

**CITY OF SANTA PAULA
PLANNING COMMISSION
MEMORANDUM**

To: Honorable Chairperson and Members of the Planning Commission

From: James Mason, Community & Economic Development Director
Tom Tarantino, Associate Planner/GIS Analyst

Subject: 20-CI-06 Continued Public Hearing Regarding the Revised Draft 2021-2029 Santa Paula Housing Element (Continued from March 22, 2022)

Date: March 22, 2022

RECOMMENDATION:

Staff recommend that the Planning Commission:

- 1) Reopen the Public Hearing (continued from March 22, 2022);
 - 2) Receive staff presentation;
 - 3) Receive other public testimony;
 - 4) Adopt Resolution No. 3836 recommending City Council adoption of the Revised Draft 2021-2029 Housing Element
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SUMMARY

All cities within the Southern California Association of Governments (“SCAG”) region are required to prepare and adopt an updated Housing Element of the General Plan for the 2021-2029 period. The Housing Element establishes goals, policies, programs and objectives to address existing and projected housing needs, including the City’s share of regional housing needs as assigned in the Regional Housing Needs Assessment (“RHNA”). Additional background information and materials from previous meetings on the Housing Element update are available for online review at www.mysantapaula.com.

Last September, after public review and meetings held by the Planning Commission and City Council, a Draft Housing Element was submitted to the California Department of Housing and Community Development (“HCD”) for review pursuant to State law. HCD provided comments on the Draft Housing Element to the City in November 2021 (Attachment B). Cities are required by law to consider HCD’s comments prior to adopting a Housing Element update.

At the March 22, 2022 Planning Commission meeting staff presented a summary of issues raised in HCD’s review letter and responded to Commission questions.

For the Regular Meeting of Planning Commission on March 22, 2022

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Since that time, City staff and consultant have continued working to prepare revisions to the Draft Housing Element to address HCD's comments. The Revised Draft Housing Element is provided as Attachment D.

The purpose of this meeting is to allow the Planning Commission and community stakeholders the opportunity to review the Revised Draft Housing Element. Attachment A includes a draft resolution recommending City Council adoption of the Revised Draft Housing Element for consideration by the Planning Commission. Attachment C provides a summary matrix of HCD's comments and the City's proposed revisions to the Draft Housing Element in response to those comments. A full redline copy of the Revised Housing Element, which corresponds to the page citations in the summary matrix, is available for review on www.mysantapaula.com.

COMMUNITY ENGAGEMENT

The COVID pandemic had significant impacts on the City's original plan for community engagement on the Housing Element update; however, the following public events and opportunities for review were successfully held:

- Project website (English & español) – www.mysantapaula.com
- Frequently Asked Questions
- Opinion survey
- Stakeholder interviews
- Santa Paula Times
- Social Media
- Publication and Distribution of the New Policy Matrix, June 1, 2021
- Joint City Council / Planning Commission work session, July 7, 2021
- Main Street Open House #1, July 15, 2021
- Publication and Distribution of the Recommended Draft Housing Element – Goals, Policies and Programs, July 30, 2021
- Main Street Open House #2, August 6, 2021
- Publication and Distribution of the Recommended Draft Housing Element – Full Document, August 12, 2021
- Planning Commission Hearing #1, August 24, 2021
- City Council Hearing #1, September 15, 2021
- 60-Day HCD and Public Review
- Planning Commission Hearing #2, March 22, 2022
- Planning Commission Hearing #2 (continued from March 22), April 26, 2022
- Santa Paula Affordable Housing Task Force Review/Comment, April/May 2022
- City Council Hearing #2, (TBD – targeting May 18, 2022)
- 60-Day HCD and Public Review

ENVIRONMENTAL REVIEW

The proposed amendment to the Housing Element of the City's General Plan is exempt from California Environmental Quality Act (CEQA) requirements pursuant to Section

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15061, *Review for Exemption of the CEQA Guidelines*. Specifically, Guidelines Section 15061(b)(3) states, in part, that a project is exempt from CEQA if “the activity is covered by the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA.”

Adoption of the Housing Element would not approve any development project or change any land use regulations. Future housing development proposals and potential amendments to land use regulations will be subject to CEQA review.

PUBLIC NOTIFICATION

As a citywide initiative, public notice of this meeting was published in the *Santa Paula Times* on Friday, April 15, 2022.

OPTIONS

1. Adopt Resolution No. 3836 recommending City Council adoption of the Revised Draft 2021-2029 Housing Element; or
2. Continue the public hearing in order to obtain further information or for Staff to make any requested revisions to the Revised Draft 2021-2029 Housing Element.

ATTACHMENTS:

- A - PC Resolution No. 3836
- B - HCD 1st Draft Comment Letter 11.15.2021
- C - Summary of HCD Comments and City Responses 04.2022
- D - Revised Draft 2021-2029 Housing Element

ATTACHMENT A

RESOLUTION NO. 3836

RESOLUTION NO. 3836

A RESOLUTION RECOMMENDING THAT THE CITY COUNCIL ADOPT THE 2021-2029 HOUSING ELEMENT UPDATE TO THE SANTA PAULA GENERAL PLAN

Project No. 2020-CI-06

The Planning Commission of the City of Santa Paula does resolve as follows:

SECTION 1: The Planning Commission finds and declares that:

- A. Government Code § 65588 requires every California city and county to update its Housing Element periodically. The Housing Element establishes goals, policies and programs to encourage the maintenance and expansion of the City's housing supply to meet demand;
- B. During 2021 the City prepared a draft Housing Element update for the 2021-2029 planning period in accordance with Government Code Section 65580 et seq.;
- C. The City conducted duly noticed public meetings to discuss and receive public comment regarding the Housing Element update on December 18, 2019, July 7, 2021, August 24, 2021 and September 15, 2021;
- D. On September 16, 2021 the City submitted a draft 2021-2029 Housing Element to the California Department of Housing and Community Development ("HCD") for review pursuant to the requirements of State law;
- E. On November 15, 2021 HCD issued a letter finding that the draft element addressed many statutory requirements; however, revisions will be necessary to comply with State Housing Element Law;
- F. On April 21, 2022 the City posted a revised draft Housing Element for public review. Revisions to the draft Housing Element have been made addressing each of HCD's findings as summarized in the Planning Commission staff report dated April 26, 2022;
- G. The Planning Commission held duly noticed public hearings on March 22 and April 26, 2022 to receive public testimony on the Draft Housing Element Update;
- H. The 2021-2029 Housing Element update is covered by the common sense CEQA exemption (CEQA Guidelines Sec. 15061(b)(3)) which provides that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Since no development project or other physical change to the environment would be approved by the adoption of the Housing Element, it can be seen with certainty that there is no possibility that Housing Element adoption may have a significant effect on the environment, and

therefore is not subject to CEQA;

- I. The Planning Commission has considered the information provided by City staff, HCD, and public testimony. This Resolution, and its findings, are made based upon the evidence presented to the Commission at its public hearings on March 22 and April 26, 2022 including, without limitation, the staff reports submitted by the Planning Division.

SECTION 2: *General Plan*, the Planning Commission makes the following findings:

- A. The 2021-2029 Housing Element is in the public interest and there is a community benefit resulting from the Housing Element Update including, without limitation, assisting in the provision of housing for all income groups and persons with special needs, preserving the affordable housing stock, and minimizing governmental constraints to providing housing.
- B. The 2021-2029 Housing Element is consistent with the goals, policies, and objectives of the General Plan. The Housing Element establishes policies, procedures, and incentives for the City's land use planning activities that serve to maintain and expand the City's housing supply to adequately house people currently living and expected to live in the City.
- C. The 2021-2029 Housing Element will not conflict with the SPMC.
- D. The proposed 2021-2029 Housing Element promotes public health, safety, and general welfare and serves the goals and purposes of the General Plan by facilitating the continued production of housing for all incomes, thereby improving housing and living conditions for all residents. The Housing Element provides housing construction objectives consistent with the Regional Housing Needs Assessment.

SECTION 3: *Environmental Assessment*.

- A. The Planning Commission finds that the 2021-2029 Housing Element update is covered by the common sense CEQA exemption (CEQA Guidelines Sec. 15061(b)(3)) which provides that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Since no development project or other physical change to the environment would be approved by the adoption of the Housing Element, it can be seen with certainty that there is no possibility that Housing Element adoption may have a significant effect on the environment, and therefore is not subject to CEQA.

SECTION 4: *Recommendations*. The Planning Commission recommends that the City Council:

- A. Adopt the 2021-2029 Housing Element as set forth in attached Exhibit "A," which is incorporated herein by reference.

SECTION 5: *Reliance on Record*. Each and every one of the findings and determinations in

this Resolution are based on the competent and substantial evidence, both oral and written, contained in the entire record relating to the 2021-2029 Housing Element. The findings and determinations constitute the independent findings and determinations of the Planning Commission in all respects and are fully and completely supported by substantial evidence in the record as a whole.

SECTION 6: *Limitations.* The Planning Commission's analysis and evaluation of the project is based on the best information currently available. It is inevitable that in evaluating a project that absolute and perfect knowledge of all possible aspects of the project will not exist. One of the major limitations on analysis of the project is the Planning Commission's lack of knowledge of future events. In all instances, best efforts have been made to form accurate assumptions. Somewhat related to this are the limitations on the City's ability to solve what are in effect regional, state, and national problems and issues. The City must work within the political framework within which it exists and with the limitations inherent in that framework.

SECTION 7: *Summaries of Information.* All summaries of information in the findings, which precede this section, are based on substantial evidence in the record. The absence of any particular fact from any such summary is not an indication that a particular finding is not based in part on that fact.

The Secretary is directed to transmit the Resolution to the City Clerk for scheduling the matter for consideration by the City Council.

SECTION 8: This Resolution will remain effective until superseded by a subsequent resolution.

PASSED AND ADOPTED this 26th Day of April, 2022.

Jason Herber, Chairperson,
City of Santa Paula Planning Commission

ATTEST:

James Mason, Secretary,
City of Santa Paula Planning Commission

Approved as to form by:

Monica Castillo,
Assistant City Attorney

**RESOLUTION NO. 3836
EXHIBIT A**

**CITY OF SANTA PAULA
2021-2029 HOUSING ELEMENT
REVISED DRAFT**

ATTACHMENT B

**HCD 1st DRAFT COMMENT LETTER
NOVEMBER 15, 2021**

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

2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov



November 15, 2021

James Mason, Director
Community & Economic Development Department
City of Santa Paula
200 S 10th Street
Santa Paula, CA 93060

Dear James Mason:

RE: City of Santa Paula's 6th Cycle (2021-2029) Draft Housing Element

Thank you for submitting the City of Santa Paula's (City) draft housing element received for review on September 16, 2021. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. Our review was facilitated by a conversation on November 9, 2021, with Mr. Jeff Mitchem, Community & Economic Development Manager, and Mr. Tom Tarantino, Associate Planner.

The draft element addresses many statutory requirements; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). The enclosed Appendix describes these, and other revisions needed to comply with State Housing Element Law.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government fails to adopt a compliant housing element within 120 days of the statutory deadline (October 15, 2021), then any rezoning to accommodate the regional housing needs allocation, including for lower-income households, shall be completed no later than one year from the statutory deadline. Otherwise, the local government's housing element will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i).

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at:

http://opr.ca.gov/docs/OPR_Appendix_C_final.pdf and
http://opr.ca.gov/docs/Final_6.26.15.pdf.

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City should continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate.

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

HCD is committed to assisting the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Molivann Phlong, of our staff, at Molivann.Phlong@hcd.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul McDougall". The signature is stylized and somewhat abstract, with a large initial "P" and "M".

Paul McDougall
Senior Program Manager

Enclosure

APPENDIX CITY OF SANTA PAULA

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

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

A. Review and Revision

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

The review requirement is one of the most important features of the element update. The element provides (p. A-2) a list of programs from the City's 2013-2021 housing element; however, a thorough program-by-program review is necessary to evaluate City's performance in addressing housing goals. As part of this analysis, the element should describe the actual results of the prior element's programs, compare those results to the objectives projected or planned, and based on an evaluation of any differences between what was planned versus achieved, provide a description of how the objectives and programs of the updated element incorporate changes resulting from the evaluation. This information and analysis provide the basis for developing a more effective housing program.

As part of the review of programs in the past cycle, the element must provide an evaluation of the effectiveness of goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female headed households, farmworkers and persons experiencing homelessness).

B. Housing Needs, Resources, and Constraints

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

Affirmatively Furthering Fair Housing (AFFH) Analysis: The element has (p. 57) some information on poverty levels at a local and regional level, limited analysis on race, makes mention of no concentrated poverty impacts and where fair housing complaints can be filed. However, the element generally does not address this requirement. The element, among other things, must include outreach, an

assessment of fair housing, identification, and prioritization of contributing factors to fair housing issues and goals and actions sufficient to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity.

For more information, please contact HCD and visit <https://www.hcd.ca.gov/community-development/affh/index.shtml>.

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

While the element quantifies (p. 10) existing extremely low-income (ELI) households, it must also analyze their housing needs, housing characteristics, overpayment, and available resources. The analysis of ELI housing needs could consider tenure and rates of overcrowding.

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

While the element identifies (p. 9) the total number of overpaying households, it must quantify and analyze the number of overpaying households by tenure (i.e., renter and owner), including lower-income households. The analysis must also include the housing cost for renters in the City.

In addition, while the element identifies the age of the housing stock (p. 13), it must include analysis of the condition of the existing housing stock and estimate the number of units in need of rehabilitation and replacement. For example, the analysis could include estimates from a recent windshield survey or sampling, estimates from the code enforcement agency, or information from knowledgeable builders/developers, including non-profit housing developers or organizations.

4. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

The City has a regional housing need allocation (RHNA) of 657 housing units, of which 201 units are for lower-income households. To address this need, the element also relies (p. B-3) on the Housing Opportunities Overlay zone and the East Area 1 Specific Plan (p. B-4). To demonstrate the adequacy of these sites and strategies to accommodate the City's RHNA, the element must include complete analyses on these overlay zones. For additional information, see the *Building Blocks* at: <https://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/analysis-of-sites-and-zoning.shtml>.

Sites Inventory: The element lists (p. B-7) sites by parcel number or unique reference, and parcel size. However, the element must list sites by describing existing uses for any nonvacant sites, in addition to listing the zoning, general plan designation, and calculation of the realistic capacity of each site. The element must also include a general map of identified sites.

Pursuant to Government Code section 65583.3, subdivision (b), the City must utilize standards, forms, and definitions adopted by HCD when preparing the sites inventory. Please see HCD's housing element webpage at <https://www.hcd.ca.gov/community-development/housing-element/index.shtml> for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance. Please note, upon adoption of the housing element, the City must submit an electronic version of the sites inventory with its adopted housing element to sitesinventory@hcd.ca.gov.

Previously Identified Nonvacant and Vacant Sites: If nonvacant sites identified in a prior adopted housing element or vacant sites identified in two or more consecutive planning periods, the sites are inadequate to accommodate housing for lower-income households unless:

- The site's current zoning is appropriate for the development of housing affordable to lower-income households by either including analysis or meeting the appropriate density, and
- The site is subject to a housing element program that requires rezoning within three years of the beginning of the planning period to allow residential use by-right for housing developments in which at least 20 percent of the units are affordable to lower-income households.

Realistic Capacity: While the element provides assumptions (p. B-1) of buildout for sites included in the inventory, it must also provide support for these assumptions. For example, the element should demonstrate what specific trends, factors, and other evidence led to the assumptions. The estimate of the number of units for each site must be adjusted as necessary, based on the land use controls and site improvements, development standards, typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction, and on the current or planned availability and accessibility of sufficient water, sewer, and dry utilities. To demonstrate the likelihood for residential development in commercial zones allowing residential through the Housing Opportunity Overlay Zone, the element must also account for land use controls such as allowing 100 percent non-residential uses. The analysis could describe past trends in developments that used the overlay, any performance standards mandating a specified portion of residential and any factors increasing the potential for residential development such as incentives for residential use, and residential development trends in the same nonresidential zoning districts.

Small Sites: The element identifies (p. B-4) several sites consisting of small parcels less than one-half acre in size. However, the element must describe whether these small parcels are expected to develop individually or consolidated with the other small parcels. *For parcels anticipated to be consolidated*, the element must demonstrate the potential for lot consolidation. For example, analysis describing the City role or track record in facilitating small-lot consolidation, policies or incentives offered or proposed to encourage and facilitate lot consolidation, conditions rendering parcels suitable and ready for redevelopment, recent trends of lot consolidation, and information on the owners of each aggregated site. *For parcels anticipated to develop individually*, the element must describe existing and proposed policies or incentives the City will offer to facilitate development of small sites. Please be aware sites smaller than a half acre in size are deemed inadequate to accommodate housing for lower-income housing unless it is demonstrated that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower-income housing units as projected for the site or unless the housing element describes other evidence to HCD that the site is adequate to accommodate lower-income housing. (Gov. Code, § 65583.2, subd. (c)(2)(A).)

