

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

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February 20, 2024

William Dean, Assistant Director  
Development Services  
City of Tracy  
333 Civic Center Plaza  
Tracy, CA 9537

Dear William Dean:

**RE: City of Tracy's 6<sup>th</sup> Cycle (2023-2031) Draft Housing Element**

Thank you for submitting the City of Tracy's (City) draft housing element received for review on November 22, 2023. Pursuant to Government Code section 65585, the California Department of Housing and Community Development (HCD) is reporting the results of its review. In addition, HCD considered comments from David Kellogg and the Building Industry Association of the Greater Valley pursuant to Government Code section 65585, subdivision (c).

The draft element addresses many statutory requirements; however, revisions will be necessary to substantially comply with State Housing Element Law (Gov. Code, § 65580 et. seq.). The enclosed Appendix describes the revisions needed to comply with State Housing Element Law.

As a reminder, the City's 6th cycle housing element was due 12/31/2023. As of today, the City has not completed the housing element process for the 6th cycle. The City's 5th cycle housing element no longer satisfies statutory requirements. HCD encourages the City to revise the element as described above, adopt, and submit to HCD to regain housing element compliance.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government does not adopt a compliant housing element within 120 days of the statutory deadline (December 31, 2023), then any rezoning to make prior identified sites available or accommodate the regional housing needs allocation shall be completed no later than one year from the statutory deadline pursuant to Government Code sections 65583, subdivision (c) and 65583.2, subdivision (c). Otherwise, the local government's housing element will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i). Please be aware, if the City does not adopt a compliant housing

element within one year from the statutory deadline, the element cannot be found in substantial compliance until these rezones are completed.

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City should continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate. Please be aware, any revisions to the element must be posted on the local government's website and to email a link to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant, the Affordable Housing and Sustainable Communities program, and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: <https://www.opr.ca.gov/planning/general-plan/guidelines.html>.

HCD appreciates the hard work and diligence of the City in preparing a housing element update and is committed to assist the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Sayed Murad, of our staff, at [sayed.murad@hcd.ca.gov](mailto:sayed.murad@hcd.ca.gov).

Sincerely,



Paul McDougall  
Senior Program Manager

Enclosure

## APPENDIX CITY OF TRACY

The following changes are necessary to bring the City's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD's website at <https://www.hcd.ca.gov/planning-and-community-development/hcd-memos>. Among other resources, the housing element section contains HCD's latest technical assistance tool, *Building Blocks for Effective Housing Elements (Building Blocks)*, available at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks> and includes the Government Code addressing State Housing Element Law and other resources.

### **A. Review and Revision**

*Review the previous element to evaluate the appropriateness, effectiveness, and progress in implementation, and reflect the results of this review in the revised element. (Gov. Code, § 65588 (a) and (b).)*

Special Housing Needs: While the element discusses various accomplishments related to special housing needs, it should also evaluate the cumulative effectiveness of programs in addressing special housing needs. For example, many of the accomplishments are not targeted toward special housing needs which may reflect the lack of specific actions. Based on the outcome of this evaluation, the element should add or modify programs to address special housing needs.

### **B. Housing Needs, Resources, and Constraints**

1. *Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2...shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)*

Enforcement and Outreach: The element must describe outreach and capacity to provide enforcement and outreach which can consist of actions such as the ability to investigate complaints, obtain remedies, engage in fair housing testing and outreach and education efforts. For example, the element generally describes outreach but should also relate that outreach to fair housing issues. Also, the element mentions the City's partnership (Program 17) with the San Joaquin Fair Housing Association (SJFH) but should also describe the effectiveness of outreach and education in reaching households across geographies and protected characteristics. In addition, the element identifies the number housing discrimination complaints but should also discuss the characteristics of complaints relative to protected persons (e.g., disability, familial status, race). Finally, the analysis indicates the City complies with fair housing related laws but should describe how the City complies with existing fair housing laws.

Disparities in Access to Opportunity: The element generally describes transportation opportunities but should also discuss access to those opportunities. For example, the element could discuss transportation availability relative to patterns of areas with relatively lower median incomes and higher poverty and overpayment.

