

PROPOSED AMENDMENT

2026 HOUSING ELEMENT AMENDMENT

to the City of Menlo Park 2023–2031 Housing Element

*Replacing the Downtown Parking Plaza Program and Securing the
Element*

Against the Willow Village Pause

THIRD DISCUSSION DRAFT FOR PUBLIC REVIEW — OCTOBER 2026

*Prepared for review by the Planning Division and City Attorney prior to
Housing Commission, Planning Commission, and City Council consideration
and submittal to the California Department of Housing and Community
Development (HCD) under Government Code § 65585.*

*Prepared by Menlo Park residents for public discussion. This is not a City
of Menlo Park document.*

*Drafting convention: this is a discussion draft for public review. Figures in
[square brackets] are placeholders or estimates requiring confirmation
against the sources identified in Attachment A. Unbracketed figures are
drawn from the adopted Housing Element (HCD certification March 20,
2024) or from the subsequent City, applicant, agency, and public records
identified in the text and in the Principal Sources note.*

1. Purpose and Summary

This Amendment responds to the two largest failures of the adopted element's housing strategy: the downtown parking plaza program, which the December 2025 developer proposals show cannot deliver 345 very low-income units on the terms assumed, and the Willow Village pipeline project — 1,730 units, approximately 18 percent of the element's below-market-rate program — placed on indefinite hold by its developer in May 2026. The Amendment: (a) removes the eight City-owned downtown parking plazas (Sites 9, 10, 14, 15, 16, 17, 18 and 19) from the sites relied upon for the lower-income RHNA; (b) replaces that reliance through updated capacity at the former USGS campus (Site 12) and the Parkline/SRI master plan (Pipeline Project H) — raising lower-income capacity at those two locations from 149 units (adopted) to [394] units (Case A; the full high-resource accounting, including the net change, is stated in Section 5) — and separately adds an approximately [17]-acre Bohannon Park master plan area west of U.S. 101 as additional resilience capacity, not counted toward the replacement; (c) replaces Program H4.G with a successor program carrying two independent requirements: first, maintain at least 345 units of lower-income capacity on High or Highest Resource sites ([394] at Parkline and the former USGS campus under Case A, against the 345 removed downtown), satisfying the no-net-loss and fair-housing requirements on the accounting stated in Section 5, with income-category accounting to be confirmed with HCD and the City Attorney; and second, independently secure, through recorded regulatory and development agreements with committed City assistance, at least [345] newly secured very low-income units at or below 50 percent of AMI at Parkline and the former USGS campus ([154] Parkline R3 + [48] Parkline inclusionary + [143] USGS); and (d) restructures the element so that the Willow Village pause — or the failure of any other single project — cannot render the City non-compliant, through the sensitivity analysis in Section 3, the moderate-income capacity added at 1283 Willow Road (Site W-1), and the evaluation deadline in Program H4.X.

The Amendment stands entirely under current law; no finding in it depends on pending legislation. As policy context, it is also consistent with the direction of SB 457 (Becker, 2025-26; as amended August 20, 2026, on the Assembly floor and not yet enacted), which would base seventh-cycle site capacity on the statistical probability of development and would expressly recognize in-kind committed assistance — including the donation or dedication of land below market value — as a means of meeting a jurisdiction's adequate-sites obligation. Each replacement mechanism in this Amendment (a dedicated and City-funded 100 percent affordable site at Parkline, a project-based capacity count at the former USGS campus, and an owner-supported rezoning with a required land dedication at Bohannon Park) is structured on that probability-and-commitment basis rather than on zoned capacity alone.

The Amendment is prepared under the Housing Element's own implementation provisions: Program H1.H (mid-cycle review of realistic capacity assumptions and identification of sites for increased densities) and Program H4.U (identification of alternative sites for the public-agency sites). It is structured to satisfy the no-net-loss requirements of Government Code § 65863, the site-inventory requirements of § 65583.2, and the affirmatively furthering fair housing (AFFH) requirements of §

65583(c)(10), and to maintain the City’s finding of substantial compliance throughout the amendment process.

Net effect on capacity. Lower-income (very low + low) capacity is [1,990] units against a combined lower-income RHNA of 1,166 — a surplus of [824] units, more than double the upper end of HCD’s recommended 15–30 percent buffer (350 units at 30 percent) and a modest increase over the adopted element’s 1,975. The Amendment does not claim a paper-capacity increase; it converts capacity the record shows cannot deliver — the plaza program — into [345] very low-income units secured by recorded covenants on entitled or in-process sites, while total inventory capacity (pipeline projects, opportunity sites and ADUs) rises from 5,815 to [6,913] units. The moderate-income surplus is [283] units and the above-moderate surplus increases substantially. Section 3.3 demonstrates the amended element remains adequate even under a full loss of the paused Willow Village project, in every category shown in the adopted element’s combined-capacity accounting, each above its RHNA with buffer. See Section 3.

Income-category accounting. The adopted element accounts sites-inventory capacity in a combined very low/low income category (Table 7-3, “Net Remaining RHNA: Combining Very Low and Low”), and this Amendment follows that convention in its summary tables (RHNA: 740 very low + 426 low = 1,166 combined; 496 moderate; 1,284 above moderate). Because the deleted Program H4.G objective is denominated in very low-income units, the very low-income production is additionally tracked unit-for-unit: the adopted element combines very low-and low-income capacity for sites-inventory accounting (Table 7-3, “Combining Very Low and Low”), and this Amendment follows that convention while separately tracking the very low-income capacity removed from the plazas; the final no-net-loss findings will quantify remaining need and capacity by income level as Government Code § 65863 requires, with the treatment of the combined category to be confirmed with the City Attorney and HCD. Independently of that accounting question, Program H4.G’s second requirement secures at least [345] very low-income units at or below 50 percent of AMI: the Parkline R3 dedicated building (all [154] units at ≤50 percent AMI under the recorded regulatory agreement, with committed City assistance), the Parkline inclusionary units (at least [48] very low-income via the § 11.1.1 finding), and the USGS affordable component (at least [143] very low-income within a [150]-unit program objective, secured in the development agreement with committed City assistance). The deleted program was denominated in very low-income units; this Amendment replaces it with very low-income units, so no finding depends on substituting low-income for very low-income capacity. The bracketed figures are completed from the recorded agreements (Attachment A, items 1–2) before submittal.

2. Background and Basis for Amendment

2.1 The parking plaza program as adopted

Appendix 7-1 credits the eight downtown parking plazas with 345 very low-income units at the El Camino Real/Downtown Specific Plan base density of 40 du/ac (realistic capacity approximately 38 du/ac). Program H4.G commits the City to “seek to complete development of 345 or more affordable housing units on a combination of

parking lot sites consistent with the Housing Element sites inventory (2027),” with milestones of a feasibility study (2023), RFP (2024), entitlements (2025) and completion (2027). Implementation to date has focused on Plazas 1, 2 and 3 (Sites 14, 19 and 15; 182 very low-income units in the inventory) at 60 du/ac base density plus density bonus. The feasibility study was completed in August 2024, an RFQ issued January 2025, an RFP September 2025, and three proposals received December 2025; entitlements have not been completed and the 2025 milestone has passed.

2.2 Changed circumstances

Downtown Parking Plazas Ordinance. A qualified citizen initiative on the November 3, 2026 ballot would require voter approval before any of the eight plazas may be sold, leased, or repurposed. The City’s Elections Code § 9212 report (December 2, 2025) concluded that the measure “could add years to the process” and that the City may need “to modify its Housing Element to support the development of 345 affordable housing units elsewhere in the City.”

USGS campus (Site 12). When the element was adopted the 17-acre campus was federally owned and being auctioned by GSA; the inventory conservatively credited a two-acre carve-out (89 very low-income units). The General Services Administration sold the campus to Presidio Bay Ventures in 2025. A development application filed in 2026 proposes 670 dwelling units including [118] deed-restricted affordable units ([31] very low / [65] low / [22] moderate; staff report 26-038-PC, Table 5) and approximately 713,200 square feet of office with 43,000 square feet of neighborhood-serving commercial. The Planning Commission held a study session August 24, 2026; an EIR will be prepared, and affordability terms are set in the development agreement. The federal-disposition uncertainty that constrained the 2023 capacity assumption no longer exists.

Parkline/SRI (Pipeline Project H). Table 7-6 credited 400 units including 60 low-income BMR units and no very low-income units. The City Council approved the Parkline master plan on September 30 and October 7, 2025 with up to 800 units, including 97 inclusionary BMR units and a 1.6-acre land dedication for a 100 percent affordable building of up to 154 units at up to 60 percent AMI. A Phase 2 application proposes 1,082 units with 294 BMR units — the unchanged 154-unit R3 dedication, [90] low-income rental inclusionary units and [50] moderate-income for-sale units — and requires a new BMR Housing Agreement (staff report 26-041-PC; Planning Commission study session September 14, 2026).

Bohannon Park (Sites 67-72). Six parcels on Bohannon Drive and Campbell Avenue (6.24 acres) west of U.S. 101 are in the inventory at 30 du/ac with an allocation of 153 moderate-income units. The owner of the adjoining nine parcels (approximately 35.6 acres) asked in writing in 2022 and 2023 that they be added at ConnectMenlo-level densities; the Council declined. See Section 2.5. (Current owner letter of intent: Attachment A, item 3.)

