>Table 1: Total Units from Sites Inventory vs. RHNA 6 Requirements</b>					
	<b>VLI</b>	<b>LI</b>	<b>MOD</b>	<b>Above-Mod</b>	<b>Total</b>
<b>Housing Opportunities (total sites, pipeline projects and ADUs)</b>	415	493	319	706	1,933
<b>RHNA 6</b>	165	95	159	410	829
<b>Buffer Units (exceeding RHNA 6)</b>	250	398	160	296	1,104
<b>Buffer Units (percent exceeding RHNA 6)</b>	152% over	420% over	101% over	72% over	133% over

*Source: Housing Element Table 5.1. Total includes pipeline projects, opportunity sites and Accessory Dwelling Units (ADUs)*

The East Palo Alto Sites Inventory or Housing Opportunity Sites contains many “pipeline units,” or units within projects that have been entitled or received ministerial Zoning Clearance for ADUs and SB 9 and SB 35 Zoning Clearance, and that are expected to apply for a building permit or begin construction after July 1, 2022, or in subsequent years. All such units are included in the Sites Inventory and will count towards the 6th RHNA cycle. Taking these units into consideration, the City can meet and exceed the RHNA in every category.

For other sites in the Sites Inventory, there is an active development application with a high level of confidence that they will lead to the construction of new units within the eight-year Housing Element cycle (2023-2031). Or, there is significant developer interest and potential feasibility, but development of residential units is pending rezoning of the parcel. For these reasons, in many cases, the development proposal or preapplication was used to calculate the realistic capacity of certain sites.

The Revised Housing Element 2023-2031 includes policies that would accommodate implementation measures to meet and exceed the City’s RHNA allocation. The Project does not include the actual implementation measures and/or development of the housing units, which would be subject to future environmental evaluation as a part of the City’s normal development review process.

As a required element of the General Plan, the Housing Element is an integral component of the General Plan which shares land use and housing assumptions. Material changes to the General Plan (and Housing Element) are considered a “project” under the California Environmental

Quality Act (CEQA), and an update to the Housing Element constitutes an amendment to the adopted General Plan.

Within the certified General Plan EIR's Project Description (Final EIR page 3-20), a narrative description of the Revised Housing Element is provided. This narrative provides general information regarding housing needs, policies, actions, and objectives regarding housing issues such as housing affordability, conditions, and constraints. This narrative is generally consistent with the 2023-2031 update. Because this narrative does not provide specific or quantified information, no revisions to the certified EIR's Project Description are necessary.

## **Environmental Analysis and Findings**

The discussion below analyzes the potential environmental impacts of the project per the criteria as described in Public Resources Code Section 21166 and CEQA Guidelines Sections 15162 and 15164.

This analysis identifies the relative changes in potential environmental effects that could occur with construction and operation of the proposed project compared to the assumptions in the certified General Plan EIR.

### **Comparison of Projected Housing Units**

In general, if the housing units assumed in the Housing Element Update for this cycle (2023-2031) are consistent with the policies, buildout assumptions and land use plan of the Vista 2035 General Plan, it is assumed that the environmental consequences of the Housing Element Update would not be significantly different than analyzed in the General Plan EIR, and therefore no significant changes to that EIR would be required.

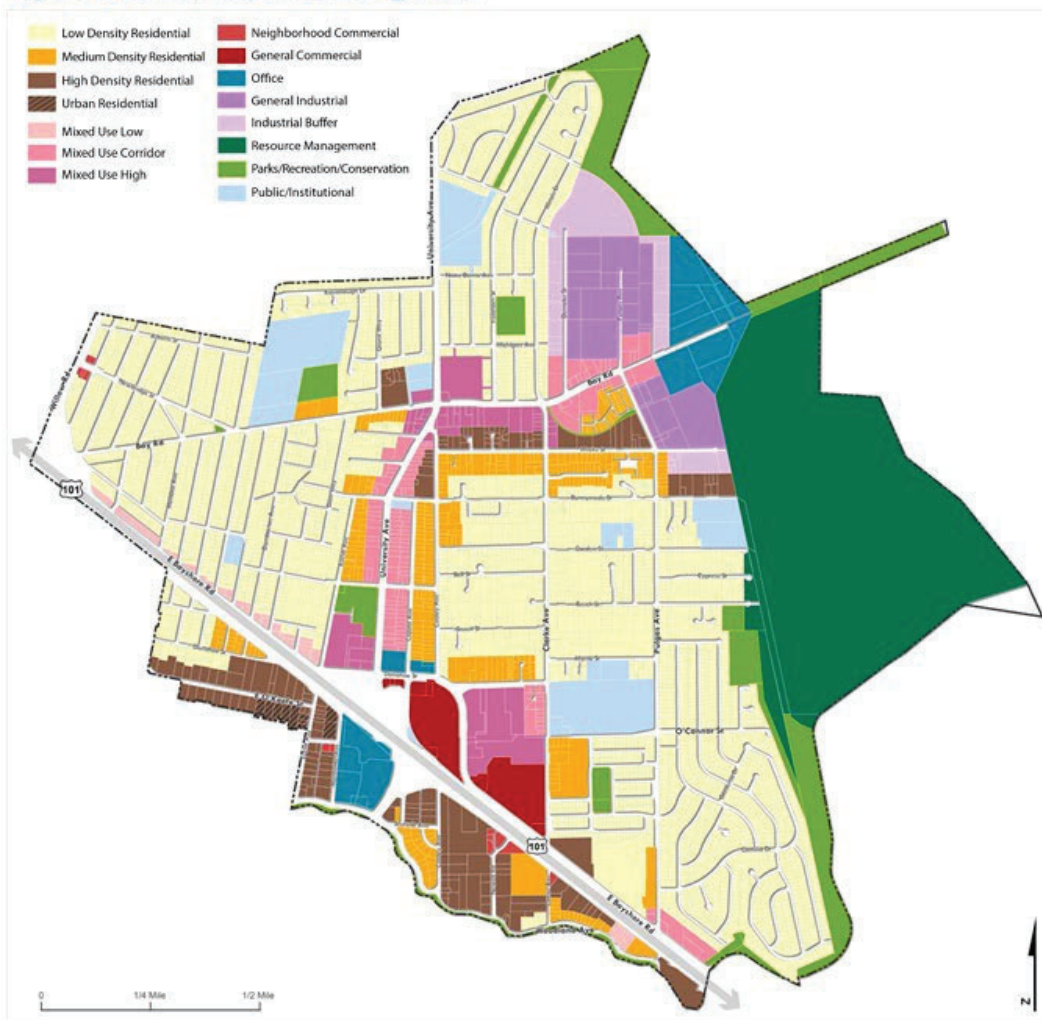
Based on the General Plan EIR Table 3-3 below, the General Plan could potentially yield an additional 2,519 new housing units citywide. The diagram below also shows the General Plan's land use designations (General Plan Figure 4-2), including the proposed location of existing and future housing.

**Table 3-3 Anticipated Growth Under General Plan Update**

District/Area	Net New Units	Net Retail	Net Office	Net Industrial
Ravenswood/4 Corners Area	835	112,400 sq. ft	1,235,853 sq. ft	267,987 sq. ft
Westside	900	45,000 sq. ft	0	0
2nd units on single-family parcels	119	0	0	0
All Other Areas Citywide	665	176,006 sq. ft	704,000 sq. ft	0.
<b>TOTAL</b>	<b>2,519</b>	<b>333,406 sq. ft</b>	<b>1,939,853 sq. ft</b>	<b>267,987 sq. ft</b>

Source: Raimi + Associates, 2015

**Figure 4-2: General Plan Land Use Designations**



The General Plan’s anticipated addition of 2,519 units over a 20-year period would equate to an average addition of 126 units per year. By comparison, the Housing Element Update is anticipating 1,933 additional units during the eight-year 6<sup>th</sup> Cycle (2023-2031), or an average of 241 units per year. In reality, however, housing units do not materialize in average units, but instead are driven by housing demand and market conditions, as balanced by City policies and housing constraints.

In East Palo Alto, many of the units planned in the General Plan (Table 3-3) have not yet been built, such as those in the Ravenswood/4 Corners Specific Plan and most of the 900 units assumed in the Westside Area. As a result, East Palo Alto has been “slow to grow” in recent years, despite the number of larger pipeline projects on the horizon. The Housing Element Update represents a realistic acceleration of housing development, as the City catches up on its inventory through these key pipeline projects that are already in the entitlement process. The total projected housing inventory of 1,933 units, however, clearly falls within the City’s planned 20-year inventory of 2,519 new units as analyzed in the General Plan EIR. This is true even when accounting for 251 additional units provided since the General Plan and Housing Element were last adopted. General Plan adoption (2016) corresponds with the Housing Element 5<sup>th</sup> Cycle (2015-2022)<sup>1</sup>.

Furthermore, the location of these future housing units remains generally consistent with the locations assumed in the General Plan Land Use Plan. Where the Housing Element inventory assumes rezoning or intensification, policies have been established to require additional review and analysis as projects are proposed. As a result, there would be no significant increase in housing or related physical development and no significant changes in the physical locations assumed for these housing units as analyzed in the prior EIR as certified. Therefore, the Housing Element Update would result in no changes required to the content or conclusions of that EIR.

For CEQA purposes all previous findings of the prior EIR would be expected to be similar, and all previously adopted mitigation measures and General Plan programs and policies would remain applicable to the Housing Element Update.

The potential effects of General Plan implementation and future housing development are addressed throughout the General Plan EIR but are most clearly detailed in chapter 4.12 (Population and Housing). As concluded in the EIR (page 4.12-17), while the General Plan Update would allow for substantial housing and population growth, the Plan creates a policy framework intended to ensure that such housing and population growth would be consistent with public service levels, infrastructure availability, and community goals. Therefore, adherence to the aforementioned mitigation measures and the goals, policies, and implementation actions of the General Plan would render impacts from housing and population growth less-than-significant by CEQA standards.

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<sup>1</sup> Housing Element 2023, Table 7.3.

## Consistency with Other City Plans

The Housing Element Update is a required Element of the City of East Palo Alto General Plan, which was updated in 2015. The changes proposed by this Housing Element update were reviewed against the General Plan, Vista 2035, and found to be consistent. City-wide zoning is consistent with the General Plan because the City of East Palo Alto is a general law City. Additionally, while the Housing Element is not currently consistent with the Ravenswood Business District/Four Corners transit-oriented development Specific Plan (RBD), this plan is also undergoing a targeted update expected for completion in 2024. The proposed housing sites, policies and programs, and any other aspects of the Housing Element update that are related to the RBD—including the rezoning program planned for 2024—will be consistent with the final updated Specific Plan.