Disproportionate Housing Needs including Displacement Risks: The element includes some general information on persons experiencing homelessness and housing conditions but should also evaluate those needs, impacts and patterns within the City, such as areas of higher need. For homelessness, the element should examine patterns of need or areas with higher concentrations of persons experiencing homelessness, including access to transportation and services. For housing conditions, the element should discuss any areas of potentially higher needs of rehabilitation and replacement. The element should utilize local data and knowledge such as service providers and code enforcement officials to assist this analysis.

Identified Sites and Affirmatively Furthering Fair Housing (AFFH): The element briefly mentions the percent of sites identified in low, moderate, and higher resource tracts but should also evaluate identified sites by income group (e.g., lower, moderate and above-moderate income) and geography relative to fair housing conditions (e.g., race, disability, income, poverty, overpayment) and particularly any isolation or lack of identified sites that may exacerbate segregation and integration.

Local Data and Knowledge and Other Relevant Factors: The element included some information about census tracts relative to City boundaries. However, the element should utilize local data and knowledge and other relevant factors to better describe fair housing conditions and local (within the City) and regional (City compared to region) patterns. For example, local data and knowledge can include City officials, local and regional advocates and service providers, past studies, infrastructure assessments and other demographics such as tenure, age of structure and housing unit types. Other relevant factors can include governmental and nongovernmental actions, historical land use and zoning practices (e.g., past redlining/Greenlining, restrictive covenants, planning documents, etc.), disparities in investment to specific communities including transportation investments, seeking investment or lack thereof to promote affordability and inclusion, local initiatives, or other information that may have impeded housing choices and mobility.

Contributing Factors: Based on the outcome of a complete analysis, the element should reassess and prioritize contributing factors to fair housing issues and prioritize those factors and then formulate appropriate policies and programs.

2. *Include an analysis of population and employment trends and documentation of projections and a quantification of the locality's existing and projected needs for all income levels, including extremely low-income households. (Gov. Code, § 65583, subd. (a)(1).)*

*Include an analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition. (Gov. Code, § 65583, subd. (a)(2).)*

*Analyze any special housing needs such as elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. (Gov. Code, § 65583, subd. (a)(7).)*

Extremely Low-Income (ELI) Households: While the element includes some basic information about ELI households, given the unique and disproportionate needs of ELI households, the element must include analysis to better formulate policies and programs. For example, the element could analyze tenure, cost burden, overcrowding and other household characteristics then examine the availability of resources to determine gaps in housing needs. For additional information, see the Building Blocks at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/extremely-low-income-housing-needs>.

Overpayment: While the element identifies the total number of households overpaying for housing, it must quantify and analyze the number of lower-income households overpaying for housing by tenure (i.e., renter and owner) and add or modify policies and programs as appropriate.

Housing Conditions: While the element discusses the age and condition of the City's housing stock and the number of violations in 2023, it should estimate the number of units in need of rehabilitation and replacement. For example, the analysis could include estimates from a recent windshield survey or could utilize code enforcement cases or knowledge from code enforcement officials to estimate the number of units in need of rehabilitation and replacement City-Wide. The analysis could also address geographic differences and incorporate that information into the fair housing analysis. For additional information, see the Building Blocks at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/housing-stock-characteristics>.

Special Housing Needs (Farmworkers): While the element quantifies farmworkers in the County, the analysis should be expanded to include discussion of characteristics of farmworker housing needs (e.g., tenure, income, housing conditions) and the magnitude and nature of the gap between resources and housing needs and characteristics. For additional information on the disproportionate needs of farmworkers, see Farmworker Health in California: Health in a Time of Contagion, Drought, and Climate Change from the University of California, Merced at [https://clc.ucmerced.edu/sites/clc.ucmerced.edu/files/page/documents/fwhs\\_report\\_2.2.2383.pdf](https://clc.ucmerced.edu/sites/clc.ucmerced.edu/files/page/documents/fwhs_report_2.2.2383.pdf).

3. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and*

*an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

Progress in Meeting the Regional Housing Need Allocation (RHNA): As you know, the City's RHNA may be reduced by the number of new units built since July 1, 2022; however, the element must demonstrate their availability in the planning period. The element identified 3,149 units including 141 units for lower-income households that are either pending approvals, approved or under construction. While the element included the project status for each project, it should also demonstrate the likelihood that these units will be available during the planning period. To demonstrate availability, the element could analyze infrastructure schedules, City's past completion rates on pipeline projects, outreach with project developers, describe any expiration dates on entitlements, anticipated timelines for final approvals, phasing requirements, and any remaining steps for projects to receive final entitlements. This analysis is particularly important for projects that were approved in past years but have still not requested building permits and large projects (e.g., over 150 units). Lastly, given the element's reliance on pipeline projects, the element should add or modify programs to facilitate development (e.g., coordination with applicants to approve remaining entitlements, expediting approvals) and monitor progress toward completion in the planning period, including alternative actions (e.g., rezoning) to be completed by a specified date if pipeline projects are not progressing toward completion in the planning period.

Parcel Listing: The element lists parcels by various factors such as size, general plan designation and zoning but only generically lists existing uses (e.g., residential, commercial). Instead, the element should describe existing uses to facilitate an analysis of redevelopment potential. For example, the element could list parcels by the various redevelopment indicators (e.g., improvement to land value ratio, age of structure).

Suitability of Nonvacant Sites: The element identifies nonvacant sites to accommodate the RHNA by three different use categories and describes the selection process according to factors. However, the element should also utilize recent redevelopment trends, including prior uses and characteristics, to support the validity of the factors and list sites by the various factors. In addition, the element includes broad statements that existing uses do not impede additional development but should also include analysis to support this statement including any demand for existing uses, leases or other conditions that preclude redevelopment in the planning period, as follows:

- *Sites with Single-Family Residential Uses:* The element should discuss the degree of underutilization and particularly several sites with a lesser degree of underutilization (e.g., less than ten to one redevelopment ratio).
- *Religious and Education Facilities:* The element should discuss demand for existing uses such as parking for religious facilities and potential site planning strategies and any actions necessary, including status, to make sites with education facilities available for development.
- *Commercial/Office/Retail Uses:* The element should describe any existing leases or other conditions that preclude redevelopment, demand for the existing uses and other indicators of potential turnover of uses such as developer interest,

vacancies, for sale signs, recent turnover of uses, age and condition of structure and viability of the business.

Finally, the element identifies sites with existing residential uses and as a result, should evaluate the affordability of existing uses and add a replacement housing policy. The replacement housing policy has the same requirements as set forth in Government Code section 65915, subdivision (c) (3).

Small and Large Sites: Sites smaller than half an acre or greater than ten acres are deemed unsuitable to accommodate housing for lower-income households unless it is demonstrated, with sufficient evidence, that sites of equivalent size and affordability were successfully developed during the prior planning period or other evidence demonstrates the suitability of these sites. The element currently discuss how development might occur on large and small sites but should include analysis, as follows:

- *Small Sites:* The element describes that small sites can be consolidated to greater than half an acre and have common ownership but should also identify these opportunities in the parcel listing and discuss other characteristics demonstrating the potential for consolidation. Characteristics may include common access and lack of access or need for site planning flexibility necessitating consolidation.
- *Large Sites:* The element discusses recent trends on large sites but should also discuss the affordability of those recent trends, rescale affordability assumption if necessary and add or modify programs to promote affordability on large sites.

Environmental Constraints: The element describes potential environmental constraints and mitigation to facilitate development but should also address any other known conditions that preclude development in the planning period. Examples of other known conditions include access, property conditions, easements, environmental overlays, Williamson Act contracts and airport and military compatibility.

Electronic Sites Inventory: 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](mailto:sitesinventory@hcd.ca.gov) for technical assistance.

Zoning for a Variety of Housing Types:

- *Emergency Shelters:* The element generally describes acreage and capacity but should also analyze proximity to transportation and services for these sites, hazardous conditions, and any conditions inappropriate for human habitability.
- *Single Room Occupancy (SRO):* The element states SROs are permitted in the Medium Density Residential (MDR), Medium Density Cluster (MDC) and High Density Residential (HDR) zones but should also evaluate whether development standards encourage and facilitate the use.