2.3 Fair housing context

HCD’s October 21, 2022 review letter required the element to analyze how identified sites “contribute to or mitigate fair housing issues” and to add lower-income capacity in higher-resource areas west of U.S. 101. Program H4.G’s objective accordingly

references “supporting the integration of affordable housing options in high resource areas of the community.” This Amendment preserves that commitment through a two-part structure: the adopted program’s 345-unit very low-income objective is carried forward in full as a production commitment — at least [345] very low-income units at or below 50 percent of AMI, to be secured under Program H4.G’s second requirement on two Highest Resource sites west of U.S. 101 (USGS and Parkline) — while the inventory accounting for the same locations is stated, without overstatement, in the tables in Section 5, and the Bohannon Park master plan area — west of U.S. 101 but not a High or Highest Resource tract — is credited only as additional resilience capacity, not as any part of the high-resource replacement (Section 5).

2.4 Feasibility of Program H4.G as adopted

The Housing Element assumed that the City’s contribution of land at a nominal value would make 100 percent very low-income development feasible on the plazas. The August 2024 feasibility study priced replacement structured parking at \$30,000 to over \$50,000 per space and identified only “assessment district, parking fees or other sources” as means of paying for it; the cost of replacing 556 public spaces was not carried in the housing pro forma. The September 2025 RFP relaxed the affordability target from 345 very low-income units to a goal of 40 percent of units at or below 60 percent AMI. The three proposals received December 15, 2025 are summarized below.

	Presidio Bay	Related / Alta	Alliant
Units	347 (207 at ~120% AMI; 140 at 80% AMI)	500 (346 affordable; 154 market-rate)	345 affordable
Units at or below 50% AMI	0	259	191
Replacement public parking	556 (455 in 6-story garage, Plaza 3)	574 (garage, Plaza 3)	556 (podium levels, Plazas 1 and 3)
Garage cost	\$33.3M (~\$73,000/space)	\$63.0M (~\$110,000/space)	Not separately stated
Total development cost	\$273.8M	\$493.6M (\$857,000 per affordable unit)	\$200–306M
City contribution requested	\$15M cash toward garage; all fee waivers; property-tax waiver; EIFD; \$10M redirected from USGS community benefits	City to issue bonds for garage; developer contributes \$5–10M from market-rate land proceeds; “do not have a fully privately funded parking garage proposal”	Loan-back of impact fees; lease value paid only through a City residual-receipts note; union labor excluded because budget is “already carrying the significant weight of substantial parking infrastructure costs”

Finding. Replacement parking of \$33–63 million absorbs the value of the land the City would contribute before any subsidy reaches affordability, and each proposal then requires additional public funds, public debt, or market-rate units to close. Only one proposal approaches the adopted 345 very low-income objective, and it depends on a \$63 million garage the City would finance. The City therefore cannot find, on the present record, that Program H4.G is likely to produce 345 very low-income units within the planning period on the terms assumed in Chapter 7. By contrast, the

replacement sites in Section 3 carry no public-parking replacement obligation, so City gap funding on those sites is applied entirely to affordability. Scope of the evidence: the December 2025 proposals address Plazas 1–3 — the sites the City itself offered as most suitable for development after the August 2024 feasibility screen, representing [182] of the 345 inventory units. The conclusion extends to all eight sites a fortiori: the five unoffered lots are smaller, were not selected by the City’s own suitability screen, and carry the same aggregate public-parking replacement obligation, so if the three strongest sites cannot deliver on contributed land, the five weaker ones cannot deliver the balance on the same terms. Nor does the Amendment claim City subsidy is unavailable downtown; it shows what the same dollars buy — a very low-income home for [\$43,000–\$91,000] of City funds at the replacement sites, against roughly [\$100,000–\$251,000] of public resources per home in the best downtown proposal — and every remaining feasibility lever the financial review identifies (reduced parking, fee waivers, City debt) is available to, and cheaper at, the replacement sites.

2.5 Support in the adopted record

The adopted element’s comment appendix already contains the evidence for the Bohannon Park component. The David D. Bohannon Organization (DDBO) wrote on May 16, June 6, November 11 and December 6, 2022 and November 28, 2023 (comments #66, #85/86, #120, #131 and #183). The December 6, 2022 letter requested inclusion of nine DDBO-controlled parcels in Bohannon Park by APN, described as assemblable into “a viable, roughly 25+-acre redevelopment opportunity that could produce hundreds of (or possibly over a thousand) residential units,” and stated that 30 du/ac was “neither realistic nor feasible,” with ConnectMenlo R-MU densities (up to 100 du/ac at the bonus level) or 150–200 du/ac identified as viable. Three of those parcels (1000 Marsh Road, 3885 Bohannon Drive and 4065 Campbell Avenue) appeared as Sites 65, 66 and 73 in the May 2022 draft; the June 6, 2022 staff report recommended retaining them and increasing density, and the Council removed them. The Menlo Together / Housing Leadership Council letter of October 9, 2023 (comment #161, signed by Karen Grove, Misha Silin, Michał Bortnik and Jeremy Levine) stated that because the owner had “indicated no interest to redevelop ... under current densities” and “Menlo Park has not increased densities as requested by the property owner, the city should also reduce realistic capacities for these sites to 5%.” The density increase proposed in Program H4.W is the remedy both the owner and the housing advocates identified. Chapter 7, page 7-41, already finds that R-MU-type allowances in this area are “a good indicator that higher-density housing could be developed in this area and that there is a market for such use.”

2.6 The Willow Village pause and pipeline concentration risk

On May 1, 2026, Meta placed the entire Willow Village project on hold; on May 19, 2026 the Planning Commission confirmed that the development agreement does not obligate the developer to build. Willow Village is Pipeline Project E in Table 7-6: 1,730 units, including 119 very low-, 76 low-and 117 moderate-income units and 1,418 above-moderate units — approximately 18 percent of the element’s below-market-rate program and more than 100 percent of its market-rate assumption. Program H1.H requires the City to monitor pipeline projects not yet under construction and evaluate

whether build-out will occur; that evaluation can no longer be deferred to the 2027 mid-cycle review.

Resilience finding. Section 3.3 (Table 3.3) presents a full-loss sensitivity: even if Willow Village is removed from the inventory entirely, the amended element remains adequate in every category shown in the adopted element’s combined-capacity tables (combined lower-income, moderate, and above-moderate). Lower-income capacity falls from [1,990] to [1,795] against a buffer-inclusive requirement of 1,516; above-moderate falls from [4,144] to [2,726] against 1,669, absorbed by Parkline Phase 2, the USGS project and the Bohannon Park master plan. The narrow category is moderate income: before counting this Amendment’s additions, sensitivity-case capacity would fall to [596] against a buffer-inclusive 645. Section 3.2 therefore adds the City-owned parcel at 1283 Willow Road (66 moderate-income units), bringing sensitivity-case moderate capacity to [662] with a surplus of [166], as shown in Table 3.3 — the narrowest margin in the Amendment, and the reason Site W-1’s moderate credit is load-bearing. The adopted element concentrated nearly one-fifth of its affordable program in a single discretionary corporate project; the amended element is structured so that no single tested project failure can render the City non-compliant: Table 3.3 tests Willow Village, the Parkline revision, the USGS secured component, and the Bohannon Park increment (including full removal of the Bohannon sites), and each single-failure case clears not only the RHNA but the buffer-inclusive totals in every category. Each sensitivity reverts a site to its adopted, certified allocation — the baseline Government Code § 65863 measures against — rather than to zero, so the claim is precisely that no single failure of this Amendment’s new assumptions renders the element inadequate; the resilience finding is limited to the scenarios Table 3.3 actually tests, and the combined cases shown there also pass. Three tests are distinct, and each carries its own instrument: citywide adequacy (this table), the fair-housing strategy (Section 5, which depends on the Parkline and USGS projects proceeding and says so), and the [345] very low-income production commitment (Program H4.G and its backstop). Passing the first does not establish the other two.

3. Amendments to Chapter 7 and Appendix 7-1 (Site Inventory)

3.1 Sites removed from RHNA capacity

Appendix 7-1, Site Inventory Table A, is amended to delete the following rows. The parcels remain in public ownership and available for future housing consideration, subject to any voter-approval requirement, but no RHNA capacity is attributed to them for the remainder of the planning period.

Site	Location	APN	Acres	Very Low units removed
9	Between Chestnut and Curtis (Plaza 6/7)	071284100; 071284080	0.69	26
10	Between Crane and Chestnut (Plaza 5)	071283140	1.00	38

14	Between El Camino Real and Chestnut, west of Santa Cruz (Plaza 1)	071102400	2.28	86
15	Between University and Crane, west of Santa Cruz (Plaza 3)	071092290	1.99	75
16	Between Evelyn and Crane (Plaza 4)	071281160	1.00	38
17	Between Curtis and Doyle (Plaza 8)	071285160	1.00	38
18	Lot behind Draeger's	071273160	0.62	23
19	Lot off Oak Grove (Plaza 2)	071094180	0.56	21
Total			9.14	345

Plaza numbering is inferred from acreage cross-referenced to the § 9212 report and should be confirmed by Public Works. Table 7-9 (Detailed Information on City-Owned Parking Lots) and the related narrative at pages 7-38 to 7-40 are deleted or revised to conform.