Suitability of Nonvacant Sites: While the element identifies (p. B-7) nonvacant sites to accommodate the regional housing need for lower-income households, it provides little description of how the potential for redevelopment. The element must describe the methodology used to determine the additional development potential within the planning period. The methodology must consider factors including the extent to which existing uses may impede additional residential development, development trends, market conditions, any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, and regulatory or other incentives or standards to encourage additional residential development on these sites. (Gov. Code, § 65583.2, subd. (g).) For sites with residential uses, the inventory could also describe structural conditions or other circumstances and trends demonstrating the redevelopment potential to more intense residential uses. For nonresidential sites, the inventory could also describe whether the use is operating, marginal or discontinued, and the condition of the structure or could describe any expressed interest in redevelopment.

Specific Plan Sites: The housing element relies upon the East Area 1 Specific Plan area to accommodate the City regional housing need for all income groups. While the housing element indicates the Specific Plans' residential capacity and estimates the number of units by income group, it does not provide any analysis demonstrating the suitability for development in the planning period or potential affordability. To utilize residential capacity in Specific Plans, the element must:

- Identify the date of approval of the plans and expiration date.
- Identify approved or pending projects within these plans that are anticipated in the planning period, including anticipated affordability based on the actual or projected sale prices, rent levels, or other mechanisms establishing affordability in the planning period of the units within the project.
- Describe necessary approvals or steps for entitlements for new development (e.g., design review, site plan review, etc.).

- Provide a breakdown of zoning. Note the element indicates there is a Figure B-1a, but this was not included in the element.
- Describe any development agreements, and conditions or requirements such as phasing or timing requirements, that impact development in the planning period.

In addition, the sites inventory indicates that there are 501 acres in the specific plan but does not break this down by parcel nor does it indicate how these large parcels will be subdivided. Please be aware, sites larger than 10 acres in size are deemed inadequate to accommodate housing for lower-income housing unless it is demonstrated that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower-income housing units as projected for the site or unless the housing element describes other evidence to HCD that the site is adequate to accommodate lower-income housing. (Gov. Code, § 65583.2, subd. (c)(2)(A).) For example, a site with a proposed and approved housing development that contains units affordable to lower-income households would be an appropriate site to accommodate housing for lower-income households. (Gov. Code, § 65583.2, subd. (c)(2)(C).)

Zoning for a Variety of Housing Types:

- *Emergency Shelters:* Emergency Shelters parking requirements should be updated pursuant to AB 139 (Chapter 335, Statutes of 2019) which requires only sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone.
 - *Accessory Dwelling Units (ADU):* The element provides (p. 34) for enumerated land use categories allowing residential uses, including ADUs. Please note that ADUs are allowed in all zones that allow residential use. (Gov. Code § 65852.2(a)(1).) In addition, the City should ensure that ADU parking requirements are consistent with state law. Parking requirements for ADUs shall not exceed one parking space per unit or bedroom, whichever is less, and guest parking spaces shall not be required for ADUs under any circumstances. For more information, please see <https://www.hcd.ca.gov/policy-research/accessorydwellingunits.shtml>.
5. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures. The analysis shall also demonstrate local efforts to remove governmental constraints that hinder the locality from meeting its share of the regional housing need in accordance with Government Code section 65584 and from meeting the need for housing for persons with disabilities, supportive housing, transitional housing, and emergency shelters identified pursuant to paragraph (7). Transitional housing and supportive housing shall be considered a residential use of property and shall be subject only to those restrictions that apply to other residential dwellings of the same type in the same zone.*

(Gov. Code, § 65583, subd. (a)(5).)

Housing Opportunity Overlay Zone: The element relies on sites in commercial zones that allow residential through the Housing Opportunity Overlay Zone. While some information was provided on how the overlay allows residential, the element must include a complete description and analysis of the Overlay, including a breakdown of affordability requirements. While the element states that 100 percent of the project must be for affordable housing, there is no definition of affordable and the breakdown for very low and low only equal 80 percent. The elements must also clarify 21 units per acre is considered the base density for purposes of calculating density bonus and demonstrate the appropriateness of proposed development standards, including requirements for 100 percent affordable, and incentives to encourage and facilitate the development of housing affordable to lower-income households.

East Area 1 Specific Plan: The element (pp. 40 and B-4) relies on the East Area 1 Specific Plan for the City's RHNA and sites for lower-income housing needs. However, the element must analyze the development standards for lower-income housing needs in the East Area 1 Specific Plan including the height limit of 30 feet which allows for only two stories as potential constraints.

Fees and Exaction: The element provides (p. 51) planning and building fees charged by the City and states that they are comparable to those levied in surrounding areas. However, the analysis must analyze those fees for their impact as a potential constraint on housing supply and affordability. For example, while the element states that typically a multifamily project results in about \$40,000 per unit, it could describe the total amount of fees in proportion to development costs. The analysis could also describe current fee study efforts.

Zoning and Fees Transparency: The element must clarify its compliance with new transparency requirements for posting all zoning and development standards for each parcel on the jurisdiction's website pursuant to Government Code section 65940.1, subdivision (a)(1).

Local Processing and Permit Procedures: The element indicates (p. 38) that many mixed-use projects were developed utilizing a Conditional Use Permit (CUP), however, per conversations with the City, the mixed-use development no longer requires a CUP. The element should be updated to reflect how mixed-use projects are currently processed.

The element describes (p. 50) the processing procedures for residential development. However, the element must describe and analyze the design review guidelines and process for their impact as potential constraints on housing supply and affordability. For example, the analysis could describe required findings and discuss whether objective standards and guidelines improve development certainty and mitigate cost impacts. The element must demonstrate this process is not a constraint or it must include a program to address this permitting requirement, as appropriate.

Constraints on housing for Persons with Disabilities: The element must further analyze (p. 43) the zoning, development standards, building codes, and process and permit procedures as potential constraints on housing for persons with disabilities. For example, the element must describe the City's current procedure for requesting and granting a reasonable accommodation to zoning and land use requirements for persons with disabilities. To AFFH, the element could include a program to provide outreach and education on the availability of the reasonable accommodation procedure. (Gov. Code, § 65583, subd. (c)(1)(3).) In addition, the element currently details (p. 43) that residential care facilities serving six or fewer persons are permitted in all residential zones. However, residential care facilities serving seven or more persons are subject to a conditional use permit. The element should analyze the process as a potential constraint on housing for persons with disabilities and add or modify programs as appropriate to ensure zoning permits group homes for seven or more persons objectively with approval certainty.

6. *An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, the cost of construction, the requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Government Code section 65583.2, and the length of time between receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality's share of the regional housing need in accordance with Government Code section 65584. The analysis shall also demonstrate local efforts to remove nongovernmental constraints that create a gap between the locality's planning for the development of housing for all income levels and the construction of that housing. (Gov. Code, § 65583, subd. (a)(6).)*

The element must include analysis of requests to develop housing at densities below those identified, the length of time between receiving approval for a housing development and submittal of an application for building permits that potentially. The element must address any hinderance on the development of housing and include programs as appropriate.

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

The element defines (p. 20) persons with developmental disabilities. However, the element must quantify the number of persons with developmental disabilities and analyze the special housing needs of persons with developmental disabilities. The analysis should include the following:

- a quantification of the total number of persons with developmental disabilities.
- a description of the types of developmental disabilities.
- a description of the housing need, including a description of the potential housing problems; and

- a discussion of resources, policies and programs including existing housing and services, for persons with developmental disabilities.

C. Housing Programs

1. *Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the housing element through the administration of land use and development controls, the provision of regulatory concessions and incentives, and the utilization of appropriate federal and state financing and subsidy programs when available. The program shall include an identification of the agencies and officials responsible for the implementation of the various actions. (Gov. Code, § 65583, subd. (c).)*

Programs must demonstrate that they will have a beneficial impact within the planning period. Beneficial impact means specific commitment to deliverables, measurable metrics or objectives, definitive deadlines, dates, or benchmarks for implementation. Deliverables should occur early in the planning period to ensure actual housing outcomes. To have a beneficial impact in the planning period and address the goals of the housing element, all programs must be evaluated and revised with discrete timelines (e.g., month and year). Programs containing unclear language (e.g., “Evaluate”; “Consider”; “Encourage”; etc.) should be amended to include more specific and measurable actions. Example of programs to revise with specific commitment include but are not limited to Programs 1 through 11, 14 through 16, and 20. In addition:

- Programs 3 (Housing Code Enforcement Program), 7 (Mobile Home Park Resident Ownership Program), and 10 (Multifamily Housing Acquisition and Rehabilitation) should be revised to provide measurable outcomes.
 - Program 20 (Objective Development Standards) should identify and provide agencies and officials responsible for implementation.
2. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city’s or county’s share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (Gov. Code, § 65583, subd. (c)(1).)*

As noted in Finding B4, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results

of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition:

Nonvacant Sites Reliance to Accommodate RHNA: As the element relies upon nonvacant sites and sites under the Housing Opportunity Overlay to accommodate the regional housing need for lower-income households, it should include a program(s) to promote residential development of those sites. The program(s) could commit to (1) provide financial assistance, (2) regulatory concessions, or incentives to encourage and facilitate new, or more intense, residential development on the sites and (3) a mid-term evaluation of the effectiveness of identified nonvacant sites. Examples of incentives include identifying and targeting specific financial resources and reducing appropriate development standards.

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

The element must include programs to assist in the development of housing for special needs households (e.g., persons with disabilities, elderly, large households) with specific commitment with timelines. For example, the element could commit to proactive actions to coordinate with non-profit developers, employers or service providers, and other related organizations, to explore funding and incentives and to identify specific development opportunities.

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

As noted in Findings B5 and B6, the element requires a complete analysis of potential governmental and non-governmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.

5. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)*

As noted in B1, the element does not include a complete assessment of fair housing. Depending on a complete analysis, the element must add or revise programs as appropriate. In addition, while the element includes Program 22 (Fair Housing Program) which describes how the City responds to fair housing complaints, it must

also include actions that promote AFFH opportunities. For example, the element could include a program committing to implement Gov. Code section 8899.50(b) which requires the City to administer its programs and activities relating to housing and community development in a manner to AFFH and take no action that is materially inconsistent with its obligation to AFFH.

E. Public Participation

Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element, and the element shall describe this effort. (Gov. Code, § 65583, subd.(c)(8).)

While the element includes a general summary of the public participation process (p. C-1), it must also demonstrate diligent efforts were made to involve all economic segments of the community in the development of the housing element. The element should be revised to discuss outreach to lower-income and special needs groups during the public participation efforts, solicitation efforts for survey responses, and participation in community workshops, and if translation services were provided. The element should also describe when the draft was made available to the public for review, the efforts to circulate the housing element among low- and moderate-income households and organizations that represent them and to involve such groups and persons in the element throughout the process. Finally, the element should also summarize the public comments and describe how they were considered and incorporated into the element. For additional information, see the *Building Blocks* at <http://www.hcd.ca.gov/community-development/building-blocks/getting-started/public-participation.shtml>.

ATTACHMENT C

**SUMMARY OF HCD COMMENTS
AND CITY RESPONSES
APRIL 2022**

**HCD Comments and Responses
City of Santa Paula**

HCD Comment (Letter of 11/15/2021)	Revised Draft Housing Element Page No.	Response/Revision
A. Review and revision	Appendix A Table A-1	Appendix A has been revised to provide additional information regarding the effectiveness of previous programs in meeting the housing needs of special needs populations.
B.1 Affirmatively furthering fair housing	Appendix D 74-76	The element has been revised to include additional analysis of fair housing (Appendix D). In addition, Program 22 has been revised to describe actions the City will take to affirmatively further fair housing.
B.2 Extremely-low-income households	9 to 11	The element has been revised to include additional analysis of ELI households, including tenure and overpayment.
B.3 Overpayment and rental cost	9-11 17	The analysis has been expanded to quantify overpaying households by tenure (i.e., renter and owner) and income category. Median rental rates are also provided.
B.3 Housing conditions	14	The element has been revised to include an estimate of the number of housing units in need to rehabilitation or replacement.
B.4 Sites inventory	Appendix B	<u>Sites inventory</u> . The original draft element listed the General Plan designation, zoning designation and realistic capacity for every site in the inventory. A general map of identified sites has also been provided. The City is also submitting an electronic sites inventory with the adopted element pursuant to Government Code section 65583.3. Please note that since no underutilized sites are listed in the inventory, no analysis of existing uses on non-vacant sites is required.
	Appendix B	<u>Sites identified in a previous planning period</u> . The element has been revised to note that all sites were used in two previous planning periods. However, since the City allows development by-right on all of these sites in compliance with Government Code Sec. 65583.2(c), no further action is necessary.
	Appendix B	<u>Realistic capacity</u> . The sites inventory has been revised to include additional analysis of the realistic capacity of sites and the availability of infrastructure.

HCD Comment (Letter of 11/15/2021)	Revised Draft Housing Element Page No.	Response/Revision
	Appendix B	<u>Small sites.</u> The sites inventory has been revised to assign small sites less than ½ acre to the moderate-income category.
	Appendix B	<u>Suitability of non-vacant sites.</u> Since adequate sites are demonstrated through approved projects and vacant parcels, the element has been revised to exclude nonvacant sites from the inventory.
	37-38 Appendix B	<u>Specific Plan Sites.</u> The element has been revised to provide additional analysis of the potential for development of sites in the East Area 1 Specific Plan.
B.4 Zoning for a Variety of Housing Types	73	<u>Emergency Shelters:</u> Program 17 has been revised to include an amendment to emergency shelter parking requirements consistent with AB 139 (Government Code sec 65583(a)(4)(A)).
	70	<u>Accessory Dwelling Units.</u> Program 13 includes a commitment to update the City's ADU ordinance as necessary to comply with State law.
B.5 Governmental constraints		<u>Housing Opportunities Overlay Zone.</u> The Housing Opportunities Overlay zone has been superseded by a recent zoning amendment and is no longer relevant. The element has been revised to reflect this change.
	37-38	<u>East Area 1 Specific Plan.</u> The element has been revised to provide additional analysis of the specific plan, including height limits.
	51-52	<u>Fees and exactions.</u> The element has been revised to provide additional analysis of fees and exactions.
	74	<u>Zoning and fees transparency.</u> Program 20 has been added to address new transparency laws requiring fees and zoning requirements to be provided on a jurisdiction's website.
	48-51 74	<u>Local Processing and Permit Procedures:</u> The element has been revised to provide additional analysis of permit processing and approval procedures. In addition, Program 20 has been expanded to include objective development standards to improve development certainty and minimize constraints.
	40-42 72-77	<u>Constraints on persons with disabilities.</u> The element has been expanded to include additional analysis of reasonable accommodation procedures and regulations for large group homes. Programs 17 and 22 have also been

HCD Comment (Letter of 11/15/2021)	Revised Draft Housing Element Page No.	Response/Revision
		revised to ensure consistency with fair housing law and facilitate reasonable accommodation requests.
B.6 Non-governmental constraints	51	<u>Approval Time and Requests Lesser Densities</u> : The element has been revised to include additional analysis of requests to develop housing at densities below those identified, and the length of time between receiving approval for a housing development and submittal of an application for building permits.
B.7 Special needs	20-21	The original draft element included a detailed description and analysis of developmental disabilities, including the federal definition, an estimate of the number of affected persons, the characteristics and housing needs of persons with developmental disabilities, and services provided by the network of regional centers such as the Tri-counties Regional Center which serves those with developmental disabilities in Ventura County. Additional analysis has been provided regarding the number of persons in Santa Paula with a developmental disabilities and how the housing needs of these persons are addressed in the Housing Element. In addition, the City recently expedited the permitting for Jackson House, a 16-bed community care facility for persons with mental illness.
C.1 Programs that set forth a schedule of actions during the planning period	Chapter V	Housing programs have been revised to include more specific timing and description of the City's role in implementation.
C.2 Programs to make sites available during the planning period	65-66	Program 9 has been revised to further encourage development of non-vacant sites.
C.3 Programs to assist in the development of adequate housing to meet the needs of extremely low-, very low-, low- and moderate-income households	67-68	Program 9 in the original draft element identified strategies the City will use to promote lower-income housing development. These strategies include financial and regulatory incentives to developers; focusing a portion of assistance towards rental and ownership projects meeting the needs of extremely-low-, very-low- and low-income renters, including large families, agricultural workers, and persons with developmental disabilities; supporting the efforts of the Housing Trust Fund of Ventura County; funding assistance from sources such as in-lieu fees, development agreements, inclusionary housing and/or grant funding to support its provision of short-term, pre-

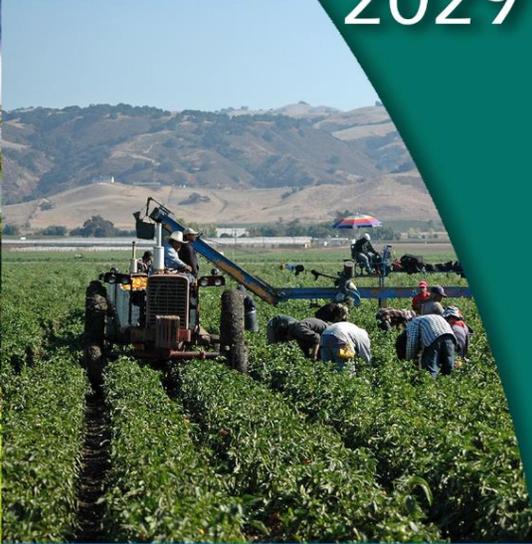
HCD Comment (Letter of 11/15/2021)	Revised Draft Housing Element Page No.	Response/Revision
		development, acquisition, and construction funding to developers of affordable housing; and supporting creation of a county-wide dedicated source of funding for affordable housing. Program 9 has been revised to clarify that special needs housing is included in these efforts.
C.4 Programs to remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing		This comment is addressed in B5 and B6 above.
C.5 Affirmatively furthering fair housing	76-78 Appendix D	Additional analysis of AFFH issues is provided in Appendix D and Program 22 has been expanded to include additional actions the City will take to further fair housing.
E. Public Participation	Appendix C	Appendix C of the original draft element included a thorough description of the public participation process, which included targeted outreach to persons and organizations representing the interests of lower-income and minority groups in Santa Paula. In particular, the Housing Task Force included many knowledgeable local experts on housing issues in Santa Paula. The Task Force was convened on several occasions to discuss housing strategies. Appendix C has been expanded to include additional information regarding public input and how comments have been incorporated into the Housing Element.

