Area is contributing to overcrowding and is forcing people to move away from Santa Clara. It is possible that development pressure has been focused on the City's specific plan areas and that once these areas are built out, developers may look to redevelop older lower density buildings that are naturally occurring affordable housing. This indicates a need to build more affordable housing, and policies that prevent a net loss of affordability if older market rate buildings are redeveloped, and to potentially require relocation assistance for displaced residents.

AFFH Analysis of the Sites Inventory

An important part of the AFFH analysis is looking at where the site inventory is directing housing growth and how that will replace segregated living patterns with integrated and balanced living patterns and convert any racially or ethnically concentrated areas that may exist into areas of opportunity for households at all income levels. The site inventory in chapter 13.3 places 82.5% of the City's housing growth over the next 8 years into in HCD/TCAC Opportunity Map High or Highest Resource areas. The site inventory includes a buffer of additional units above the required RHNA so most of the following figures exceed 100%.

- 84.5 percent of the City's Very Low Income RHNA units are located in High or Highest Resource areas.
    - VLI RHNA = 2,872 units.
    - VLI Units in Sites Inventory: 252 in Highest Resource Areas (9% of VLI RHNA) and 2,169 in High Resource Areas (75.5% of VLI RHNA).
- 126 percent of the City's Low Income RHNA units located in High or Highest Resource areas.
    - LI RHNA = 1,653 units.
    - LI Units in Sites Inventory: 358 in Highest Resource Areas (22% of LI RHNA) and 1,726 in High Resource Areas (104% of LI RHNA).
- 104 percent of the City's Moderate RHNA units located in High or Highest Resource areas.
    - Moderate RHNA = 1,981 units.
    - Moderate Units in Sites Inventory: 112 in Highest Resource Areas (6% of Moderate RHNA) and 1,946 in High Resource Areas (98% of Moderate RHNA).
- 175 percent of the City's Above Moderate RHNA units located in High or Highest Resource areas.
    - Above Moderate RHNA = 5,126 units.
    - Above Moderate Units in Sites Inventory: 161 in Highest Resource Areas (3% of Above Moderate RHNA) and 8,813 in High Resource Areas (172% of Above Moderate RHNA).

The following table provides additional details on which types of units are located in different HCD/TCAC opportunity Map Areas:

Table 13.3-22: Sites Inventory Units by HCD/TCAC Opportunity Map Area

	Affordability Category					HCD/TCAC Opportunity Map Areas: Highest Resource				High Resource				Moderate Resource				Low Resource			
Site/Credit Type	**VLI**	**LI**	**Mod.**	**Above Mod.**	**Total Capacity**	**VLI**	**LI**	**Mod.**	**Above Mod.**	**VLI**	**LI**	**Mod.**	**Above Mod.**	**VLI**	**LI**	**Mod.**	**Above Mod.**	**VLI**	**LI**	**Mod.**	**Above Mod.**
RHNA	**2,872**	**1,653**	**1,981**	**5,126**	**11,632**																
Pending and Approved Projects	**710**	**794**	**627**	**10,898**	**13,029**	**148**	**271**	**20**	**145**	**364**	**372**	**464**	**8,676**	**92**	**72**	**63**	**669**	**106**	**79**	**80**	**1,408**
Tasman East Focus Area SP	*114*	*239*	*175*	*3,838*	*4,366*					*114*	*239*	*175*	*3,838*								
Patrick Henry Drive SP	*76*	*75*	*75*	*1,294*	*1,520*					*76*	*75*	*75*	*1,294*								
Lawrence Station Area	*39*	*45*	*58*	*635*	*777*									*39*	*45*	*58*	*635*				
Freedom Circle Focus Area	*54*	*54*	*54*	*913*	*1,075*					*54*	*54*	*54*	*913*								
Other[1]	*427*	*381*	*265*	*4,218*	*5,291*	*148*	*271*	*20*	*145*	*120*	*4*	*160*	*2,631*	*53*	*27*	*5*	*34*	*106*	*79*	*80*	*1,408*
ADU Projection	**118**	**118**	**118**	**39**	**393**	**47**	**47**	**47**	**16**	**47**	**47**	**47**	**16**	**18**	**18**	**18**	**6**	**6**	**6**	**6**	**1**
Available Specific Plan Sites	**1,748**	**1,295**	**1,437**	**140**	**4,620**					**1,625**	**1,204**	**1,326**	**121**	**123**	**91**	**111**	**19**				
Tasman East Focus Area SP	*268*	*196*	*318*	*121*	*903*					*268*	*196*	*318*	*121*								
Patrick Henry Drive SP	*1,357*	*1,008*	*1,008*	*-*	*3,664*					*1,357*	*1,008*	*1,008*									
Lawrence Station Area	*123*	*91*	*111*	*19*	*344*									*123*	*91*	*111*	*19*				
El Camino Real Rezoning Sites	**319**	**236**	**250**	**-**	**805**	**57**	**40**	**45**	**-**	**133**	**103**	**109**	**-**	**129**	**93**	**96**	**-**	**-**	**-**	**-**	**-**
Total	**2,895**	**2,443**	**2,432**	**11,077**	**18,847**	**252**	**358**	**112**	**161**	**2,169**	**1,726**	**1,946**	**8,813**	**362**	**274**	**288**	**694**	**112**	**85**	**86**	**1,409**
Surplus Units	*23*	*790*	*451*	*5,951*	***7,215***																
Surplus Percentage Above RHNA	*0.8%*	*47.8%*	*22.8%*	*116.1%*	***62%***																