3.2 Sites modified or re-credited

Site 12 — 345 Middlefield Road (former USGS campus), APNs 062390700 and 062421070

Ownership is revised from “GSA/federal” to private. The developable-acreage assumption is revised from 2.0 acres to the residential portion of the pending application, and the unit allocation is revised from 89 very low-income units to [172] deed-restricted units: the [118] in the pending application ([31] very low / [65] low / [22] moderate, per staff report 26-038-PC, Table 5) plus the increment to the [150]-unit secured component (at least [143] very low-income) that amended Program H4.G(c) commits City assistance to — credited on the same program-commitment basis on which Case A credits the Parkline R3 units, for [150] lower-income and [22] moderate-income units and the affordability terms to be secured in the development agreement. The site is over 10 acres; pursuant to § 65583.2(c)(2)(B), the City relies on the Parkline entitlement (up to 800 units, 251 BMR; Phase 1 approved October 2025), on [completed large-site precedent to be cited — Attachment A, item 18], and on this project’s own phasing commitments in the development agreement, as evidence that sites of this scale in Menlo Park deliver lower-income housing within a planning period; the Willow Village entitlement is cited as evidence of entitlement feasibility at scale, not of completed development. The General Plan amendment and rezoning from P-F required for the project proceed on the project’s own entitlement track (targeted [2027–28]; Section 7). At Amendment adoption this site’s credit therefore rests on the program-commitment basis stated above and in amended Programs H4.G(c) and H4.U — not on zoning already in place — and Table 3.3 carries the sensitivity in which the secured component is not achieved and the credit reverts to the application’s [118], with the element remaining adequate ([1,936] lower-income).

The inventory credits the [150]-unit secured component ([143] very low-income), pursued under amended Programs H4.G(c) and H4.U, on the strength of the Amendment’s own funding-and-covenant commitment — the same program-commitment basis on which Case A credits the Parkline R3 units — plus the [22] moderate-income units in the pending application. Table 3.3 carries a sensitivity showing the element remains adequate if the component is not secured and the credit reverts to the application’s [118]. The City would request that HCD credit this site on a project basis rather than on zoned capacity; the inventory claims no zoning-based capacity for the full 17-acre campus. Note also that the applicant’s December 2025 downtown plaza proposal anticipated applying \$10 million of its community-benefit contribution from this entitlement toward the plaza parking garage; with the plaza program ended by this Amendment, that contribution is a candidate source for affordability at this site, subject to negotiation in the development agreement; it is cited here as evidence of the entitlement’s value, not as a committed fund.

Pipeline Project H — 333 Ravenswood Avenue (Parkline master plan)

Table 7-6 is revised to reflect the approved master plan and the Phase 2 application. The status column is revised from “Proposed” to “Approved (Phase 1, October 7, 2025); Phase 2 revisions under review (26-041-PC, study session September 14, 2026).”

Row	Total net new	Market-rate	Total BMR	Very Low	Low	Moderate
Adopted (Dec. 2022)	400	340	60	0	60	0
Amended (Case A — conservative)	[1,082]	[788]	[294]	[154]	[90]	[50]
Amended (Case B — with § 11.1.1 blended finding)	[1,082]	[788]	[294]	[202]	[0]	[92]

Case A assumes the 154-unit R3 building is regulated at or below 50 percent AMI (see Program H4.G as amended, which commits City gap funding in exchange for that regulatory agreement), the [90] inclusionary rental units remain at the low-income level, and the [50] Phase 2 for-sale units are moderate-income (26-041-PC, Table 8). Case B additionally assumes a City Council finding under BMR Guidelines § 11.1.1 that a blended mix of very low-and moderate-income inclusionary units — here [48] very low and [42] moderate, a weighted average of roughly 78 percent of AMI — is “roughly equivalent” to the low-income level. The average is illustrative only: the § 11.1.1 finding requires an economic-equivalence analysis using the applicable rent and price limits and the actual bedroom mix, and the developer’s concurrence in the revised BMR Housing Agreement (Attachment A, item 21). Case A is the inventory basis for the no-net-loss finding. Case B is the affordability structure Program H4.G(b) affirmatively pursues: the § 11.1.1 blended finding yields [48] very low-income inclusionary units while shifting [42] units to the moderate level (Parkline lower-income capacity 244 to 202). H4.G(b) permits the finding only when the USGS affordable component reaches [143] or more units, so aggregate lower-income units under H4.G(a)-(c) never fall below 345. If Case B is executed, the inventory is conformed: citywide lower-income capacity falls by 42 to [1,948] and moderate rises to [821], which exceeds the RHNA and buffer in every scenario in Table 3.3, including the combined sensitivity case ([1,638] against the buffer-inclusive 1,516). If Phase 2 is not approved before submittal, substitute the Phase 1 figures (800 / 549 / 251 / [154] / [90] / [7]).

Sites 67-72 and new Sites B-1 to B-9 — Bohannon Park master plan area

The six existing inventory parcels (Sites 67-72; 6.24 acres; 153 moderate-income units at 30 du/ac) and nine additional DDBO-controlled parcels identified in comment #131 total approximately 41.8 acres of common ownership, within which a Bohannon Park master plan area of approximately [17] acres (parcel schedule to be confirmed with the owner) is to be rezoned under Program H4.W to a Residential Mixed Use designation modeled on ConnectMenlo R-MU, with a base density of [60] du/ac and a bonus density of [100] du/ac, with use of the bonus density conditioned on dedication of land sufficient for a 100 percent affordable development of at least [190] units to a qualified affordable housing developer, on the model of the Parkline R3 dedication. The inventory credits only the base inclusionary yield; the dedication is a program objective, not a capacity assumption.

Site	Address	APN	Approx. acres	Adopted allocation	Amended allocation
67	3905 Bohannon Dr	055-253-140	1.01	25 Mod	see master plan total
68	3925 Bohannon Dr	055-253-150	1.05	26 Mod	
69	4005 Bohannon Dr	055-253-240	0.64	16 Mod	
70	4025 Bohannon Dr	055-253-190	1.00	24 Mod	
71	4055 Bohannon Dr	055-253-030	1.72	42 Mod	
72	4060 Campbell Ave	055-253-200	0.82	20 Mod	
B-1	120, 140, 160 Scott Place	055-253-220	6.7	—	
B-2	4065 Campbell Ave	055-251-270	1.4	—	
B-3	4045-4055 Campbell Ave	055-251-260	2.7	—	
B-4	3885 Bohannon Dr	055-251-220	5.0	—	
B-5	990 Marsh Rd	055-251-070	0.7	—	
B-6	1000 Marsh Rd	055-251-340	2.5	—	
B-7	1100 Marsh Rd	055-251-320	1.0	—	
B-8	1110 Marsh Rd	055-251-250	0.63	—	
B-9	1020-1080 Marsh Rd (Menlo Place)	055-251-350	15.0	—	
Total (holdings shown; master plan ~[17] ac, TBC)			41.8	153 Mod	[115] Low (15% inclusionary) + [650] Above Mod · dedication upside [190] lower, not credited

					(H4.W)
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Realistic zoned capacity at [100] du/ac on the [17]-acre master plan area approaches 1,700 units; the Amendment deliberately credits only [765] units (45 du/ac — comparable to the 40 du/ac the pending 345 Middlefield application requests, and far below ConnectMenlo bonus densities), of which [115] lower-income from the BMR Ordinance’s 15 percent inclusionary requirement alone. The only affordability assumption is that the ordinance applies once the land is rezoned. The dedicated-site upside of at least [190] units (Program H4.W) is deliberately not credited; the credit rises only upon a recorded dedication commitment. This is deliberately stricter than the program-commitment basis on which Site 12 is credited: Site 12 has a pending application and committed City assistance under Program H4.G(c); Bohannon Park has neither, so nothing beyond the ordinance’s inclusionary yield is counted. Acreages are from the map attached to DDBO comment #183 and must be confirmed against Assessor records. Existing uses (office, warehouse, light industrial) must be shown not to impede development in the planning period (§ 65583.2(g)); the owner’s lease-expiration schedule and a current letter of intent are required exhibits (Attachment A, item 3). Sites designated to address a lower-income shortfall must comply with § 65583.2(h) and (i) (by-right approval for projects with at least 20 percent lower-income units, minimum 20 du/ac, at least 16 units per site, residential-only or at least 50 percent residential floor area). Per Chapter 7 page 7-25, the Marsh Road/Bohannon Drive cluster is not within a TCAC High or Highest Resource area; see Section 5.

New Site W-1 — 1283 Willow Road (City-owned, Belle Haven)

The City-owned 0.67-acre parcel at Willow Road and Ivy Drive (acquired November 2019 for \$3.6 million; vacant since) is added to the inventory with a realistic capacity of [66] units at AHO density, subject to a Belle Haven-led community process and the Surplus Land Act. When the element was prepared, the City declined to inventory this parcel, citing concentration concerns — a rationale premised on Willow Village delivering 312 below-market-rate units and more than \$180 million in community amenities to the neighborhood. With that project on indefinite hold, the premise no longer applies: a modest City-owned development here partially restores what the neighborhood lost, rather than adding to a concentration that never materialized. Consistent with community priorities and recent precedent (the Laurel Landing affordable ownership townhomes, funded by the City and County in this neighborhood in 2024–2026), the intended program is a mixed-income or affordable ownership development, credited to the moderate-income need — the category in which the Willow Village pause actually creates a shortfall — while the element’s lower-income replacement strategy remains led by the Parkline and USGS sites west of U.S. 101, with Bohannon Park supplying additional resilience capacity. Credit: [0] VL / [0] L / [66] Moderate (ownership). If the Belle Haven community process selects a mix with fewer than [66] moderate-income units, Program H4.X requires equivalent moderate-income capacity to be restored elsewhere first (Government Code § 65863). Feasibility basis: [66] units on 0.67 acres (approximately [99] du/ac) is within the density the Affordable Housing Overlay permits for qualifying affordable projects [confirm AHO standards and ownership tenure — Attachment A, item 19]; the intended building form is a [3–4-story] attached ownership type, not the Laurel Landing townhome type, and disposition follows the Surplus Land Act milestones in Program H4.X. Without Site W-1, base-case moderate capacity is [713] against the 496 RHNA; in the Willow Village sensitivity W-1 is load-bearing against the buffer-inclusive 645, which is why Program H4.X carries disposition milestones rather than an aspiration.

