

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

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December 12, 2025

Darcy Goulart, Community Development Director  
2729 Prospect Park Drive  
Rancho Cordova, CA 95670

Dear Darcy Goulart:

**RE: City of Rancho Cordova – 9851 Folsom Blvd. – Letter of Technical Assistance**

The California Department of Housing and Community Development (HCD) received a request for technical assistance regarding a 441-unit project to be located at 9851 Folsom Blvd. (Project). The purpose of this letter is to assist the City of Rancho Cordova (City) with its decision-making by providing technical assistance regarding the Permit Streamlining Act (Completeness Review)<sup>1</sup> and the Housing Accountability Act (HAA) (Consistency Review and Resubmittal).<sup>2</sup>

**Project Description and Background**

HCD understands that Trumark Homes (Applicant) is seeking discretionary approvals for a major design review permit (DR) and tentative subdivision map (TSM) for a 441-unit housing development project (PLND-0623-0073) on an approximately 42-acre site identified as the "Kassis Opportunity Site" within the City's 2013 Folsom Boulevard Specific Plan (Specific Plan). The Project includes a mix of single-family homes and multifamily apartments, including three managers' units and 249 units affordable to lower-income households located within an approximately 10-acre portion fronting Folsom Boulevard. The 10-acre portion of the site is identified in both the City's 5<sup>th</sup> and 6<sup>th</sup> Cycle General Plan Housing Elements for 240 lower-income units.

As proposed, the Project is within the density ranges specified in the City's general plan land use element, zoning, and specific plan. In addition, the Project meets the definition of housing for "very low, low-, or moderate-income households" under the Housing Accountability Act (HAA)<sup>3</sup> and therefore qualifies for additional protection under state law.<sup>4</sup>

<sup>1</sup> Gov. Code, § 65943, 65944, and 65956.

<sup>2</sup> Gov. Code, § 65589.5.

<sup>3</sup> Gov. Code, § 65589.5, subd. (h)(3)(C)(i). At least 13 percent of the total units are dedicated to lower-income households.

<sup>4</sup> Gov. Code, § 65589.5, subd. (d).

The site is zoned RMU (FBSP) [Residential Mixed Use (Folsom Boulevard Specific Plan)] and the general plan land use designation is Specific Plan (Folsom Boulevard Planning Area). The City's Specific Plan identifies the Kassis Opportunity Site as appropriate for the development of medium- and high-density housing between 6.1 to 40.0 dwelling units per acre, where at least 10 acres shall be developed at a minimum of 24 units per acre.<sup>5</sup> Furthermore, the Specific Plan permits multifamily and single-family land use for the Kassis Opportunity Site,<sup>6</sup> and single-family and multifamily dwellings are permitted in the RMU zoning district.<sup>7</sup>

HCD understands the following key dates apply to the Project:

- **December 16, 2022.** The applicant submitted and paid the fees for an SB 330 preliminary application.
- **June 12, 2023.** The applicant submitted and paid the fee for the full development application (DR and TSM.)
- **August 25, 2023.** The City determined the application to be complete. (See enclosure.)
- **October 24, 2023.** The City issued a written notice of inconsistency, including a request for a CUP application.
- **February 25, 2025.** The applicant submitted an additional application for a Conditional Use Permit (CUP) as part of the existing Project application.

**1. After deeming the Project complete, can the City request additional application items during its consistency review under the HAA?**

No. Once a housing development project application is deemed complete under the Permit Streamlining Act (PSA)<sup>8</sup>, the City cannot request new application items during its review for consistency, compliance, or conformity under the HAA.

**PSA Completeness Review**

According to the PSA, local governments are required to provide an application completeness determination no later than 30 days following the receipt of an application, otherwise the application shall be deemed complete by operation of law. In making that determination, a local government "shall be limited to those items actually required on the lead agency's submittal requirement checklist."<sup>9</sup> Notably, for subsequent reviews of an *incomplete* application, the "local agency shall not request the applicant to

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<sup>5</sup> [Folsom Boulevard Specific Plan](#) (FBSP), dated December 16, 2013, pp. 2-3, 2-13, 4-3, 5-9.

<sup>6</sup> FBSP, p. 5-5: "*The site will feature a large residential component, including apartments, condominiums, townhouses, and compact single-family homes.*"

<sup>7</sup> RCMC [Section 23.313.030, Table 23.313-1](#) (Allowed Use and Permit Requirements for Mixed-Use Districts).

<sup>8</sup> Gov. Code, § 65943, subd. (a), (b).