4.7%	**Highest Resource**	**77.8%**	**High Resource**	**8.6%**	**Moderate Resource**	**9%**	**Low Resource**

Note:

1. Included in the "Other" category, the Mission Point Project, a 48-acre mixed-use Planned Development that has been entitled to allow up to a maximum of 2,600 residential units and is subject to a 10-year Development Agreement with three optional 5-year extensions, is still in the early planning stages, so to be conservative, only a portion of maximum allowable residential units have been included. The Developer has agreed to provide at least fifteen (15%) percent of their units at rents or prices affordable to very low, low and moderate income households or some combination thereof, providing an average affordability of eighty (80%) AMI with no individual affordable rental unit exceeding a maximum of one hundred percent (100%) AMI and no individual affordable for-sale unit exceeding a maximum of one hundred and twenty percent (120%) AMI.

period. As determined by ABAG, the City of Santa Clara's allocation for the 2023-2031 planning period is 11,632 housing units, with the units distributed among the four income categories as shown in Table 13.6-1.

Table 13.6-1 City of Santa Clara RHNA 2023-2031

Income Group	*Income Category (% AMI)*	*RHNA (Housing Units)*	*Percentage of Total Housing Units*
Very Low	<50%	2,872	25%
Low	50-80%	1,653	14%
Moderate	80-120%	1,981	17%
Above Moderate	>120%	5,126	44%
Total		**11,632**	**100%**

Source(s): Final Regional Housing Needs Allocation (RHNA) Plan: San Francisco Bay Area, 2023-2031, Updated March 2022.
Note(s):
1 AMI = Area Median Income
2 Pursuant to AB 2634, local jurisdictions are required to project the housing needs of extremely low-income households (0-30% AMI) and consider this income group a subset of the very low-income category. In estimating the number of extremely low-income households, a jurisdiction can use 50% of the very low-income allocation or apportion the very low-income figure based on Census data.

Progress Toward the RHNA

Since the RHNA uses June 30, 2022, as the baseline for growth projections for the 2023-2031 Housing Element planning period, jurisdictions may claim units approved and proposed that are anticipated to be complete (have a Certificate of Occupancy) after June 30, 2022.

Approved and proposed residential development projects credited toward the RHNA include a variety of affordable and market-rate projects in various stages of the development process. Most of these projects are concentrated within Specific Plan areas and along major thoroughfares, where residential development is expected to continue throughout the planning period. These projects are credited toward the RHNA based on the affordability and unit count of the development. Combined, a total of 13,029 units are expected to be completed within the planning period, as shown in Table 13.6-2.

Approved Projects

Approved residential development projects credited toward the 2023-2031 RHNA have been reviewed by Planning and other City departments for compliance with applicable Codes and regulations and have received all required planning entitlement approvals. The next step for these projects is to proceed through the building permit application review, issuance, and

construction process. All approved projects have anticipated completion and occupancy permits that will be finalized on or after June 30, 2022 and before January 31, 2031.

Historically, the drop-out rate (percentage of projects that do not develop after receiving entitlements) in the City of Santa Clara has been extremely low. Rather than drop-out completely after receiving entitlements, it is more common that projects will delay the start of construction until presented with more favorable market conditions. After receiving entitlements, the primary barrier to development has, and will likely continue to be, the availability of financing/market conditions.

Pending or Proposed Projects

Five projects in various stages of planning review are included as proposed projects. These sites are included although there is no certainty those units will be achieved because the proposals have not been approved, are currently under staff review, or are pending a formal application submittal. The identified realistic capacity for these sites is the total units included in the preliminary proposals.

To help ensure that pending and proposed projects will complete the development process and result in new units, the City has included an additional ongoing objective under Action 10, Adequate Sites Inventory. The Planning Division will included a narrative and table within the City's Annual Progress Report that describes the status of projects listed in Table 13.6-2, Pending and Approved Projects, and when an entitlement is nearing expiration, the Planning Division will proactively notify applicants to apply for an extension.