State law requires the General Plan land use designation for properties to be consistent with the corresponding zoning designation for a property. Along with a program in the Housing Element to update the RBD Specific Plan to resolve any existing General Plan/zoning inconsistencies, a general program is included to ensure General Plan/zoning consistency and consistency between General Plan Elements during the 6th cycle Housing Element for all sites included in the City's RHNA Sites Inventory. Any proposed zoning or General Plan amendment whether associated with a development proposal or a plan update would be reviewed for consistency with existing General Plan policies and zoning standards with additional amendments identified if necessary to maintain consistency.



<p style="text-align: center;"><b>Summary of RHNA 6 Goals, Objectives, and Policies &amp; Programs</b></p>	<p style="text-align: center;"><b>Summary of Determination the Program is consistent with State CEQA Guidelines §15164 regarding use of an Addendum to an EIR</b></p>
<p style="text-align: center;"><b>Goal 1: Create more housing opportunities, and more housing that is affordable to East Palo Alto residents.</b></p>	
<p><b>Policy 1.0:</b> Track and review planning approval and building permit processes for residential projects. Establish actions for streamlining, clarifying, and simplifying the approval and permit processes, including the design review process. Seek input from developers and other stakeholders to identify ways to improve and streamline development review.</p>	<p>This Policy Action addresses the City’s support for construction of residential projects in the City through streamlined development review. This Policy Action does not result in direct housing development. Therefore, this Policy would not modify the conclusions made in the Vista 2035 General Plan EIR or result in physical environmental impacts.</p>
<p><b>Objective:</b> Implement measures to reduce overall processing times for residential development applications while maintaining robust community outreach and engagement.  <i>Lead: Planning, Building and Code Enforcement</i></p>	<ul style="list-style-type: none"> <li>• <i>Target: Strive for the following planning application processing timelines by the end of the planning period:</i> <ul style="list-style-type: none"> <li>o <i>Ministerial/By-Right: 1-3 months from a complete application</i></li> <li>o <i>Discretionary - Planning Commission approval authority: 4-6 months from a complete application, not including projects appealed to City Council</i></li> <li>o <i>Discretionary - City Council approval authority: 6-9 months from a complete application, not including projects with extenuating conditions (e.g., projects with an environmental impact report, development agreement, or tenant relocation plan, or during periods of reducing staffing).</i></li> </ul> </li> </ul>

**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

	<p><b>Policy 1.1:</b> Develop objective development and design standards that will be consistent with adopted findings of approval for all single-family and multi-family developments that simplify, clarify, and improve approval certainty and reduce the time for permit processing. Establish a time schedule for expedited ministerial or administrative approval of projects that comply with objective design standards, zoning standards, and development regulations. Ensure compliance with SB35, SB330, Housing Accountability Act, and other applicable state laws for qualifying projects.</p>	<p>This Policy Action addresses development standards and development review processes concerning residential development. This Policy Action is intended to programmatically expedite the development of affordable housing in the City. However, it does not result in the approval of site-specific projects or the construction of such projects. Therefore, this Policy Action would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>
	<p><b>Policy 1.2:</b> Implement existing processing guidelines for projects that qualify for by-right, ministerial, or administrative approval and CEQA exemption under SB 35, SB 330, Housing Accountability Act, and other applicable state laws.</p>	<p>This Policy Action only addresses the development approval process for projects that meet the requirements of SB 35, SB 330, Housing Accountability Act, and other applicable state laws. This Policy Action would facilitate more efficient approval of affordable housing projects in the City. However, it does not result in the approval of site-specific projects or the construction of such projects. Therefore, this Policy Action would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>
	<p><b>Program 1.3:</b> Review and adjust building permit review and approval procedures as needed to comply with streamlining requirements in AB2234.</p>	<p>This Program only addresses updating the development review and approval process to comply with AB 2234. This Program would facilitate more efficient approval of affordable housing projects in the City. However, it does not result in the approval of site-specific projects or the construction of such projects. This Program would not modify the conclusions made in the Vista 2035 General Plan EIR or result in physical environmental impacts.</p>



**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

<p><b>Objective:</b> Incentivize affordable housing development.</p> <p><i>Leads: Planning, Housing and Economic Development</i></p>	<p><b>Policy 1.4:</b> Develop standards to prioritize, incentivize, and expedite processing of residential projects that commit housing units for special needs populations such as the developmentally disabled, single-female head of households, at-risk youths, large family households, extremely low-income households, and unhoused individuals.</p>	<p>This Policy Action addresses the development of housing projects that meet the needs of special needs populations by facilitating expeditious development review. However, it does not result in the approval of site-specific projects or the construction of such projects. This Policy Action may result in minor technical changes but would not modify conclusions of the Vista 2035 General Plan EIR. Therefore, this Policy Action would not result in physical environmental impacts.</p>
	<p><b>Policy 1.5:</b> Pursuant to Government Code 65583.2 (h) and (i), sites that require rezoning to meet the RHNA for lower-income households and sites carried over from the 2015-2023 Housing Element to accommodate the needs of lower-income households shall be rezoned within the statutory deadline prescribed in Government Code 65583.2 (c). The rezoning shall commit to 20% lower-income units, minimum densities, and objective development standards, and complying projects shall not require discretionary approval. One site is carried over from the 2014-2022 Housing Element – a 0.65-acre parcel at 851 Weeks with an existing zoning of 22-40 units/acres. If a project contains at least 20% lower-income units and complies with objective development standards, discretionary approval shall not be required. On December 1, 2023, a qualifying SB 35 application for a 100% affordable housing project with 79 lower-income units was approved by the City.</p> <ul style="list-style-type: none"> <li>• <i>Target: For 851 Weeks, approve SB35 project or designate site for by-right approval for a qualifying project by Spring 2024.</i></li> </ul>	<p>This Policy Action addresses the rezoning of sites to accommodate needs of lower-income households and to encourage affordable housing development. This Policy Action does not result in direct housing development. Further, any housing development facilitated from the rezoning would be subject to the City's development review and plan check process, or shall be exempt from discretionary approval if the project meets specific criteria consistent with State law. This Policy Action may result in minor technical changes related to approval process of qualifying projects but would not modify conclusions of the Vista 2035 General Plan EIR or result in physical environmental impacts beyond those already under analysis by the City.</p>

**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

	<p><b>Policy 1.6:</b> Seek and support financial resources from state, regional, and county housing programs, tax credits, and other sources that provide funding assistance for affordable housing projects to cover design and development costs and off-site public facility and infrastructure improvements.</p> <ul style="list-style-type: none"> <li>• <i>Target: Annually survey Notices of Funding Availability (NOFAs) and work with developers to apply for funds for affordable housing projects and supporting public improvements. Prioritize assistance for projects in lower-resource areas as defined by AFFH analysis (including, but not limited to, westside of State Highway 101 and south of Bay Road/west of University Avenue).</i></li> </ul>	<p>This Policy Action only addresses financing of affordable housing projects. This Policy Action does not grant funding or directly facilitate development of projects. Therefore, this Policy Action would not result in physical environmental impacts beyond those already under analysis by the City, or change the conclusions of the Vista 2035 General Plan EIR.</p>
<p><b>Objective:</b> Encourage smaller-scale housing that is relatively more affordable, including duplexes/triplexes and market-rate accessory dwelling units (ADUs). <i>Lead: Planning</i></p>	<p><b>Policy 1.7:</b> Develop a “next-phase” streamlining effort for ADUs and JADUs, SB 9 projects, and any future small-development, ministerial approval process that builds on lessons learned from the ADU Streamlining collaboration with EPACANDO and City Systems (See Program 10.5 pertaining to ADU zoning amendments that are necessary to comply with current state laws and for numerical geographical targets.)</p>	<p>This Policy Action addresses the City’s support and accommodation for ADU and similar small-development construction in the City through streamlined development review. This Policy Action does not result in direct housing development. This Policy includes development of a website committed to information related to submit development applications and development of objective design and development standards for unit construction. Therefore, this Policy would not modify the conclusions made in the Vista 2035 General Plan EIR or result in physical environmental impacts.</p>
	<p><b>Policy 1.8:</b> Study feasibility and desirability of waiving or reducing fees or delaying payment of permit fees and development impact fees for ADUs and small projects, e.g., two or fewer units.</p>	<p>This Policy Action only addresses the City’s efforts to facilitate development of small residential projects through reduced fees or alternative payment plans. This Policy Action does not result in direct housing development. This Policy would result in surveys of other San Mateo County jurisdictions to determine potential models for implementation in the City. Therefore, this Policy Action would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>

**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

	<p><b>Program 1.9:</b> Develop outreach materials targeting smaller developers aimed at informing future applicants and improving the quality of Planning and Building applications received.</p>	<p>This Program would support residential developers in preparation of outreach material and improved Planning and Building development applications. This Program does not result in direct housing development. This Program would minimize delays and improve submittal quality to facilitate more efficient review and approval of smaller-scale housing projects and would not modify the conclusions made in the Vista 2035 General Plan EIR. Therefore, this Program would not result in physical environmental impacts.</p>
	<p><b>Program 1.10:</b> Implement a preapproved and modular ADU designs program or participate in proposed 21 Elements clearinghouse to facilitate streamlined review and reduce design costs of ADUs.</p>	<p>This Program addresses the City’s efforts to streamline review and reduce costs associated with ADU development. This Policy Action does not result in direct housing development. This Policy/Program would require collaboration with the City’s ADU Working Group to develop design recommendations. Therefore, this Program would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>
	<p><b>Program 1.11:</b> Develop proposals for relaxing or allowing flexible zoning standards (e.g., building setbacks and height, open space, parking, and density) to facilitate the developing of SB 9 and small infill housing projects to increase housing opportunities and housing types throughout the community.</p> <ul style="list-style-type: none"> <li>• <i>Target: Assist property owners to approve eight (8) SB9 units during the 6th cycle Housing Element Period; focus on opportunities sites in lower-density residential neighborhoods (e.g., under-utilized lots over 10,000 square feet in size.)</i></li> </ul>	<p>This Program only addresses the City’s efforts to facilitate development of small residential projects by relaxing applicable zoning standard, where feasible. This Program would result in review of existing standards and potential modifications but would not result in direct housing development. Therefore, this Program may result in minor technical changes but would not modify conclusions of the Vista 2035 General Plan EIR or result in physical environmental impacts.</p>