ATTACHMENT D

**REVISED DRAFT
2021-2029
CITY OF SANTA PAULA
HOUSING ELEMENT**



2029 Housing Element



Revised Draft
April 26, 2022

Acknowledgements

City Council

Jenny Crosswhite, Mayor
Andy Sobel, Vice Mayor
Rick Araiza, Councilmember
Leslie Cornejo, Councilmember
Carlos Juarez, Councilmember

Planning Commission

Jason Herber, Chair
Aaron Dunkel, Vice Chair
JaQuay Bangs
Maria Grace Kelly
Elyssa Vasquez

City Staff

Dan Singer, City Manager
James Mason, CED Director
Jeff Mitchem, AICP, Planning Manager
Tom Tarantino, Associate Planner/GIS Analyst
Anna Arroyo, Assistant Planner
Taylor Hernvall, Assistant Planner
Neal Morrissette, CED Technician

Consulting Assistance:

JHD Planning LLC

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I. INTRODUCTION

A. Purpose of the Housing Element

State law recognizes the vital role local governments play in the supply and affordability of housing. Each local government in California is required to adopt a comprehensive, long-term General Plan for the physical development of the city or county. The Housing Element is one of the seven mandated elements of the General Plan. Housing Element law, first enacted in 1969, mandates that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community. The law recognizes that, in order for the private market to adequately address housing needs and demand, local governments must adopt land use plans and regulations that provide opportunities for, and do not unduly constrain, housing development. As a result, housing policy in California rests largely upon the effective implementation of local General Plans and, in particular, local Housing Elements. Housing Element law also requires the State Department of Housing and Community Development (HCD) to review local housing elements for compliance with State law and to report its written findings to the local government.

Santa Paula's Housing Element provides policies and programs to address the following important housing issues as well as other identified local needs.

- Preservation and improvement of its aging housing stock;
- A relatively high level of household overcrowding and housing overpayment;
- A limited supply of large rental units;
- Provision of adequate housing for farm workers;
- The need to promote homeownership opportunities; and
- The desire to achieve a more economically balanced community.

As mandated by State law, the planning period for this Housing Element extends from 2021 to 2029. This Element identifies strategies and programs that focus on: 1) conserving and improving existing affordable housing; 2) providing adequate housing sites; 3) assisting in the development of affordable housing; 4) removing governmental and other constraints to the housing development; and 5) promoting equal housing opportunities.

The Housing Element consists of the following major components:

- An analysis of the city's demographic and housing characteristics and fair housing (Chapter II);
- An evaluation of land, financial, and administrative resources available to address the City's housing goals (Chapter III); and
- A review of potential constraints, both governmental and non-governmental, to meeting Santa Paula's identified housing needs (Chapter IV);

- The Housing Action Plan for addressing the City's identified housing needs, including housing goals, policies and programs (Chapter V).

B. Community Context

Incorporated in 1902, the City of Santa Paula is in the geographical center of Ventura County, and is located in the rich agricultural Santa Clara Valley (see Figure I-1). Surrounded by orange, lemon and avocado groves, Santa Paula is commonly referred to as the "Citrus Capital of the World." The City is a major distribution point for citrus fruits in the United States and is also well-known for its avocado producing and processing. Compared to most other cities in Ventura County, Santa Paula has been a relatively stable community, experiencing modest population growth over the past 30 years. As of 2021, the city had an estimated population of 30,691 residents according to the California Department of Finance.

Demographic shifts are taking place in the city impacting housing needs. First, Santa Paula has a growing Hispanic population. In 1990, 59% of the city's population was of Hispanic origin, and according to recent Census estimates has increased to more than 80% since then. Second, the city is home to an increasing number of younger families, as evidenced by the growth in both the young to mid-adult (age 25 to 44) and school age (5 to 19) populations. The provision of adequate affordable housing, including larger rental units and first-time homeownership opportunities for younger growing families, is thus an important issue facing Santa Paula.

Santa Paula is a predominantly lower- and moderate-income community and seeks to be more economically balanced. To achieve this goal, additional "move-up" housing opportunities are necessary to attract working professionals and upper-income households.

Because the majority of the housing stock in Santa Paula is over 30 years old, maintenance and repair is a significant housing concern. The City is continuing to promote neighborhood upgrading through a combined approach of code enforcement and provision of home rehabilitation assistance.

Housing costs in Santa Paula are relatively affordable in comparison to most Ventura County cities. Even so, decent housing of suitable size may be out of reach for many lower-income families. As a result, many households in Santa Paula are overpaying and many "double up" with other families to afford rents, which in turn contributes to overcrowding.

C. Public Participation

Public participation is an important component of the planning process in Santa Paula, and this update to the Housing Element has provided residents and other interested parties numerous opportunities for involvement. Appendix C contains a summary of these opportunities as well as a list of persons and organizations that were notified during the Housing Element update process.

D. Consistency with Other Elements of the General Plan

State law requires that all portions of the General Plan be internally consistent. The City of Santa Paula General Plan was comprehensively updated in 2020 and consists of seven elements: 1) Land Use; 2) Circulation and Mobility; 3) Housing; 4) Environmental and Cultural Resources; 5) Hazards and Public Safety; 6) Public Services and Utilities; and 7) Economic Development and Downtown. This Housing Element builds upon and is consistent with the policies and programs set forth in other elements of the General Plan. As the General Plan is amended over time, the City will review the Housing Element for internal consistency and make any necessary revisions.

SB 1087 of 2005 requires cities to provide a copy of their Housing Elements to local water and sewer providers, and also requires that these agencies provide priority hookups for developments with lower-income housing. The Housing Element will be provided to these agencies immediately upon adoption.

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II. HOUSING NEEDS ASSESSMENT

Incorporated in 1902, the City of Santa Paula is near the geographical center of Ventura County in the rich agricultural Santa Clara Valley. Surrounded by orange, lemon and avocado groves, Santa Paula is referred to as the “Citrus Capital of the World.” The city is a major distribution point for citrus fruits in the United States and is also well-known for its avocado producing and processing. Compared to most other cities in Ventura County, Santa Paula has been a relatively stable community, experiencing modest population growth over the past 30 years.

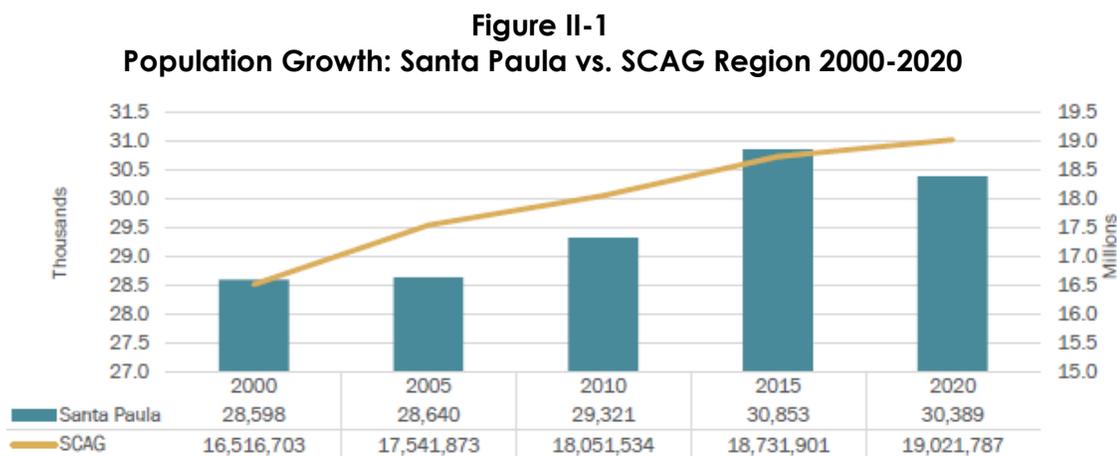
This chapter examines general population and household characteristics such as age, employment, household composition and size, household income, and special needs. Characteristics of the existing housing stock (e.g., type, tenure, age and condition, costs) are also addressed. Finally, the city’s projected housing needs based on the Regional Housing Needs Assessment (RHNA) are examined.

The Housing Needs Assessment utilizes recent data from the U.S. Census Bureau, California Department of Finance (DOF), California Employment Development Department (EDD), Southern California Association of Governments (SCAG) and other relevant sources. Supplemental data was obtained through field surveys and from other organizations. The implications of these findings for the City’s housing policies and programs are also discussed.

A. Population Characteristics

1. Population Growth Trends

Santa Paula had a 2020 total population of 30,389 including 133 living in group quarters according to the California Department of Finance. Over the 2000-2020 period Santa Paula had an annual growth rate of 0.3% compared to 0.7% for the region (Figure II-1).

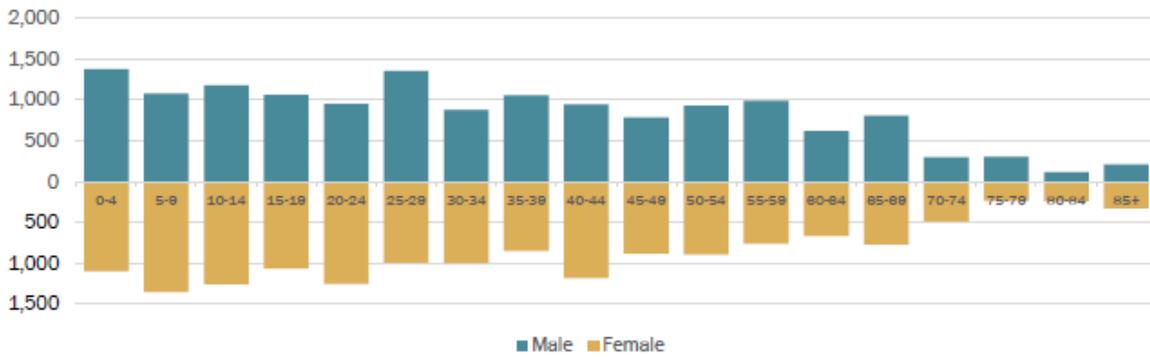


CA DOF E-5 Population and Housing Unit Estimates

2. Age

Housing needs are influenced by the age characteristics of the population. Different age groups have different housing needs based on lifestyles, family types, income levels, and housing preference. Table II-1 shows recent estimates of the city’s population by age group and gender. The population of Santa Paula is 49.4% male and 50.6% female. The share of the population of Santa Paula under 18 years of age is 29%, which is higher than the regional share of 23.4%. Santa Paula’s seniors (65 and above) make up 12.6% of the population, which is lower than the regional share of 13%.

**Table II-1
Population by Age and Gender – Santa Paula**



American Community Survey 2014-2018 5-year estimates

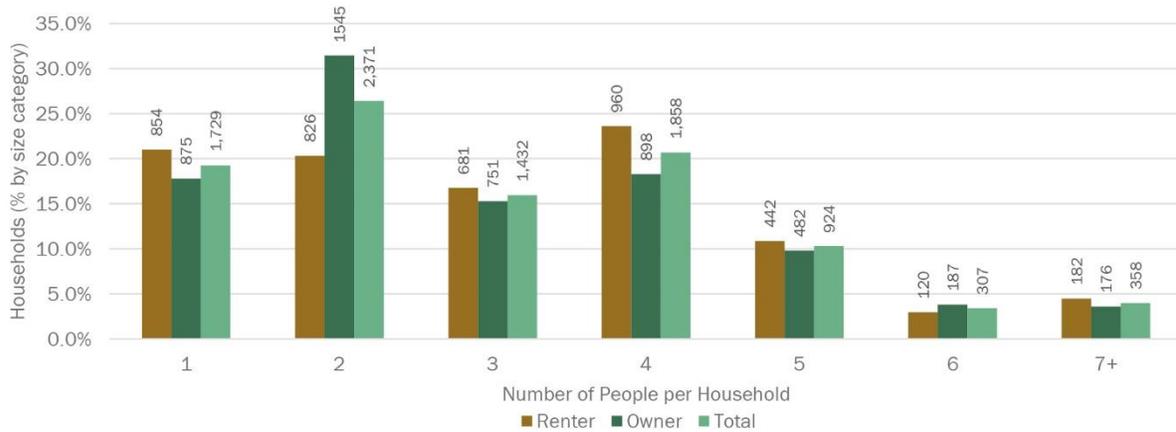
B. Household Characteristics

1. Household Composition and Size

Household characteristics are important indicators of the type and size of housing needed in a city. The Census defines a “household” as all persons occupying a housing unit, which may include single persons living alone, families related through marriage or blood, or unrelated persons sharing a single unit. Persons in group quarters such as dormitories, retirement or convalescent homes, or other group living situations are included in population totals, but are not considered households.

Table II-2 illustrates the range of household sizes in Santa Paula for owners, renters, and overall. The most commonly occurring household size is two people (26.4%) and the second-most commonly occurring household is of four people (20.7%). Santa Paula has a lower share of single-person households than the SCAG region overall (19.3% vs. 23.4%) and a higher share of 7+ person households than the SCAG region overall (4% vs. 3.1%). While these statistics suggest that there is a greater need for large units in Santa Paula than for some other areas of Ventura County, there is also a substantial number of persons living alone.

**Table II-2
Household Size – Santa Paula**

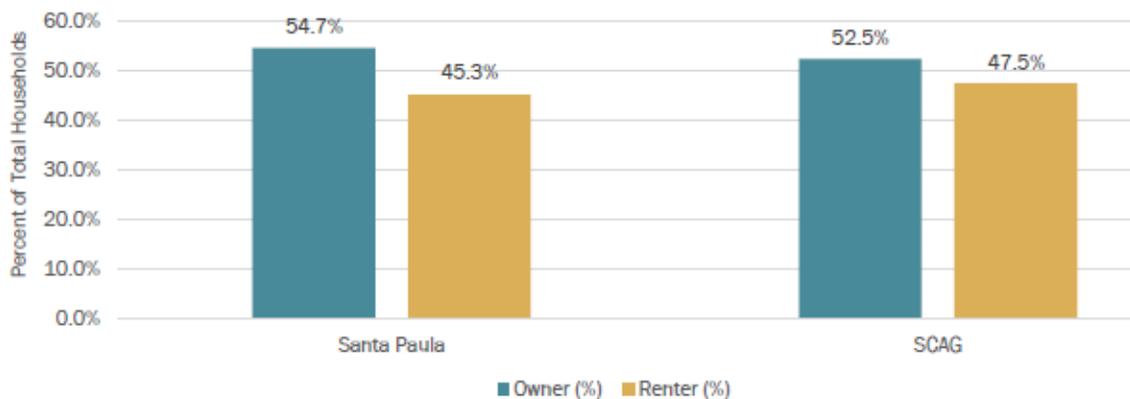


American Community Survey 2014-2018 5-year estimates.

2. Housing Tenure

Housing tenure (owner vs. renter) is an important indicator of the housing market. Communities need an adequate supply of units available both for rent and for sale in order to accommodate a range of households with varying incomes, family sizes and composition, and lifestyles. Table II-3 provides a comparison of the number of owner-occupied and renter-occupied units in the city as compared to the SCAG region as a whole. Santa Paula's housing stock consists of 8,979 total units, 4,914 of which are owner-occupied and 4,065 of which are renter-occupied. The share of renters in Santa Paula is lower than in the SCAG region overall.