In Addition, the Zoning Code Update will allow administrative extensions for entitlements Development approvals are generally permitted for 2 years initially, and then two 1-year administrative extensions are allowed, which saves time and eliminates that possibility of adding conditions. The current process requires going through entitlement process again for extension.

The administrative time extension process has been added to Action 9, Zoning Ordinance.

Since there is no guarantee that the projects will be approved or developed, in the case a proposed development falls through, the sites are still available to accommodate those identified units and may be able to count toward the lower-income RHNA depending on site density and size. Affordability for these projects is assumed based on the site's location per Specific Plan requirements, the City's inclusionary housing ordinance requirements, or a developer/affordable housing agreement. The status of the following projects is as of December 2023.

As shown in Table 13.6-2 below, the total of all pending and approved projects is 13,029units, which is 1,397 units more than the City's total RHNA of 11,632 units. Because the majority of pending and approved projects fall within the above moderate affordability category (10,898 units), the City has a remaining RHNA of 4,375 units in the very low, low, and moderate affordability categories.

Site/Credit Type	AFFORDABILITY CATEGORIES					*Project Status (est. completion date)*	*Affordability*
	Very Low [0-50% AMI]	Low [50-80% AMI]	Moderate [80-120% AMI]	Above Moderate [above 120% AMI]	Total Units		
Gateway Crossings (Hunter/Storm) - Phase 2	-	42	42	756	**840**	Proposed	*per Developer Agreement, Phase 2: affordability TBD*
Mission Point/3005 Democracy Way (Kylli)			123	697	**820**	Approved[6]	*per Developer Agreement; affordability TBD*
subtotal other project(s)	*427*	*381*	*142*	*4,218*	*5,291*		
Total Pending and Approved Projects	**710**	**794**	**627**	**10,898**	**13,029**		
Remaining RHNA 2023-2031	**2,162**	**859**	**1,354**	**(5,772)**	**(1,397)**		

Source(s): City of Santa Clara, April 2023.

Note(s): All calculations were rounded down. There are likely discrepancies due to rounding down between the row and column totals. Project Status "Approved" means a project has received all required Planning entitlements.

[1] Phase I building permit issued 4/18/22 for 311 units; the remaining 192 units are approved.

[2] Application expected early 2024.

[3] Application expected early 2024.

[4] 165 unit affordable senior apartment occupied.

[5] Project's affordable housing obligation consolidated into 2302 Calle Del Mundo

[6] The Mission Point Project, a 48-acre mixed-use Planned Development that has been entitled to allow up to a maximum of 2,600 residential units and is subject to a 10-year Development Agreement with three optional 5-year extensions, is still in the early planning stages, so to be conservative, only a portion of maximum allowable residential units have been included. The Developer has agreed to provide at least fifteen (15%) percent of their units at rents or prices affordable to very low, low and moderate income households or some combination thereof, providing an average affordability of eighty (80%) AMI with no individual affordable rental unit exceeding a maximum of one hundred percent (100%) AMI and no individual affordable for-sale unit exceeding a maximum of one hundred and twenty percent (120%) AMI.

- Phase 2 (2030-2034): 2,234 units
- Housing Element (2023-2031): 5,184 units (1,520 pending/approved + 3,664 sites)

- Ten remaining Patrick Henry Drive sites have maximum densities of 149 du/ac, one site has a maximum density of 250 du/ac, and one site has a maximum density of 99 du/ac.
- 72% of 149 du/ac = 107 du/ac. One approved Patrick Henry Drive project has a density of 122 du/ac (Summerhill). There are pre-applications on file for projects on two other sites that have proposed densities of 123 du/ac (Sares Regis) and 148 du/ac (Walnut Hill).

For the Lawrence Station area, the realistic capacity of the remaining sites is a total of 344 units (123 VLI, 91 LI, 111 Mod, and 19 Above Mod). See Table 13.6-5. The buildout horizon for these units falls within the 6th cycle.

For the Tasman East Specific Plan area, the realistic capacity of the remaining sites not tied to approved or proposed projects is 903 units, per Table 13.6-5. When combined with the number of units already proposed or on file, the total number of units is 769 units greater than the total number of units approved as a part of the adoption of the Tasman East Specific Plan. The City is currently processing a Specific Plan amendment to increase the capacity of the plan area by an additional 1,500 units. That effort is recognized as Action 19, Tasman East Specific Plan Amendment in the Housing Plan. The buildout horizon for the Housing Element portion of these additional units is 2030.

For the Patrick Henry Drive Plan area, sites totaling 3,664 units are available during the planning period. Additionally, 1,520 units have either been proposed or approved in the Patrick Henry Drive area.