The parcel was purchased with surplus funds and has no committed use; the Fire District’s early interest did not advance. Site suitability is strengthened by the fully renovated Belle Haven

Elementary campus, opened January 2026, within walking distance. If the community process selects a non-residential use, the moderate cushion must be restored elsewhere (e.g., additional moderate credit within the Bohannon Park master plan). Confirm APN and acreage against Assessor records; tract designation (Low Resource + Neighborhood Change) confirmed on the 2025 AFFH Mapping Tool, to be re-verified on the 2026 refresh.

3.3 Revised Table 7-4: Land Inventory Summary

	Very Low + Low	Moderate	Above Moderate	Total
RHNA	1,166	496	1,284	2,946
Pipeline Projects (adopted)	410	197	3,038	3,645
Parkline revision (Case A)	[+184]	[+50]	[+448]	[+682]
Pipeline Projects (amended)	[594]	[247]	[3,486]	[4,327]
ADUs	51	26	8	85
Opportunity Sites (adopted)	1,514	571	0	2,085
Remove Sites 9, 10, 14-19	-345	0	0	-345
Site 12 revision (89 VL → [150] lower + [22] mod, program basis)	[+61]	[+22]	0	[+83]
Bohannon Park master plan (~[17] ac within Sites 67-72 and B-1 to B-9)	[+115]	[-153]	[+650]	[+612]
New Site W-1 — 1283 Willow Road (moderate only)	0	[+66]	0	[+66]
Opportunity Sites (amended)	[1,345]	[506]	[650]	[2,501]
Total capacity (amended)	[1,990]	[779]	[4,144]	[6,913]
Surplus over RHNA (adopted element)	809	298	1,762	2,869
Surplus over RHNA (amended)	[824]	[283]	[2,860]	[3,967]
Sensitivity: full Willow Village loss (-119 VL -76 L / -117 M / -1,418 AM)	[1,795]	[662]	[2,726]	[5,183]
Surplus in sensitivity case	[629]	[166]	[1,442]	[2,237]
Sensitivity: USGS secured component not achieved (credit reverts to [118]: -54 lower)	[1,936]	[779]	[4,144]	[6,859]
Surplus in that	[770]	[283]	[2,860]	[3,913]

case				
Sensitivity: Bohannon Park increment not realized (–115 / +153 / –650)	[1,875]	[932]	[3,494]	[6,301]
Surplus without the Bohannon increment	[709]	[436]	[2,210]	[3,355]
Sensitivity: Parkline revision not realized (revert to adopted: –184 / –50 / –448)	[1,806]	[729]	[3,696]	[6,231]
Surplus in that case	[640]	[233]	[2,412]	[3,285]
Sensitivity: Bohannon Park sites removed entirely (adopted 153 moderate units also excluded)	[1,875]	[779]	[3,494]	[6,148]
Surplus with the Bohannon sites removed entirely	[709]	[283]	[2,210]	[3,202]
Sensitivity: combined (full Willow Village loss and no Bohannon increment)	[1,680]	[815]	[2,076]	[4,571]
Surplus in the combined case	[514]	[319]	[792]	[1,625]
30% buffer (upper end of HCD's recommended 15- 30% range)	350	149	385	884

The “Bohannon Park increment” is the net capacity change produced by the master plan relative to the adopted inventory: Sites 67-72 carry 153 moderate-income units at 30 du/ac in the adopted element; the master plan replaces that credit with [115] low-income inclusionary and [650] above-moderate units across the ~[17]-acre master plan area (net –153 moderate; the moderate cushion is restored by Site W-1 and the Site 12 moderate units, and every moderate-income test in Table 3.3 continues to clear its buffer). The “increment not realized” sensitivity assumes the master plan does not proceed: Sites 67-72 revert to their adopted 153-moderate credit and Sites B-1 through B-9 contribute nothing. The same definition applies wherever the increment is referenced, including the Section 6 findings.

The adopted element does not report Pipeline or Opportunity Site capacity split between very low and low; the combined lower-income figure is used here, consistent with Table 7-3 and 7-4. Totals exclude the 621 units of “Other Land Use Strategies” in Table 7-2, which are not relied upon.

4. Amendments to Chapter 8 (Goals, Policies and Programs)

4.1 Program H4.G — replaced in its entirety

Existing Program H4.G, “Prioritize Affordable Housing on City-Owned Parking Lots Downtown,” is deleted and replaced with the following:

Program H4.G Deliver Deed-Restricted Very Low-and Low-Income Housing on High-Resource Replacement Sites.

This program has two independent requirements. Requirement 1 (capacity): maintain at least 345 units of lower-income replacement capacity, replacing the capacity previously attributed to the downtown City-owned parking plazas, through actions (a) through (c) on privately owned sites west of U.S. 101 in High or Highest Resource areas, sufficient to satisfy the City’s no-net-loss and fair-housing obligations; the treatment of the combined very low/low income category in the formal accounting is subject to confirmation with HCD and the City Attorney. Requirement 2 (very low-income production): independently secure, through recorded regulatory and development agreements — each recorded against the land for an affordability term of not less than 55 years (45 years for ownership units) and binding all successor owners — at least [345] newly secured very low-income units at or below 50 percent of AMI — [154] under action (a), [48] under action (b), and [143] under action (c) — so that the very low-income units deleted from the downtown program are replaced by very low-income units, whatever the formal accounting treatment. Each such agreement shall specify the affordable units’ bedroom-size mix and require that the affordable units be comparable to the project’s market-rate units in size, finish and access to amenities. Action (d) provides additional resilience capacity and is not counted toward either requirement.

(a) Parkline R3 (333 Ravenswood Avenue). Commit [approximately \$10 million — to be set from the R3 developer pro forma; Attachment A, items 8 and 15] from the City’s Below Market Rate Housing Fund and/or other sources identified in Attachment A as gap financing for the 100 percent affordable building on the 1.6-acre parcel dedicated under the Parkline development agreement, conditioned on a recorded regulatory agreement restricting all [154] units to households at or below 50 percent of AMI for a term of not less than 55 years. City funds shall be disbursed only upon recordation of the regulatory agreement and shall be structured as a residual receipts loan secured against the property. Issue a Notice of Funding Availability or enter into an exclusive negotiating agreement with the affordable housing developer selected by the master developer (2027); support applications for tax credits, AHSC, Multifamily Housing Program and County funds (2027–2028); complete entitlements (2028); issue building permits (2029). The funding commitment shall address construction phasing: the applicant’s Phase 2 plan sequences the R3 building last, and the regulatory agreement shall provide for R3 building permits within the planning period, or earlier transfer of the dedicated parcel to the affordable developer.

(b) Parkline inclusionary units. In the BMR Housing Agreement for the R1 and R2 buildings, secure a Council finding under BMR Guidelines § 11.1.1 that an affordability mix including very low-income units is roughly equivalent to the low-income level, yielding at least [48] very low-income units among the [90] inclusionary rental units (2027); provided that the finding shall be made only when the aggregate lower-income

units secured under actions (a) through (c) remain at least 345 after accounting for units the blended mix shifts to the moderate-income level — a condition satisfied when the USGS affordable component reaches [143] units or more — and the sites inventory shall be conformed to the executed agreements (see the Case A/Case B note in Section 3.2).

(c) Former USGS campus (345 Middlefield Road). Through the development agreement for the pending application, and with committed City assistance to deepen affordability, secure an affordable component with a program objective of [150] deed-restricted units, of which at least [143] very low-income at or below 50 percent of AMI; the inventory credits the [150]-unit component on the basis of this program's commitment, and Table 3.3 carries the sensitivity in which the credit reverts to the application's [118]. The City's cash contribution shall be capped on a per-unit basis in the development agreement and disbursed only upon recordation of affordability covenants with a term of not less than 55 years, with the balance of the affordability cost absorbed through the value of the entitlement. Provide priority processing and any fee or parking incentives under the Affordable Housing Overlay; complete General Plan amendment, rezoning and entitlements (2027– 2028, following the project EIR); issue building permits for the first residential phase (2029).

(d) Bohannon Park master plan (additional resilience capacity; not counted toward the 345-unit high-resource replacement objective). Complete the rezoning described in Program H4.W (within 12 months of HCD's finding on this Amendment, per the implementation schedule); enter into a development agreement with the property owner for a phased master plan that dedicates a site of at least [2] acres, with infrastructure, to a qualified affordable housing developer for a 100 percent affordable development of at least [190] units (a condition of bonus density under Program H4.W; not credited in the inventory unless and until recorded), and that provides BMR units in the market-rate phases under the BMR Ordinance (2028); support the affordable developer's financing applications (2028– 2029); issue building permits for the affordable site (2030).

(e) Downtown parking plazas. The City retains the downtown parking plazas in public ownership for public parking and other public purposes. Nothing in this program precludes the City Council, subject to any voter-approval requirement in effect, from proposing housing on one or more plazas in the future; any such housing would be additional to, and not relied upon for, the capacity described in Chapter 7.

