



**TOWN OF LOS GATOS**  
**COMMUNITY DEVELOPMENT DEPARTMENT**  
**PLANNING DIVISION**  
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LOS GATOS, CA 95030

March 31, 2023

Paul McDougall  
State Department of Housing and Community Development  
C/O Land Use and Planning Unit  
2020 W. El Camino Avenue, Suite 500  
Sacramento, CA 95833

Re: Town of Los Gatos Draft Revised 2023-2031 Housing Element

Dear Mr. McDougall,

This letter serves to transmit the Town of Los Gatos' draft revised 2023-2031 Housing Element.

**Previous Submittal – February 13, 2023**

On January 30, 2023, the Los Gatos Town Council adopted the 2023-2031 Housing Element with modifications to the Sites Inventory, making the finding that it is in substantial compliance with State law. On February 13, 2023, the Town submitted the adopted 2023-2031 Housing Element to HCD for review and comment. As described in the February 13, 2023, letter to HCD, the Town modified Appendix D (Sites Inventory Analysis), and Appendix H (Sites Inventory Form), to assume development at a minimum density. The letter described that the Town was in process of addressing the remaining comments found in the January 12, 2023, HCD Findings/Comment Letter and would be resubmitting a revised Housing Element after the revisions have been completed.

**Draft Revisions**

This draft revised 2023-2031 Housing Element responds to the comments provided by HCD in the January 12, 2023 letter. The Town has made several modifications to the Housing Element, including but not limited to the following:

- Added additional analysis on the 5<sup>th</sup> cycle goals, policies, and implementation programs;
- Added local knowledge on existing housing conditions;
- Added narrative describing the Town's Below Market Price Program;
- Added an Implementation Program addressing replacement housing requirements;
- Added quantified objective and performance metrics;
- Added quantified objectives to establish an estimate of housing units by income category;
- Added additional analysis on Pipeline projects, ADU projections, and SB9 projections;
- Provided additional narrative describing the Town's processing and permitting timelines;
- Provided further site analysis for the Site's Inventory;
- Provided further analysis on potential governmental constraints;
- Provided further AFFH analysis;
- Added RCAA information and mapping;
- Added narrative describing the housing sites and how they mitigate fair housing issues;
- Provided an assessment and prioritization of contributing factors to fair housing issues; and

- Enhanced the ADU Implementation Program to include development of pre-approved ADU plans.

An expanded summary of these changes and detailed response to the January 12, 2023, letter with reference to the specific sections of the Housing Element that have been updated has been attached.

### **Housing Sites Inventory**

The draft revised 2023-2031 Housing Element adds additional sites to the Sites Inventory, creating an inventory that provides housing capacity for 2,494 housing units. This inventory accommodates a buffer of approximately 25 percent above the Town's RHNA of 1,993 housing units.

### **Public Review**

Pursuant to Government Code 65585(b)(1), the Town has posted the modifications to the Town's Housing Element website and provided notification to all individuals and organizations that previously requested notices, as well as all parties on the Town's notification list, including those who have previously commented on the Housing Element. The draft revised 2023-2031 Housing Element was posted on March 23, 2023, seven days prior to submittal of the draft revised 2023-2031 Housing Element to HCD for review, consistent with AB 215 requirements.

Included in this resubmittal is the Town's response memorandum to HCD's January 12, 2023, Findings/Comment Letter, two versions of the draft revised 2023-2031 Housing Element, one with track changes and one clean copy, an electronic copy of the Sites Inventory Form, and written comments submitted to the Town during the seven-day public review period.

On behalf of the Town of Los Gatos, thank you for the review of the Town of Los Gatos' draft revised 2023-2031 Housing Element. The Town looks forward to direction and feedback from HCD that would assist the Town in the evaluation and decision-making process. Questions or comments on the Housing Element may be directed to:

Joel Paulson, Community Development Director  
[jpaulson@losgatosca.gov](mailto:jpaulson@losgatosca.gov)  
408-354-6879

Sincerely,



Joel Paulson  
Community Development Department  
Town of Los Gatos

Enclosures:

- Response Memorandum to HCD's January 12, 2023 Findings/Comment Letter
- Town of Los Gatos draft Revised 2023-2031 Housing Element with track changes
- Town of Los Gatos draft Revised 2023-2031 Housing Element clean copy
- Electronic copy of the Sites Inventory Form
- Written comments submitted to the Town during the seven-day public review period