Given the fact that housing in all the City's Specific Plan areas and on the El Camino Real rezoning sites (with the adoption of the December 2023 Zoning Ordinance Amendment and spring 2024 Zoning Map Amendment) is allowed by right, the primary impediment to development of housing, according to feedback received from developers at stakeholder meetings, is the economic environment (construction and land costs) and the ability for developers to obtain financing and/or state funding (for affordable projects). Another potentially significant impediment is the provision of infrastructure, which has been addressed in the Tasman East and Patrick Henry Drive plan areas through the creation and administration of infrastructure fees for the respective areas. For the few remaining projects not yet built in the Lawrence Station Area, required infrastructure improvements will be addressed through the development review process.

Table 13.6-4 Specific Plan Land Use Designations

Land Use Designation	*Min./Max. Density*	*Meets Default Density*	*Number of Parcels Included in 6th Cycle*	*Total Acreage of Available Sites*
Tasman East Focus Area Specific Plan				
Transit Neighborhood (parcels less than 1 acre)	60 to 350	Yes	13	7.033
Tasman East Specific Plan Subtotal			*13*	*7.033*
Patrick Henry Drive Focus Area Specific Plan				
Very High Density Residential	51 to 99	Yes	1	3.8
Village Residential	60 to 149	Yes	0[1]	9.062
High Density Flex	60 to 149	Yes	4	9.568
Urban Village	100 to 149	Yes	5	12.986
Urban Center	120 to 250	Yes	1	3.821
Patrick Henry Drive Specific Plan Subtotal			*11*	*39.238*
Lawrence Station Area Plan				
Low Density Residential	8 to 19	No	0	0
Medium Density Residential	20 to 36	No	3	1.993
High Density Residential	37 to 50	Yes	0	0
Very High Density Residential	51 to 100	Yes	1	3.14
Lawrence Station Area Plan Subtotal			*4*	*5.133*

Source(s): Patrick Henry Drive Specific Plan, March 2022. Lawrence Station Area Plan, Neighborhood Transit-Oriented Development Plan, Nov. 2016. Tasman East Focus Area Specific Plan, Nov. 2020.
Note: 1. The Patrick Henry Drive site designated Village Residential includes 26 parcels for each condominium unit and an approximately 6.8-acre common area parcel (shared parking/circulation). This site is available for redevelopment, but not included on the Sites Inventory for purposes of RHNA.

Re-use of Sites

AB 1397 (2017) requires that specific parameters be placed on sites that were used in previous Housing Element planning cycles but did not develop and are identified in the current Housing Element to meet the lower-income RHNA. However, as noted in HCD guidance documents, due to updates in the prior planning period to the General Plan or other planning activities, such as the creation of a specific plan, some sites previously identified in the Housing Element may have been rezoned during intervening years to allow a higher density, thereby increasing the potential

Site Selection

The Housing Element sites inventory, in addition to the list of pending and approved projects, includes accessory dwelling unit (ADU) projections, underutilized sites within Specific Plan areas zoned for high-density residential and mixed-use development, and the El Camino Real rezoning sites. These latter two categories have been used to demonstrate that the RHNA for the extremely low-, very low-, low- and moderate-income categories can be accommodated during the planning period. As the discussion below concludes, the sites have no identified constraints that would prevent development or reuse during the Housing Element period. Table 13.6-5 summarizes the sites inventory.

Table 13.6-5 Sites to Meet the RHNA

Site/Credit Type	*Affordability Category*				*Total Capacity*
	Lower		Moderate	Above Moderate	
	Very Low [0-50% AMI]	Low [50-80% AMI]	[80-120% AMI]	[> 120% AMI]	
Pending and Approved Projects	710	794	627	10,898	13,029
ADU Projection	118	118	118	39	393
Available Specific Plan Sites	1,748	1,295	1,437	140	4,620
Tasman East Focus Area Specific Plan	*268*	*196*	*318*	*121*	*903*
Patrick Henry Drive Focus Area Specific Plan	*1,357*	*1,008*	*1,008*	*-*	*3,373*
Lawrence Station Area Plan	*123*	*91*	*111*	*19*	*344*
El Camino Real Rezoning Sites	319	236	250	-	805
Total	**2,895**	**2,443**	**2,432**	**11,077**	**18,847**
RHNA	2,872	1,653	1,981	5,126	11,632
Surplus (buffer above RHNA)	***18%***		***23%***	***116%***	***62%***