**Table II-3
Household Tenure**



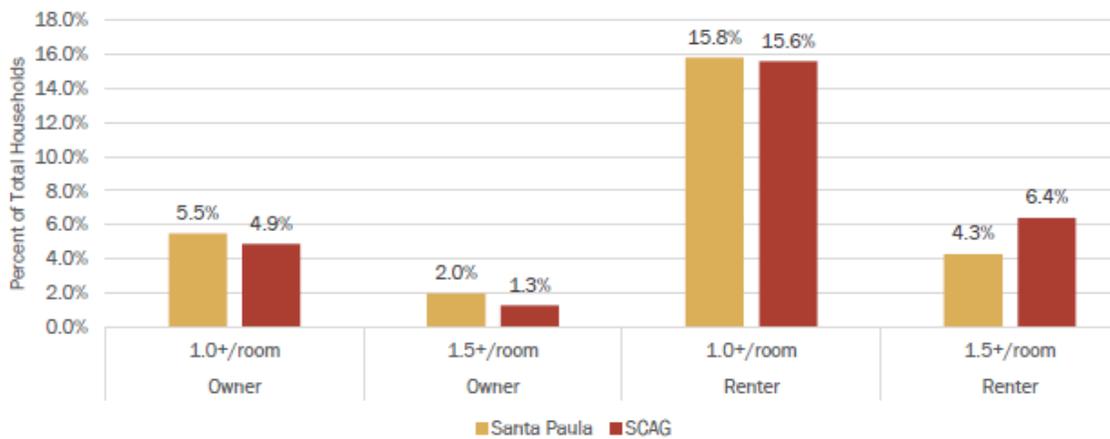
American Community Survey 2014-2018 5-year estimates.

3. Overcrowding

Overcrowding is often closely related to household income and the cost of housing. The U.S. Census Bureau considers a household to be overcrowded when there is more than one person per room, excluding bathrooms and kitchens, with severe overcrowding when there are more than 1.5 occupants per room. Overcrowded households are usually a reflection of the lack of affordable housing. Table II-4 shows recent overcrowding estimates for Santa Paula compared to the SCAG region as a whole. In Santa Paula, 271 owner-occupied and 642 renter-occupied households had more than 1.0 occupants per room, while 97 owner-occupied households and 174 renter-occupied households had more than 1.5 occupants per room.

The Housing Plan includes several programs intended to address the problem of overcrowding, including Program 4: Section 8 Rental Assistance, Program 6: Rent Stabilization and Just Cause Eviction Protections, Program 8: Mortgage Credit Certificate, Program 9: Workforce and Special Needs Housing Development, Program 10: Multi-Family Housing Acquisition and Rehabilitation, Program 11: Affordable Housing Funding Sources, Program 12: Inclusionary Housing, Program 13: Accessory Dwelling Units, Program 15: Adequate Sites for Housing Development, Program 19: Density Bonus Ordinance, and Program 21: Affordability by Design.

**Table II-4
Overcrowding by Tenure – Santa Paula vs. SCAG Region**



American Community Survey 2014-2018 5-year estimates.

4. Overpayment

According to State housing policy, overpaying occurs when housing costs exceed 30% of gross household income. Table II-5 displays recent HUD estimates for overpayment by income category and tenure. This table shows that overpayment is much more prevalent among households with incomes in the extremely-low and very-low categories, especially renters.

Although homeowners enjoy income and property tax deductions and other benefits that help to compensate for high housing costs, lower-income homeowners may need to defer

maintenance or repairs due to limited funds, which can lead to deterioration. For lower-income renters, severe cost burden can require families to double up resulting in overcrowding and related problems.

Several programs in the Housing Action Plan (Chapter V) designed to address housing affordability will also help to alleviate overpayment. These programs include the owner-occupied housing rehabilitation program, rental housing rehabilitation program, Section 8 rental assistance program, mobile home rent stabilization program, mobile home park resident ownership program, downpayment and mortgage assistance programs (through Ventura Cities Mortgage Finance Authority), mortgage credit certificate program, workforce and senior housing development program, multi-family housing acquisition and rehabilitation program, and the inclusionary housing program.

**Table II-5
Overpayment by Income Category and Tenure – Santa Paula**

Income by Cost Burden (Renters only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income less-than or= 30% HAMFI	1,130	950	1,260
Household Income >30% to less-than or= 50% HAMFI	890	240	1,160
Household Income >50% to less-than or= 80% HAMFI	319	4	845
Household Income >80% to less-than or= 100% HAMFI	40		285
Household Income >100% HAMFI	4		515
Total	2,383	1,194	4,065
Income by Cost Burden (Owners only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income less-than or= 30% HAMFI	190	150	315
Household Income >30% to less-than or= 50% HAMFI	340	200	715
Household Income >50% to less-than or= 80% HAMFI	415	85	1,005
Household Income >80% to less-than or= 100% HAMFI	245	85	755
Household Income >100% HAMFI	335	10	2,125
Total	1,525	530	4,915

Extremely-Low-Income Households

Extremely-low-income (ELI) is defined as less than 30% of area median income. Households with extremely-low-income have a variety of housing needs. Table II-6 provides a breakdown of ELI households by race and ethnicity. The race/ethnicity with the highest share of ELI households in Santa Paula is Asian and other, non-Hispanic (32.5% compared to 22% of total population). In the SCAG region, the highest share of ELI households is Black, non-Hispanic (27.1% compared to 17.7% of total households).

ELI households often face multiple housing problems. As shown previously in Table II-5 above, ELI households also have the highest rates of overpayment. Overcrowding is also a common problem because ELI households cannot afford the cost of housing units of adequate size for the number of people in the household or may be doubled-up with another household to afford rent.

**Table II-6
Extremely-Low-Income Households – Santa Paula**

	Total Households	Households below 30% HAMFI	Share below 30% HAMFI
White, non-Hispanic	2,322	379	16.3%
Black, non-Hispanic	18	4	22.2%
Asian and other, non-Hispanic	209	68	32.5%
Hispanic	6,465	1,530	23.7%
TOTAL	9,014	1,981	22.0%
Renter-occupied	3,975	1,530	38.5%
Owner-occupied	5,040	455	9.0%
TOTAL	9,015	1,985	22.0%

HUD CHAS, 2012-2016. HAMFI refers to Housing Urban Development Area Median Family Income.

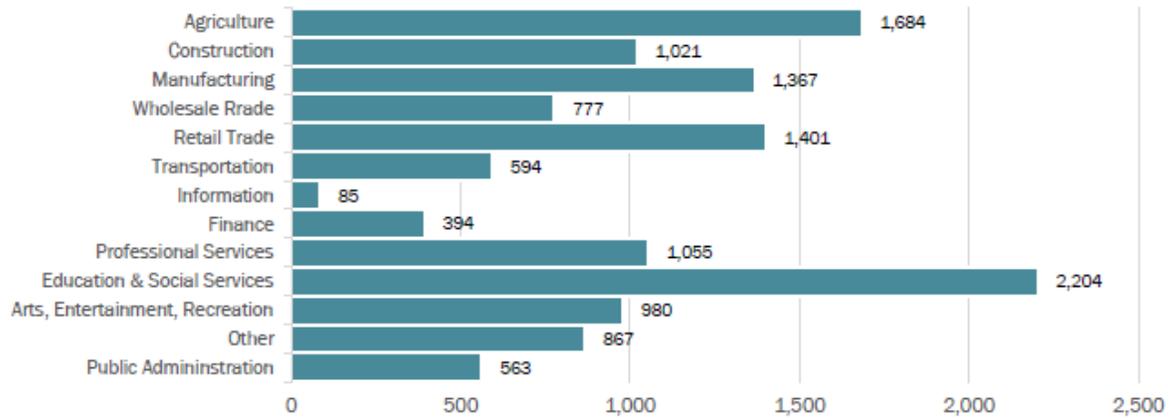
C. Employment

Employment is an important factor affecting housing needs within a community. The jobs available in each employment sector and the wages for these jobs affect the type and size of housing residents can afford.

1. Current Employment Characteristics

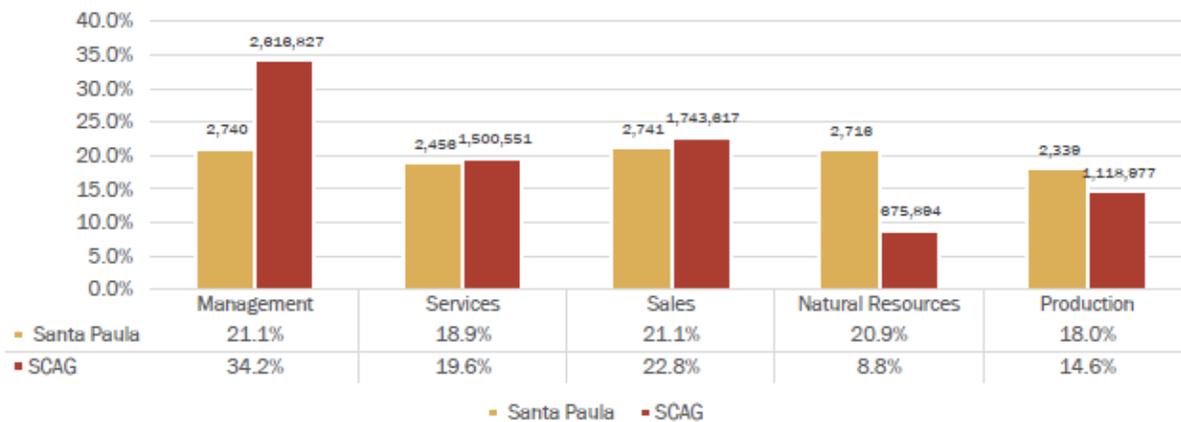
Current employment and projected job growth have a significant influence on housing needs during this planning period. According to recent ACS data (Table II-7) Santa Paula has 12,992 workers living within its borders who work across 13 major industrial sectors. The most prevalent industry is Education & Social Services with 2,204 employees (17% of total) and the second most prevalent industry is Agriculture with 1,684 employees (13% of total). Employment by occupation for Santa Paula compared to the SCAG region is shown in Table II-8.

**Table II-7
Employment by Industry – Santa Paula**



American Community Survey 2014-2018 5-year estimates using groupings of 2-digit NAICS codes.

**Table II-8
Employment by Occupation – Santa Paula vs. SCAG Region**



American Community Survey 2014-2018 5-year estimates using groupings of SOC codes.

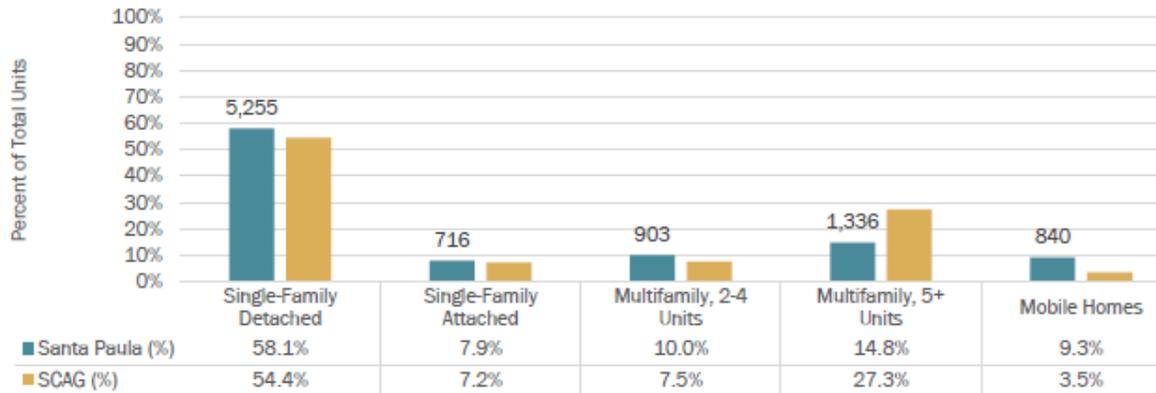
D. Housing Stock Characteristics

This section presents an evaluation of the characteristics of the community's housing stock and helps in identifying and prioritizing needs. The factors evaluated include the number and type of housing units, age and condition, tenure, vacancy, housing costs, affordability, and assisted affordable units at-risk of loss due to conversion to market-rate. A housing unit is defined as a house, apartment, mobile home, or group of rooms, occupied as separate living quarters, or if vacant, intended for occupancy as separate living quarters.

1. Housing Type and Growth Trends

Table II-9 provides recent estimates of Santa Paula's housing stock by type compared to the region as a whole. Santa Paula has a total of approximately 9,050 housing units, with single-family detached being the most prevalent housing type. The share of all single-family units in Santa Paula is 66%, which is higher than the 62% share for the entire SCAG region.

**Table II-9
Housing by Type – Santa Paula vs. SCAG Region**



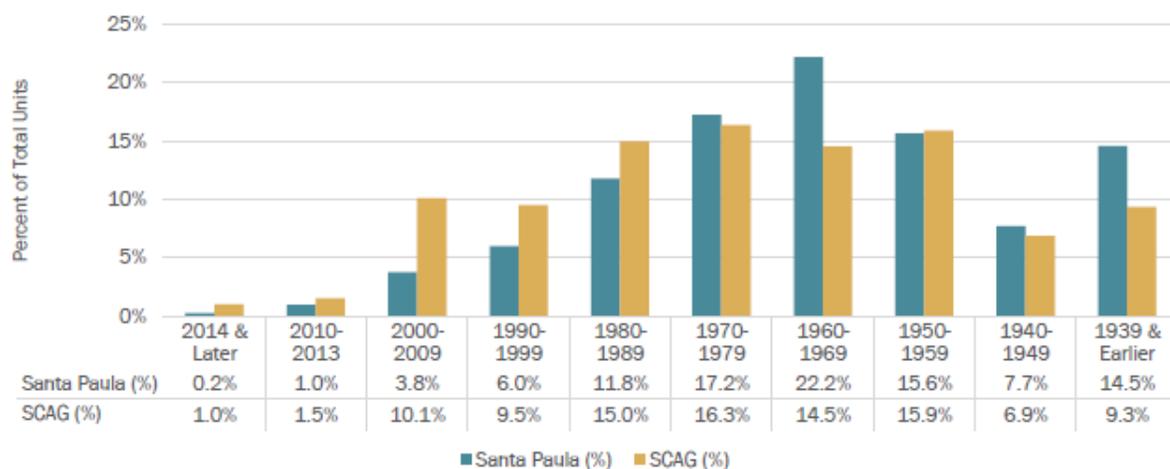
CA DOF E-5 Population and Housing Unit Estimates

2. Housing Age and Conditions

Housing age is often an important indicator of housing condition. Housing units built prior to 1978 before stringent limits on the amount of lead in paint were imposed, may have interior or exterior building components coated with lead-based paint. Housing units built before 1970 are the most likely to need rehabilitation and to have lead-based paint in deteriorated condition. Lead-based paint becomes hazardous to children under age six and to pregnant women when it peels off walls or is pulverized by lead-based paint coated windows and doors opening and closing.

Table II-10 shows the age distribution of the housing stock in Santa Paula compared to the SCAG region as a whole as reported in recent Census estimates.

**Table II-10
Age of Housing Stock –
Santa Paula vs. SCAG Region**



American Community Survey 2014-2018 5-year estimates.

This table shows that the majority of owner-occupied and rented units in Santa Paula were constructed prior to 1970. These findings suggest that there may be substantial need for maintenance and rehabilitation, including remediation of lead-based paint, for a large proportion of the city's housing stock.

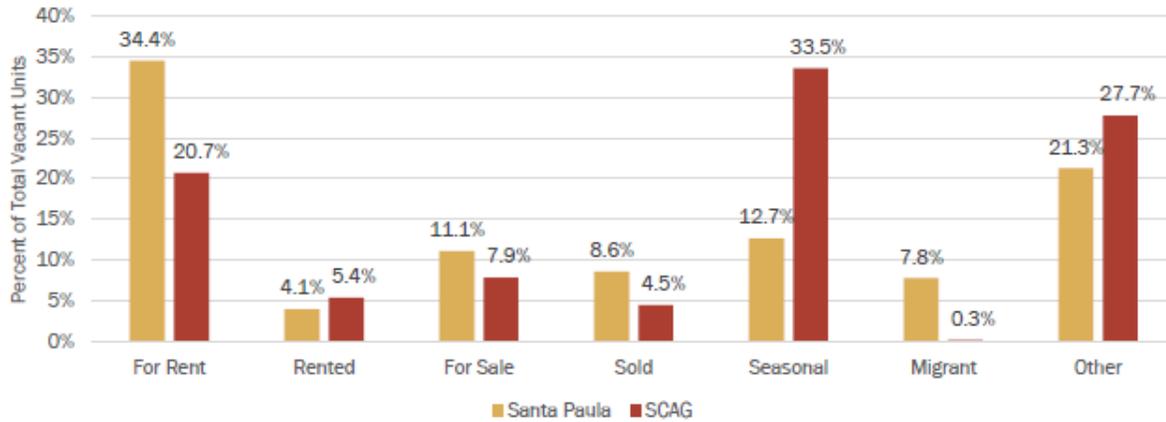
Single-family home neighborhoods in Santa Paula are generally well-maintained and contain only isolated properties in deteriorated condition that require moderate rehabilitation. However, the denser, older residential neighborhoods to the south and east of downtown are in need of varying degrees of upgrading, and some units are likely to qualify for rehabilitation assistance. Based on observations of City staff, it is estimated that approximately 40% of the total housing stock (3,600 units) are in need of some type of repair to correct deficiencies or complete replacement.

The City currently administers several programs to facilitate upgrade of the housing stock and stabilization of neighborhoods, including Code Enforcement, owner and renter rehabilitation programs, and the Remove and Replace Program.

3. Vacancy

According to recent Department of Finance data, the housing vacancy rate in Santa Paula is approximately 3%. The estimated distribution of vacant units by category is shown in Table II-11.