(f) Monitoring and backstop. Report progress under this program in each Annual Progress Report. Milestone: by the 2027 mid-cycle review under Program H1.H, all [345] very low-income units required by Requirement 2 shall be secured by recorded regulatory agreement, development agreement, or BMR Housing Agreement. If any shortfall exists at that review, the City shall within 180 days adopt a corrective action matched to its cause: (i) for a site-capacity shortfall, identify and, as necessary, rezone additional High or Highest Resource sites sufficient to accommodate the full shortfall, consistent with Government Code § 65863(c) and § 65583.2(h); (ii) for a financing shortfall, adopt a funding plan identifying sources (BMR Housing Fund balances, in-lieu revenue, State funding rounds, or other sources) and the schedule on which the remaining units will be secured; and (iii) for delay in a counterparty agreement, exercise the schedule-enforcement provisions of the applicable development agreement or BMR Housing Agreement and report a revised date certain. If fewer than [200] of the [345] units have been secured at that review, remedies (i) and (ii) shall proceed concurrently and immediately. If no counterparty agreement exists to

enforce, remedy (iii) is unavailable and remedies (i) and (ii) apply in its place. Final deadline: if fewer than [345] units are secured by [June 30, 2028], the City shall complete remedy (i) — identification and rezoning of alternative High or Highest Resource sites sufficient for the full remaining shortfall — by [December 31, 2028]. The 2027 milestone is measured by executed agreements, which for the USGS component may be executed with or in advance of project entitlement ([2027-28]); the milestone is read against the schedule in Section 7.

(g) High-resource capacity restoration. The tables in Section 5 show that, measured against the adopted inventory as printed, this Amendment reduces lower-income inventory capacity at High and Highest Resource locations by [100] units (Case A) or [142] units (Case B). The City shall restore both the unit count and the geographic share: (1) add lower-income inventory capacity on High or Highest Resource sites sufficient to restore the adopted count at those locations (at least [100] units under Case A, [142] under Case B); and (2) if, after that addition, the share of citywide lower-income capacity in High and Highest Resource tracts remains below the adopted share computed from the completed distribution analysis (Attachment A, item 9), add the further units required for share parity. On the figures stated in Section 5 alone, share parity requires at least [39] units beyond the count restoration — a lower bound of [139] units under Case A and [181] under Case B — because each unit added at a High or Highest Resource site also enlarges the citywide total; to the extent other High and Highest Resource sites contribute to the adopted share, the requirement rises (at an adopted share of 50 percent, [215] and [257] respectively). The required total shall be computed before submittal from the completed distribution analysis (Attachment A, item 9) and stated in the adopted text. Candidate sources, to be verified and inventoried before submittal under Attachment A, item 22: (i) by-right capacity on qualifying parcels owned by religious institutions or independent institutions of higher education west of U.S. 101 under Government Code § 65913.16 (SB 4, 2023) [candidate parcels on the Santa Cruz Avenue, Middle Avenue and Oak Grove Avenue corridors, subject to ownership-date and size eligibility]; (ii) Affordable Housing Overlay density on the El Camino Real/Downtown Specific Plan opportunity sites retained in the inventory; and (iii) additional realistic capacity at Parkline Phase 2 documented in the revised BMR Housing Agreement. Deadline: the inventory additions shall be adopted, with any required rezoning, within twelve months of HCD's finding on this Amendment and in no event later than [June 30, 2028]; Attachment A, item 22 shall identify the specific parcels and their realistic capacity before submittal so that the obligation is sized in the adopted text. This program is independent of, and cumulative with, the backstop in (f): (g) restores nominal distribution; (f) secures very low-income production.

Responsibility: Planning Division; Housing Division; City Attorney; City Manager; City Commissions; City Council.

Financing: BMR Housing Fund; General Fund; other sources identified in Attachment A (item 8).

Objectives: (1) maintain at least 345 units of lower-income capacity on the High and Highest Resource sites identified in (a) through (c) ([394] under Case A, against 149 at the same locations in the adopted inventory; Section 5 states the accounting); (2) at least [345] deed-restricted very low-income units at or below 50 percent of AMI ([154] + [48] + [143]), supporting the integration of affordable housing options in high resource areas of the community.

Timeframe: Funding commitment and regulatory agreement for Parkline R3 (2027); USGS entitlements (2027–2028); Bohannon Park rezoning within twelve months of HCD’s finding on this Amendment (2027–early 2028); mid-cycle review (2027); building permits for at least 345 units (2029–2030).

4.2 Program H4.U — revised

Program H4.U, “Federally-Owned Sites and School Sites,” is revised to (i) delete references to the USGS site as federally owned and to coordination with the General Services Administration; (ii) revise the USGS timeframe to “Complete General Plan amendment, rezoning and development entitlements (2027–2028); issue residential building permits for at least [118] affordable units — the inventory-credit floor, rising to the secured component under the [150]-unit objective — (2029)”; (iii) revise the numerical objective from “at least 131 new affordable housing units” to “at least [251] new affordable housing units (USGS [150], credited on the program basis stated in Section 3.2, plus VA 60 plus Ravenswood City School District 41)”; and (iv) retain the VA and Ravenswood City School District provisions without change (but see Attachment A, item 17).

4.3 New Program H4.W — Bohannon Park Rezoning

Program H4.W Bohannon Park Residential Mixed Use Rezoning and Master Plan.

Within twelve months of HCD’s finding on this Amendment, amend the General Plan Land Use Map and the Zoning Map and Ordinance to establish a Residential Mixed Use designation for the Bohannon Park master plan area (a master plan area of approximately [17] acres within Sites 67–72 and Sites B-1 through B-9, parcel schedule to be confirmed), modeled on the ConnectMenlo R-MU district, with a minimum density of 20 du/ac, a base density of [60] du/ac and a bonus density of up to [100] du/ac, and development standards (height up to [8] stories, floor area ratio, parking maximums, setbacks and open space) that allow the maximum density to be achieved. The rezoning shall (i) permit multifamily residential use by right for developments in which at least 20 percent of the units are affordable to lower-income households, allow at least 16 units per site, and allow 100 percent residential use, consistent with Government Code § 65583.2(h) and (i); (ii) condition use of the bonus density on a master plan or development agreement that dedicates land sufficient for a 100 percent affordable development of at least [190] units, with site infrastructure, to a qualified affordable housing developer no later than the first residential phase; (iii) apply the BMR Ordinance to all market-rate phases; (iv) require a phasing plan under which no more than [50] percent of market-rate units receive certificates of occupancy before the affordable site has been dedicated and entitled; (v) require the master plan to provide safe and convenient pedestrian and bicycle access between the master plan area and the adjacent neighborhoods and commercial services across Marsh Road, and an internal circulation network that connects to the surrounding street and path network, with specific designs determined through the master plan and the City’s transportation review; (vi) require that the neighborhood park, open space and any neighborhood-serving retail be constructed or bonded no later than completion of the first residential phase; (vii) require residential siting, setback and ventilation standards for buildings adjacent to U.S. 101 consistent with air-quality siting guidance; and (viii) reserve frontage along the former Dumbarton rail right-of-way for a future transit stop and trail connection, and direct staff to submit a City

letter to the SamTrans Reimagine Dumbarton record (which may be filed as a standalone Council action in advance of this Amendment's adoption; Attachment A, item 7), before the fall 2026 selection of a preferred design, supporting a stop serving the Marsh Road area and bicycle-pedestrian access to the corridor. Responsibility: Planning Division; Housing Division; City Attorney; Planning Commission; City Council. Financing: General Fund; applicant deposits. Objectives: Zoned capacity for at least [765] units including at least [115] lower-income inclusionary units, and dedication of a site for a 100 percent affordable development of at least [190] additional lower-income units as a condition of bonus density. Timeframe: Ordinance adoption within 12 months of HCD's finding on this Amendment; development agreement within 24 months.

4.4 New Program H4.X — Pipeline Resilience and 1283 Willow Road

Program H4.X Pipeline Resilience (Willow Village) and Community-Led Development at 1283 Willow Road.

(a) Within 90 days of adoption of this Amendment, complete the Program H1.H evaluation of the Willow Village pipeline assumption. If building permits for the residential phases have not been filed, or the developer has not provided a written construction schedule, by [June 30, 2027], remove or discount the project in the sites inventory and identify replacement capacity consistent with Government Code § 65863, drawing first on the surplus capacity established by this Amendment. Report the evaluation in each Annual Progress Report.

(b) The City-owned parcel at 1283 Willow Road is committed to housing and counted in the inventory (Site W-1, 66 moderate-income units). Initiate a Belle Haven community process in 2027 to shape the development program — tenure, design, affordability mix, and community amenities — for a mixed-income or moderate-income ownership development consistent with the Surplus Land Act and the element's AFFH analysis; issue an RFP (2027); complete entitlements (2028). If the Council nonetheless directs a non-residential use, the 66-unit moderate cushion shall first be restored elsewhere in the inventory under the no-net-loss procedure of Government Code § 65863. The site shall not be programmed for concentrated very low-income rental development, consistent with Chapter 4. Actions (a) and (b) are independent: the commitment and inventory credit in (b) do not depend on the outcome of the evaluation in (a).

Responsibility: Planning Division; Housing Division; City Manager; City Council. Financing: General Fund; BMR Fund (moderate-income ownership assistance); land value of the City-owned parcel. Objectives: No single project failure renders the element inadequate; at least [66] moderate-income units at 1283 Willow Road, unless equivalent moderate-income capacity is first restored elsewhere pursuant to Government Code § 65863. Timeframe: Willow Village evaluation (within 90 days); Surplus Land Act notice of availability ([Q1 2027], as an advance action before Amendment adoption); community process (2027); disposition agreement and entitlements (2028).