Source(s): Final Regional Housing Needs Allocation (RHNA) Plan: San Francisco Bay Area, 2023-2031, Updated March 2022. Technical Assistance for Local Planning, Housing – Using ADUs to Satisfy RHNA, Technical Memo, March 2022. Patrick Henry Drive Specific Plan, March 2022. Lawrence Station Area Plan, Neighborhood Transit-Oriented Development Plan, Nov. 2016. Tasman East Focus Area Specific Plan, Nov. 2020.
Note(s): AMI = Area Median Income. In the Pending and Approved Projects category, the Mission Point Project, a 48-acre mixed-use Planned Development that has been entitled to allow up to a maximum of 2,600 residential units and is subject to a 10-year Development Agreement with three optional 5-year extensions, is still in the early planning stages, so to be conservative, only a portion of maximum allowable

residential units have been included. The Developer has agreed to provide at least fifteen (15%) percent of their units at rents or prices affordable to very low, low and moderate income households or some combination thereof, providing an average affordability of eighty (80%) AMI with no individual affordable rental unit exceeding a maximum of one hundred percent (100%) AMI and no individual affordable for-sale unit exceeding a maximum of one hundred and twenty percent (120%) AMI.

ADU Projection

Since 2017, the State legislature has passed a series of laws that significantly increase the potential for the development of ADUs and Junior ADUs (JADUs) by removing development barriers, allowing ADUs through ministerial permits, and requiring jurisdictions to include programs in their housing element that incentivize ADU development. Interest in constructing ADUs is high in Santa Clara and continues to grow. In 2018, the City issued 21 ADU building permits. In 2019, the number increased to 51 annual building permits, with similar numbers in 2020 (45 ADU building permits) and 2021 (53 ADU building permits), then increasing in 2022 to 76 ADU building permits. This represents a 262 percent increase in ADU production in Santa Clara between 2018 and 2022. The City estimates that interest will continue to increase over the next few years, given the many single-family neighborhoods citywide that create capacity for additional ADUs. As of June 2022, 53 percent (or 16,103 parcels) of total parcels were zoned for single-family housing, totaling 2,504 acres. ADUs are permitted on single-family, multi-family, and mixed-use lots, including R1, R2, and R3 zone districts, which represent a significant number of lots in Santa Clara.

As an incentive to ADU production, the City does not charge a Planning fee for review/processing ADU requests. Also, State law allows jurisdictions to charge impact fees on ADUs over 750 square feet, but the City of Santa Clara does not. The City has also exempted ADUs/JADUs from providing parking (JADUs that convert a garage space/s are required to provide replacement parking for the primary dwelling).

The slight dip in ADU production in 2020 may be due to the COVD-19 pandemic and other events of 2020. In 2022, the City had the highest number of ADU building permits to date, which is likely more representative of ADU production moving forward based on ADU trends in Santa Clara, new and pending favorable ADU legislation that created new incentives and streamlined processes to build ADUs, and the pent-up demand for additional housing in the Bay Area.

While it is impossible to predict with certainty the exact number of ADUs that will be developed during the planning period (2023-2031), the City conservatively estimates:

- An average of 49.2 ADUs per year will be constructed throughout the planning period. This reflects the average number of building permits issued for ADUs between 2018 and 2022. Given the anticipated increase in ADUs over the near term, this is a conservative estimate.