**Table II-11
Vacant Units by Type –
Santa Paula vs. SCAG Region**



American Community Survey 2014-2018 5-year estimates.

4. Housing Cost

a. Housing Affordability Criteria

State law establishes five income categories for purposes of housing programs based on the area (i.e., county) median income (“AMI”): extremely-low (30% or less of AMI), very-low (31-50% of AMI), low (51-80% of AMI), moderate (81-120% of AMI) and above moderate (over 120% of AMI). Housing affordability is based on the relationship between household income and housing expenses. According to HUD and the California Department of Housing and Community Development, housing is considered “affordable” if the monthly payment is no more than 30% of a household’s gross income. In some areas (such as Ventura County), these income limits may be increased to adjust for high housing costs.

Table II-12 shows 2021-22 affordable rent levels and estimated affordable purchase prices for housing in Ventura County by income category. Based on State standards, the maximum affordable monthly rent for extremely-low-income households is \$845, while the maximum affordable rent for very-low-income households is \$1,411. The maximum affordable rent for low-income households is \$2,259, while the maximum for moderate-income households is \$2,964. These figures are based on a 4-person household and are adjusted for different household sizes.

Maximum purchase prices are more difficult to determine due to variations in mortgage interest rates and qualifying procedures, down payments, special tax assessments, homeowner association fees, property insurance rates, etc. With this caveat, the maximum home purchase prices by income category shown in Table II-12 have been estimated based on typical conditions.

**Table II-12
Income Categories and Affordable Housing Costs –
Ventura County**

Income Category	Maximum Income	Maximum Affordable Rent	Maximum Affordable Price (est.)
Extremely low	\$33,850	\$845	*
Very low	\$56,450	\$1,411	*
Low	\$90,350	\$2,259	*
Moderate	\$118,550	\$2,964	\$500,000
Above moderate	Over \$118,550	Over \$2,964	Over \$500,000

Assumptions:

- Based on a family of 4 and 2021 State income limits
- 30% of gross income for rent or principal, interest, taxes & insurance plus utility allowance
- 10% down payment, 3.75% interest, 1.25% taxes & insurance, \$300 HOA dues

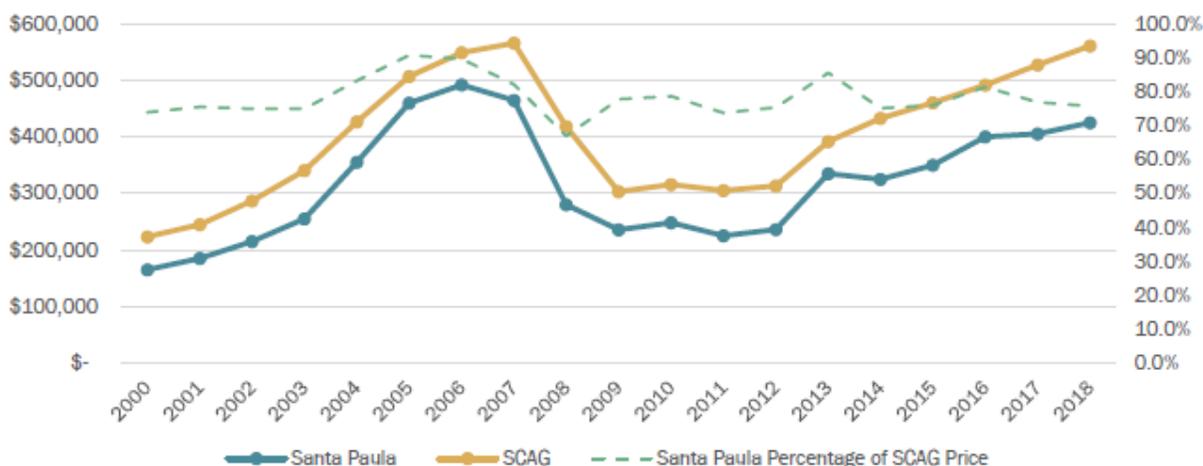
* For-sale affordable housing is typically at the moderate-income level

Source: Cal. HCD; JHD Planning LLC

b. For-Sale Housing

Between 2000 and 2018, median home sales prices in Santa Paula increased 158% while prices in the SCAG region increased 151%. 2018 median home sales prices in Santa Paula were \$425,000 and the highest experienced since 2000 was \$492,000 in 2006. Prices in Santa Paula have ranged from a low of 66.9% of the SCAG region median in 2008 and a high of 90.8% in 2005 (Table II-13). These statistics show that housing in Santa Paula is generally more affordable than average for the entire SCAG region.

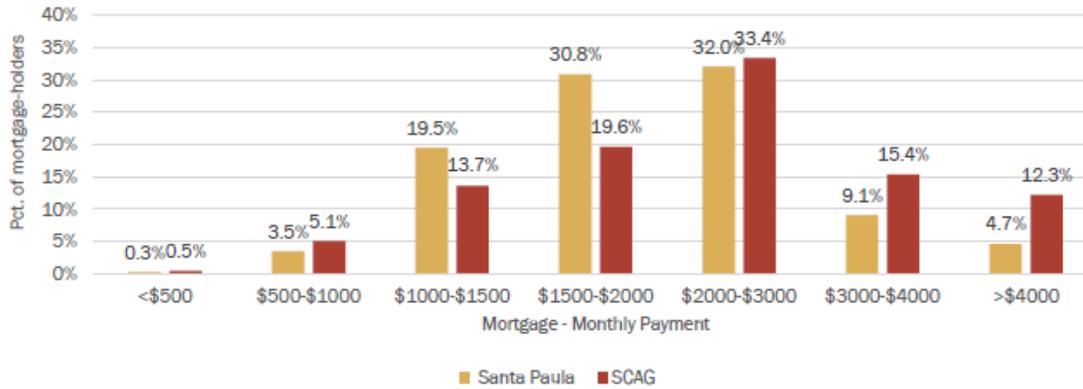
**Table II-13
Median Existing Home Sales Price 2000-2018 –
Santa Paula vs. SCAG Region**



SCAG Local Profiles, Core Logic/Data Quick. SCAG median home sales price calculated as household-weighted average of county medians.

While renter households receive much of the focus when it comes to housing cost analysis, owner households make up 54.7% of Santa Paula and 52.5% of the SCAG region. The most commonly occurring mortgage payment in Santa Paula is \$2000-\$3000/month and the most commonly occurring mortgage payment in the SCAG region is \$2000-\$3000/month as shown in Table II-14.

**Table II-14
Monthly Mortgage Costs –
Santa Paula vs. SCAG Region**

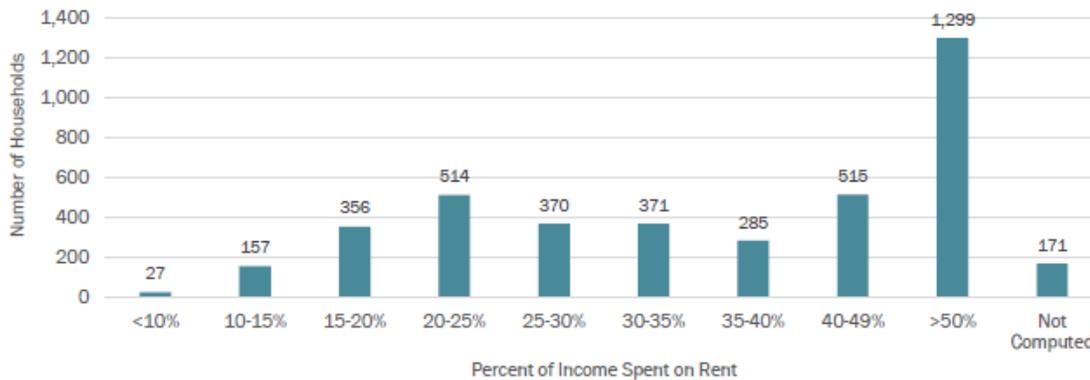


American Community Survey 2014-2018 5-year estimates.

c. Rental Housing

Across Santa Paula's 4,065 renter households, 2,470 (61%) spend 30% or more of gross income on housing cost, compared to 55% in the SCAG region as a whole. Additionally, 1,299 renter households in Santa Paula (32%) spend 50% or more of gross income on housing cost, compared to 29% in the SCAG region (Table II-15). According to recent ACS estimates, the median rent in Santa Paula was \$1,277 per month.

**Table II-15
Percentage of Income Spent on Rent –
Santa Paula**



E. Special Needs

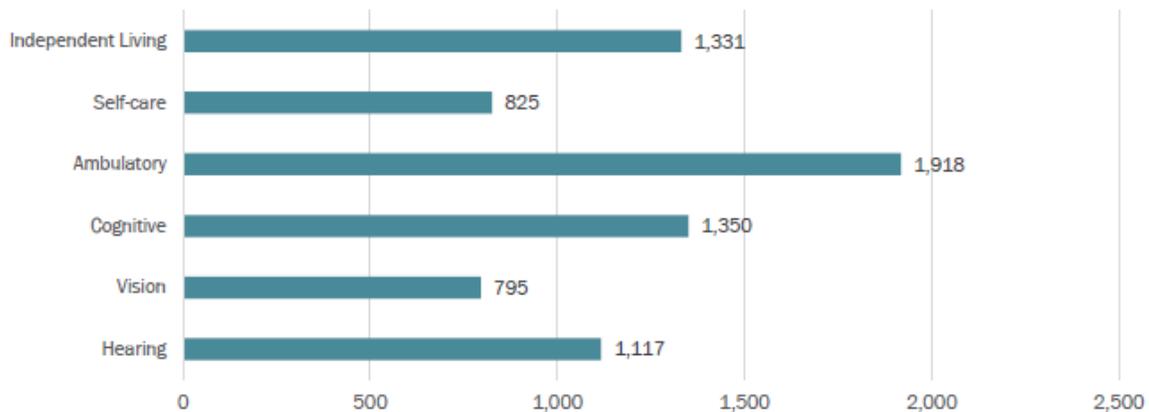
Certain groups have greater difficulty in finding decent, affordable housing due to special circumstances. Such circumstances may be related to one’s employment and income, family characteristics, disabilities, or other conditions. As a result, some Santa Paula residents may experience a higher prevalence of overpayment, overcrowding, or other housing problems.

State Housing Element law defines “special needs” groups to include persons with disabilities, the elderly, large households, female-headed households with children, homeless people, and farm workers. This section contains a discussion of the housing needs facing each of these groups.

1. Persons with Disabilities

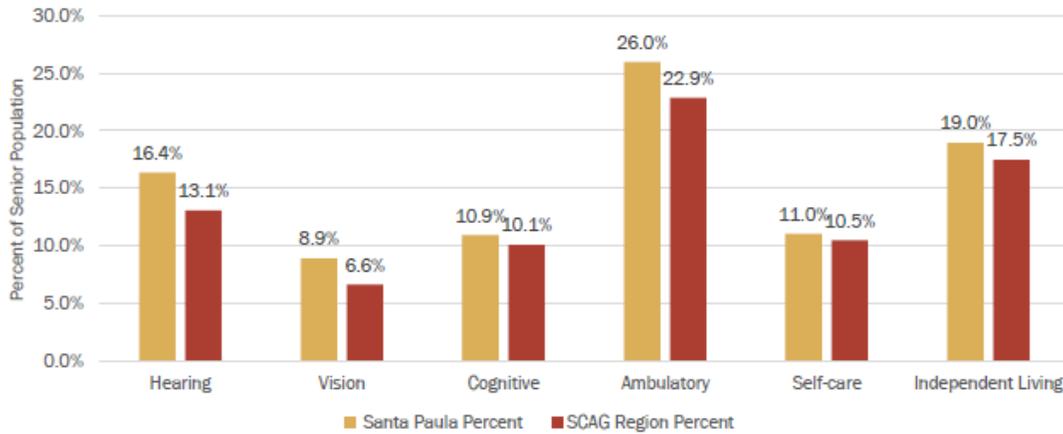
In Santa Paula, the most commonly occurring disabilities are ambulatory, cognitive and independent living (Table II-16). Of those aged 65 and over, ambulatory problems were the most common disability, experienced by 26% of Santa Paula’s seniors and 23% of seniors in the entire SCAG region (Table II-17). As seen in Table II-18, approximately 42% of persons with a disability were in the labor force. Housing opportunities for persons with disabilities can be expanded through housing assistance programs and providing universal design features such as widened doorways, ramps, lowered countertops, single-level units and ground floor units. The Municipal Code also includes procedures to provide reasonable accommodation for persons with disabilities pursuant to State law (Program 22).

**Table II-16
Disabilities by Type –
Santa Paula**



American Community Survey 2014-2018 5-year estimates.

**Table II-17
Disabilities by Type for Seniors 65+ –
Santa Paula**



American Community Survey 2014-2018 5-year estimates.

**Table II-18
Employment Status for Persons with Disabilities –
Santa Paula**

	With a Disability	Percent of Total	No Disability	Percent of Total
Employed	574	33%	11,606	73%
Unemployed	149	9%	929	6%
Not in Labor Force	1,022	59%	3,395	21%
TOTAL	1,745		15,930	

American Community Survey 2014-2018 5-year estimates.

Developmental Disabilities

As defined by federal law, “developmental disability” means a severe, chronic disability of an individual that:

- Is attributable to a mental or physical impairment or combination of mental and physical impairments;
- Is manifested before the individual attains age 22;
- Is likely to continue indefinitely;

- Results in substantial functional limitations in three or more of the following areas of major life activity: a) self-care; b) receptive and expressive language; c) learning; d) mobility; e) self-direction; f) capacity for independent living; or g) economic self-sufficiency;
- Reflects the individual's need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

The Census does not record developmental disabilities. According to the U.S. Administration on Developmental Disabilities, an accepted estimate of the percentage of the population that can be defined as developmentally disabled is 1.5 percent. Many developmentally disabled persons can live and work independently within a conventional housing environment. More severely disabled individuals require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Because developmental disabilities exist before adulthood, the first issue in supportive housing for the developmentally disabled is the transition from the person's living situation as a child to an appropriate level of independence as an adult.

The State Department of Developmental Services (DDS) currently provides community-based services to persons with developmental disabilities and their families through a statewide system of 21 regional centers, four developmental centers, and two community-based facilities. Santa Paula is served by the Tri-Counties Regional Center¹ (TCRC) which is based in Santa Barbara and operates a field office in Oxnard. As of 2019 the Center served approximately 15,200 clients. According to data compiled by DDS, there were approximately 372 persons with developmental disabilities in the Santa Paula zip code who were receiving services from TCRC, and the vast majority of those lived in the home of a family member or guardian. Any resident who has a developmental disability that originated before age 18 is eligible for services. Services are offered to people with developmental disabilities based on Individual Program Plans and may include adult day programs; advocacy; assessment/consultation; behavior management programs; diagnosis and evaluation; independent living services; infant development programs; information and referrals; mobility training; prenatal diagnosis; residential care; respite care; physical and occupational therapy; transportation; consumer, family vendor training; and vocational training. TCRC also coordinates the state-mandated Early Start program, which provides services for children under age three who have or are at substantial risk of having a developmental disability.

While most persons with developmental disabilities live with a relative or guardian, these arrangements can create difficulties particularly as the caregivers grow older and may no longer be able to provide the level of assistance needed. Living arrangements such as permanent supportive housing and residential care facilities can address the needs of those with developmental disabilities. As discussed in the Constraints chapter and the

¹ www.tri-counties.org

Housing Plan, the City facilitates the production of these types of facilities through its zoning regulations as well as assistance to non-profit organizations.

2. Elderly

Federal housing data define a household type as 'elderly family' if it consists of two persons with either or both age 62 or over. According to recent Census estimates, of Santa Paula's 2,093 elderly households, 28% earn less than 30% of the median income compared to 24% for the entire SCAG region, and 54% earn less than 50% of the median income compared to 31% in the SCAG region (Table II-19). Many elderly persons are dependent on fixed incomes and many have disabilities. Elderly homeowners may be physically unable to maintain their homes or cope with living alone. The housing needs of this group can be partially addressed through smaller units, second units on lots with existing homes, shared living arrangements, congregate housing and housing assistance programs.

The City encourages affordable and accessible housing options for seniors through a variety of programs described in the Housing Action Plan, including the Santa Paula Housing Authority's Section 8 program (Program 4), Mobile Home Park Tenant Protections (Program 5), Mobile Home Rent Stabilization (Program 6), Workforce and Senior Housing Development (Program 9), and a Reasonable Accommodation Ordinance (Program 22).

**Table II-19
Elderly Households by Income and Tenure –
Santa Paula**

		Owner	Renter	Total	Percent of Total Elderly Households:
Income category, relative to surrounding area:	< 30% HAMFI	280	300	580	27.7%
	30-50% HAMFI	320	220	540	25.8%
	50-80% HAMFI	165	49	214	10.2%
	80-100% HAMFI	240	4	244	11.7%
	> 100% HAMFI	440	75	515	24.6%
TOTAL		1,445	648	2,093	

HUD CHAS, 2012-2016. HAMFI refers to Housing Urban Development Area Median Family Income.