- *Manufactured Housing:* Per Table III-7, single-family homes are Permitted in MDC and MDR zones, while manufactured housing is not permitted. Manufactured homes that are built on a permanent foundation must be allowed in the same manner and in the same zones as conventional or stick-built structures. Specifically, manufactured homes on a permanent structure should only be subject to the same development standards that a conventional single-family residential dwelling would be subject to. The element must demonstrate consistency with this requirement or add or modify programs as appropriate.

4. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures... (Gov. Code, § 65583, subd. (a)(5).)*

Land Use Controls: The element must identify and analyze all relevant land use controls impacts as potential constraints on a variety of housing types. The analysis should analyze land use controls independently and cumulatively with other land use controls. The analysis should specifically address requirements related to parking, heights, and lot coverage. The analysis should address any impacts on cost, supply, and ability to achieve maximum densities and include programs to address identified constraints.

In addition, for parking, the element indicated that multifamily projects are required to provide 1.5 spaces for one-bedroom units. For your information, requiring smaller bedroom types (e.g., studio and one-bedrooms) to provide more than one space per unit is generally considered a constraint. Based on a complete analysis, the element may need to add or modify programs to address any potential or actual constraints.

Finally, the element (p. IV-3) indicates the City regulates net densities. The element should describe the definition of net density, its application and evaluate any impacts on housing supply and costs.

Fees and Exaction: The element analyzes the cumulative impact of fees on a typical single-family and multifamily development. However, the analysis should also incorporate planning and building fees. For additional information and a sample analysis and tables, see the Building Blocks at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/fees-and-exactions>.

Local Processing and Permit Procedures: While the element includes information about processing times, it should also describe the procedures for a typical single-family and multifamily development. The analysis lists various considerations for a Development Review Permit but should also analyze those consideration and any approval findings for impacts on approval certainty.

In addition, the element mentions the Planned Unit Development (PUD) zone but should also clarify whether the zone is optional or required. If the zone is required, the element



should discuss any fixed development standards or the lack of fixed development standards and analyze impacts on approval certainty.

Finally, the element should address public comments on this revised draft submittal and discuss compliance with the Permit Streamlining Act and intersections with CEQA and timing requirements, including streamlining determinations and add or modify programs as appropriate.

On/Off-Site Improvements: The housing element must identify and analyze improvements to street widths, curbs, gutters, sidewalks, water and sewer connections, landscaping, circulation improvement, and any other onsite/offsite improvement required by the jurisdiction that could potentially be a constraint to development of housing. While the element includes a discussion of site improvements, it should also analyze impacts on housing supply and costs and timing of development.

Building Codes and Enforcement: The element must describe and analyze any local amendments to the building code and type of enforcement (e.g., complaint-based, proactive) for impacts on housing supply and costs. For additional information and a sample analysis, see the Building Blocks at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/codes-and-enforcement-and-onsite-offsite-improvement-standards>.

Constraints on Housing for Persons with Disabilities: The element briefly describes its reasonable accommodation procedures. However, the element should also describe the process and decision-making criteria such as approval findings and analyze any potential constraints on housing for persons with disabilities.

Water Sewer Priority: Water and sewer service providers must establish specific procedures to grant priority water and sewer service to developments with units affordable to lower-income households. (Gov. Code, § 65589.7.) Local governments are required to immediately deliver the housing element to water and sewer service providers. The element should discuss compliance with these requirements and if necessary, add or modify programs to establish a written procedure by a date early in the planning period. For additional information and sample cover memo, see the Building Blocks at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/priority-water-and-sewer>.