<sup>9</sup> Gov. Code, § 65943, subd. (a).

provide any new information that was not stated in the initial list of items that were not complete.”<sup>10</sup>

Once an application is determined to be complete, the local government “shall not subsequently request of an applicant any new or additional information which was not specified in the list prepared pursuant to Section 65940” and are limited to requests to “clarify, amplify, correct, or otherwise supplement the information required for the application.”<sup>11</sup>

#### HAA Consistency Review

During the review for consistency under the HAA, the City is limited to requests for minor clarifications, amplifications, and corrections that would assist the City’s review for consistency with objective standards, such as requests for adding labels or correcting inaccurate dimensions.<sup>12</sup>

HCD understands that after the application was deemed complete under the PSA on August 25, 2023, the City subsequently requested additional application items, including an additional permit (CUP) and new reports and plans (Pedestrian Plan, Outdoor Lighting Plan) in its October 24, 2023 notice of inconsistency. Since the City deemed the application complete on August 25, 2023, the applicant is not required to submit new information regardless of whether the requested items are included in the City’s submittal requirement checklist.

The applicant is therefore not required to provide new reports and plans (i.e., Pedestrian Plan, Outdoor Lighting Plan) nor submit for an additional permit (i.e., CUP.) Since the City failed to request additional application materials during the PSA completeness review, the Project is no longer subject to a CUP and the developer may rescind its CUP application.

## **2. Can a housing development project resubmit following a determination of inconsistency under the HAA?**

Yes, an applicant has the option to resubmit an application following a local agency’s written documentation that the proposed housing development project is inconsistent, not in compliance, or not in conformity with objective provisions of “an applicable plan, program, policy, ordinance, standard, requirement, or other similar provision” as specified in the HAA.<sup>13</sup>

HCD understands that the City issued a second written notice of inconsistency on February 11, 2025, the applicant resubmitted on February 25, 2025, and the City submitted additional comments on April 7, 2025 and April 22, 2025.

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<sup>10</sup> Gov. Code, § 65943, subd. (a).

<sup>11</sup> Gov. Code, § 65944, subd. (a).

<sup>12</sup> Gov. Code, § 65589.5, subd. (j)(4).

<sup>13</sup> Gov. Code, § 65589.5, subd. (j)(2)(A).

Although the HAA does not specify provisions for resubmittal following a local agency's determination of inconsistency, an applicant must necessarily resubmit their application in order to address the local agency's findings of inconsistency. In keeping with the general intent of the HAA (i.e., "implemented in a manner to afford the fullest possible weight to the interest of, and the approval and provision of, housing"<sup>14</sup>), both the applicant and City should work in good faith to resolve identified inconsistencies expeditiously.

### **3. Under the HAA, can the City determine the Project to be inconsistent with the City's Park and Recreation Dedication and Fee requirements?**

No, because the HAA consistency review is limited to a project's compliance with "objective, quantifiable, written development standards, conditions, and policies appropriate to, and consistent with, meeting the jurisdiction's share of the regional housing need pursuant to Section 65584."<sup>15</sup> The HAA defines "objective, quantifiable, written development standards, conditions, and policies" as:

"…criteria that involve no personal or subjective judgment by a public official and are uniformly verifiable by reference to an external and uniform benchmark or criterion *available and knowable by both the development applicant or proponent and the public official before submittal*, including, but not limited to, any standard, ordinance, or policy described in paragraph (4) of subdivision (o) (emphasis added)."<sup>16</sup>

HCD understands that the Project proposes dedicating approximately 2.7 acres of parkland and seeks to pay a fee in lieu of the remainder of the City's Park and Recreation Dedication and Fee requirement. The City, in its notice of inconsistency, is instead requiring that the Project satisfy 100 percent of the Park and Recreation Dedication and Fee requirement—or approximately 4.7 acres—via parkland dedication.

The City's municipal code does not specify if a subdivider will be required to dedicate parkland, or pay a fee in lieu, to fulfill the City's Park and Recreation Dedication and Fees requirements. Instead, the City requires an applicant filing for approval of a tentative subdivision map to indicate "whether the subdivider desires to dedicate property for park or recreation purposes, or whether the subdivider desires to pay a fee in lieu thereof, or a combination of dedication and in-lieu fees."<sup>17</sup> However, regardless of the subdivider's proposal for fulfilling the City's Park and Recreation Dedication and Fees requirement, HCD understands the ultimate approval body makes this determination as a condition to the approval of the tentative subdivision map.<sup>18</sup>

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<sup>14</sup> Gov. Code, § 65589.5, subd. (a)(2)(L)

<sup>15</sup> Gov. Code, § 65589.5, subd. (f)(1).