3. Large Households

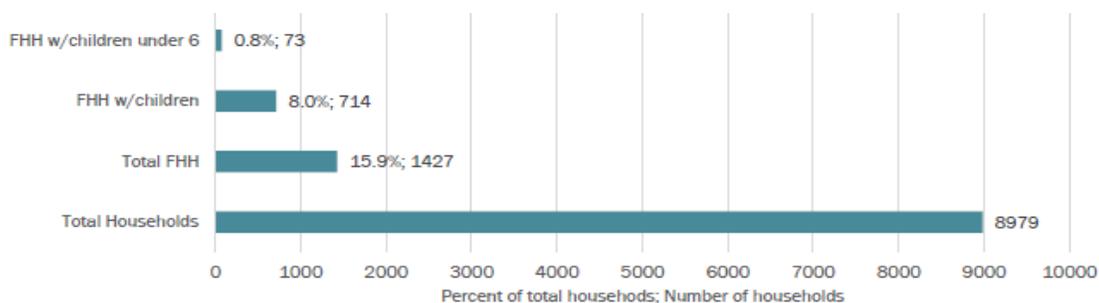
Household size is an indicator of need for large units. Large households are defined as those with five or more members. As shown previously (Table II-2) about 18% of Santa Paula households had five or more members (744 renter households and 845 owner households). While this distribution indicates a need for large units with four or more bedrooms, there are substantially more small households with one or two persons in Santa Paula. The City responds to the needs of large households through participation in the Housing Authority's Section 8 program which allows renters to afford larger units and the CDBG funded Owner-Occupied Housing Rehabilitation (Loan) Program which can be used for the addition one bedroom and one bathroom.

4. Female-Headed Households

According to recent Census estimates (Table II-20), about 16% of Santa Paula households are female-headed (compared to 14% in the SCAG region), 8% are female-headed and with children (compared to 7% in the SCAG region), and 0.8% are female-headed and with children under 6 (compared to 1% in the SCAG region). Approximately 11% of Santa Paula's households are experiencing poverty, compared to 8 percent of households in the SCAG region (Table II-21). Poverty thresholds vary by household type. In 2018, the poverty threshold for a family consisting of 2 adults and 2 children was \$25,465/year.

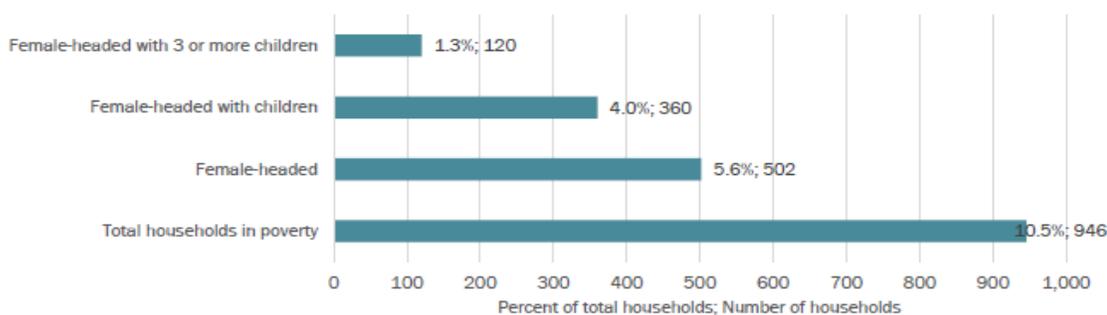
While female-headed households represent a relatively small portion of all Santa Paula households, they often have special challenges of balancing work and childcare responsibilities. The City responds to the needs of female-headed households through participation in the CDBG program and the Housing Authority's Section 8 program. The inclusionary housing program and the density bonus program also facilitate production of affordable housing that helps to address the needs of female-headed households.

**Table II-20
Female Headed Households by Type –
Santa Paula**



American Community Survey 2014-2018 5-year estimates.

**Table II-21
Female Headed Households by Poverty Status – Santa Paula**

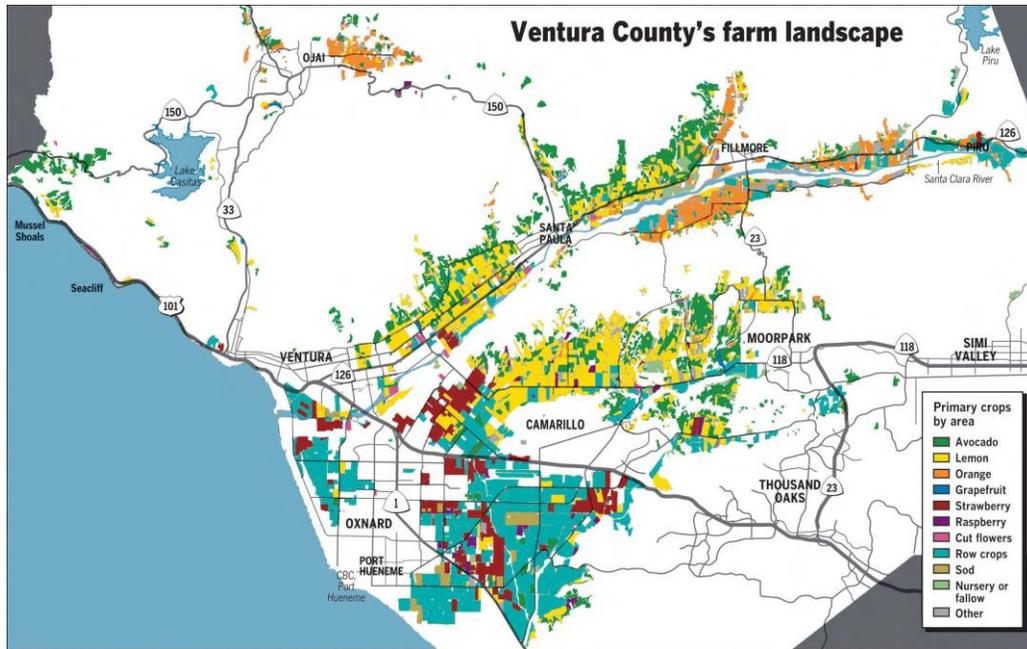


American Community Survey 2014-2018 5-year estimates.

5. Farm Workers

Unlike most areas of the Southern California metropolitan area, agriculture is still a significant component of the economy in Ventura County, with a total annual crop value of nearly \$2 billion in 2019². There is strong public sentiment for retaining agricultural production, as reflected in the SOAR (Save Open Space and Agricultural Resources) initiatives that have been approved by voters. Figure II-2 illustrates the wide variety of crops produced in the county.

**Figure II-2
Ventura County Agricultural Production Areas**



Source: Ventura County Farm Bureau, 2021

Accurate statistics regarding agricultural workers in Ventura County, especially migrant workers, are difficult to obtain. According to the County of Ventura³ there are an estimated 18,000 to 23,000 farmworkers in the county. Recent Census data estimated that there are 1,402 jobs in the farming, fishing and forestry occupations in Santa Paula, of which 666 were full-time, year-round jobs (Table II-22).

**Table II-22
Ventura County Farm Workers by Occupation**

Santa Paula	Percent of total Santa Paula workers:	SCAG Total	
1402	10.79%	57,741	Total jobs: Farming, fishing, and forestry occupations
666	7.85%	31,521	Full-time, year-round jobs: Farming, fishing, and forestry occupations

² Ventura County Agricultural Commissioner, 2019 Crop Report

³ Farmworker Housing in Ventura County, APAC meeting, 12/9/2020

The majority of farm laborers in the greater Santa Paula area are permanent non-migrant and seasonal laborers. According to the California Department of Housing and Community Development There are approximately 14 State-licensed employee housing camps in Ventura County, of which three are located in Santa Paula. In addition to these camps, the housing needs of farmworkers are addressed through the provision of permanent affordable housing, such as apartments, lower-cost single-family homes, and mobile homes. In compliance with the Employee Housing Act (Health and Safety Code §17021.5 and §17021.6), City regulations allow farmworker housing consistent with State law (see also the discussion of farmworker housing regulations in Chapter IV – Constraints). The City has also approved non-profit affordable housing developments that respond to the needs of permanent and seasonal farmworkers.

6. Homeless Persons

Homelessness is a continuing national problem that persists within local cities and communities including Ventura County. An increasing number of single persons have remained homeless year after year and have become the most visible of all homeless persons. Other persons (particularly families) have experienced shorter periods of homelessness. However, they are often replaced by other families and individuals in a seemingly endless cycle of homelessness.

The most recent Ventura County Continuum of Care Alliance homelessness survey report published in 2020 estimated that there were 1,743 homeless persons in Ventura County at the time of the survey. The cities of Oxnard and Ventura accounted for nearly two-thirds (63%) of the total (567 persons representing 32.5% and 531 persons representing 30.5%, respectively). The survey identified 95 homeless persons in Santa Paula, which represents about 5% of the county total. Of the 95 homeless persons, 21 were sheltered and 74 were unsheltered.

Although there are myriad causes of homelessness, among the most common causes are substance abuse, domestic violence and mental illness.

There is one homeless services facility within the City of Santa Paula, operated by SPIRIT of Santa Paula at 1498 E. Harvard Boulevard. In addition to its 42 beds, this facility provides services for the homeless such as meals, financial assistance, counseling and outreach. In addition, there is one 15-bed recovery and sober living facility (Jackson House) and one permanent supportive housing facility (Harvard Place). The Santa Paula Housing Authority also provides public housing assistance. As noted in the Constraints chapter, the City of Santa Paula has been proactive in facilitating the development of these facilities, including waiving approximately \$50,000 in fees for Spirit of Santa Paula and expediting permit approval for Jackson House. City regulations regarding emergency shelters and other facilities that address the needs of homeless persons are discussed in Chapter IV – Constraints, and Program 15 in the Housing Plan describes City efforts to address the problems of homelessness.

F. Assisted Housing at Risk of Conversion

This section identifies all residential projects in the city that are under an affordability covenant, along with those housing projects that are at risk of losing their low-income affordability restrictions within the ten-year period 2021-2031. This information is used in establishing quantified objectives for units that can be conserved during this planning period. The inventory of assisted units includes all units that have been assisted under any federal Department of Housing and Urban Development (HUD), State, local and/or other program.

Table II-23 provides a list of developments within the City of Santa Paula that include deed-restricted low-income rental units. According to the California Housing Partnership Corporation and City records there are no units at risk of converting to market rate during the 2021-2031 time period.

**Table II-23
Assisted Affordable Housing Developments –
Santa Paula**

Project	Year	No. of Units	Program	Covenant Expires
Santa Paulan, CEDC 115 N. 4 th St.	1992	151	The City facilitated the development by providing financial assistance and rezoning the site to R-4. In addition, the project was financed through County funds and Low-Income Housing Tax Credits (LIHTC). The complex provides all 151 units at reduced rents to very low- and low-income seniors.	2061
Casa Garcia CEDC 220 S. Garcia St.	1998	14	14 low income rental units (45 Years)	2052
Santa Paula Village 218 N. 8 th St.	1999	56	The City approved the issuance of multi-family revenue bonds in the amount of \$3 million to finance the acquisition and rehabilitation of the development.	2052
El Dorado Apartments 241 S. 8 th St.		22	The project is owned by the Santa Paula Housing Authority. All units are restricted for occupancy by lower-income households in perpetuity.	Permanent
Thompson Citrus Court 517, 519, 611 East Harvard Blvd.	2004	28	This mixed-use project includes 15 deed restricted units affordable to lower-income households. (45 Years)	2049
Harvard Place Apts. 320 W. Harvard Blvd.	2006	40	Accommodates 39 very low-income units and 1 moderate-income unit.	2060
Vista Hermosa CEDC 200 W. Santa Ana St.	2007	24	Allows for 24 very low-income units for farm worker families. The City granted this project \$150,000 in CDBG funds. (45 Years)	2061
Corporation for Better Housing 622 E. Main St.	2007	41	Allows for 41 very low-income units.	2061
Judson / CEDC 236 W. Harvard Blvd.	2008	35	Apartment project includes 35 deed restricted units affordable to lower-income households. The project received a reduction in common open space and a reduction in parking requirements. (45 Years)	2062
Rodney Fernandez Gardens/CEDC 210 W. Santa Barbara St.	2011	90	Allow for 90 rental multi-family apartments (33 low and 51 very low)	2065/2067
The Orchards at Santa Paula/VC Housing Auth.	2012	20	This Project is owned by the Santa Paula Housing Authority. All units are restricted for very low income households (30 years).	2042

Source: California Housing Partnership Corporation; City of Santa Paula 2021

G. Future Housing Needs

The Regional Housing Needs Assessment (RHNA) is a key tool for local governments to plan for anticipated growth. The latest RHNA was adopted by the Southern California Association of Governments (SCAG) in March 2021 and covers the projection period of June 30, 2021 to October 15, 2029. The future need for housing is determined by the forecasted growth in households in a community, a vacancy adjustment to promote housing choice and mobility, an adjustment to account for units expected to be lost due to demolition, natural disaster, or conversion to non-housing uses, and existing need due to current overcrowding and overpayment.

The total housing need for the City of Santa Paula during the 2021-2029 period is 1,285 units, which is distributed by income category as shown in Table II-24.

Table II-24
2021-2029 Regional Housing Needs –
Santa Paula

Very Low*	Low	Moderate	Above Mod	Total
102	99	121	335	657

Source: SCAG 2021

Notes:

*Includes 51 units in the extremely-low-income category pursuant to State law

The City's resources for addressing this future housing need are discussed in Chapter III.

III. RESOURCES

A. Land Resources

Section 65583(a)(3) of the *Government Code* requires Housing Elements to include an “inventory of land suitable for residential development, including vacant sites and sites having potential for redevelopment, and an analysis of the relationship of zoning and public facilities and services to these sites.” A detailed analysis of vacant land and potential redevelopment opportunities is provided in Appendix B. The table shows that the city’s land inventory exceeds the RHNA allocation in all income categories. The Housing Action Plan (Chapter V) contains several programs that will facilitate the production of housing needed for the planning period.

A discussion of public facilities and infrastructure needed to serve future development is contained in Section IV.B, Non-Governmental Constraints. There are currently no known service limitations that would preclude the level of development described in the RHNA, although developers will be required to pay fees or construct public improvements prior to or concurrent with development.

B. Financial and Administrative Resources

1. State and Federal Resources

Community Development Block Grant Program (CDBG) - Federal funding for housing programs is available through the Department of Housing and Urban Development (HUD). Santa Paula is a participating jurisdiction under the Ventura Urban County Entitlement Area for the CDBG program. The CDBG program is very flexible in that the funds can be used for a wide range of activities. The eligible activities include, but are not limited to, acquisition and/or disposition of real estate or property, public facilities and improvements, relocation, rehabilitation and construction (under certain limitations) of housing, homeownership assistance, and clearance activities. The City expects to receive approximately \$125,000 in CDBG funds annually, translating to approximately \$1 million during the 8-year Housing Element planning period. This is less than half the amount received in the prior planning period. The majority of these funds are expected to be used for housing code enforcement and rehabilitation programs.

Low-Income Housing Tax Credit Program - The Low-Income Housing Tax Credit Program was created by the Tax Reform Act of 1986 to provide an alternate method of funding low-and moderate-income housing. Each state receives a tax credit, based upon population, toward funding housing that meets program guidelines. The tax credits are then used to leverage private capital into new construction or acquisition and rehabilitation of affordable housing. Limitations on projects funded under the Tax Credit programs include minimum requirements that a certain percentage of units remain rent-restricted, based upon median income.

Mortgage Credit Certificates (MCC) – This program provides a federal tax credit for income-qualified homebuyers equivalent to 15% of the annual mortgage interest. Generally, the tax savings are calculated as income to help buyers qualify to purchase a

home. Using an MCC, first-time buyers can save \$700 to \$2,500 a year on their annual federal income tax bill. The City contracts with Affordable Housing Applications for administration of this program.

Other State and Federal Resources - City has also utilized other State and federal funding sources as appropriate. For example, the City was successful in securing \$500,000 in State CalHome grant funds to fund its housing rehabilitation program. Multifamily Housing Revenue Bonds and mortgage revenue bond financing have also been used by the City when financing terms and conditions were appropriate. These funding sources are typically used on a project-by-project basis and are not secure, annual funding sources such as CDBG and Redevelopment housing set-aside funds. However, they do represent the City's commitment to work with non-profit and for profit developers in applying for all available funding resources that could be used to ensure an affordable housing project.

2. Local Resources

Santa Paula Housing Authority – The Santa Paula Housing Authority provides Section 8 rental subsidies to lower income families and seniors. Section 8 vouchers assist lower-income households by paying the difference between 30% of an eligible household's income and the actual cost of renting a unit.

Cabrillo Economic Development Corporation (CEDC): The Cabrillo Economic Development Corporation (CEDC) is an active affordable housing developer in Ventura and Santa Barbara counties. CEDC also has construction, property management, homeownership, counseling, and community building divisions. CEDC has developed several projects in Santa Paula: The Santa Paulan, a 151-unit senior apartment complex; Casa Garcia, a 14-unit affordable townhouse development for large families; Vista Hermosa, a 24-unit affordable apartment complex on West Santa Ana Street; and Rodney Fernandez Gardens, a 90-unit apartment project that



Rodney Fernandez Gardens (CEDC)

also includes a child day care center in close proximity to the project site.