Patrick Henry Drive Focus Area Specific Plan

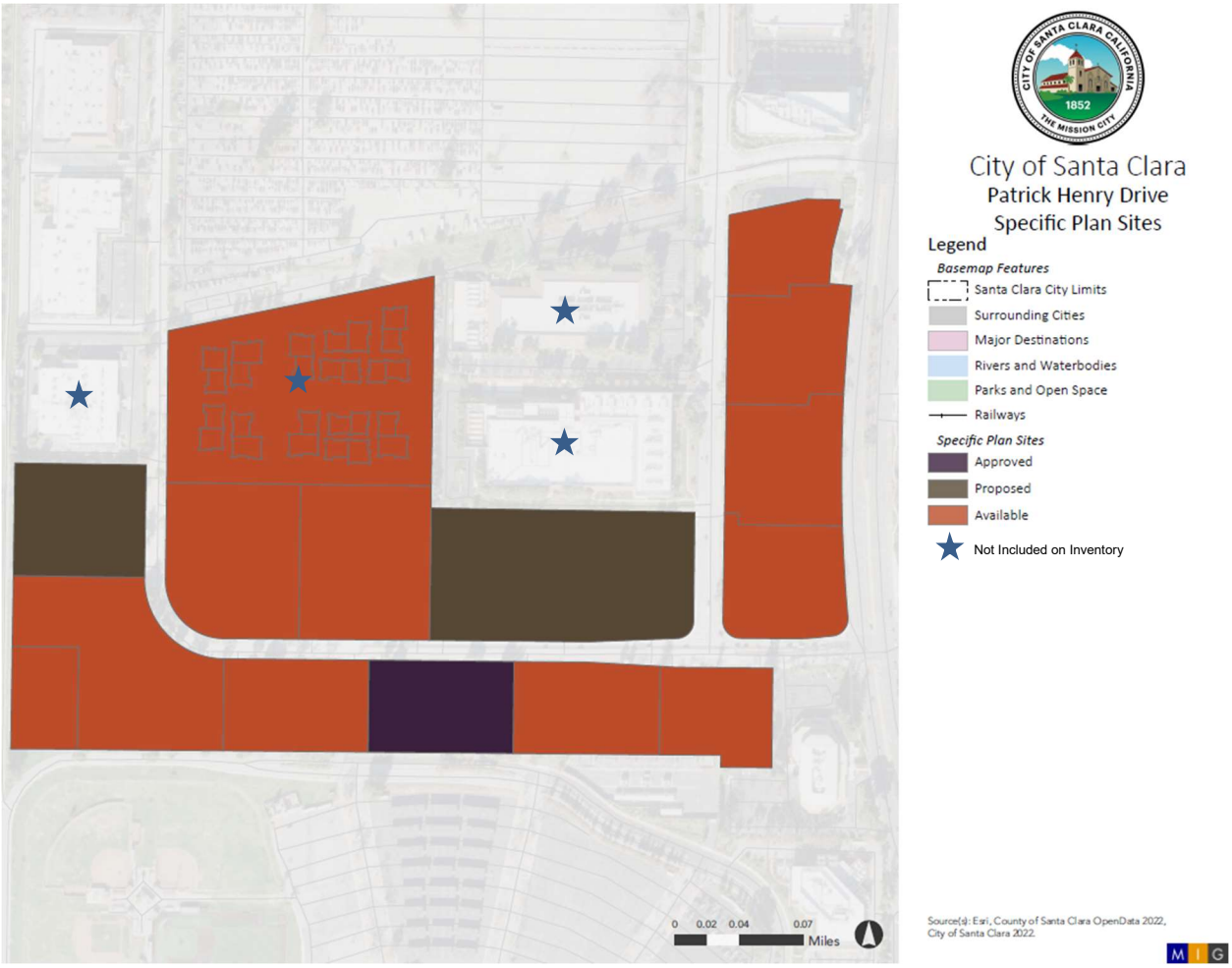
In March 2022, the City Council approved the Patrick Henry Drive Specific Plan. The planning area encompasses approximately 73.59 acres bounded by Sunnyvale and Calabazas Creek to the west, the southern edge of San Francisco Public Utilities Commission right-of-way to the north, Great America Parkway to the east, and Mission College to the south. As one of the City's first high-density residential neighborhoods, Patrick Henry Drive will add thousands of units to better balance the City's jobs-housing ratio, a share of which will be income restricted to help meet regional and local affordability goals. Several regional destinations and amenities are nearby, including Levi's Stadium, Great America Theme Park, and the Santa Clara Convention Center. The VTA light rail station at Old Ironsides and Tasman Drive is just over one-half mile, or an approximately 10-minute walk, from the center of the Specific Plan area.

The Patrick Henry Drive Specific Plan resulted from a collaborative planning effort involving the City, area property owners, and the Santa Clara community. The plan will create a 73.59-acre high-density, residential neighborhood located near regional destinations, including job-centers, transit, and other amenities. At buildout, the project will accommodate up to 12,000 new residential dwelling units and 310,000 square feet of nonresidential uses, including 200,000 square feet of new neighborhood-serving retail and public facilities, such as libraries and community spaces. New and improved pedestrian and bicycle connections, trails, and parks will link neighborhoods and enhance connections to nearby amenities and recreation destinations. Careful planning will ensure adequate infrastructure and services to support the proposed new development. Targeted residential densities range from a minimum of 51 dwelling units per acre to a maximum of 250 units per acre. These densities will help meet the demand for housing that addresses job and retail growth in the City and region.

Three projects within the Specific Plan area were counted toward the sixth cycle RHNA as approved, proposed, or under construction. Eleven remaining parcels, on approximately 30.2 acres, have been identified as sites and remain to be re-developed. Not Viable sites were identified and excluded based on existing uses. Assuming realistic capacity, on a parcel-level, the Patrick Henry Drive Focus Area Specific Plan sites identified in this Housing Element can accommodate a total of 3,373 units (see Table 13.6-5). Appendix B provides a detailed list of all sites, including assumed affordability. Appendix C provides supplemental sites inventory analysis including the availability of specific plan sites during the planning period and suitability of nonvacant sites.

