

Updated Responses to HCD’s May 20, 2025, Response to Revisions Letter

All page numbers are from the Track Changes version of the September 2025 HCD Draft. The May 20, 2025, Response to Revisions Letter [is available here](#).

Comment #	Revision Request	Corresponding Recommended Modifications to the Housing Element
1	<p><u>Progress in Meeting the Regional Housing Needs Allocation (RHNA)</u>: While the element revised Program 1-1 (Provision of Adequate Sites) to monitor the development of pipeline projects, Table C-4 should clarify what remaining steps may be needed for final permitting approval for the following sites: A, D, E, F, H, I, V, W, AB, AE, AH, and especially AI. The section should also include a discussion of any known barriers or constraints to development in the planning period.</p>	<p>C: Housing Resources</p> <p>Page C-4: Added additional information context on non-governmental constraints (interest rates, development uncertainty):</p> <p><u>Increasing costs (e.g., interest rates) and development uncertainty since 2020 have acted as a general impediment in Half Moon Bay. Compared to the bay side of San Mateo County, there is less demand pressure on coastside communities in San Mateo County, which has led to a pause – particularly on larger projects. These non-governmental constraints are discussed in Chapter B. There are no other known barriers or constraints to development in the planning period.</u></p> <p>Page C-5: Updated table C-4. See updates at: https://m-group.box.com/s/n3k98ohgumqpu1okru78rbf7ccptjvsa</p> <p>Page C-10: Added additional information on the 75 Main Street project (Site AI):</p> <p><u>There is a preliminary plan in place for the site, the City is in ongoing conversations with a developer.</u></p>
2	<p><u>Environmental Constraints</u>:</p> <p>As noted in prior reviews, while the element includes discussion of environmental constraints relative to identified sites, it should also discuss any other known conditions that could preclude development on identified sites in the planning</p>	<p>C: Housing Resources</p> <p>C-24: Added a paragraph describing general environmental constraints:</p> <p><u>Environmental Constraints</u></p> <p><u>The “Housing Opportunity Sites Summaries” section provides site-by-site descriptions of potential environmental constraints. Half Moon Bay is</u></p>

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	<p>period. Examples include shape, easements, Williamson act contracts, contamination, coastal policies, and property conditions.</p>	<p><u>entirely within the Coastal Zone, which includes attendant issues such as flooding, sea level rise, and environmentally-sensitive habitats. Additional environmental analysis may be required for some projects, but none of the City’s housing opportunity sites are located in areas with these unique constraints. There are no other known conditions that preclude development on identified sites, such as shape, easements, Williamson act contracts, contamination, coastal policies, and property conditions.</u></p>
3	<p><u>Electronic Sites Inventory</u>: For your information, pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD. Please see HCD’s housing element webpage at https://www.hcd.ca.gov/planning-and-community-development/housing-elements for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance.</p>	N/A
4	<p><i>Program 3-7 (Emergency Shelters)</i>: The Program should provide specific commitment to amend the definition of emergency shelter to include “other interim interventions, including but not limited to, navigation centers, bridge housing, and respite or recuperative care.”</p>	<p>H: Housing Plan</p> <p>Revised bullet 2 of Program 3-7 (page H-21):</p> <ul style="list-style-type: none"> ➤ Emergency Shelter and Low Barrier Navigation Center: Add a definition to the Zoning Ordinance for “Low Barrier Navigation Center” consistent with AB 101 and a definition of emergency shelter as “housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less by a homeless person, <u>including other interim interventions, such as (but</u>

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		<p><u>not limited to), navigation centers, bridge housing, and respite or recuperative care.</u> No individual or household may be denied emergency shelter because of an inability to pay.”</p>
5	<p><u>Approval Times:</u></p> <p>The element was not revised to address this finding. As stated in HCD’s prior review, the element identifies one recent project as part of the requisite analysis; however, the element should estimate and examine the length of time experienced for other typical developments and add or revise Programs as necessary to address any hinderances to construction of the City’s RHNA.</p>	<p>B: Constraints</p> <p>Added new sentence on page B-74:</p> <p><u>This example is typical of past developments.</u></p> <p>H: Housing Plan</p> <p>Added new Program 1-12 on page H-11:</p> <p><u>Program 1-12: Approvals Monitoring</u></p> <p><u>Track the length of time between Planning Department approval and submittal of building permits as part of tracking development. This can be done as a supplement to the City’s Annual Progress Report. If the length of time between Planning approval and building permit submittal averages over one year through 2028, identify ways to encourage timely submittal to improve construction certainty.</u></p> <p><u>Objectives:</u> <u>Facilitate development of approved residential development</u></p> <p><u>Timeline:</u> <u>Review through 2028 APR (submitted April 1, 2029). If necessary, encouragement and streamlining should be completed by the end of December 2030.</u></p> <p><u>Responsible Party:</u> <u>Community Development Department</u></p> <p><u>Anticipated Funding</u></p> <p><u>Sources:</u> <u>General Fund</u></p>