Mercy Charities Housing California (MCHC): Mercy Charities is a statewide non-profit housing development corporation whose mission is to support and strengthen communities through the provision of quality, affordable, services-enriched housing for lower income individuals and families. MCHC has been active in nearby Oxnard, and has completed construction of several affordable housing projects.

Habitat for Humanity of Ventura County: Habitat for Humanity is a non-profit, Christian organization dedicated to building affordable housing and rehabilitating damaged homes for lower income families. Habitat builds and repairs homes for families with the help of volunteers and homeowner/partner families. Habitat homes are sold to partner families at no profit with affordable, no-interest loans. Volunteers, churches, businesses, and other

groups provide most of the labor for the homes. Habitat has developed several projects in Santa Paula.

Many Mansions, Inc.: Many Mansions is a non-profit housing and community development organization founded in 1979 to promote and provide safe, well-managed housing to limited income residents of the Conejo Valley and surrounding communities in Ventura County. Many Mansions develops, owns, and self-manages special needs and permanent affordable housing. The organization also provides resident services, housing counseling, a food bank and homeownership counseling.

Peoples' Self-Help Housing Corporation (PSHHC): PSHHC is a housing and community development corporation serving San Luis Obispo, Santa Barbara, and Ventura counties. PSHHC provides design, implementation, technical assistance, and property management of low-income homeownership and rental housing. PSHHC is known to have produced attractive single-family homes at affordable prices in Santa Barbara.

Corporation for Better Housing: Corporation for Better Housing is a non-profit development organization that developed and manages a 41-unit apartment complex for farm worker families.

Partners in Housing: Built and manages a 40-unit apartment complex for very-low- and extremely-low-income persons and provides onsite supportive services for its residents with disabilities.

C. Energy Conservation Opportunities

State law requires all new construction to comply with "energy budget" standards that establish maximum allowable energy use from non-renewable resources (Title 24 of the California Administrative Code). These requirements apply to such design components as structural insulation, air infiltration and leakage control, setback features on thermostats, water heating system insulation (tanks and pipes) and swimming pool covers if a pool is equipped with a fossil fuel or electric heater. State law also requires that a tentative tract map provide for future passive or natural heating or cooling opportunities in the subdivision, including designing the lot sizes and configurations to permit orienting structures to take advantage of a southern exposure, shade or prevailing breezes.

Southern California Edison (SCE) and the Southern California Gas Company offer energy conservation programs to residents of Santa Paula including audits of home energy use to reduce electricity consumption, refrigerator rebates, appliance repair and weatherization assistance to qualified low-income households, buyer's guides for appliances and incentives, by the Gas Company, to switch from electric to gas appliances. Direct assistance to low-income households is provided by the Gas Company through the California Alternate Rates for Energy (CARE) Program and by SCE through its Energy Management Assistance Program.

Both companies have programs to encourage energy conservation in new construction. SCE's energy rebate program applies to residential developers as well as individual customers. SCE also offers an Energy STAR new home program, and Sustainable Communities Program offering design assistance and financial incentives for sustainable

housing development projects. The Gas Company's Energy Advanced Home Program is offered to residential developers who install energy-efficient gas appliances that exceed California energy standards by at least 15%.

The City of Santa Paula is a member of the Ventura County Regional Energy Alliance (VCREA), a regional public agency whose mission is to establish Ventura County, its communities, and neighboring regions as leaders in developing and implementing durable, sustainable energy initiatives that support sensible growth, a healthy environment and economy, an enhanced quality of life, and greater self-reliance for the region, by (1) reducing energy demand and increasing energy efficiency, and (2) advancing the use of clean, efficient and renewable local resources. VCREA works to help bring energy awareness and return Public Goods Charge (PGC) utility ratepayer rebates back to individuals, businesses, local government agencies and community organizations within the Ventura region.

VCREA, in partnership with the Southern California Gas Company and Southern California Edison Company, also maintains and staffs the Ventura County Energy Resource Center (VCERC), a central clearinghouse for energy information in Ventura County, designed to assist public agencies, businesses, and residential customers find information and appropriate resources to enhance responsible and efficient use of energy resources. The VCERC is funded by California utility ratepayers. Additional VCREA services and programs include: an energy newsletter and website; training seminars; participation in community outreach events; technical services; connecting business and residential customers to utility programs, incentives and rebates; resources to mitigate climate change; Employee Energy Efficiency Plan; Implementation of EnergyStar Building Program; Small Measure Energy Efficiency Initiatives Program; and Resources for Green Building Approaches to Energy Efficiency.

IV. CONSTRAINTS

In planning for the provision of housing, constraints to the development, maintenance and improvement of housing must be recognized, and jurisdictions must take appropriate steps to mitigate them where feasible. Potential constraints to housing are discussed below and include governmental constraints and non-governmental constraints.

A. Governmental Constraints

Governmental regulations, while intentionally controlling the quality of development in the community can also, unintentionally, increase the cost of development and thus the cost of housing. These potential governmental constraints include land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local development processing and permit procedures.

1. Land Use Plans and Regulations

a. General Plan

Each city and county in California must prepare a comprehensive, long-term General Plan to guide its future. The land use element of the General Plan establishes the basic land uses and density of development within the various areas of the city. Under State law, the General Plan elements must be internally consistent and the City's zoning must be consistent with the General Plan. Thus, the land use plan must provide suitable locations and densities to implement the policies of the Housing Element.

The City's General Plan was comprehensively updated in 2020. The Land Use Element provides for six residential land use designations and two mixed-use designation allowing residential uses, as shown in Table IV-1. In addition, residential or mixed-use development is allowed in all four commercial designations.

**Table IV-1
General Plan Land Use Categories Allowing Residential Uses
Santa Paula General Plan**

Designation	Maximum Density*	Description
Residential Hillside	3	Single-family residential and accessory uses.
Residential - Single Family	8	Residential and accessory uses.
Residential - Medium Density	15	Residential and accessory uses.
Residential - Medium High Density	21	Residential and accessory uses.
Residential - High Density	29	Residential and accessory uses.
Mobile Home Park	10	Mobile home parks.
Mixed Use: Office/Residential	29	Commercial and residential uses.
Mixed Use: Commercial/Light Industrial/Residential	21	Uses are allowed to mix to reflect the heavy commercial character and infill housing opportunity of East Main Street. Stand-alone residential is also allowed.
Central Business	No maximum	Primary intended uses include retail shops and restaurants on the ground floor facing the street, with other business or residential uses permitted in the remaining ground floor areas and the upper floors.
Commercial - Neighborhood	1 unit per business occupancy	Convenience shopping and personal services. Residential is also permissible.
Commercial - Office	29	Professional offices, banks, medical clinics. Mixed-use commercial/residential and stand-alone residential development is also permissible.
Commercial - General	29	Retail and services for the entire city, auto sales, and other highway-oriented commercial uses. Mixed-use commercial/residential and stand-alone residential is also permissible.

Source: City of Santa Paula General Plan, 2021.
*Density expressed in dwelling units per gross acre.

b. Save Open Space and Agricultural Resources (SOAR)

Approved by Santa Paula voters in 2000 and renewed in 2016, this measure establishes a City Urban Restriction Boundary (CURB) inside the City’s Sphere of Influence. The CURB creates an additional approval step in the process beyond staff review and approval by the Planning Commission and City Council for developers wishing to develop land located outside the CURB line. Developers who desire to develop such property must voter approval. The CURB line may also be amended in annual 20-acre increments to comply with State law regarding the provision of housing for all economic segments of the community. There are a few situation-specific exceptions to the CURB requirement, including public park lands and public schools.

c. Measure L6-Citizens Advocating Responsible Expansion

Adopted in 2006 and extended in 2016, the Citizens Advocating Responsible Expansion Initiative, aka the “81-Acre Initiative” generally requires voter approval for large-scale developments proposed on 81 or more acres of property. In 2008, the City Council adopted Ordinance No. 1188, which added Chapter 16.237 to the Santa Paula Municipal Code to implement the 81-Acre Initiative. As noted in SPMC Sec. 16.237, developments that amend the Land Use Element of the General Pan to increase the density or land

intensity on property located within the City's planning areas, which includes its Sphere of Influence, generally require voter approval. Other than the voter-approved East Area 1 ("Harvest at Limoneira") project, no projects have been submitted that would trigger Ordinance No. 1188. If a project were submitted that required voter approval, the applicant would be responsible for the cost of conducting the required election. Projects with affordable units are not exempt from the initiative, although elections would be "piggy-backed" with other ballot measures that may be required for the project (e.g., SOAR) thereby reducing administrative costs.

d. Greenbelt Agreements

In Ventura County, greenbelts are created by agreements between neighboring public agencies. They represent an agreement between two or more jurisdictions concerning urban form, the protection of farmland and open space land, the future extension of urban services/facilities, and annexations. These greenbelts are intended to operate as buffers and participating public entities agree not to extend municipal services into greenbelts or to annex greenbelt lands. Santa Paula currently participates in two Greenbelt Agreements that affect lands contiguous to the city on the east and the west:

- The Santa Paula and San Buenaventura (Ventura) Greenbelt Agreement: Adopted in 1967, between the County of Ventura and cities of Santa Paula and Ventura, this agreement covers approximately 8,350 acres from the Adams Barranca westward to the Franklin Barranca, with no clearly defined southern or northern boundaries. The agreement was intended to cover the flat prime agricultural lands south of Foothill Road.
- The Santa Paula and Fillmore Greenbelt Agreement: Established in 1980 between the County of Ventura and cities of Fillmore and Santa Paula, was amended in 2000 and 2009, this agreement covers 34,200 acres and represents the largest greenbelt in Ventura County covering Sespe Creek adjacent to Fillmore and the western boundary is coterminous with the City CURB. The southern boundary is the South Mountain ridgeline and Oak Ridge, while the northern boundary lies at the Los Padres National Forest boundary.

e. Zoning Designations and Development Standards

The City regulates the type, location, density, and scale of residential development through the Municipal Code. Zoning regulations serve to implement the General Plan and are designed to protect and promote the health, safety, and general welfare of residents. The Municipal Code also helps to preserve the character and integrity of existing neighborhoods. The Municipal Code sets forth residential development standards for each zone district.

Residential Zones

The nine residential zones are as follows:

HR-PD1	Hillside Residential – Planned Development (0-1 du/ac)
HR-PD2	Hillside Residential – Planned Development (0-3 du/ac)
R-A	Rural Residential
R-1	Single Family Residential
R-1a	Small Lot Single Family Residential
R-2	Medium Density Residential
R-3	Medium High Density Residential
R-4	High Density Residential
MHP	Mobile Home Park

A summary of the development standards for these residential zones is provided in Table IV-2. Development standards continue to be viewed as necessary to protect the public health, safety and welfare and maintain the quality of life, and are not considered constraints on the development of housing.

**Table IV-2
Development Standards – Residential Zones**

Requirement	District								
	HR-PD1	HR-PD2	R-A	R-1	R-1a	R-2	R-3	R-4	MHP
Maximum Density (DU)	1 du/ac	2 du/ac	4 du/ac	7 du/ac	7 du/ac	15 du/ac	21 du/ac	29 du/ac	10 du/ac
Minimum Density (DU)	N/A	N/A	N/A	N/A	N/A	N/A	16 du/ac	22 du/ac	N/A
Minimum Lot Area (sq. ft.)	43,560	14,500	10,000	6,000	n/a	6,000	6,000	6,000	3,500
Minimum distance between dwellings (ft.)	10	10	10	10	10	10	10	10	6
Minimum Front Yard (ft.)*	25	25	25	20	15	20	20	20	5
Minimum Rear Yard (ft.)**	25	10	25	10	10	20	20	20	3
Maximum Building Height (ft.)	35	35	35	35	35	35	45	45	25

Source: Santa Paula Development Code, 2022

*From the ultimate street right-of-way line

**1st story setback

Densities range from the lower-density rural residential single-family zones with a maximum of two units per acre to a maximum of 29 units per acre in the R-4 Zone. Under State law, density bonuses would permit more units than allowed by the underlying zone depending on the amount of affordable units provided. It should be noted that residential development (primarily individual single-family homes on existing rural lots) is also a permitted use in the Agricultural zones at very low densities (i.e., 20-acre minimum lot size). For a project located within the City’s Planned Development (PD) overlay zone, minimum lot sizes and development standards can be flexible if it is part of an approved comprehensive planned development permit application.



In the past few years, several multi-family projects have been entitled in the R-2 (15 du/ac max.) and R-3 (21 du/ac max.) zones, some of which achieved the maximum allowable densities. The height limits for these zones (35 feet and 45 feet respectively) are greater than some other Ventura County cities and do not act as a constraint to development. The height limit for the R-4, which has a maximum density of 29 du/ac, is also comparable to other cities.

Non-Residential Zones Allowing Residential or Mixed-Use Development

In addition to the residential zones listed above, the five non-residential zones listed below permit varying levels of mixed-use or residential development. Stand-alone residential development is allowed by-right in all of these commercial zones except the CBD where residential is allowed as part of a mixed-use project. Development standards in these zones are summarized in Table IV-3.

- CBD** Central Business District
- C-O** Commercial Office
- C-G** General Commercial
- C-LI** Commercial/Light Industrial
- C-N** Neighborhood Commercial

**Table IV-3
Residential Development Standards in Commercial Zones**

Requirement	C-O	C-G	C-LI	C-N	CBD
Maximum Density (DU)	29	29	21	*	Unlimited
Maximum Lot Coverage (%)	75	80	80	75	100
Minimum Front Yard (ft.)*	10	10	10	10	0 or 10**
Minimum Rear Yard (ft.)**	5 or 10***	5 or 10***	5 or 25***	10	0 or 10***
Maximum Building Height (ft.)	2-1/2 stories/ 35 ft.	3 stories/ 45 ft.	3 stories/ 45 ft.	1 story 20 ft.	3 stories/ 45 ft.

*1 unit per business occupancy

** When located across from a residential zone

***When abutting a residential zone

Mixed-use and residential projects recently built or approved in non-residential zones are summarized in Table IV-4. The average density of these projects is over 30 units/acre and nearly all projects included deed-restricted affordable units. Given the history of successful mixed-use and residential development in Santa Paula, several commercial sites are included in the Residential Land Inventory (Appendix B) in fulfillment of RHNA requirements.



Citrus Court Apartments Mixed Use Project

**Table IV-4
Recent Residential Developments in Non-Residential Zones**

Project	Zoning	Density (units/acre)	Income Category				Total
			Very Low	Low	Mod	Above	
519 E. Harvard Blvd.	C-G	28	2*	26*			28
320 W. Harvard Blvd.	C-G	47	40*				40
622 E. Main St.	C-G	55	40*				40
234 W. Harvard Blvd.	C-G	29	2*	33*			35
720 E. Main St.	C-G	14		6*		8	14
15891 W. Telegraph Rd.	C-G	15		2*			2
1115 E. Harvard Blvd.	C-G	18		3*		15	18
1445 E. Main St.	C-G	36			9		9
714 W. Harvard Blvd.	C-G	35	7*	62*			69
18004 E. Telegraph Rd.	C-LI	25	83 (33 ELI)*	83*		132	298
895 Faulkner Rd.	C-G	25		37*		207	244
603 E. Main St.	C-G	43		7*		20	27
720 E. Main St.	C-G	67		12*			12
129-133 N. Mill St.	C-O	24		20*			20
Average Density		32.9					

*Deed-restricted units

Specific Plans

The City has adopted several specific plans that provide customized land use regulations. The largest specific plan with potential for additional residential development during the planning period is the East Area 1 Specific Plan (“Harvest at Limineira”). This specific plan area was annexed to the City in 2013 and development commenced in 2017.

The East Area 1 Specific Plan encompasses approximately 501 acres and allows a total of 1,500 residential units distributed among five planning areas. Chapter 5 of the specific plan describes development standards for a range of housing types including single-family, multi-family and live/work mixed-use projects in a “form-based code” system. This system does not limit maximum densities, and regulates development based on building configuration and physical layout on the site. The plan allows all types of residential uses

by-right, except senior housing in the CV (Civic Institutional) and RD (Railroad District) zones.

The density of residential development within the East Area 1 plan is controlled mainly by development standards such as height limit and setbacks, which are summarized in Table IV-5.

**Table IV-5
Residential Development Standards – East Area 1 Specific Plan**

Requirement	District						
	NE	NG-1	NG-2	NG-3	NC	RD	CV*
Minimum Front Yard (ft.)*	25	20	15	10	0	0	15
Minimum Rear Yard (ft.)**	25	25	25	25	4	4	10
Maximum Eave Height (ft.)	20	20	24	30	30	30	30**

Source: East Area 1 Specific Plan

NE=Neighborhood Edge

NG-1=Neighborhood General 1

NG-2=Neighborhood General 2

NG-3=Neighborhood General 3

NC=Neighborhood Center

RD=Railroad District

CV=Civic/Institutional

*Residential uses limited to senior housing and medical care facilities

**Tower features may be up to 50 ft.

Height limits are expressed as maximum eave height (rather than ridge) and range from 20 to 30 feet. These standards can accommodate 2- and 3-story buildings, which are sufficient to achieve densities in the range of 20-30 units/acre. Based on State law, this density is appropriate to facilitate lower-income housing in Santa Paula. Please refer to Appendix B for additional analysis of the realistic potential for additional housing during the planning period within this specific plan area.