There are no regulatory constraints or City-specified buildout horizons that would prevent the eleven remaining parcels from being developed in this Housing Element cycle. Sites that are unlikely to be developed in this Housing Element cycle have not been included and are shown in the Patrick Henry Drive plan as being in a later build-out horizon. As a result of the adoption of the Patrick Henry Drive Specific Plan and the associated program EIR, regulatory impediments to the development of those sites have been removed via a streamlined by-right approval process that includes CEQA tiering.

FIGURE 13.6-6 PATRICK HENRY DRIVE SITES



C

Appendix C
Supplemental Sites Inventory Analysis

Sites to Meet the RHNA

Santa Clara has taken concrete steps, including the recent adoption of multiple specific plans, to support a significant amount of new housing development within the City. There are 13,029 units in pending and approved projects with a status of either: proposed (i.e. awaiting Planning approval), approved (all required Planning entitlements secured), under construction, or occupied (See Table 13.6-2 Pending and Approved Projects).

The majority of pending and approved projects are market rate with the conservative assumption that assigns the 10,898 units from those projects into the Above Moderate (above 120% AMI) affordability category. The remaining pending and approved projects include over 2,100 restricted affordable units, because of the City's inclusionary requirements and/or the development of 100% affordable projects.

Although the total number of pending and approved units (13,029) exceeds the City's total RHNA of 11,632 units, as shown in the below table, these projects do not fully meet the City's RHNA requirement within the Very Low (0-50% AMI), Low (50-80% AMI), and Moderate (80-120% AMI) affordability categories.

In addition to the City's pending and approved projects (14,809 units) and projected ADU production (393 units), the Housing Element Sites Inventory includes redevelopment of available specific plan sites (4,620 units) and certain rezoning sites along the El Camino Real corridor (805 units).

The sites to meet the City's RHNA includes a surplus of units (buffer beyond the minimum RHNA target) in all affordability categories (i.e. Lower, Moderate, Above Moderate) above the 15 to 30-percent buffer recommended by HCD to comply with "no net loss" provisions of State Housing Element law, which requires jurisdictions to maintain a sufficient capacity to accommodate their RHNA throughout the planning period at all income levels.

Table 13.C-1 Sites to Meet the RHNA

Site/Credit Type	*Affordability Category*				*Total Capacity*
	Lower		Moderate	Above Moderate	
	Very Low [0-50% AMI]	Low [50-80% AMI]	[80-120% AMI]	[> 120% AMI]	
Pending and Approved Projects	710	794	627	10,898	13,029
Tasman East Focus Area	*114*	*239*	*175*	*3,838*	*4,366*
Patrick Henry Drive Focus	*76*	*75*	*75*	*1,294*	*1,520*
Lawrence Station Area Plan	*39*	*45*	*58*	*635*	*777*
Freedom Circle Focus Area	*54*	*54*	*54*	*913*	*1,075*
Other[2]	*427*	*381*	*265*	*4,218*	*5,291*
ADU Projection	118	118	118	39	393
Available Specific Plan Sites	1,748	1,295	1,437	140	4,620
Tasman East Focus Area	*268*	*196*	*318*	*121*	*903*
Patrick Henry Drive Focus Area	*1,357*	*1,008*	*1,008*	*-*	*3,373*
Lawrence Station Area Plan	*123*	*91*	*111*	*19*	*344*
El Camino Real Rezoning Sites[1]	319	236	250	-	805
Total	**2,895**	**2,443**	**2,432**	**11,077**	**18,847**
RHNA	2,872	1,653	1,981	5,126	11,632
Surplus (buffer above RHNA)	***18%***		***23%***	***116%***	***62%***

Notes:

1. *The El Camino Real rezoning sites are not required to accommodate a lower-income RHNA shortfall but have been included in the Sites Inventory for their contribution to the recommended RHNA buffer for lower-income units, particularly in the VLI affordability category.*
2. *In the "Other" category, the Mission Point Project, a 48-acre mixed-use Planned Development that has been entitled to allow up to a maximum of 2,600 residential units and is subject to a 10-year Development Agreement with three optional 5-year extensions, is still in the early planning stages, so to be conservative, only a portion of maximum allowable residential units have been included. The Developer has agreed to provide at least fifteen (15%) percent of their units at rents or prices affordable to very low, low and moderate income households or some combination thereof, providing an average affordability of eighty (80%) AMI with no individual affordable rental unit exceeding a maximum of one hundred percent (100%) AMI and no individual affordable for-sale unit exceeding a maximum of one hundred and twenty percent (120%) AMI.*

Availability of Specific Plan Sites During the Planning Period

Planned Buildout Horizons

Tasman East Focus Area

- Specific Plan (6,000-unit capacity)
    - Phase 1 (4,500 units)
    - Phase 2 (1,500 units) *Action 19
- Housing Element (5,269 units):
    - Pending and Approved (4,366 units, estimated completion 2028)
        - 196 units occupied
        - 2,441 units under construction
        - 581 units approved (all Planning entitlements secured)
        - 1,148 units pending Planning approval
    - Available Sites (903 units, estimated completion 2030)