<sup>16</sup> Gov. Code, § 65589.5, subd. (f)(9).

<sup>17</sup> [RCMC § 22.40.020](#) (Procedure for subdivider).

<sup>18</sup> [RCMC § 22.40.030](#) (Dedication requirements).

As a result, the applicant could not have known before submitting the application whether the City would ultimately require “the dedication of all land, the payment of fees in lieu therefore, or a combination of both”<sup>19</sup> because the determination is made by the approval body or city council. Therefore, the Park and Recreation Dedication and Fee is not objective as defined in the HAA, and the City cannot determine the Project to be inconsistent based on a standard, condition, or policy that is not objective.

HCD notes; however, that nothing in this letter precludes the City from imposing fees or other exactions authorized by law that are essential to provide necessary public services and facilities to the housing development project as allowed under Government Code section 65589.5, subdivision (f)(3).

## Conclusion

In sum, the applicant is not required to provide new information or application materials that were not identified during the City’s initial or subsequent reviews for completeness, including submitting an additional permit (i.e., CUP) or providing new reports and plans (i.e., Pedestrian Plan, Outdoor Lighting Plan). Furthermore, the City’s consistency review under the HAA is limited to a project’s compliance with objective standards, conditions, or policies that are knowable to both the applicant and the public official prior to project submittal. HCD encourages both the applicant and City to work in good faith to resolve identified inconsistencies, including resubmitting and reviewing in an expeditious manner.

As the City is aware, the State of California remains in a housing crisis and the provision of much-needed housing, especially affordable housing, continues to be a priority. If you have any questions or need additional information, please contact Grace Wu at [grace.wu@hcd.ca.gov](mailto:grace.wu@hcd.ca.gov).

Sincerely,



Melinda Coy  
Housing Accountability Unit Chief

## Enclosure

City of Rancho Cordova to Trumark Homes, Completeness Letter dated August 25, 2023.

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<sup>19</sup> RCMC § 22.40.030.



PLANNING DEPARTMENT  
2729 Prospect Park Drive | Rancho Cordova, CA 95670  
Phone: (916) 851-8750 | Fax: (916) 851-8762

August 25, 2023

Trumark Homes  
3001 Bishop Drive, Suite 100  
San Ramon, CA 94583

**Subject: Trumark at Kassis (PLND-0623-0073) Completeness Letter per SB 330**

The City of Rancho Cordova's Planning Division has received your application package for the Trumark at Kassis Tentative Subdivision Map and Major Design Review. This application was submitted on June 12, 2023, and the City responded on July 12, 2023, indicating that the submitted application and documents were INCOMPLETE and did not include the required Lighting Plan. On July 27, 2023, Trumark Homes submitted the Lighting Plan to the City. Pursuant to Government Code section 65943(a), submittal of new application materials began a new thirty (30) day period for review by the City.

The Planning Division has reviewed your submittal package pursuant to the application submittal matrix listed in the City of Rancho Cordova Discretionary Entitlement application document, provided as **Attachment A**, and summarized in the table below.

Required Submittal Materials	
Application and Deposit Fees	Submitted
Letter of Authorization	Submitted
Radius Map: 500-ft. Radius from Property Line	Submitted
Property Owner and Occupant 500-ft. Radius from Property Line and Envelope Labels (One Set)	Submitted
Current Title Report	Submitted
Digital Set of Plans	Submitted
Full Color Elevations and Landscape Plans	Submitted
Lighting Plans	Submitted
Colors/Materials Board	Submitted
Color Rendering/Photo	Submitted

The Planning Division has determined that the submitted application package is COMPLETE pursuant to Government Code Section 65943. Per Government Code Section 65589.5(j)(2)(A)(ii), the City has 60 days from the date of this letter to review the application package for consistency with the City's adopted standards.

If you have any questions, I can be contacted at [agranadosin-jones@cityofranchocordova.org](mailto:agranadosin-jones@cityofranchocordova.org).

The City's determination that all required submittal materials have been submitted is not in any way a determination that the proposed project complies with the City's adopted standards.

Sincerely,

Arlene Granadosin-Jones, AICP  
Senior Planner  
City of Rancho Cordova



PLANNING DEPARTMENT  
2729 Prospect Park Drive | Rancho Cordova, CA 95670  
Phone: (916) 851-8750 | Fax: (916) 851-8762

Attachments:

- Attachment A: Discretionary Entitlement Application