

**HCD Comments and Responses**  
**City of Villa Park 2021-2029 Housing Element**  
**June 28, 2022**

HCD Comment (Letter of 1/6/2022)	Housing Element Page No.	Response/Revision
A. Review and Revise	Appendix A	Appendix A has been revised to provide additional information regarding the City's effectiveness in addressing special needs.
B.1 Affirmatively Furthering Fair Housing	Appendix C IV-52/53	The Housing Element has been expanded to include additional fair housing analysis. In addition, Program 6 has been revised to describe actions the City will take to affirmatively further fair housing.
B.2 Inventory of Sites to Accommodate the RHNA	IV-31 to 36 IV-50 to 52	<p><u>New vacant sites.</u> The element has been revised to demonstrate the suitability and availability of vacant sites, including environmental constraints, sites more than 10 acres, infrastructure and access constraints, public ownership and other relevant factors. In addition, Program 1 has been expanded to include proactive steps to encourage and facilitate development on the vacant OCWD site, with a contingency provision to process a Housing Element amendment by 2025 if necessary to ensure adequate sites to accommodate the RHNA.</p> <p><u>Realistic Capacity.</u> The element has been revised to provide additional analysis of the realistic capacity of the sites in the inventory.</p> <p><u>Suitability of Non-vacant Sites.</u> The element has been revised to provide additional analysis of the suitability of non-vacant sites. Non-vacant sites comprise only 17% of the lower-income sites inventory (28 of 169 potential lower-income units).</p> <p><u>ADUs.</u> Analysis of the City's assumptions for future ADU production has been expanded to address this comment.</p>
B.3 Governmental Constraints	IV-40/41	<u>Land use controls.</u> The element has been revised to clarify that maximum densities of 20-24 units/acre in the C-P zone may be achieved without a discretionary variance or exception.
B.4 Nongovernmental Constraints	IV-47	<u>Densities and approval times.</u> The element states that requested development densities are consistent with allowable densities, and the time between site plan review approval and submittal of building permit application is generally not more than one month.

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C.1 Programs to make sites available	IV-50 to 53	Programs 1 and 3 describes specific, proactive actions the City will take to encourage housing development on the City-owned site.
C.2 Programs to remove constraints		Analysis of constraints and programs to address them are discussed in #B.3 and B.4, above.
C.3 Conserve and improve the condition of the existing affordable housing stock	IV-54	Program 5 has been revised to commit to a specific time when the City will determine if housing conditions are deteriorating and when actions will be taken if necessary. The program also includes exploring partnerships with non-profit organizations given the City's lack of staff resources.
C.4 Affirmatively furthering fair housing	IV-54/55 Appendix C	Program 6 has been revised to describe actions the City will take to address AFFH based upon the Fair Housing Assessment (Appendix C).