Patrick Henry Drive Focus Area

- Specific Plan (10,300 to 12,000-unit capacity)
    - Phase 1 (5,839 units, estimated completion 2025-2029)
    - Phase 2 (2,234 units, estimated completion 2030-2034)
- Housing Element (5,184 units, estimated completion 2030)
    - Pending and Approved (1,520 units)
        - 307 units approved (all Planning entitlements secured)
        - 1,213 units pending Planning approval
    - Available Sites (3,664 units)

Lawrence Station Area

- Specific Plan (3,500-unit capacity)
- Housing Element (846 units) completed in 5th Cycle
- Housing Element (1,121 units)
    - Pending and Approved (777 units, estimated completion 2024-2027)
        - 449 units under construction
        - 328 units approved (all Planning entitlements secured)
    - Available Sites (344 units, estimated completion 2030)

11. 4701 Patrick Henry Drive (APN: 104-53-001 through -026) Consolidated Site "O"

Site is Available for Redevelopment, but Not Included on Sites Inventory for Purposes of RHNA

			Criteria 6 (Existing Site Utilization)				Criteria 7	Criteria 8
Acres	**Min. Density**	**Max. Density**	**Building Size (sf)**	**FAR**	**Stories**	**Surface Parking**	**Improvement Ratio**	**Year Built**
9.06	60	149	**52,920**	**0.13**	**1 & 2**	**All**	1.67	**1981**

Use(s): Office.

This 9.06-acre industrial site was developed with approximately 52,920 square feet in multiple, mostly one-story, with some two-story office buildings (0.13 FAR) with surface parking in 1981.

The following factors were used to determine that the existing use does not constitute an impediment to additional residential uses on the site and that the existing use is likely to be discontinued during the planning period.

- The low FAR (less than 0.5), mostly one-story, all surface parking, indicate that the property is underutilized, particularly in comparison to the high density residential allowed on the site.
- The existing buildings are almost 43 years old, indicating they may need substantial improvements or replacement for maximum financial return.
- The Village Residential Zoning District for this site has flexible development standards to facilitate redevelopment of this site, including a gross density maximum of 149 du/ac, height up to 160-feet and 12-stories, with no FAR maximum.
- This site (Great America Technology Park / Marriott Center) is currently made up of 26 separate condominium map parcels (and 1 common area parcel) with 10 separate owners. Although there are multiple owners, several of them, including one property owner who own a majority of the parcels, actively participated in the drafting of the Patrick Henry Drive Specific Plan, which has as one of its primary purposes the redevelopment of sites like 4701 Patrick Henry Drive.
- In a March 2024 conversation between the City and the majority property owner and a follow-up conversation with the broker representing the majority owners, they expressed keen interest in redeveloping their site with residential uses and noted that their existing

Public Comment on Sites Inventory

The City received public comment from the Housing Action Coalition on the adopted Housing Element objecting to the inclusion of several sites, including 4701 Patrick Henry Drive, on the sites inventory (see Appendix A Public Outreach).

Although the City continues to believe that 4701 Patrick Henry Drive is prime for redevelopment within the timeframe of the Housing Element (see evaluation criteria above), this site has been removed from the inventory. As noted in table 13.C-1, there are sufficient sites in the inventory to achieve the City's RHNA targets with a buffer at all affordability levels.

As described in Chapter 6 Housing Resources and reflected in Appendix B Electronic Sites Inventory and Appendix C Supplemental Sites Inventory Analysis, the following sites were also identified through public comments (see Appendix A Public Outreach) and have been excluded from the Sites Inventory since they are unlikely to redevelop with residential uses within the timeframe of the Housing Element:

- Tasman East Specific Plan
  - 5101 Lafayette Street (data center)
- Patrick Henry Drive Specific Plan
  - 4650 Old Ironsides Drive (data center)
  - 4700 Old Ironsides Drive (data center)
  - 4600 Patrick Henry Drive (Drawbridge parcel)
- Lawrence Station Area Plan
  - 2960 – 3030 Corvin Drive (data centers)
  - 3350 – 34420 Central Expressway (Gemini Rosemont industrial campus)
- El Camino Real Rezoning Sites
  - 3615 El Camino Real (24-hour Fitness)
  - 3735 and 3705 El Camino Real (Big Lots/Lucky)

As noted above (Appendix C), in addition to the removal of the 4701 Patrick Henry Drive site at the request of the Housing Action Coalition, six additional El Camino Real rezoning sites and one Tasman East Specific Plan site were also excluded from the inventory because it was determined that they are less likely to redevelop in the planning period.