4.5 Program H1.H — conforming revision

Program H1.H is revised to add the Parkline R3 building, the former USGS campus, and the Bohannon Park sites to the list of projects and sites monitored annually, and to

provide that the 2027 mid-cycle review shall include the evaluation and backstop described in Program H4.G(f).

4.6 Other conforming changes

Chapter 1 summary and Chapter 7 narrative references to housing on City-owned parking lots (including pages 7-18 to 7-19, 7-38 to 7-40, Table 7-9 and Figure 7-1) are revised or deleted to conform.

Program H4.D (Affordable Housing Overlay) and Program H4.I (mixed-use zoning at 30 du/ac in non-residential zones) are revised to exclude the Bohannon Park master plan area, which is governed by Program H4.W.

Appendix 7-5 (site sheets) and Appendix 7-7 (redevelopment factors) are updated for Sites 12 and 67-72.

5. Affirmatively Furthering Fair Housing Analysis (Chapter 4 addition)

The downtown parking plazas were included in the inventory in part to respond to HCD's October 2022 finding that the City's draft concentrated lower-income capacity east of U.S. 101 in the Belle Haven and Bayfront areas. This Amendment preserves that response by placing the 345 units of lower-income replacement capacity on two Highest Resource sites west of U.S. 101 (USGS and Parkline) and adds a large mixed-income master plan area, also west of U.S. 101, in a tract the adopted element (page 7-25) identifies as outside the TCAC High/Highest Resource categories. The following table is added to Chapter 4 and must be completed from the current TCAC/HCD Opportunity Map.

Site(s)	Location relative to U.S. 101	Council District	TCAC/HCD Opportunity Category	Lower-income units (amended)	R/ECAP or low-resource tract?
Sites 9, 10, 14-19 (removed)	West (downtown)	[3/4]	[Highest Resource]	0 (was 345)	No
Site 12 — USGS	West (Linfield Oaks)	[3]	[Highest Resource]	[150] (was 89)	No
Pipeline H — Parkline	West (Ravenswood/C altrain)	[3]	[Highest Resource]	[244] (was 60)	No
Bohannon Park master plan	West (Marsh Rd / Suburban Park)	[2]	[Low Resource + Neighborhood Change — confirm on 2026 map]	[115] (was 0)	No R/ECAP
Site W-1 — 1283 Willow Road	East (Belle Haven)	[1]	[Low Resource + Neighborhood Change — confirm on 2026 map]	0 (66 moderate ownership)	[Confirm — Attachment A, item 5]

Legal framework note. Although the federal government terminated the federal AFFH regulation in 2025 and replaced it with a certification-only regime, California’s independent statutory duty — Government Code § 8899.50 (AB 686) and § 65583(c) (10) — remains fully in force and is enforced by HCD. This analysis is prepared under state law.

Consistent with HCD’s AFFH guidance and the framework used in the adopted element at page 7-21, the amended Site Inventory is analyzed under HCD’s five recommended factors.

Improved conditions. The 345 very low-income units the adopted element assigned downtown are carried forward in full as a production commitment — [345] very low-income units to be secured at USGS and Parkline under Program H4.G. That is the production measure; the inventory measures are distinguished in the tables below and do not equal it. Combined lower-income capacity at these High and Highest Resource locations is [394] under Case A against 494 in the adopted inventory including the plazas — a net change of [–100] units ([–142] under Case B), stated plainly in the table below. The fair-housing finding does not rest on denying that arithmetic. It rests on three facts: the removed 345 was paper capacity that the December 2025 proposals and the City’s independent financial review (26-163-CC) show could not be delivered on the terms assumed; the replacement capacity is program-backed — an approved master plan and a pending application with committed City assistance — rather than zoned capacity alone; and the secured very low-income count at these locations rises from zero to [345]. The Bohannon Park and 1283 Willow Road capacity is additional to, and not a substitute for, that replacement. The completed distribution table above must show the share of the City’s lower-income capacity located in High and Highest Resource tracts under the amended element, computed against the adopted baseline both with and without the plazas’ paper capacity.

High/Highest Resource location	Adopted lower-income capacity	Amended (Case A)	Amended (Case B)
Downtown parking plazas (Sites 9, 10, 14–19)	345	0	0
Parkline / SRI (Pipeline Project H)	60	[244]	[202]
Former USGS campus (Site 12)	89	[150]	[150]
Total, these locations	494	[394]	[352]
Net change from adopted	—	[–100]	[–142]
Very low-income units secured by recorded regulatory agreement (as of September 2026; basis documented per Attachment A, item 20)	0	[297] to be secured ([345] upon the Case B finding)	[345] to be secured

Very low-income INVENTORY capacity at the same locations	Adopted	Amended (Case A)	Amended (Case B)
Downtown parking	345	0	0

plazas			
Parkline / SRI	0	[154]	[202]
Former USGS campus (Table A, Site 12: 89 very low / 0 low)	89	[143]	[143]
Total very low-income inventory capacity	434	[297]	[345]
Net change from adopted	—	[–137]	[–89]

Three measures, kept distinct. (1) Inventory capacity: the adopted 434 very low-income units at these locations were paper — 345 on plaza sites the December 2025 proposals and the City’s financial review show cannot deliver on the terms assumed, and 89 premised on a two-acre federal carve-out of a campus that has since sold to a private applicant proposing a different project. (2) Units required by agreements in existence today: as of September 2026 no recorded covenant restricts any unit at these locations to the very low-income level (Attachment A, item 20 documents this baseline). (3) Units this Amendment secures: [345] very low-income units under Program H4.G, backed by committed City funding, named counterparty agreements, and the backstop in H4.G(f). The Amendment’s claim is made on measures (2) and (3) — production — and the inventory tables above state measure (1) without overstatement.

Exacerbated conditions. The [115] lower-income units at Bohannon Park are located within a mixed-income master plan of approximately [765] units, not a concentrated affordable enclave; the dedicated-site mechanism replicates the Parkline model already reviewed by HCD in this element. HCD’s October 21, 2022 concern for Menlo Park was the concentration of lower-income capacity east of U.S. 101 in the Belle Haven and Bayfront neighborhoods; the Bohannon Park area is west of U.S. 101 and outside that geography. Program H4.W structures the site as a predominantly market-rate, mixed-income master plan — [115] inclusionary lower-income units, and a dedicated site of at least [190] affordable units, within a plan of approximately [765] units or more — and conditions bonus density on the dedication, the integration mechanism modeled on Parkline. These features are designed to prevent development as a concentrated low-income enclave; the completed opportunity-map and unit-mix analysis (Attachment A, items 5 and 9) will document the resulting income distribution.

Isolation of the RHNA. The master plan area adjoins the established Suburban Park and Flood Triangle neighborhoods, with the Marsh Manor neighborhood retail center directly across Marsh Road. Program H4.W requires the master plan to provide safe and convenient pedestrian and bicycle access to the neighborhoods and services across Marsh Road, an internal network connected to its surroundings, and delivery of the park and neighborhood-serving uses with the first residential phase, with designs settled through the master plan process rather than prescribed here. In addition, the master plan area touches the former Dumbarton rail right-of-way, the subject of SamTrans’s Reimagine Dumbarton feasibility study (fall 2025–winter 2027), which is advancing a dedicated zero-emission busway with bicycle and pedestrian improvements between East Palo Alto and the Redwood City Transit Center; a preferred design is scheduled for selection in fall 2026. Program H4.W(viii) reserves corridor frontage for a stop and commits the City to support corridor service in the SamTrans record. A corridor SamTrans itself describes as a barrier between communities would, as converted, connect the site to Caltrain, Belle Haven and East Palo Alto.

Local data and knowledge. The TCAC/HCD Opportunity Map is tract-level; the Bohannon Park area sits in a census tract whose boundary crosses U.S. 101, and the parcels themselves lie west of the highway, geographically adjacent to High Resource neighborhoods. Adjacency is reported as geographic fact, not as a claim that tract geometry itself establishes access to those neighborhoods' resources; access depends on the connectivity, services and site design that Program H4.W requires and the master plan process will document. The adopted element applies precisely this local-data analysis to the tract 6121 boundary sliver at page 4-14, footnote 29. This analysis reports the mapped designation as it stands and supplements, without reclassifying: the tract is predominantly non-residential, its trajectory is documented by the Neighborhood Change designation, and the neighborhood services across Marsh Road are established and improving. On schools: the parcels are served by the Redwood City School District (attendance boundary to be confirmed; Attachment A, item 6), whose enrollment has declined from a peak of roughly 10,000 to 6,310 (2025-26) with a projected loss of more than 1,000 additional students by 2033-34; new households at Bohannon Park support the enrollment stabilization that district has publicly identified as a need. This is offered solely as community-stabilization context within the fair-housing analysis; under Government Code §§ 65995-65996, school capacity is not a basis for approving, denying or conditioning any housing site, and no such use is made of it here.

Other relevant factors. The Amendment responds directly to comment #184 (November 28, 2023), which asserted that ConnectMenlo's concentration of development in the Bayside has had a racially disparate impact, by creating a west-of-101 mixed-income site of comparable scale. Environmental screening: the CalEnviroScreen 4.0 percentile for the tract and the FEMA flood designation for the Marsh Road frontage are recorded before submittal (Attachment A, item 5); residential uses adjacent to U.S. 101 are subject to the siting and ventilation standards in Program H4.W(vii).