**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

<p><b>Objective:</b> Incentivize production of deed-restricted ADUs, including deed-restricted units, to add to the City's affordable housing stock.</p> <p><i>Leads: Planning, Housing and Economic Development</i></p>	<p><b>Program 1.12:</b> Develop an expedited legalization process for unpermitted second units. Identify zoning amendments to reduce the impediment to building ADUs, such as setback and open space standards. Identify potential funding sources as assist.</p> <p><b>Policy 1.13:</b> Support and participate in a potential county-wide initiative to create a resource center to effectively educate homeowners, provide resources, and promote the construction of ADUs.</p> <p><b>Policy 1.14:</b> Seek available public and private sources of rehabilitation/repair funding and strengthen partnership with organizations (e.g., Habitat for Humanity, Rebuilding Together, and others) to produce ADUs. Seek assistance for correcting code compliance issues to legalize or upgrade existing ADUs.</p> <ul style="list-style-type: none"> <li>• <i>Target: Annually research available funds and partnerships, and implement incentives with the goal of approving at least 115 new or legalized ADUs in single-family zoning districts during the 6th cycle Housing Element period.</i></li> </ul>	<p>This Program addresses the City's program to allow owners with existing unpermitted second units to obtain permits to legalize the ADUs. This Program does not entitle or automatically permit new ADU construction. Rather, this Program is a new program to help bring into compliance existing unpermitted ADUs. This Program would not modify the conclusions made in the Vista 2035 General Plan EIR or result in physical environmental impacts.</p> <p>This Policy Action only addresses the City's efforts to increase homeowners' knowledge of available housing-related resources and promote construction of ADUs. This Policy Action would include development of public outreach and information programs and would not modify the conclusions made in the Vista 2035 General Plan EIR. Therefore, this Policy Action would not result in physical environmental impacts.</p> <p>This Policy Action only addresses the City's efforts to identify alternative funding sources for ADU projects through collaboration with community partnerships. This Policy Action would help upgrade or bring into compliance existing ADUs. Therefore, this Policy Action would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>
<p><b>Objective:</b> Develop long-term, sustainable funding sources that are flexible and may be used for affordable housing production and preservation and to prevent displacement and</p>	<p><b>Policy 1.15:</b> Implement the 2022 approval of Measure L which increased and expanded the City's existing Gross Receipts Tax on rental residential properties for affordable housing and support programs.</p>	<p>This Policy Action is expected to increase revenue for funding future affordable housing projects through increased taxes on rental residential properties. This is only a potential source of revenue generation. Therefore, this Policy Action would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>

**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

<p>homelessness. <i>Lead: Housing and Economic Development</i></p>	<p><b>Program 1.16:</b> Update the City’s five-year Affordable Housing Strategy (AHS) to implement the 6th cycle Housing Element goals, policies, and programs and to sets priorities for allocation of the City’s affordable housing revenue sources for a finite period (1 year to 5 years). Establish priorities to implement fair housing policies and programs in low resource neighborhoods per the AFFH analysis.</p> <ul style="list-style-type: none"> <li>• <i>Target: Adopt the AHS with numerical goals and place-based funding priorities to implement the goals, policies, and programs in the Housing Element.</i></li> </ul>	<p>This Program only identifies the City’s plan to identify funding goals and priorities and identify state funding sources to support affordable housing projects and address homelessness as outlined within the City’s Affordable Housing Strategy (AHS). This Program would include application for State grants including the Regional Early Action Planning grants, grants from HCD, and additional sources identified for homelessness and low-resource neighborhoods. This Program only sets priorities and would not modify conclusions of the Vista 2035 General Plan EIR or result in physical environmental impacts.</p>
	<p><b>Program 1.17:</b> Collaboratively (Planning, Housing, and Public Works) pursue state grant funds wherever possible to support affordable housing projects and programs to address homelessness in the City.</p>	<p>This Program only addresses the pursuit of funding opportunities for affordable housing projects and programs within the City. Therefore, this Policy Action would not modify conclusions of the Vista 2035 General Plan EIR or result in physical environmental impacts.</p>
<p><b>Objective:</b> Take reasonable measures to reduce the cost of development for fully affordable housing developments. <i>Leads: Planning, Housing and Economic Development</i></p>	<p><b>Policy 1.18:</b> Use the opportunity of the RBD Specific Plan Update or initiate a city-wide study on the feasibility and desirability of fee waivers or reductions or delayed fee payments for fully affordable housing projects; additionally, consider providing City financial assistance to cover these fees.</p>	<p>This Policy Action addresses the City’s efforts to facilitate development of affordable residential projects through reduced fees or alternative payment plans. This Policy Action does not result in direct or additional housing development within the RBD Specific Plan area. As this Policy would only result in feasibility analyses performed for each of the major projects in RBD, this Policy Action would not change the conclusions of the Vista 2035 General Plan EIR or result in physical environmental impacts.</p>
	<p><b>Policy 1.20:</b> Incorporate parking reductions into the City’s Transportation Demand Management Program including compliance with AB2097 and related state laws that eliminates parking minimums within one-half mile major transit stops and radius and parking maximums for affordable housing projects.</p>	<p>This Policy Action would establish a TDM Program to reduce parking requirements to incentivize and facilitate affordable housing developments. This Policy Action would not modify the conclusions made in the Vista 2035 General Plan EIR or result in physical environmental impacts.</p>



**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

<p><b>Objective:</b> Encourage housing on sites zoned for mixed use in the Ravenswood/4 Corners Specific Plan Area.</p> <p><i>Lead: Planning</i></p>	<p><b>Policy 1.21:</b> For sites within the RBD Specific Plan Area, study feasibility and effectiveness of an RBD-specific density bonus, relaxed zoning controls, minimum densities (particularly for mixed-use sites), streamlined subdivision approvals, and by-right or ministerial approvals. Incorporate provisions into the Specific Plan Update and Development Code amendments that are planned for City Council adoption in Summer 2024. (See also related Program 10.8).</p>	<p>This Policy Action addresses the potential for density bonuses and incentives to promote affordable housing development within the RBD/4 Corners Specific Plan Area. This Policy Action includes the study of by-right density bonus and other development incentives to streamline approvals and provide recommendations for the RBD. This Policy Action does not grant any development entitlements or authorize development beyond what could be allowed and analyzed in the final Specific Plan. Further, any housing development or intensification induced by this policy would be subject to the City’s development review and plan check process, including CEQA review, which is already in progress. This Policy Action may result in minor technical changes and Development Code amendments but would not modify conclusions of the Vista 2035 General Plan EIR. Therefore, no additional physical environmental impacts would occur.</p>
<p><b>Objective:</b> Leverage available public lands for affordable housing development where feasible and beneficial to the community.</p> <p><i>Leads: City Manager’s Office, Housing and Economic Development</i></p>	<p><b>Program 1.23:</b> Work with County of San Mateo to complete land swap and determine feasibility of the County developing affordable housing at 2277 University. Comply with Surplus Lands Act (This project is not included in Sites Inventory but could potentially be constructed during Housing Element 6th Cycle).</p> <ul style="list-style-type: none"> <li>• <i>Target: Support the County in redeveloping the property for at least ten (10) housing units, or whatever is found feasible, encouraging the County to develop permanent supportive housing.</i></li> </ul>	<p>This Program only addresses the City’s efforts to increase the supply of affordable housing through redevelopment of public-owned properties through the Surplus Lands Act. This Policy Action does not result in direct housing development. Rather, this Policy Action would result in an Exchange Agreement with the County and subsequent development activity. Further, any housing development facilitated by this partnership would be subject to the City’s development review and plan check process. This Program would not change conclusions made in the Vista 2035 General Plan EIR. Therefore, this Policy Action would not result in physical environmental impacts.</p>

**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

<p><b>Objective:</b> Incentivize “missing middle” housing, or smaller-scale housing that is affordable to households at 80-120% of Area Median Income.</p> <p><i>Lead: Planning</i></p>	<p><b>Program 1.24:</b> Work with Ravenswood City School District to facilitate the development of the district-owned parcel at 2120-2160 Euclid Avenue as affordable housing. Comply with Surplus Lands Act.</p>	<p>This Program addresses the City’s efforts to increase the supply of affordable housing through redevelopment of public-owned properties through the Surplus Lands Act. This Policy Action does not result in direct housing development. Rather, this Program would result in collaboration with the School District for future housing. Further, any housing development facilitated by this partnership would be subject to the City’s development review and plan check process. This Program would not change conclusions made in the Vista 2035 General Plan EIR. Therefore, this Policy Action would not result in physical environmental impacts.</p>
<p><b>Policy 1.25:</b> Revise City zoning and subdivision standards to increase compatibility with SB 9 (e.g., flexible zoning standards for setbacks, open space, height, and density) and make process improvements to encourage application of SB 9 on appropriately zoned parcels. Conduct informational outreach to property owners whose properties are prime candidates for SB 9 projects, including advising them of the ministerial process.</p> <ul style="list-style-type: none"> <li>• <i>Target: Assist property owners to approve eight (8) SB9 units during the 6th cycle Housing Element Period with focus on opportunities sites in lower-density residential neighborhoods (e.g., under-utilized lots over 10,000 square feet in size).</i></li> </ul>	<p>This Policy Action only addresses existing zoning and subdivision standards to conduct informational outreach and facilitate development of housing units in the Moderate and Above Moderate-income categories. This Policy Action does not result in direct housing development, but would ensure City compliance with SB 9 and SB 35 and would not modify conclusions made in the Vista 2035 General Plan EIR. Therefore, this Policy Action would not result in physical environmental impacts.</p>	<p>This Policy Action only addresses existing zoning and subdivision standards to conduct informational outreach and facilitate development of housing units in the Moderate and Above Moderate-income categories. This Policy Action does not result in direct housing development, but would ensure City compliance with SB 9 and SB 35 and would not modify conclusions made in the Vista 2035 General Plan EIR. Therefore, this Policy Action would not result in physical environmental impacts.</p>

**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

<p><b>Objective:</b> Monitor progress on Sites Inventory.</p> <p><i>Leads: Planning, Housing and Economic Development</i></p>	<p><b>Policy 1.26:</b> Annually review overall progress and effectiveness in meeting RHNA and evaluate the progress on meeting the City’s RHNA and adjust the Sites Inventory as needed. Track the production of inclusionary housing units, ADUs, SB 9 units, and housing for special needs populations. If the City is not making sufficient progress in meeting its Housing Element goals and its RHNA for lower-income units by 2027 (i.e., 130 lower-income units under construction or completed by 2027), consider alternative land use strategies within six months. Possible actions include amending policies and programs, defining new actions, or identifying alternative housing sites, including rezoning if necessary, and strategies to facilitate a variety of housing choices, such as encouraging missing middle zoning (small-scale multi-unit projects), adaptive reuse, and additional ADUs and/or JADUs.</p>	<p>This Policy Action addresses the City’s efforts to regularly monitor progress on its RHNA targets and Sites Inventory. This Policy Action does not result in direct housing development, but would promote progress on Housing Element goals and programs. This Policy Action would consider strategies to minimize delays in reaching Housing Element goals and identify how to facilitate varying housing projects but would not modify the conclusions made in the Vista 2035 General Plan EIR. Therefore, this Policy Action would not result in physical environmental impacts.</p>
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**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