## **C. Housing Programs**

1. *Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the Housing Element... (Gov. Code, § 65583, subd. (c).)*

To have a beneficial impact in the planning period and achieve the objectives of the housing element, programs must have specific commitment (e.g., amend, revise, establish, complete) and discrete timing (e.g., annually, by 2025), as follows:

- *Program 4 (Affordable Housing Monitoring)*: The Program should commit to provide education and support to tenants upon a notice of intent to opt-out of affordability terms.
- *Program 6 (Homebuyer and Financial Literacy Training)*: The Program should commit to how often trainings will occur.
- *Program 7 (Affordable/Workforce Housing)*: The Program should commit to proactively and annually coordinate and identify affordable housing development opportunities.
- *Program 12 (Accessory Dwelling Units (ADU))*: The Program should commit to monitor permitted ADUs and affordability at least twice in the planning period and take appropriate action such as adjusting assumptions or rezoning within a specified time (e.g., six months).
- *Program 18 (Place-Based Improvements)*: The Program should commit to annually prioritize the capital improvement program (beyond year 2023-2024) and annually apply for funding and implement the Ten-Year Economic Development Strategic Plan and Downtown Transit-Oriented Development Plan.

2. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (Gov. Code, § 65583, subd. (c)(1).)*

As noted in Finding B3, the element does not include a complete site analysis; therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition, the element should be revised as follows:

- *Program 10 (Development of Large Sites)*: The Program should commit to establish incentives or other strategies to encourage appropriately sized parceling and affordability.
- *Infrastructure*: The element indicates potential future shortfalls of water and sewer capacity (pp. III-36 to III-37) and as a result, should include programs to address projected shortfalls. For example, a program could commit to various strategies listed in the analysis.

- *Publicly Owned Sites:* The element identified City-Owned sites to accommodate a portion of the RHNA. The element should include a program with numerical objectives that ensures compliance with the Surplus Land Act, provides incentives and actions along with a schedule to facilitate development of City-Owned sites. Actions should include outreach with developers, issuing requests for proposals, incentives, fee waivers, priority processing and financial assistance.
- *Rezone Timing:* As noted in the element (p. V-7), the City has yet to complete rezoning to accommodate a shortfall of capacity in the 5<sup>th</sup> cycle of the housing element. Rezoning to accommodate this unaccommodated must be completed within the first year of the planning period. While Program 9 (Provision of Adequate Sites) commits to rezone sites by December 31, 2024, if this zoning is not completed within the first year of the planning period, the housing element will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i). Please be aware, if the City does not adopt a compliant housing element within one year from the statutory deadline, the element cannot be found in substantial compliance until these rezones are completed.

3. *The Housing Element shall contain programs which assist in the development of adequate housing to meet the needs of extremely low-, very low-, low- and moderate-income households. (Gov. Code, § 65583, subd. (c)(2).)*

ELI Households and Special Housing Needs: The element must include specific actions to assist in the development of housing for ELI and special needs households. In addition, the element must include specific actions to address the needs of persons experiencing homelessness and farmworkers. For example, for farmworkers, specific efforts should be included based on the outcomes of a complete analysis. For example, the element could commit to proactive actions to coordinate with nonprofit developers, employers, and other related organizations, to explore funding and incentives, annually identify specific development opportunities, pursuing strategies to integrate affordable housing and targeting rehabilitation and conservation and improvement programs toward farmworkers.

4. *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)*

As noted in Findings B4, the element requires a complete analysis of potential governmental and non-governmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints. In addition, the element should be revised, as follows:

- *Program 14 (Zoning Ordinance)*: While the Program commits to allow group homes for seven or more persons in all zones allowing residential uses, it should also commit to address the conditional use permit (CUP) as a constraint and permit these residential uses similar to other residential uses of the same type in the same zone.
  - *Program 16 (Growth Management Ordinance (GMO))*: The Program should commit to revise the GMO ordinance by a specified date (e.g., within one year) based on annual monitoring and evaluation. In addition, as noted on page III-10, the Program should commit to pursue allowing more Residential Growth Allotments for affordable housing projects, including market-rate developments that include a specified percentage of affordable units.
5. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics... (Gov. Code, § 65583, subd. (c)(5).)*

As noted in Finding B1, the element requires a complete AFFH analysis. Depending upon the results of that analysis, the City may need to revise or add programs. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have specific commitment, milestones, geographic targeting and metrics or numerical targets and, as appropriate, address housing mobility enhancement (housing choices and affordability across geographies), new housing choices and affordability in higher opportunity or income areas (throughout the City), place-based strategies for community preservation and revitalization, and displacement protection.