Neighborhood Change designation. The Belle Haven census tract is designated on the CTCAC/HCD Neighborhood Change Map (confirmed on the 2025 AFFH Mapping Tool; the 2026 update is a data-only refresh with no methodology change), with a base Neighborhood Opportunity designation of Low Resource. The Neighborhood Change overlay identifies areas that "have already undergone substantial racial and economic change" and that "would likely require additional policy interventions to ensure stability and access for current and future low-income people and communities of color." The combined designation resolves the fair-housing analysis for Site W-1 in one direction: state guidance cautions against siting additional concentrated very low-income rental housing in Low Resource tracts, while the Neighborhood Change overlay calls for stabilization and anti-displacement investment. Affordable ownership can serve both objectives — it adds no concentrated very low-income rental stock while creating a stabilization asset — provided eligibility, outreach, financing access and resale restrictions are structured to reach existing Belle Haven households; those terms are set in the disposition process (Attachment A, item 19). An affordable ownership development at 1283 Willow Road is precisely such an intervention, consistent with the Laurel Landing precedent. The City should treat the Neighborhood Change designation as analytical rather than financial: HCD describes the Neighborhood Change Map as a tool to inform stabilization policy, and the CTCAC

regulations in effect for 2026 attach no scoring, tiebreaker, or basis-limit consequence to the designation. It strengthens the fair-housing case for stabilization-oriented investment here; it does not by itself improve a tax credit application. The tract's opportunity trajectory is further evidenced by the fully renovated Belle Haven Elementary campus opened in January 2026.

Finding. The Amendment (1) re-secures the element's 345-unit very low-income objective on sites that are all west of U.S. 101 and outside any racially or ethnically concentrated area of poverty; (2) increases lower-income capacity on Highest Resource sites (USGS and Parkline) from 149 (89 USGS + 60 Parkline, adopted) to [394] units under Case A ([244] Parkline: [154] R3 + [90] inclusionary; [150] USGS), or [352] under Case B, of which [154] are secured by a City-funded regulatory agreement rather than zoning alone; the [345] very low-income units are secured under Program H4.G, with the final [48] arising upon the Case B finding under H4.G(b), which conforms lower-income capacity at these locations to [352] and citywide capacity to [1,948]; (3) adds [115] lower-income inclusionary units within a mixed-income master plan in Council District 2 (with a dedicated-site objective of at least [190] further units under Program H4.W), an area that currently contains [a share to be computed — Attachment A, item 9] of the City's deed-restricted affordable units and whose Opportunity Map score reflects a predominantly non-residential tract adjacent to the High Resource Suburban Park and Flood Triangle neighborhoods; and (4) responds directly to the concern raised in comment #184 (November 28, 2023) that ConnectMenlo has had a racially disparate impact by concentrating development in the Bayside, by creating a west-of-101 site of comparable scale and density. Upon completion of the distribution table with 2026 map designations, the finding shall state the adopted and amended shares of lower-income capacity in High and Highest Resource tracts on two bases: (a) against the adopted inventory as printed, on which the high-resource share declines, as the accounting table in this Section discloses; and (b) against the adopted inventory with the plaza sites at the realistic capacity the December 2025 proposals and the City's independent financial review establish, on which both the high-resource share and its depth rise. The fair-housing conclusion rests on basis (b) together with the delivery evidence in Sections 2 and 3 — the amended strategy places deliverable, program-backed lower-income housing, including [345] very low-income units, in the City's highest-resource geography, where the adopted strategy placed capacity the record shows could not be built. The finding shall state both computations rather than assume either. As context and not as a finding: if the plaza and USGS lines cannot be sustained at the 2027 mid-cycle review, as the record to date indicates, a no-action alternative would lose the same high-resource capacity without the replacement and production commitments this Amendment carries; Program H4.G(g) addresses the nominal reduction directly in either case. On that record the Amendment is consistent with Government Code § 8899.50 and § 65583(c)(10). Because the Bohannon Park tract is not High/Highest Resource, the City does not rely on it for the Highest Resource replacement of the plaza units; it is additional capacity and buffer.

6. No-Net-Loss Findings (Government Code § 65863)

The City Council finds, based on the revised Table 7-4 in Section 3.3, that after removal of Sites 9, 10, 14, 15, 16, 17, 18 and 19 from the site inventory:

1. The remaining sites identified in the Housing Element, as amended, are adequate to meet the City's remaining regional housing need, for the 2023-2031 planning period, in each category shown in the adopted element's combined-capacity accounting (combined very low/low, moderate, and above moderate). This finding is preliminary: the adopted findings will quantify remaining need and capacity by income level as Government Code § 65863 requires, applying the income-category treatment confirmed with HCD and the City Attorney per Section 2 — a question Section 2 identifies for confirmation and the adopted findings will resolve. Lower-income capacity of [1,990] units exceeds the combined very low-and low-income RHNA of 1,166 units by [824] units; moderate-income capacity of [779] units exceeds the moderate-income RHNA of 496 units by [283] units; and above-moderate capacity of [4,144] units exceeds the above-moderate RHNA of 1,284 units by [2,860] units.
2. The surplus in each income category exceeds the upper end of HCD's recommended 15-30 percent buffer (Housing Element Sites Inventory Guidebook), using the buffer-inclusive totals as printed in the adopted element's Table 7-1.
3. The no-net-loss findings are satisfied without the Bohannon Park increment and without Willow Village: in the combined sensitivity case of Table 3.3, capacity of [1,680] lower-, [815] moderate-and [2,076] above-moderate-income units exceeds the RHNA in every category and the buffer-inclusive totals printed in adopted Table 7-1 (1,516 / 645 / 1,669) — and even if, additionally, the USGS credit reverts to the application's [118], lower-income capacity of [1,626] still exceeds those totals. The findings accordingly rest on the Parkline, USGS and W-1 capacity and the existing inventory; the Bohannon Park master plan supplies further resilience and is supported by its own record.
4. The replacement capacity on Site 12, Pipeline Project H and Site W-1 is supported by substantial evidence, including [the recorded Parkline development agreement and BMR Housing Agreement; the pending USGS application and draft development agreement; and the City's site records for W-1], and meets the requirements of Government Code § 65583.2(c), (g), (h) and (i) as applicable. The Bohannon Park resilience capacity is separately supported by [the Bohannon Companies letter of intent (Attachment A, item 3) and the rezoning ordinance to be adopted under Program H4.W].
5. Accordingly, no rezoning is required under § 65863(c) to maintain adequate sites: capacity exceeds the remaining need in every income category without additional sites. The inventory additions, and any rezoning, undertaken under Program H4.G(g) serve the fair-housing objective of restoring lower-income capacity at High and Highest Resource locations, not the cure of a capacity shortfall, and are scheduled in Section 7 alongside the rezoning described in Programs H4.W and H4.U.

7. Implementing Actions and Schedule

Step	Action	Body	Target date
1	Council resolution initiating this Amendment under Programs H1.H and H4.U (staff to assign the City's official amendment number); direct staff to retain the downtown RFP process in abeyance pending HCD action	City Council	[Oct 2026]
2	Obtain Bohannon Companies owner letter; confirm Parkline BMR agreement AMI terms; negotiate USGS DA affordability term sheet	Staff	[Oct-Nov 2026]
3	Prepare CEQA Addendum to the Housing Element Subsequent EIR for the adoption action (precedent: December 2023 Addendum); initiate scoping for the separate Bohannon Park subsequent CEQA review	Staff / consultant	[Nov-Dec 2026]
4	Post the draft Amendment and updated sites inventory for public review and provide notice to the housing element interested-parties list, as Government Code § 65585(b)(2) (AB 215) requires — the revised draft posted at least seven days before submittal to HCD, with the electronic sites inventory accompanying the adopted amendment; Housing Commission and Planning Commission study sessions	Commissions	[Dec 2026]
5	Submit the draft Amendment to HCD at least 60 days before adoption (Gov. Code § 65585(b)(1)(A)); HCD review	Staff / HCD	[Jan 2027 submittal; HCD letter by Mar 2027]

6	Respond to HCD comments; Planning Commission recommendation	Planning Commission	[Mar–Apr 2027]
7	Adopt Amendment and CEQA Addendum; adopt Parkline R3 funding resolution; USGS GP amendment/rezoning proceeds with the project	City Council	[Apr–May 2027]
7a	Bohannon Park: scope and complete subsequent CEQA review; adopt Residential Mixed Use rezoning ordinance per Program H4.W (within 12 months of HCD’s finding)	Staff / Planning Commission / City Council	[2027–early 2028]
7b	Program H4.G(g): adopt the inventory additions identified under Attachment A, item 22 (rezoning if required) to restore High/Highest Resource lower-income capacity and share	Planning Commission / City Council	[within 12 months of HCD’s finding; no later than June 30, 2028]
8	Submit adopted Amendment to HCD within 10 days; HCD 60-day compliance finding	Staff / HCD	[May 2027 submittal; HCD finding by Jul 2027]
9	Mid-cycle review under Program H1.H, incorporating Program H4.G(f) backstop test	City Council	[Dec 2027]

The downtown plaza RFP and feasibility work should not be terminated until HCD has issued a letter confirming the City “continues to comply.” Portola Valley’s decertification (HCD letter to the Town of Portola Valley, March 26, 2024, finding the Town’s housing element “no longer in substantial compliance” after unimplemented rezoning programs) followed a gap between a commitment and its replacement; the sequence above is designed so that no such gap exists.