Goal 2 Create homeownership opportunities for East Palo Alto residents and stability for existing homeowners		
<p><b>Objective:</b> Promote financial literacy as a means of encouraging homeownership and support first-time homebuyers.</p> <p><i>Lead: Housing and Economic Development</i></p>	<p><b>Policy 2.1:</b> In partnership with non-profit partners, the City will develop a City led homebuyer support program or programs tailored to the needs of lower and moderate-income households in East Palo Alto. Prioritize outreach to neighborhoods with a proportionally higher percentage of rental households such as the westside of State Highway 101. Conduct proactive outreach to seek interested applicants.</p> <ul style="list-style-type: none"> <li>• <i>Target: Propose a homebuyer support program with a goal of assisting a minimum of eight (8) residents during the 6th cycle Housing Element period.</i></li> </ul>	<p>This Policy Action only addresses the City's efforts to increase homeownership for lower and moderate-income households in East Palo Alto through review of federal, state, and local programs. This Policy Action does not result in direct or indirect housing development, but would develop a program to support residents in achieving homeownership, specifically in neighborhoods with higher percentages of rental households. Therefore, this Policy Action would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>
<p><b>Objective:</b> Create pathways to affordable homeownership opportunities.</p> <p><i>Lead: Housing and Economic Development</i></p>	<p><b>Policy 2.2:</b> With the assistance of the City's grant coordinator, seek and apply for funds from federal, state, and other sources to create and finance homebuyer support program.</p>	<p>This Policy Action only addresses the City's efforts to increase homeownership through City-led financing programs. This Policy Action does not result in direct or indirect housing development, but would develop a program to support residents in achieving homeownership. Therefore, this Policy Action would not modify the conclusions made in the Vista 2035 General Plan EIR or result in physical environmental impacts.</p>
<p><b>Objective:</b> Create pathways to affordable homeownership opportunities.</p> <p><i>Lead: Housing and Economic Development</i></p>	<p><b>Policy 2.3:</b> Pursue a possible pathway to homeownership is through tenant purchase of their buildings, such as on their own or through a community land trust or housing trust fund.</p> <ul style="list-style-type: none"> <li>• <i>Target: Create a program that will facilitate a minimum of two (2) single-family and one (1) multi-family housing transactions during the 6th cycle Housing Element period.</i></li> </ul>	<p>This Policy Action only addresses the City's efforts to increase homeownership and gives tenants, a community land trust, or a housing trust fund to purchase a residential property. This Policy Action does not result in direct or indirect housing development but would develop a program to support residents in achieving homeownership. This Policy Action would not change the conclusions made in the Vista 2035 General Plan EIR. Therefore, this Policy Action would not result in physical environmental impacts.</p>

**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

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<p><b>Objective:</b> Advocate for homebuyer and homeownership programs at the regional level.  <i>Lead: Housing and Economic Development</i></p>	<p><b>Policy 2.4:</b> East Palo Alto will continue to work with its partners to advocate for the homebuyer and homeownership programs, including exploring shared and sweat equity models at the federal, state, county, and regional levels.</p>	<p>This Policy Action only addresses the City’s continued advocacy for homeownership throughout the region. Therefore, this Policy Action would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>
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**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

<b>Goal 3 Promote stewardship and preservation of the City's existing affordable housing stock.</b>		
<p><b>Objective:</b> Ensure that the City's deed-restricted affordable housing and Below Market-Rate (BMR) portfolio remain well-maintained and monitored. <i>Lead: Housing and Economic Development</i></p>	<p><b>Program 3.1:</b> Continue working with the BMR Administrator on the existing BMR Program contract and draft Request for Proposals (RFP) for next phase of BMR Program management, including additional rental and for-sale inclusionary housing units, and evaluating as needed the Local Preference Guidelines.   <ul style="list-style-type: none"> <li>• <i>Target: Maintain 53 existing BMR units and add at least eight (8) new BMR ownership or rental units during the 6th cycle Housing Element period.</i></li> </ul> </p>	<p>This Program only addresses an ongoing inventory-monitoring program for deed-restricted units in the very low-, low-, and moderate-income categories. This Program does not result in direct housing development. This action is primarily for monitoring and reporting purposes; therefore, it would not result in changes the conclusions of the Vista 2035 General Plan EIR or physical environmental impacts.</p>
<p><b>Objective:</b> Improve data on affordability of the City's rental housing stock outside of the Rent Stabilized portfolio. <i>Lead: Housing and Economic Development</i></p>	<p><b>Program 3.2:</b> With the allocated City Council funding, implement the rent registry program.</p>	<p>This Program only addresses the City's efforts to maintain data on existing housing stock and develop a rent registry following review of similar Bay Area programs. This Program does not result in direct housing development. This action is primarily for monitoring and management purposes; therefore, it would not result in changes the conclusions of the Vista 2035 General Plan EIR or physical environmental impacts.</p>
<p><b>Objective:</b> Leverage County initiatives and affordable housing resources to increase public awareness of affordable housing opportunities in East Palo Alto. <i>Lead: Housing and Economic Development</i></p>	<p><b>Program 3.3:</b> Work with the County of San Mateo and landlords to list all affordable housing projects and inclusionary units on Doorway, a new regional platform for searching and applying for affordable housing and finding affordable housing resources; conduct proactive outreach.</p>	<p>This Program only addresses the City's efforts to increase awareness and visibility of existing and planned affordable housing developments. This Program does not result in direct housing development. This action is primarily for marketing and accessibility purposes; therefore, it would not result in changes the conclusions of the Vista 2035 General Plan EIR or physical environmental impacts.</p>

**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

<p><b>Objective:</b> Protect and preserve the City's supply of rent-stabilized affordable housing units.</p> <p><i>Lead: Housing and Economic Development</i></p>	<p><b>Policy 3.4:</b> Continue to support the function of the Rent Stabilization Board to enforce the City's Rent Stabilization Ordinance to protect tenants from unreasonable rent increase, to protect tenants from unlawful evictions, to address health, safety, and code enforcement issues, and to allow landlords sufficient rental income for maintenance and operating expenses and capital improvements.</p> <ul style="list-style-type: none"> <li>• <i>Target: Plan to assist the approximately 2500 registered units under the Rent Stabilization Ordinance which are primarily located west of State Highway 101.</i></li> </ul>	<p>This Policy Action only addresses the City's efforts to manage the cost of rental housing through its Rent Stabilization Ordinance. Therefore, this Policy Action would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>
<p><b>Objective:</b> Protect and preserve the City's supply of rent-stabilized affordable housing units.</p> <p><i>Lead: Housing and Economic Development and Rent Stabilization</i></p>	<p><b>Policy 3.5:</b> The City will monitor any changes to state law related to rent stabilization and if possible, update the Rent Stabilization Program to provide greater protections.</p>	<p>This Policy Action only addresses the City's efforts to monitor state legislation regarding rent stabilization and to consider update to the City's Rent Stabilization Program to strengthen tenant protections if possible. This action is primarily for monitoring and management purposes; therefore, it would not result in changes the conclusions of the Vista 2035 General Plan EIR or physical environmental impacts.</p>

**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

<b>Goal 4 Prevent displacement of East Palo Alto residents.</b>		
<p><b>Objective:</b> Connect the creation of new jobs in the City from commercial development to the creation of new housing at the appropriate affordability levels.</p> <p><i>Leads: Planning, Housing and Economic Development</i></p>	<p><b>Policy 4.1:</b> As part of the RBD Specific Plan update, develop a requirement to build new housing at specified levels of affordability based on a numerical linkage to office/R&amp;D square footage in Ravenswood Business District (RBD).</p> <ul style="list-style-type: none"> <li>• <i>Target: Plan for 1,350 to 1,600 new housing units in the RBD Specific Plan; seek to approve entitlements for at least 350 housing units during the 6th cycle Housing Element.</i></li> </ul> <p><b>Program 4.2:</b> Participate in countywide nexus study led by 21 Elements to update the existing Commercial Linkage Fee.</p>	<p>This Policy Action would establish a jobs-housing linkage requirement within the RBD Specific Plan Area and is incorporated into the current scope of work for the overall RBD Specific Plan. This Program does not result in direct housing development. This policy would not change conclusions made in the Vista 2035 General Plan EIR. Therefore, it would not result in physical environmental impacts beyond those already under analysis.</p> <p>This Program only addresses the City's participation in the County's Commercial Linkage Fee study. This Program does not result in direct or indirect housing development. Therefore, it would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>
<p><b>Objective:</b> Promote the preservation of existing housing stock and rehabilitation of housing that is at-risk due to age, structural deficiencies, etc.</p> <p><i>Leads: Housing and Economic Development, Building and Code Enforcement</i></p>	<p><b>Policy 4.3:</b> Develop a preservation strategy that addresses funding sources, identification of properties, and partnerships that can lead to preservation of affordable housing in East Palo Alto. Prioritize assistance to lower-resource neighborhoods identified in the AFFH analysis (including, but not limited to, westside of State Highway 101, south of Bay Road/west of University Avenue, and multi-family housing on southside of Bay Road and east of University Avenue.)</p> <ul style="list-style-type: none"> <li>• <i>Target: Identify properties and reach out to organizations to achieve the minimum targets in Policy 4.6 during the 6th cycle Housing Element period.</i></li> </ul>	<p>This Policy Action only addresses the City's efforts to maintain its affordable housing stock through partnerships including its existing partnership with the Policy Grant Fellow. This Policy Action does not result in direct or indirect housing development, but would preserve affordable housing and prioritize lower-resource neighborhoods. This policy would not change conclusions made in the Vista 2035 General Plan EIR. Therefore, it would not result in physical environmental impacts.</p>