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6	<p><i>Program 6-8 (Annual Review of Residential Dwelling Unit Allocation System):</i> This Program commits to address constraints on Accessory Dwelling Units (ADUs) and, Junior Accessory Dwelling Units (JADUs) production due to Measure D allocation limits, including exempting ADU and JADUs from Residential Dwelling Unit Allocation limits. However, as noted in the prior review, the Program should provide alternative actions with discrete timing if the Local Coastal Plan is not amended to exempt ADU and JADU from Residential Dwelling Unit Allocation limitations. Regarding alternative actions, HCD, in collaboration with the California Coastal Commission, will follow up with more detailed guidance under separate cover.</p>	<p>H: Housing Plan</p> <p>Revised Program 6-8 on page H-35:</p> <p><i>Program 6-8: Residential Dwelling Unit Allocation System</i></p> <p><u>Measure D, as currently enforced through Section 8 of the Measure, is only applicable to the extent that it is judicially determined to be in compliance with State law. The City will clarify Measure D’s compliance with State law regarding ADUs, addressing this constraint by taking the following series of actions:</u></p> <ul style="list-style-type: none"> ➤ <u>Seek approval of a Local Coastal Program Amendment to revise the allocation requirements for ADUs and JADUs, from a full allocation per unit to a lesser amount, such as a partial allocation of 0.5 or amount considered reasonable by the City. The City will prepare amendments to its Local Coastal Program for Council consideration and Coastal Commission certification to increase available allocations.</u> ➤ <u>Reallocate unused Measure D allocations for ADUs and affordable housing units by rolling over those allocations to the next year for which no building permit is applied</u> ➤ <u>Prepare a ballot measure for the 2028 election with a substantial public communications process that will revise Measure D by:</u> <ul style="list-style-type: none"> ○ <u>Revising to define “Downtown Area” as the area designated as the Town Center in the Certified Local Coastal Land Use Plan</u> ○ <u>Exempting Accessory Dwelling Units (ADUs), including Junior Accessory Dwelling Units (JADUs) from Residential Dwelling Unit Allocation limitations</u> ➤ <u>If the 2028 ballot measure fails, the City will seek other measures</u>

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		<p><u>as necessary.</u></p> <p>Seek approval of a Local Coastal Program Amendment to revise the allocation requirements for ADUs and JADUs, from a full allocation per unit to a lesser amount, such as a partial allocation of 0.5 or amount considered reasonable by the City. The City will prepare amendments to its Local Coastal Program for Council consideration and Coastal Commission certification to increase available allocations.</p> <p>Within one year of identifying constraints on ADU and JADU production due to Measure D allocations, staff will prepare a report to City Council on allocation amendments and a potential LCP amendment that would release these constraints, which could include a ballot measure.</p> <p>If necessary, the City will consider the preparation of a ballot measure for the 2026 election with a more substantial public communications process than the timespan for the 2024 election allows, which may include revisiting the following areas:</p> <ul style="list-style-type: none"> ➤ Revise to define “Downtown Area” as the area designated as the Town Center in the Certified Local Coastal Land Use Plan ➤ Exempt Accessory Dwelling Units (ADUs), including Junior Accessory Dwelling Units (JADUs) from Residential Dwelling Unit Allocation limitations. <p>Note: Under the current LCP and voter-approved Residential Dwelling Unit Allocation System (Measure D), allocations are confirmed by City Council in December annually; evaluation of applications received between January 1 and January 31, evaluation and establishment of rankings if needed for</p>

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		<p>Planning Commission ratification in April; City Council consideration of potential allocation transfers no earlier than September.</p> <p><i>Objectives:</i> <u>Clarify relationship between State law and Measure D regarding its control over ADUs and JADUs. This may include revising Amend the Local Coastal Program / zoning ordinance to revise allocation requirements for ADUs and JADUs from a full allocation per unit to a lesser amount, such as a partial allocation of 0.5 or an amount consistent with the voter-approved Measure D.</u></p> <p>If Needed: Allocations for the following year confirmed by City Council in December; evaluation of applications received on or before January 1 by February, evaluation and establishment of rankings if needed for Planning Commission ratification in May; City Council consideration of potential allocation transfers no earlier than September. Prepare Code amendments to update the Measure D allocation process to reduce constraints on RHNA housing production. The need for a Code amendment is indicated if, by mid-cycle (end of January 2027) there are not enough allocations for ADUs, mobile/manufactured homes, and/or multi-family units including duplexes and larger projects. The Code amendment will occur by the end of July 2027, if needed.</p> <p><i>Timeline:</i> Within <u>24-6</u> months of housing element certification, <u>identify a pathway towards clarifying Measure D's relationship to State law. As appropriate,</u> submit a LCP</p>

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		<p data-bbox="1215 302 1919 375">/ zoning ordinance amendment revising allocation requirements for ADUs and JADUs to the City Council.</p> <p data-bbox="1215 380 1919 453">If Needed: On-going with multiple milestones each year</p> <p data-bbox="930 457 1919 565"><i>Responsible Party:</i> Community Development Department, City Manager’s Office, City Attorney, Planning Commission, City Council</p> <p data-bbox="930 570 1188 605"><i>Anticipated Funding</i></p> <p data-bbox="930 610 1297 646"><i>Sources:</i> General Fund</p>