8. Environmental Review

The Amendment is structured so that its adoption and the Bohannon Park rezoning are separate actions with separate environmental review, and so that the adoption action does not depend on the rezoning. This structure follows from Section 6: the no-net-loss findings are satisfied by the amended inventory without the Bohannon Park capacity, which is credited as additional resilience capacity. Numerical non-reliance does not by itself settle the CEQA scope of the adoption action; that question is expressly reserved for CEQA counsel (Section 8; Attachment A, item 12).

Adoption of the Amendment. The Amendment deletes analyzed residential capacity on nine downtown acres studied in the Housing Element Subsequent EIR (SCH No. 2015062054), increases assumed capacity on Site 12, which was analyzed in that SEIR, relies on the certified Parkline EIR (SCH No. 2022120058) for the Parkline capacity, and adds one small infill site (W-1, 66 units). Subject to City Attorney and CEQA counsel confirmation, an Addendum under CEQA Guidelines § 15164 is expected to be the appropriate document for the adoption action, consistent with the City's December 2023 Addendum; counsel should confirm the treatment of Site W-1 and of the Parkline Phase 2 revisions (Addendum analysis, or separate review at project stage), and whether the Program H4.W rezoning commitment itself requires analysis in the adoption document notwithstanding that the adequacy findings do not rely on the Bohannon capacity.

Bohannon Park rezoning. The master plan area at the densities in Program H4.W was not analyzed in the Housing Element SEIR. The rezoning therefore proceeds on its own track under Program H4.W with its own subsequent CEQA review — assumed to be a Supplemental EIR addressing traffic at the Marsh Road/U.S. 101 interchange, utilities, noise, and land use compatibility with adjacent neighborhoods — scoped after Amendment adoption and completed before the rezoning ordinance is adopted. Because the Amendment's findings do not depend on the Bohannon capacity, HCD review of the Amendment and CEQA review of the rezoning are expected to proceed independently, subject to the counsel review reserved in this Section and in Attachment A, item 12.

Attachment A — Items to Confirm Before Submittal

1. Parkline BMR Housing Agreement and development agreement: exact AMI levels and tenure of the [90] Phase 2 inclusionary rental units; feasibility and City cost of restricting all [154] R3 units to ≤50 percent AMI (R3 developer proforma); terms of the 1.6-acre R3 dedication (timing, any developer contribution); Phase 2 BMR breakdown (294 units per 26-041-PC, Table 8).
2. USGS application (Presidio Bay Ventures): current deed-restricted unit count and AMI levels; feasibility of the [150]-unit affordable component with [143] very low-income units, and the City assistance required; residential acreage; anticipated entitlement date.
3. Bohannon Companies (DDBO): current letter of intent identifying the ~[17]-acre master plan area (parcel schedule) at the proposed density, including willingness to dedicate an affordable site of at least [2] acres with infrastructure; existing lease expirations; Assessor acreage confirmation; any known site conditions (the Menlo Place parcel at 1020–1080 Marsh Road is the largest and should be verified first).
4. Bohannon Park opportunity-map status: record the census tract number and confirm the 2026 designation (working assumption per local review: Low Resource with Neighborhood Change overlay, via a tract boundary that crosses U.S. 101); retain the Section 5 local-data explanation (non-residential tract adjacent to High Resource neighborhoods, per the page 4-14 footnote 29 method); consider whether a Council-adopted finding under § 65583.2(g) is needed for existing office/warehouse uses.

5. Environmental screens for the Bohannon Park area: CalEnviroScreen 4.0 percentile for the tract; FEMA flood zone for the Marsh Road frontage; air-quality siting standards for residential adjacent to U.S. 101 (reflected in Program H4.W(vii)).
6. Schools: confirm Redwood City School District attendance boundary for the master plan area; cite the RCSD Strategic Resource Alignment record (enrollment 6,310 in 2025-26; projected loss of 1,000+ students by 2033-34) as community-stabilization context only, with the §§ 65995-65996 disclaimer.
7. Reimagine Dumbarton: track SamTrans's fall 2026 preferred-design selection; file the City support letter (which Program H4.W(viii) will memorialize) as a standalone Council action before that decision, or record the milestone as it stands at submittal; record the study milestone reached at time of submittal.
8. City BMR Housing Fund balance and other available sources for the Parkline R3 gap commitment; estimated total development cost and funding stack for a 154-unit tax-credit building in Menlo Park.
9. TCAC/HCD Opportunity Map designations (2026) for census tracts containing Sites 12 and 67-72, Parkline, and the downtown plazas; (Belle Haven confirmed Low Resource + Neighborhood Change on the 2025 AFFH Mapping Tool; re-verify on the published 2026 refresh and record the tract number).
10. Plaza-to-site numbering (Table 3.1) and Table 7-9 cross-reference, confirmed by Public Works.
11. Whether the adopted element's capacity figures used for pipeline projects (Table 7-6) reflect any post-2022 corrections reported in the 2023, 2024 and 2025 Annual Progress Reports.
12. CEQA scoping: density range analyzed for Sites 67-72 in the Housing Element SEIR and whether an Addendum suffices.
13. Willow Village: current status of building-permit applications and any developer correspondence since the May 19, 2026 annual review; whether HCD has commented on the pause; APN/acreage for 1283 Willow Road and any deed or funding restrictions from the 2019 purchase.
14. Status of the Downtown Parking Plazas Ordinance (November 3, 2026) and any resulting charter/ordinance text that must be reflected in Program H4.G(e).
15. Total City assistance required for Program H4.G Requirement 2: approximately [\$10.1M] for the [108]-unit Parkline R3 deepening, and [\$4.7M to \$21.4M] for the USGS deepening depending on the cost share negotiated in the development agreement — against Fund 222 balances, future NOFA rounds, and other sources; align the bracketed funding commitments in H4.G(a) and (c). The [\$10.1M] prices the [108]-unit deepening increment: of the [154] R3 units, approximately [46] are expected to reach the very low-income level through the tax-credit financing structure at no City cost (TCAC scoring practice), leaving [108] to fund; confirm the split against the R3 pro forma.

16. City Attorney review of the no-net-loss findings, the § 65583.2(h)/(i) by-right language, and the Housing Accountability Act implications of any pending applications on affected sites.

17. Conforming update to the retained school-site objective in Program H4.U: the approved 320 Sheridan Drive project (88 BMR units, 53 very low-income; Planning Commission approval January 13, 2025, upheld March 11, 2025) exceeds the retained 41-unit Ravenswood City School District objective; reflect actuals at submittal.

18. Completed large-site precedent for the § 65583.2(c)(2)(B) finding: cite completed Menlo Park large-site developments (e.g., Springline; the Menlo Uptown / Menlo Portal build-out status) so the finding rests on completions as well as entitlements.

19. Site W-1 delivery basis: AHO development standards applicable to the parcel, including whether ownership tenure qualifies and the realistic configuration at approximately [99] du/ac; Surplus Land Act disposition schedule; eligibility, outreach and resale-restriction terms for an affordable ownership program reaching existing Belle Haven households.

20. Dated baseline of secured units: document from City records that, as of [September 2026], no recorded covenant restricts any unit at Parkline or the former USGS campus to the very low-income level (Parkline BMR Housing Agreement AMI terms pending per 26-041-PC; USGS development agreement not executed), so the three measures in Section 5 — inventory capacity, units under existing agreements, and units secured by this Amendment — each carry a dated basis.

21. § 11.1.1 economic-equivalence analysis for the Case B blended finding: applicable rent and price limits, bedroom mix, and the economic analysis supporting rough equivalence of the [48] very low / [42] moderate mix to the low-income level, with developer concurrence in the revised BMR Housing Agreement.

22. Parcel list for Program H4.G(g): (a) SB 4 scan — parcels owned by religious institutions or independent institutions of higher education west of U.S. 101 (Government Code § 65913.16; institutional ownership on or before January 1, 2024; size and location standards), with APN, acreage, current use, and realistic capacity; (b) the El Camino Real/Downtown Specific Plan opportunity sites retained in the inventory that qualify for Affordable Housing Overlay density, with the realistic increment; (c) any additional Parkline Phase 2 capacity documented in the revised BMR Housing Agreement. The list shall total at least [139] lower-income units under Case A or [181] under Case B, or the larger figure computed under item 9, so that H4.G(g) is sized in the adopted text rather than left open.

Principal sources: City of Menlo Park 2023–2031 Housing Element (adopted clean copy, Jan. 3, 2024), Chapters 7 and 8 and Appendix 7-1; HCD review letters of Oct. 21, 2022 and Aug. 29, 2023; Elections Code § 9212 report (Dec. 2, 2025); Parkline staff report (Sept. 30, 2025), Phase 2 application (June 4, 2026) and staff report 26-041-PC (Sept. 14, 2026); staff report 26-038-PC (Aug. 24, 2026); staff report 26-163-CC with the Strategic Economics financial review (Sept. 24, 2026); City Council special meeting of June 2, 2026; BMR Housing Program Guidelines (Res. 7003, Oct. 21, 2025); HCD Housing Element Sites Inventory Guidebook (June 2020) and SB 166 No-Net-Loss memorandum; Government Code §§ 65583, 65583.2, 65585, 65863, 8899.50; RCSD Strategic Resource Alignment record (2025–2026); SamTrans Reimagine Dumbarton feasibility study materials (2025–2026); HCD AFFH Guidance (April 27, 2021); HCD Neighborhood Change Map memo and FAQ; HCD letter to the Town of Portola Valley, Mar. 26, 2024 (hcd.ca.gov, Housing Accountability Unit)