**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

	<p><b>Policy 4.4:</b> Identify and maintain a list of at-risk and substandard buildings throughout the City. Ensure property owner complies with the State Preservation Notice Law. Actively engage with property owners to reach agreements to preserve at-risk units and properly maintain their properties.</p> <ul style="list-style-type: none"> <li>• <i>Target: Continue to preserve or conserve the affordability of at least twenty (20) substandard or at-risk units; set a goal to improve a minimum of twenty (20) substandard or at-risk units during the 6th cycle Housing Element period.</i></li> </ul>	<p>This Policy Action addresses the City's efforts to maintain its affordable housing stock through maintenance and rehabilitation projects. This Policy Action does not result in direct or indirect housing development. In addition, maintenance and rehabilitation efforts are typically exempt from CEQA. Therefore, it would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>
<p><b>Policy 4.5:</b> Study improvements to a City process for addressing health, safety, and code violations on residential properties, including, but not limited to, unpermitted second units.</p>	<p>This Policy Action only addresses the City's efforts to maintain the quality of existing affordable housing stock. Implementation would include study of similar programs throughout the Bay Area. This Policy Action does not result in direct or indirect housing development. Therefore, it would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>	

**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

<p><b>Objective:</b> Support housing stability of existing lower-income homeowners and enable the community's seniors to age in place.</p> <p><i>Lead: Public Works, Planning, Building, Housing and Economic Development</i></p>	<p><b>Program 4.6:</b> Create and fund a City housing rehabilitation program for City Council consideration that covers both single-family homes and multi-family apartments to preserve affordable housing opportunities, encourage proper maintenance and repairs, promote renovation, and increase energy conservation. Prioritize neighborhoods with a concentration of units in need of rehabilitation per Housing Element, Section 2.12.2.D (including, but not limited to, westside of State Highway 101, south of Bay Road west of University Avenue, and multi-family housing on southside of Bay Road and east of University Avenue.)</p> <ul style="list-style-type: none"> <li>• <i>Target: Propose a program with a goal to rehabilitate and/or renovate a minimum of five (5) single-family and twenty (20) multi-family housing units during the 6th cycle Housing Element period.</i></li> </ul>	<p>This Program only addresses the City's efforts to maintain the quality of its existing housing through City-led programs, with focus on concentrated neighborhoods of need. This Program does not result in direct or indirect housing development. In addition, repair and rehabilitation efforts are typically exempt from CEQA. The neighborhoods prioritized for rehabilitation are consistent with the General Plan. Therefore, this policy would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>
<p><b>Objective:</b> Support housing stability of existing lower-income homeowners and enable the community's seniors to age in place.</p> <p><i>Lead: Public Works, Planning, Building, Housing and Economic Development</i></p>	<ul style="list-style-type: none"> <li>• <b>Program 4.7:</b> Research establishing and funding a City home repairs program to assist low-income homeowners with major repairs and rehabilitation to address acute safety and livability issues. The program would also assist seniors to "age-in-place" and install necessary accessibility improvements. Develop a public outreach plan and also inform homeowners of financial assistance available from other agencies such as energy conservation and electrification incentives. <i>Target: Propose a home repairs program with a goal to assist five (5) to ten (10) low-income homeowners during the 6th cycle Housing Element period.</i></li> </ul>	<p>This Program addresses the City's efforts to maintain its housing stock by providing financial assistance to low-income homeowners and low-resource neighborhoods for maintenance and rehabilitation projects. This Program does not result in direct or indirect housing development. In addition, repair and rehabilitation efforts are typically exempt from CEQA. This policy would not change conclusions made in the Vista 2035 General Plan EIR. Therefore, this policy would not result in physical environmental impacts.</p>



**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

<p><b>Objective:</b> Promote community/cooperative ownership of land and housing in East Palo Alto. <i>Lead: Housing and Economic Development</i></p>	<p><b>Policy 4.8:</b> Continue to implement public accessibility improvements in accordance with the City’s ADA Compliance Plan, and allow for reasonable accommodations through Municipal Code Chapter 14.10 – Reasonable Accommodations and Development Code Chapter 18.98 – Reasonable Accommodations as needed to comply with all applicable state laws.</p> <p><b>Policy 4.9:</b> Study models of foreclosure prevention at the local level in similarly sized cities, whether through local investment or leveraging outside funding; evaluate establishing a mortgage assistance program for low-income households.</p> <ul style="list-style-type: none"> <li>• <i>Target: Launch a pilot program to assist at least three (3) homeowners that are facing the risk of foreclosure during the 6th cycle Housing Element period.</i></li> </ul>	<p>This Policy Action addresses the City’s efforts to promote accessibility and make progress on its ADA Compliance Plan and provide individuals with disabilities reasonable accommodation to ensure equal access to housing. This Policy Action does not result in direct or indirect housing development. Therefore, it would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p> <p>This Policy Action only addresses the City’s efforts to promote and maintain homeownership for lower-income households. This Policy Action does not result in direct or indirect housing development. Therefore, it would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>
<p><b>Objective:</b> Promote community/cooperative ownership of land and housing in East Palo Alto. <i>Lead: Housing and Economic Development</i></p>	<p><b>Program 4.10:</b> Evaluate opportunities to support and/or leverage local community land trusts (CLTs) to create community ownership of new or preserved affordable housing, such as through scattered-site ADUs, small inclusionary projects, sweat equity projects (e.g., Habitat for Humanity, Rebuilding Together, and others), or preservation projects.</p> <ul style="list-style-type: none"> <li>• <i>Target: Participate in at least one annual workshop to provide outreach and education to CLTs and similar organizations to create affordable rental and ownership housing with identification of possible opportunity sites.</i></li> </ul>	<p>This Program only addresses the City’s efforts to promote and maintain homeownership through community partnerships. This Program does not result in direct or indirect housing development. Therefore, it would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>



**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

<p><b>Objective:</b> Prevent displacement due to high housing cost burden and barriers to housing, such as rental deposits.</p> <p><i>Lead: Housing and Economic Development</i></p>	<p><b>Policy 4.11:</b> Continue to appropriate funds and consider increasing funds for direct emergency financial assistance or rent relief to be administered by a qualified organization identified through a Request for Proposals (RFP) process. Conduct proactive public outreach, particularly to lower-income households and neighborhoods where a high housing cost burden has been documented in the fair housing assessment. To support this effort, seek out a permanent source of funds for rental assistance.</p> <ul style="list-style-type: none"> <li>• <i>Target: Propose a rent relief program with a goal to provide direct emergency financial assistance or rent relief to thirty (30) households each year during the 6th cycle Housing Element period, subject to available funds.</i></li> </ul>	<p>This Policy Action only addresses the City's efforts to prevent displacement of lower-income households through development of an emergency funding program. This Policy Action does not result in direct or indirect housing development. Therefore, it would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>
	<p><b>Program 4.12:</b> Develop a proposal for City Council consideration for a direct financial assistance program for lower-income tenants that cannot pay their first and last month's rent/security deposit or other move-in expenses.</p>	<p>This Program only addresses the City's efforts increase housing affordability and accessibility through financial assistance programs. This Policy Action does not result in direct or indirect housing development. This Program would not change conclusions made in the Vista 2035 General Plan EIR. Therefore, it would not result in physical environmental impacts.</p>
<p><b>Objective:</b> Implement an effective and fair housing compliant Local Preference Policy.</p> <p><i>Lead: Housing and Economic Development</i></p>	<p><b>Policy 4.13:</b> Complete and enforce guidelines on City's existing Local Preference Policy for inclusionary housing for-sale and rental units. Periodically evaluate the guidelines and adjust as needed.</p>	<p>This Policy Action only addresses the City's efforts to prevent displacement by providing preference for housing opportunities to existing residents of East Palo Alto. This Policy Action does not result in direct or indirect housing development. Therefore, it would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>

**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

<p><b>Objective:</b> Provide access to living wage jobs to allow residents to afford to remain to live in East Palo Alto.</p> <p><i>Lead: Housing and Economic Development</i></p>	<p><b>Program 4.14:</b> Through Measure HH, a parcel tax on large office developments approved by East Palo Alto residents in 2018, implement a Workforce Development Program to provide job training, apprenticeships, and job placement services to residents through partnerships with community-based non-profit organizations and private companies. Programs shall include proactive outreach to East Palo Alto residents, and service agreements shall define performance goals and metrics and required deliverables.</p> <ul style="list-style-type: none"> <li>• <i>Target: Assist at least eighty (80) East Palo Alto residents through the Pilot Workforce Development Program during 2024-2025. Evaluate continuing and expanding the program beyond 2025.</i></li> </ul>	<p>This Program only addresses the City's efforts to support residents in affording housing in East Palo Alto through development of job training and related programs. This Program does not result in direct or indirect housing development. Therefore, it would not result in changes the conclusions of the Vista 2035 General Plan EIR or physical environmental impacts.</p>
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<b>Goal 5 Apply environmental justice principles in planning for new housing development.</b>		
<p><b>Objective:</b> Adopt policies and programs to address environmental justice issues in the community. <i>Lead: Planning, Housing and Economic Development</i></p>	<p><b>Program 5.1:</b> Update the Environmental Justice Element (Health and Equity) in the City's General Plan to include a comprehensive set of policies and programs and an implementation plan to address environmental justice issues in the community; scope of work to include a robust community engagement process is integrated into the preparation of this Element.</p> <p><b>Program 5.2:</b> Establish and implement a plan to address the San Mateo County Local Agency Formation Commission (SMCLAFCo) Municipal Service Review and to resolve the delays to housing development caused by issues with the East Palo Alto Sanitary District.</p>	<p>This Program addresses the City's efforts to develop an Environmental Justice Element for its General Plan which would address environmental justice issues, including those relevant to housing. This Program does not result in direct or indirect housing development, and would be expected to result in beneficial impacts to vulnerable communities. Therefore, it would not result in changes the conclusions of the Vista 2035 General Plan EIR or physical environmental impacts.</p> <p>This Program would result in coordination between the City and water (City) and wastewater (EPASD) utility providers to facilitate development of residential projects through utility system improvements. This Program does not result in direct housing development. Future development that may result from removing water and sewer service constraints has been adequately evaluated in the City's General Plan Vista 2035 and certified EIR (SCH No. 2014092027). Therefore, this Program would not result in physical environmental impacts beyond those previously evaluated at a city-wide, programmatic level. This Program would not change the conclusions made in the Vista 2035 General Plan EIR.</p>
<p><b>Objective:</b> Address water and sewer system constraints to housing production, to the extent they are within the City's control, through targeted capital and governance improvements. <i>Lead: City Manager's Office, Public Works</i></p>	<p><b>Program 5.3:</b> Implement the Water System Master Plan adopted in 2022 and complete the first-phase capital improvements in the plan. Update the Urban Water Management Plan to confirm with the Master Plan and ensure adequate water service to parcels in the Sites Inventory (adequate water supply but water infrastructure upgrades may be needed for certain locations).</p>	<p>This Program would result in coordination between the City and water (City) utility providers to facilitate development of residential projects by ensuring adequate water service to parcels in the Sites Inventory. This Program does not result in direct housing or water system development. Future development that may result from removing water service constraints has been adequately evaluated in the City's General Plan Vista 2035 and certified EIR (SCH No. 2014092027). Therefore, this Program would not result in physical environmental impacts beyond those previously evaluated at a city-wide, programmatic level. This Program would not change the conclusions made in the Vista 2035 General Plan EIR.</p>

**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

<p><b>Objective:</b> Minimize new housing in highest-risk areas prone to flooding/sea level rise or due to environmental contamination. <i>Lead: Public Works</i></p>	<p><b>Policy 5.4:</b> Work with water and sewer providers to adopt a policy that prioritizes water and sewer capacity allocations to affordable housing projects and low-income households per SB1097.</p>	<p>This Policy Action only addresses the City’s efforts to provide and coordinate water and sewer utility service to applicable housing projects pursuant to State law. Therefore, this Policy Action would not result in changes the conclusions of the Vista 2035 General Plan EIR or physical environmental impacts.</p>
	<p><b>Program 5.5:</b> Leverage community partnerships to utilize and maintain data and maps wherever possible to monitor areas subject to flooding and identify sites for future development and to comply with Government Code 65302.</p>	<p>This Program only addresses the resiliency of residential developments through monitoring and consideration of climate- and weather-related data. This Program does not result in direct housing development, and instead focuses on long-term sustainability of future development. Therefore, this Program would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>
	<p><b>Program 5.6:</b> Develop environmental “overlay” map with most up-to-date data to avoid housing in at-risk areas or with prescribed mitigation measures.</p>	<p>This Program addresses the resiliency of residential developments through development of an environmental overlay to identify potential risks for development. This Program does not result in direct housing development, and instead focuses on long-term sustainability of future development, as well as the prevention of future impacts. Therefore, this Program would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>
<p><b>Objective:</b> Expand and establish program to promote fair housing practices for East Palo Alto residents. <i>Lead: Housing and Economic Development</i></p>	<p><b>Program 5.7:</b> Implement fair housing and anti- eviction programs using Measure O and other qualifying local revenue sources to fund community- based organizations to provide legal services, financial assistance, case management, referrals, proactive community outreach (social media, workshops, flyers), posted resource information, and a citizen advocacy committee. Contracts with organizations will specify quantified deliverables for each of these areas.</p> <ul style="list-style-type: none"> <li>• <i>Target: See the performance metrics for this program in Section 6.4, Implementation Plan.</i></li> </ul>	<p>This Program addresses the City’s efforts to implement fair housing and anti- eviction programs by funding related community- based organizations. This Program does not result in direct housing development, and instead focuses on supporting residents in achieving and maintaining housing security. Therefore, this Program would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>

**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

	<p><b>Policy 5.8:</b> Continue to support agencies such as Project Sentinel that provide consultation and landlord/tenant mediation services for residents.</p>	<p>This Program addresses the City’s efforts to support community-based organizations that support residents in housing-related matters. This Program does not result in direct housing development, and instead focuses on supporting residents in achieving and maintaining housing security. Therefore, this Policy Action would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>
	<p><b>Policy 5.9:</b> Place program priority on providing fair housing and support services to special needs populations such as extremely low-income households, persons with disabilities, female heads of households, large family households, seniors, at-risk youths, and households at-risk of homelessness. Target proactive public outreach to lower resource neighborhoods such as western and northern areas in East Palo Alto or projects where there is a higher presence of special needs populations based on the fair housing analysis.</p> <ul style="list-style-type: none"> <li>• <i>Target: Provide fair housing and support services for minimum of thirty (30) special needs individuals or households during the 6th cycle Housing Element period.</i></li> </ul>	<p>This Program addresses the City’s efforts to support residents with special needs by providing support services related to housing. This Program does not result in direct housing development, and instead focuses on achieving fair housing opportunities for residents. Therefore, this Policy Action would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>

**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

<p><b>Objective:</b> Prioritize flood control, infrastructure, and transportation improvements in lower-resource areas.</p> <p><i>Lead: Public Works Department</i></p>	<p><b>Policy 5.10:</b> Pursue funding and prioritize neighborhoods of concentrated need for future investment, which may include but is not limited to rehabilitation, safe routes to schools, parks, transit, and active transportation. Evaluate the distribution of infrastructure and transportation investment by higher versus lower need areas when updating the Capital Improvement Program (CIP). Assess the needs in lower-resource areas and implement actions to ensure an equitable distribution of investment.</p> <ul style="list-style-type: none"> <li>• <i>Target: Ensure that the CIP and economic redevelopment plans reflect the needs of lower-resource areas as identified in the AFFH analysis (including, but not limited to, westside of State Highway 101 and south of Bay Road/west of University Avenue.)</i></li> </ul>	<p>This Policy Action only addresses the City's efforts to fund and equitably distribute investments into infrastructure, with focus on neighborhoods of concentrated need. This Policy Action does not result in direct or indirect housing development. In addition, repair and rehabilitation efforts are typically exempt from CEQA. Therefore, this policy would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>
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**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

	<p><b>Policy 5.11:</b> Support local and regional flood control and infrastructure projects that benefit existing and future residents. Prioritize improvement projects that benefit high need and lower-resource areas as identified in AFFH analysis.</p> <ul style="list-style-type: none"> <li>• <i>Target: Support the San Francisquito Creek Joint Powers Authority (SFCJPA) in completing the following flood control projects to benefit residents on the westside of the State Highway 101:</i> <ul style="list-style-type: none"> <li>○ <i>Palo Reach II project – channel improvements as well as top of bank improvements to enhance the creek and increase flow/capacity;</i></li> <li>○ <i>Pope Chaucer Bridge Project improvement project in Menlo Park to replace the bridge to enhance flow and capacity; and</i></li> <li>○ <i>Newell Bridge Replacement Project – replace bridge to enhance flow and capacity under the bridge.</i></li> </ul> </li> </ul>	<p>This Policy Action only addresses the City’s efforts to maintain and promote beneficial improvement projects, with focus on neighborhoods of higher need. This Policy Action does not result in direct or indirect housing development. Therefore, this policy would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>
<b>Goal 6 Promote safe and healthy housing in East Palo Alto.</b>		
<p><b>Objective:</b> Strengthen monitoring and enforcement of habitability issues. <i>Leads: Housing and Economic Development, Building and Code Enforcement</i></p>	<p><b>Policy 6.1A:</b> Annually review the City’s habitability complaints and the Rent Stabilization Ordinance’s rules and regulations and forward any recommended changes or updates for enforcing habitability issues to the City’s Rent Stabilization Board.</p>	<p>This Policy Action includes evaluation of the City’s existing processes for addressing maintenance concerns to prevent violations of building and zoning ordinances in residential developments. This Policy Action does not result in direct housing development. Therefore, this Policy Action would not result in adverse physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>



**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

	<p><b>Program 6.1B:</b> Continue to use code enforcement to support housing preservation and neighborhood quality financial assistance on code corrections, emergency repairs, and rehabilitation.</p> <ul style="list-style-type: none"> <li>• <i>Target: Through code enforcement efforts, set a goal to correct code violations and make necessary repairs and improvements for a minimum of twenty (20) housing units during the 6th cycle Housing Element period.</i></li> </ul>	<p>This Policy Action only addresses the City’s efforts to maintain the quality of existing housing stock through reinforcement of code compliance. This Policy Action does not result in direct or indirect housing development. In addition, repair and rehabilitation efforts are typically exempt from CEQA. Therefore, it would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>
<p><b>Objective:</b> Incorporate amenities into multifamily housing that support households with children. <i>Lead: Planning</i></p>	<p><b>Policy 6.2:</b> Determine the most effective means of incentivizing or requiring childcare facilities in new affordable housing developments and commercial developments.</p>	<p>This Policy Action addresses the encouragement of childcare centers as a component of new affordable housing developments. This Policy Action does not result in direct housing development. Rather, it involves granting additional incentives in conjunction with the review. This Policy Action would not change conclusions made in the Vista 2035 General Plan EIR. Therefore, this Policy Action would not result in physical environmental impacts.</p>
<p><b>Objective:</b> Improve energy conservation and reduce the carbon footprint of residential buildings. <i>Lead: Building and Code Enforcement</i></p>	<p><b>Program 6.3:</b> Implement the East Palo Alto Reach Codes, which became effective in January 2021 (amended March 2023) and apply to all new construction and substantial rehabilitations and additions; continue to explore expanding building electrification requirements while considering the impact on project feasibility, environmental justice, and equity. Support incentive programs for retrofitting existing buildings and seek funding sources for equitable clean energy solutions.</p>	<p>This Program only addresses requirements for residential housing developments to include the installation of energy efficient appliances and devices. This Program does not result in direct housing development, and instead involves compliance with existing energy efficiency codes as housing projects are approved. Therefore, this Policy Action would not result in physical environmental impacts. Energy conservation efforts would be expected to result in beneficial environmental effects. This Program would not change conclusions made in the Vista 2035 General Plan EIR.</p>
<p><b>Objective:</b> Improve earthquake readiness and resilience. <i>Lead: Planning, Public Works, Building</i></p>	<p><b>Program 6.4:</b> Complete and implement the recently updated Multi-Generational Local Hazard Mitigation Plan.</p>	<p>This Program addresses the safety of residential developments through implementation of the City’s LHMP. This Program does not result in direct or indirect housing development. Therefore, this Program would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>



**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

<p><b>Objective:</b> Ensure implementation and enforcement of flood protection and prevention measures.  <i>Lead: Public Works, Planning, Building and Code Enforcement</i></p>	<p><b>Program 6.5:</b> Update the City’s Safety Element to address earthquakes, flooding, and other natural and manmade hazards; consider policies such as studying the inventory of the soft-story housing stock and establishing a seismic retrofit program to address these buildings; establishing a program for remediation of lead-based paint in older residential buildings; and incorporating targeted outreach to vulnerable and special needs populations to ensure their needs are well-addressed.</p>	<p>This Program addresses updates to the City’s General Plan Safety Element to meet the needs of special needs populations. This Program does not result in direct or indirect housing development. This Program would not change conclusions made in the Vista 2035 General Plan EIR. Therefore, this Program would not result in physical environmental impacts.</p>
	<p><b>Policy 6.6:</b> Continue to disseminate information through onsite resources and workshops to homeowners, property owners, and developers on FEMA, state, and local regulations on floodplain construction and management practices.</p>	<p>This Policy Action addresses the City’s efforts to increase the resiliency of residential developments by providing information on flood-related construction and management practices . This Policy Action does not result in direct or indirect housing development. This Policy Action would not modify the conclusions made in the Vista 2035 General Plan EIR or result in physical environmental impacts.</p>
	<p><b>Program 6.7:</b> Continue to participate in FEMA’s Community Rating System Program to ensure that new housing development complies with floodplain construction standards with submittal of required certifications.</p>	<p>This Program addresses the City’s efforts to promote resilient residential development through enforcement of relevant construction standards. This Program does not result in direct or indirect housing development. Therefore, this Program would not modify the conclusions made in the Vista 2035 General Plan EIR or result in physical environmental impacts.</p>

**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

<b>Goal 7 Create more housing opportunities for special needs households, including large households, people at risk of or experiencing homelessness, and individuals with disabilities.</b>		
<p><b>Objective:</b> Incorporate special housing needs into City-supported future affordable housing developments.</p> <p><i>Lead: Housing and Economic Development</i></p>	<p><b>Policy 7.1:</b> For affordable housing projects located near high-quality transit and on City-owned land, with City subsidy, or where otherwise legally defensible, require developers of affordable housing to demonstrate how they will serve people with disabilities in the development.</p>	<p>This Policy Action would require residential project applicants (as deemed appropriate by the City) to provide supportive services and accessible development targeted for persons with developmental disabilities. This Policy Action does not result in direct housing construction. This Policy Action may result in minor technical changes and Development Code amendments but would not modify conclusions of the Vista 2035 General Plan EIR. Therefore, this Policy Action would not result in physical environmental impacts.</p>
<p><b>Objective:</b> Provide housing solutions for unhoused residents in East Palo Alto.</p> <p><i>Leads: Housing and Economic Development, Planning</i></p>	<p><b>Program 7.2:</b> Finalize the Master Temporary Use Permit for temporary housing program rollout that includes City coverage of permit fees to provide housing for individuals experiencing homelessness in the community.</p> <ul style="list-style-type: none"> <li>• <i>Target: Seek to assist at least five (5) RVs through the MTUP program.</i></li> </ul>	<p>This Policy Action only addresses finalization of the City's Zoning Code to encourage and facilitate emergency shelters and transitional and supportive housing. This Policy Action does not result in direct housing or shelter development. The City would provide information on Temporary Use Permits to future applicants and collaborate with local organizations to promote applications for transitional and supportive housing. This Policy Action may result in minor technical changes and Development Code amendments but would not modify conclusions of the Vista 2035 General Plan EIR. Therefore, this Policy Action would not result in physical environmental impacts.</p>
	<p><b>Program 7.3:</b> Evaluate lessons learned and options for longer-term, holistic solutions to RVs parked in public right of way with the conclusion of the RV Safe Parking Program.</p>	<p>This Program only evaluates and reflects upon the end of a program. This Program does not result in direct housing development. Rather, it involves evaluation of the existing RV Safe Parking Program and identification of future programs. Therefore, this Program would not modify conclusions of the Vista 2035 General Plan EIR or result in physical environmental impacts.</p>

**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

	<p><b>Program 7.4:</b> Research all available public funding sources to address homelessness and consider City investment of funds in homeless outreach and case management to supplement the countywide system.</p> <ul style="list-style-type: none"> <li>• <i>Target: Seek funds to assist at least sixty (60) unhoused individuals during the 6th cycle Housing Element period.</i></li> </ul>	<p>This Program only addresses the identification, pursuit and use of public funds for assisting the homeless. This Program does not result in direct housing or shelter development. Rather, it includes researching and reporting on available funding opportunities to provide shelter and other services for the homeless. Therefore, this Program would not modify conclusions of the Vista 2035 General Plan EIR or result in physical environmental impacts.</p>
	<p><b>Policy 7.5:</b> Pursue expansion of support programs for unhoused residents by establishing partnerships with other public agencies, private corporations and foundations, and non-profit service providers.</p> <ul style="list-style-type: none"> <li>• <i>Target: Pursue programs and partnerships to provide support services for a minimum of sixty (60) unhoused households or individuals during the 6th cycle Housing Element period.</i></li> </ul>	<p>This Policy Action only addresses expansion of supportive programs for unhoused residents through partnership with other organizations with such initiatives. This Program does not result in direct housing or shelter development. Therefore, this Program would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>
	<p><b>Policy 7.6:</b> Continue to support the low barrier navigation center and emergency shelter operated by WeHope, a non-profit organization, that provides an interim shelter and supportive services for unhoused individuals. Accommodate the special needs of at-risk youths, households with children, and persons with disabilities.</p> <ul style="list-style-type: none"> <li>• <i>Target: Provide an emergency shelter(s) with a minimum of 100 beds for unhoused and at-risk individuals during the 6th cycle Housing Element period.</i></li> </ul>	<p>This Policy Action only addresses the City's support of WeHope temporary and transitional housing facilities. This Policy Action does not result in direct or indirect housing development. Therefore, this Policy Action would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>

**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

<p><b>Objective:</b> Reduce overcrowding and unsafe housing conditions related to housing affordability in East Palo Alto.</p> <p><i>Lead: Housing and Economic Development, Planning</i></p>	<p><b>Policy 7.7:</b> Develop options for incentivizing deeply affordable housing units that serve larger household sizes, such as allowing additional density or other relaxed zoning regulations.</p> <ul style="list-style-type: none"> <li>• <i>Target: Seek to produce a minimum of five (5) affordable housing units for larger households during the 6th cycle Housing Element.</i></li> </ul> <p><b>Policy 7.8:</b> Continue to require residential projects to include Extremely Low-Income housing units through the City’s Inclusionary Housing Program. Encourage production of deed-restricted ADUs serving Extremely Low and Very Low-Income households as an Inclusionary Housing Alternative Compliance option instead of paying in-lieu fees for fractional unit requirements.</p> <ul style="list-style-type: none"> <li>• <i>Target: Seek to produce a minimum of 69 Extremely Low and Very Low-Income Units, which includes deed restricted ADUs.</i></li> </ul>	<p>This Policy Action only includes review of the City’s Zoning Code to identify opportunities to encourage and facilitate development of larger affordable housing units to meet the needs of larger households. This Policy Action does not result in direct housing development. Therefore, this Policy Action would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p> <p>This Policy Action includes promotion of inclusionary ADUs by exhibiting past projects with inclusionary ADUs and use of incentive programs on the City’s website. This Policy Action does not result in direct housing development. Therefore, this Policy Action would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>
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**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

<b>Goal 8 Improve transparency and communication between the City and the public on housing issues.</b>		
<p><b>Objective:</b> Make the City website, social media, and newsletter a reliable source of housing information and make parallel efforts to reach residents through mailers and in-person meetings. <i>Lead: Housing and Economic Development</i></p>	<p><b>Program 8.1:</b> Improve and maintain the Housing website as a primary means of communicating the work of the Division. Expand measures to inform homeowners, landlords ,and tenants about available local and County housing resources and supportive services.</p>	<p>This Program only addresses the City’s efforts to increase the accessibility and availability of housing-related information through increased public outreach and engagement. This Program does not result in direct housing development. This Program is primarily for informational and accessibility purposes; therefore, it would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>
	<p><b>Policy 8.2:</b> Create a budget for mailers and non-digital outreach on Housing workplan items at the start of each fiscal year.</p>	<p>This Policy Action only addresses the City’s efforts to increase the accessibility and availability of housing-related information through increased public outreach and engagement. This Program/Policy does not result in direct housing development. This Program /Policy is primarily for informational and accessibility purposes; therefore, it would not result in physical environmental impacts, or change the conclusions of the Vista 2035 General Plan EIR.</p>
<p><b>Objective:</b> Incorporate language accessibility/language justice into City materials and meetings. <i>Leads: City Manager’s Office, Planning, Housing and Economic Development</i></p>	<p><b>Policy 8.3:</b> Provide translation of materials and interpretation of City Council, Planning Commission, Rent Stabilization, and other City meetings in alignment with City’s Language Policy.</p>	<p>This Policy only addresses the City’s efforts to increase the accessibility and availability of housing-related information to non-English-speaking residents. This Policy does not result in direct housing development. This Policy is primarily for informational and accessibility purposes; therefore, it would not change conclusions made in the Vista 2035 General Plan EIR or result in physical environmental impacts.</p>
<b>Goal 9 Build City capacity for long-term housing planning and implementation of a range of Housing programs and initiatives.</b>		
<p><b>Objective:</b> Maintain sufficient Housing Division staff to implement Housing Element programs.</p>	<p><b>Policy 9.1:</b> Regularly assess the level of staffing or contract assistance to ensure that sufficient staffing is committed to implement the 6<sup>th</sup> cycle Housing Element policies and programs are completed in a timely manner per the Implementation Plan.</p>	<p>This Policy addresses the City’s efforts to make progress on Housing Element goals and programs by ensuring adequate staffing for implementation. This Policy does not result in direct housing development. This Policy Action would not modify the conclusions made in the Vista 2035 General Plan EIR or result in physical environmental impacts.</p>

**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

<p><b>Objective:</b> Seek efficiencies and collaborative staffing and resource opportunities to simultaneously implement the Housing Element programs and other Housing Division responsibilities.</p> <p><i>Leads: Housing and Economic Development, City Manager's Office</i></p>	<p><b>Program 9.2:</b> Join with other cities in San Mateo County to share housing staff to support longer-term housing initiatives and programs.</p>	<p>This Program only addresses the City's efforts to reduce costs and increase efficiency of ongoing housing initiatives and programs through collaboration and partnerships with other cities. This Program does not result in direct housing development. Therefore, it would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>
<p><b>Objective:</b> Work in close collaboration with the Planning Division to more efficiently achieve both divisions' goals and workplan items.</p> <p><i>Lead: Housing and Economic Development</i></p>	<p><b>Program 9.3:</b> Collaboratively update the City's Development Code to align Planning and Housing objectives, with an emphasis on resolving inconsistencies and ensuring consistency with the objectives of the City's General Plan.</p>	<p>This Program only addresses the City's efforts to facilitate housing development by promoting consistency between the General Plan and development standards. This Program does not result in direct housing development. Therefore, it would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>
<p><b>Objective:</b> Seek financing resources for affordable housing construction and preservation.</p> <p><i>Lead: Housing and Economic Development</i></p>	<p><b>Policy 9.4:</b> As Notices of Funding Availability (NOFA) are issued (typically annually), proactively work with the City's grant coordinator to apply for regional, state, and federal grants to finance qualifying affordable housing projects and to fund Housing Element programs, such as housing rehabilitation program and first-time homebuyer program.</p>	<p>This Policy Action only addresses the City's efforts to pursue and facilitate affordable housing development through State funding opportunities. This Program does not result in direct housing development. This Policy Action would not modify the conclusions made in the Vista 2035 General Plan EIR or result in physical environmental impacts.</p>
<p><b>Objective:</b> Monitor Housing Element Implementation Plan.</p> <p><i>Lead: Housing and Economic Development</i></p>	<p><b>Policy 9.5:</b> Review the Sites Inventory annually to assess progress in achieving the City's RHNA allocation and, as needed, consider identifying additional sites or adjusting development policies, programs, and priorities.</p>	<p>This Policy Action addresses the City's efforts to make progress on Housing Element goals and programs by reviewing the Sites Inventory and monitoring progress on goals. This Policy does not result in direct housing development. This Policy Action would not modify the conclusions made in the Vista 2035 General Plan EIR or result in physical environmental impacts.</p>



<p><b>Objective:</b> Monitor the Inclusionary Housing Ordinance. <i>Lead: Housing and Economic Development</i></p>	<p><b>Program 9.6:</b> Evaluate the effectiveness of the Inclusionary Housing Ordinance (IHO) in producing affordable units and the financial impact of the inclusionary requirements and Alternative Compliance Options on residential development. Evaluate the effect of changing economic, development, and financing conditions and the cumulative financial impact of development impact fees and exactions. Following completion of the evaluation, amend the IHO to reduce constraints within six months if necessary. Continue to assess the financial impact of the IHO on individual projects and implement further measures to reduce the barriers to housing production and achieve the City's RHINA if needed.</p> <ul style="list-style-type: none"> <li>• <i>Target: Include the IHO requirements in the financial feasibility analysis of impact fees on residential development; these analyses are scheduled every five years for consistency with the Mitigation Fee Act (next analysis to be completed in 2024; subsequent analysis in 2029/2030).</i></li> </ul>	<p>This Program only addresses the City's efforts to monitor progress of availability and access to existing and planned affordable housing developments in relation to the IHO. This Program does not result in direct housing development. This Program may result in minor technical changes but would not modify conclusions of the Vista 2035 General Plan EIR or Therefore, this Policy Action would not result in physical environmental impacts.</p>
<b>Goal 10 Amend Zoning and Other Development Regulations to Facilitate the Construction of Housing.</b>		
<p><b>Objective:</b> Require replacement housing to be provided for applicable housing developments. <i>Lead: Housing and Economic Development</i></p>	<p><b>Policy 10.1:</b> For applicable development projects that will be removing residential units, require a replacement housing program for lower-income households in accordance with Government Code 65583.2(g).</p>	<p>This Policy Action only addresses the City's efforts to promote housing security by requiring replacement housing be considered when development projects intend to remove existing housing units. This Policy Action does not result in direct or indirect housing development. Therefore, it would not modify conclusions of the Vista 2035 General Plan EIR or result in physical environmental impacts.</p>



**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

<p><b>Objective:</b> Update zoning and development standards as needed for Emergency Shelters. <i>Lead: Planning</i></p>	<p><b>Program 10.2:</b> Evaluate current sites, development standards, and approval process and amend the Development Code to comply with Assembly Bill 2339 and other applicable state laws. AB 2339 adds specificity on how jurisdictions plan for emergency shelters and ensure sufficient capacity for low-income housing in their housing elements. This law requires that the identified zones for emergency shelter meet at least one of the following: (1) vacant and zoned for residential use; (2) vacant and zoned for nonresidential use if the local government can demonstrate how the sites are located near amenities and services that serve people experiencing homelessness; or (3) nonvacant if the site is suitable for use as a shelter in the current planning period. Amend the Development Code to address zoning requirements, update the definition of emergency shelters, ensure sufficient capacity for emergency shelters in zones with proximity to transportation and homelessness services, establish objective development standards, and comply with all other requirements of AB 2339.</p>	<p>This Program only addresses the City’s efforts to comply with State housing law and account for sufficiency in emergency shelters and low-income housing. This Program does not result in direct or indirect housing development. Therefore, it would not modify conclusions of the Vista 2035 General Plan EIR or result in physical environmental impacts.</p>
<p><b>Objective:</b> Update zoning as needed for By-Right Permanent Supportive Housing. <i>Lead: Planning</i></p>	<p><b>Program 10.3:</b> Update zoning to require permanent supportive housing to be allowed by-right in residential and mixed-use zoning districts per Government Code 65651.</p>	<p>This Program only addresses the City’s efforts to facilitate supportive housing by allowing it by-right in residential and mixed-use zoning districts. This Program does not result in direct or indirect housing development. Therefore, it would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>
<p><b>Objective:</b> Update zoning as needed for Housing for Farmworkers. <i>Lead: Planning</i></p>	<p><b>Program 10.4:</b> Update zoning and the definition of a “housekeeping unit” to comply with the Employee Housing Act and adopt a “barrier-free” definition that does not subject persons with disabilities to special regulations..</p>	<p>This Program only addresses updating the City Zoning Code to be consistent with State housing law. This Program does not result in direct or indirect housing development. Therefore, it would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>

**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

<p><b>Objective:</b> Update zoning as needed for Accessory Dwelling Units (ADU). <i>Lead: Planning</i></p>	<p><b>Program 10.5</b> Amend the ADU ordinance to comply with State law, pending formal comment from HCD by December 2023. Further actions include programs and policies to facilitate construction of ADUs in Goal 1. Consider additional measures to remove zoning impediments such as relaxing side and rear yard setback and open space standards and facilitating conversion of unpermitted accessory structures to ADUs.</p> <ul style="list-style-type: none"> <li>• <i>Target: Implement measures with the goal of approving at least 115 new or legalized ADUs in single-family zoning districts during the 6th cycle Housing Element period.</i></li> </ul>	<p>This Program only addresses the City's efforts to make City regulations and policies consistent with state laws regarding ADUs and to facilitate ADU construction. This Program does not result in direct or indirect housing development, as ADUs are already allowed per city regulations. Therefore, it would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>
<p><b>Objective:</b> Update zoning as needed for Residential Care Facilities. <i>Lead: Planning</i></p>	<p><b>Program 10.6:</b> Update zoning regulations for residential care facilities and group homes (7+) to comply with state law and to reduce barriers for establishing facilities for special needs populations such as persons with disabilities, including revising existing spacing constraints.</p>	<p>This Program only addresses updating the City Zoning Code to promote consistency with state law and facilitate development of housing for special needs populations. This Program does not result in direct or indirect housing development. Therefore, it would not result in physical environmental impacts or change the conclusions of the Vista 2035 General Plan EIR.</p>
<p><b>Objective:</b> Update other zoning ordinance regulations to comply with latest state law and reduce impediments for residential development. <i>Lead: Planning</i></p>	<p><b>Program 10.7:</b> Review zoning ordinance regulations for compliance with the current state laws and reduce development impediments or provide incentives such as standards pertaining to parking, open space, density bonuses, and objective design standards. Implement Policies/Programs 1.1 to 1.6, 1.18, 1.20, 1.21 and 1.25 for a comprehensive multi-prone approach to reduce regulatory constraints, improve development processing, create incentives for housing development, and reduce, mitigate, and not constrain housing supply, cost, and ability to achieve maximum densities.</p>	<p>This Program only addresses updating the City Zoning Code to promote consistency with state law and to facilitate residential development in the City. This Program does not result in direct or indirect housing development. This Program may result in minor technical changes but would not modify conclusions of the Vista 2035 General Plan EIR. Therefore, it would not result in physical environmental impacts.</p>

**Attachment A  
East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

<p><b>Objective:</b> Adopt update to Ravenswood/Four Corners Specific Plan to include residential uses at designated locations. <i>Lead: Planning</i></p>	<p><b>Program 10.8:</b> Adopt update to Specific Plan to allow residential and mixed-use development at designated locations in plan area and address provisions as noted in other Housing Element policies/programs. Concurrently, rezone parcels for residential and mixed-use development. Additionally, establish by-right approval, minimum residential densities for mixed use zoning, objective design standards, minimum residential requirements for mixed use zoning, parking, flexible open space standards for affordable housing, transportation demand management (TDM) program, streamlined subdivision approvals, and incentives for special needs populations. Further, resolve inconsistencies between the General Plan and current Specific Plan (See related Policy 1.21).</p> <ul style="list-style-type: none"> <li>• <i>Target: Zone sites and define minimum densities and objective design standards to accommodate 1,350 to 1,600 housing units within the Specific Plan area.</i></li> </ul>	<p>This Program only addresses updating the Ravenswood/Four Corners Specific Plan to allow for more residential development in specific locations of the plan area. Further, this Program would review and revise specific plan development standards concerning residential and mixed-use development. This Program does not result in direct or indirect housing development beyond the effects of plan buildout scenarios that are currently being evaluated through review of and processing of the specific plan. Because this rezoning through the specific plan update would be evaluated by a separate EIR, this program would not modify the conclusions made in the Vista 2035 General Plan EIR or result in physical environmental impacts.</p>
<p><b>Objective:</b> Facilitate single-room occupancy (SRO) and transitional supportive housing. <i>Lead: Planning, Housing and Economic Development</i></p>	<p><b>Program 10.9:</b> Develop procedures and review zoning regulations with the objective of encouraging and facilitating the development of SRO projects and transitional supportive housing at suitable locations.</p> <ul style="list-style-type: none"> <li>• <i>Target: During the 6th cycle Housing Element period, streamline zoning regulations as needed, identify potential funding, and reach out to developers (e.g., through a request for proposals or qualifications) to construct an SRO or supportive housing project on a suitable site in the City with convenient transit service.</i></li> </ul>	<p>This Program only addresses facilitating SRO or supportive housing projects at accessible locations. This Program does not result in direct housing development. This Policy Action may result in minor technical changes but would not modify conclusions of the Vista 2035 General Plan EIR or Therefore, this Policy Action would not result in physical environmental impacts beyond those already under analysis by the City.</p>

**Attachment A**  
**East Palo Alto 2023-2031 Housing Element Update Program Review and Environmental Matrix**

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<p><b>Objective:</b> Maintain General Plan and zoning consistency.  <i>Lead: Land Planning</i></p>	<p><b>Policy 10.10:</b> During the 6th cycle Housing Element, ensure that the General Plan elements are internally consistent and that the land use designation and zoning are consistent for properties included in the City’s RHNA Sites Inventory.</p>	<p>This Policy Action addresses the City’s efforts to make progress on Housing Element goals and programs by reviewing the Sites Inventory and monitoring consistency across City documents. This Policy does not result in direct housing development. This Policy Action would not modify the conclusions made in the Vista 2035 General Plan EIR or result in physical environmental impacts.</p>
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