Provision of Housing for Lower-Income Households

Low-income housing can be accommodated in all zones permitting residential use in Santa Paula, provided they meet site development standards. These may include multi-family units in residential or commercial zones, or accessory dwelling units that are permitted within all residential zones. Please refer to Appendix B for a more detailed discussion of affordability characteristics of housing in Santa Paula.

A summary of the residential uses permitted by the City's zoning regulations is provided in Table IV-6.

**Table IV-6
Allowed Residential Development by Zone**

Housing Type	HR-PD1	HR-PD2	R-A	R-1	R-1(a)	R-2	R-3	R-4	MHP	C-N	C-O	CBD	G-C	C/LI	LI
Single-Family Detached	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
Single-Family (duplex)						P	P	P	P	P	P	P	P	P	
Multi-Family						P	P	P		P	P	P	P	P	
Mobile or Manufactured Home	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
Accessory Dwelling Units	P	P	P	P	P	P	P	P		P	P	P	P	P	
Live/Work Studio										P	P	P	P	P	
Mixed Use										P	P	P	P	P	
Farm Worker Housing								C						C	C
Emergency Shelters											C		C	P	C
Transitional & Supportive Housing	**	**	**	**	**	**	**	**	**	**	**	**	**	**	**
SRO/Group Quarters								C					C		
Community Care Facility (6 or fewer)	**	**	**	**	**	**	**	**	**	**	**	**	**	**	**
Community Care Facility (7+)						C	C	C			C	C	C		
Assisted Living/ Convalescent Care						C	C	C		C	C	C	C		

P = Permitted C = Conditional Use Permit

*Permitted subject to minimum affordability requirements

**Permitted subject to the same standards as other residential uses of the same type in the same zone

Source: Santa Paula Developemnt Code 2021

f. Special Needs Housing

Persons with special needs include those in residential care facilities, persons with disabilities, farm workers, persons needing emergency shelter or transitional living arrangements, and single room occupancy units. Many of these groups also fall under the category of extremely low-income households. The City's provisions for these housing types are discussed below.

- **Extremely-Low-Income Households.** Many of the persons and households discussed in this section under the topic of special needs fall within the Extremely-low-income category, which is defined as 30% or less of area median income, or up to \$33,850 per year for a 4-person household in Ventura County (2021).

A variety of City policies and programs described in Chapter V address the needs of extremely-low-income households, including those in need of residential care facilities, and persons with disabilities. However, it must be recognized that the development of new housing for the lowest income groups typically requires significant public subsidies, and the level of need is greater than can be met due to funding limitations, especially during these times of declining public revenues.

Residential Care Facilities. Residential care facilities refer to any family home, group home, or rehabilitation facility that provide non-medical care to persons in need of personal services, protection, supervision, assistance, guidance, or training essential for daily living. State law provides that State-licensed residential care facilities serving six or fewer persons must be permitted as a single-family residential use. The Santa Paula Municipal Code currently defines *Community Care Facilities* as "Any facility, place, or building where six or more persons live together which is maintained and operated to provide nonmedical residential care, day treatment, or foster family agency services for children, adults, or children and adults, including, but not limited to, physically handicapped, mentally impaired, mentally incompetent persons, abused or neglected people, and substance abusers; which includes residential facilities, day treatment facilities, foster family homes, small family homes, social rehabilitation facilities, community treatment facilities, shelters for battered women, substance abuse treatment facilities and social day care facilities." Community Care Facilities are conditionally permitted in the R-2 through R-4 Zones and the C-O, CBD and C-G Zones with Convalescent Homes conditionally permitted in all of the Commercial Zones.

In July 2020, the Jackson House/Alvarado Parkway Institute Behavioral Health System approached the City about developing a 16-bed "Short-Term Crisis Residential Social Rehabilitation" facility – a sub-acute, voluntary program aimed at helping people struggling with behavioral and mental health issues that do not rise to a level requiring inpatient hospitalization, with typical stays of 24 hours to 21 days.

The City welcomed the project and advised that a Conditional Use Permit would be required from the Planning Commission. The City assisted in coordinating further support for the project from Ventura County Behavioral

Health and members of the Ventura County Board of Supervisors, and supported the conversion of an existing vacant 4,992-sf office building for the facility. The CUP was approved by the Planning Commission in October 2020, and a Certificate of Occupancy was granted in January 2022.

While the Jackson Housing project clearly demonstrates that current City regulations and procedures for large residential care facilities are not a constraint to persons with disabilities, Program 17 in the Housing Plan includes a commitment to review and amend the Municipal Code to ensure that requirements for community care facilities serving more than six persons are consistent with fair housing law, including replacing or modifying the CUP requirement to provide greater objectivity and certainty. In addition, the Code will be amended to allow residential care facilities serving up to 6 persons as a single-family use.

- **Housing for Persons with Disabilities.** Both the federal Fair Housing Act and the California Fair Employment and Housing Act impose an affirmative duty on local governments to make reasonable accommodations (i.e., modifications or exceptions) in their zoning laws and other land use regulations when such accommodations may be necessary to afford disabled persons an equal opportunity to use and enjoy a dwelling. The Building Codes adopted by the City of Santa Paula incorporate accessibility standards contained in Title 24 of the California Administrative Code. For example, apartment complexes of three or more units and condominium complexes of four or more units must be designed to accessibility standards.

Definition of "family". The Santa Paula Municipal Code defines family as: "One or more persons, related or unrelated, living together as a single housekeeping unit." This definition is consistent with fair housing law.

Maximum concentration, site planning constraints and parking. The Santa Paula Municipal Code (Chapter 16.64) prohibits an "over-concentration" of community care facilities (residential care facilities) where over-concentration is defined as "the presence of one or more community care facilities, or similar uses, located within three hundred (300) feet of a proposed community care facility site. "Community care facility is defined as having the same meaning as set forth in Health and Safety Code § 1502 where 6 or more persons live together. The development standards for licensed residential care facilities of 6 or fewer persons are no different than for other residential uses in the same zone. A conditional use permit is required for licensed residential care facilities and group homes of 6 or more persons.

Reasonable accommodation. To facilitate the review and approval of requests to reduce architectural obstacles for persons with disabilities, the City adopted a Reasonable Accommodation Ordinance in 2013 (SPMC Sec. 16.13.500 et seq.). Reasonable accommodation is defined as "any request by, or on behalf of, a disabled person for a reasonable deviation from the city's strict application of its land use or building regulations as set forth in this code, or as adopted by reference in this code, in order for such disabled person to use and enjoy a dwelling."

Requests for reasonable accommodation are reviewed and approved administratively by the Director within 30 days without the need for a public hearing. The following findings must be made in order to approve a request for reasonable accommodation:

(A) The parcel and/or housing, which is the subject of the request for reasonable accommodation, will be occupied as the primary residence by an individual protected under the Fair Housing Laws.

(B) The request for reasonable accommodation is necessary to make specific housing available to one or more individuals protected under the Fair Housing Laws.

(C) The requested reasonable accommodation will not impose an undue financial or administrative burden on the city.

(D) The requested accommodation will not require a fundamental alteration of the zoning or building laws, policies and/or other procedures of the city.

These procedures are consistent with fair housing law and do not pose a constraint on persons with disabilities. To facilitate the reasonable accommodation process, information is posted on the City website and City staff are available to answer questions upon request.

Building Codes. Compliance with accessibility standards contained in the Building Code may increase the cost of housing production and can also impact the viability of rehabilitation of older properties required to be brought up to current code standards. However, these regulations provide minimum standards that must be complied with in order to ensure the development of safe and accessible housing. In addition to providing disabled access in new construction projects, Santa Paula also provides funding for retrofitting existing rental and owner-occupied housing for ADA access under the City's Owner-Occupied and Rental Housing Rehabilitation Programs.

- **Farm Worker Housing.** Housing for agricultural employees occurs in two types of settings: housing accommodations located on farmland that is exclusively for farmworkers; or traditional housing that is intended for lower-income households but is not restricted to farmworkers.

The majority of farm laborers in the Santa Paula area are permanent non-migrant and seasonal workers. As such, the housing needs of farmworkers are primarily addressed through the provision of permanent affordable housing, such as apartments, lower-cost single-family homes, and mobile homes. Nevertheless, to provide additional sites for farmworker housing, especially for migrant farm workers, the City permits migrant farm labor camps/housing in the R-4 and C/LI and LI zones, subject to a CUP. Such farm labor housing is typified by (but not exclusively) dormitory style structures, and not individual dwelling units, designed for temporary occupancy by migrant workers. Housing for migrant families and single male farmworkers is accommodated through this process. The Development Code establishes standards for farm labor housing to ensure livability and compatibility with surrounding uses tied to the use and not the user, and is not a constraint to development. A use permit is an

appropriate mechanism due to the unique nature of farm labor housing within an Industrial zone. A public hearing is conducted before the Planning Commission, which typically takes approximately one and a half months to schedule after a project has been deemed complete.

The State Employee Housing Act⁴ regulates farmworker housing and generally requires that any employee housing providing accommodations for six or fewer employees shall be deemed a single-family structure with a residential land use designation, and facilities with no more than 36 beds (as group quarters) or 12 separate units be treated as an agricultural land use that is not subject to any conditional use permit that is not required of other agricultural uses in the same zone. In accordance with State law, the Municipal Code permits agricultural employee housing consistent with these requirements.

Emergency Shelters and Low Barrier Navigation Centers. An emergency shelter is a facility that provides shelter to homeless families or individuals on a short-term basis. Emergency shelters are permitted by-right in the Commercial/Light Industrial (C/LI) zone subject to the following development standards:

Emergency Shelter Development Standards in the C/LI Zone	
Maximum number of beds	60
Minimum separation from another shelter	300 ft.
Minimum floor area per bed	50 sq. ft.
Off street parking	1 space per 10 beds + 1 per employee
Management office on-site	

The C/LI zoning district is intended to provide for a mix of commercial, light industrial and residential uses that do not produce emissions of odor, dust, gas, fumes, smoke, glare, liquids, waste, noise, vibrations, disturbances or other similar impacts to surrounding properties. All operations are to be conducted entirely within enclosed buildings. This zone encompasses over 100 parcels with a total of approximately 135 acres, has vacant and underutilized parcels that could accommodate at least one shelter, and provides access to transit and other services. A majority of parcels range in size from 4,000 square feet to 9 acres, with an average parcel size of about 1.6 acres.

Emergency shelters are also conditionally permitted in the C-O, C-G, C-H and LI zoning districts.

To address recent changes enacted by AB 139 of 2019, Program 17 includes a commitment to update City parking standards for emergency shelters consistent with State law.

Spirit of Santa Paula operates a 49-bed year-round shelter and resource center for unsheltered homeless persons in Santa Paula which includes meal service, consulting for housing, healthcare, behavioral health, benefits, job opportunities and various other services. Phase 1 of the project involved conversion of an existing building (former nightclub/bar) into the current shelter facilities. Phase 2

⁴ California Health and Safety Code § 17021.5 and § 17021.6

of the project will consist of remodeling improvements to the existing building which will include: administration, shower facilities and classrooms. The City waived approximately \$50,000 in fees for the initial project to facilitate its development.

In 2019 the State Legislature adopted AB 101 establishing requirements related to local regulation of low barrier navigation centers, which are defined as “Housing first, low-barrier, service-enriched shelters focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing.” *Low Barrier* means best practices to reduce barriers to entry, and may include, but is not limited to:

- The presence of partners if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth
- Accommodation of residents' pets
- The storage of possessions
- Privacy, such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms”

Low barrier navigation centers meeting specified standards must be allowed by-right in areas zoned for mixed use and in nonresidential zones permitting multi-family uses. Program 15 in Chapter V includes a commitment to process an amendment to the Development Code in compliance with this requirement.

Transitional and Supportive Housing. Transitional housing is temporary (often 6 months to 2 years) housing for a homeless individual or family who is transitioning to permanent housing. Transitional housing often includes a supportive services component (e.g., job skills training, rehabilitation counseling) to allow individuals to gain necessary life skills in support of independent living. Supportive housing may have no occupancy time limit and provide more extensive supportive services.

Transitional and supportive housing are allowed as residential uses subject to only those requirements that apply to other residential uses of the same type in the same zone.

In 2018 AB 2162 amended State law to require that supportive housing be a use by-right in zones where multi-family and mixed uses are permitted, including non-residential zones permitting multi-family uses, if the proposed housing development meets specified criteria. Program 15 in Chapter V includes a commitment to process an amendment to the Development Code in compliance with this requirement.

- **Single Room Occupancy.** The SPMC defines Single Room Occupancy as:

A type of group quarters generally intended or designed to be used, rented, or occupied for sleeping or living purposes by guests, which is also the primary residence of those guests. This type of use commonly contains five or more guestrooms or efficiency units. Generally, each single room

occupancy (SRO) unit contains a living area, kitchen sink, cooking appliances and refrigeration facilities and a separate bathroom. A SRO hotel with more than 12 units generally contains an on-site manager's office.

SRO facilities are often occupied by extremely-low-income persons. This use is conditionally permitted within the High Density Residential (R-4) and the General Commercial (G-C) zones (under the term "Boardinghouse/Roominghouse"). Development standards for SRO facilities are no more restrictive than for other residential uses in that zone.

There are no minimum unit size requirements in the SPMC that would pose a constraint to SRO housing. SRO applications are processed in the same manner as other conditional uses in the R-4 zone. Required findings are as follows:

1. The proposed use at the particular location is necessary or desirable to provide a service or facility that will contribute to the general convenience or welfare of the neighborhood or the community;
2. The characteristics of the proposed use are not unreasonably incompatible with the types of use permitted in the surrounding areas;
3. The proposed use is consistent with the objectives, policies, general land uses, and programs of the Santa Paula General Plan; and
4. The proposed use will not, under the circumstances of the particular case, be detrimental to the health, safety, or general welfare of persons residing or working in the vicinity or injurious to property or improvements in the vicinity.

These existing regulations encourage and facilitate development of this type of housing by designating SROs as a conditionally permitted use in the R-4 and C-G zones. Requirements and procedures are no more restrictive than for other comparable types of projects. Although SROs would be permitted under the requirements described above, no applications have been received for this type of housing during the previous planning period.

g. Off-Street Parking Requirements

The City's parking requirements for residential zones vary by residential type, number of bedrooms, and parking needs. A two-car garage is required for a single-family residence. For larger single-family residences (five or more bedrooms), a three-car garage is required. Multi-family and second unit parking requirements are based on the number of bedrooms. Efficiency and one-bedroom units require 1.5 parking spaces, increasing up to 2.5 spaces for a 5 or more bedroom unit. Senior citizen studio/bachelor housing is permitted with reduced parking standards. Mobile home parks require two parking spaces for each unit. All multi-family developments as well as mobile home parks require one guest parking space per four units.

**Table IV-7
Residential Parking Requirements**

Type of Unit	Minimum Parking Space Required
Single Family Residence	2 spaces in a garage (4 or fewer bedrooms)
Mobile Home Park	2 spaces (may be tandem, 1 covered) 1 of which must be covered, plus 1 space per 4 units for guest parking
Multi-Family Dwellings/ Second Units	Efficiency/1-Bedroom: 1.5 spaces (1 covered) 2-Bedroom: 1.75 spaces (1 covered) 3-Bedroom: 2.0 spaces (1 covered) 4-Bedroom: 2.25 spaces (1 covered) 5-Bedroom: 2.5 spaces (1 covered) plus 1 space per 4 units for guest parking
Senior Citizen Housing	Bachelor/Studio located within ¼ mile of a shopping center or CBD: 1 space/3 units All other Senior Housing; 1 covered space per 2 units

Source: Santa Paula Development Code

The Housing Opportunities Overlay regulations⁵ allow reduced parking for affordable projects in the C/LI zone consistent with state Density Bonus Law.

h. Accessory Dwelling Units

Accessory dwelling units (ADUs) are attached or detached dwelling units that provide complete independent living facilities for one or more persons including permanent provisions for living, sleeping, cooking and sanitation, located on the same lot as the primary structure. In recent years the State Legislature has adopted several changes to ADU law. The City is currently in the process of preparing an amendment to the Municipal Code in conformance with current law (see Program 4 in Chapter V).

i. Density Bonus

Pursuant to State law (Government Code §65915 et seq.), cities and counties must provide a density increase above the otherwise maximum allowable residential density under the SPMC and the Land Use Element of the General Plan (or bonuses of equivalent financial value) when builders agree to construct housing developments with units affordable to low- or moderate-income households. AB 2345 (2019) amended State law to revise density bonus incentives that are available for affordable housing developments. Program 18 in Chapter V includes a commitment to amend the Development Code to include these changes to State density bonus law.

j. Inclusionary Housing

The City's inclusionary housing regulations were adopted in 2005 and amended in 2008 (Chapter 16.13.400 SPMC). These regulations establish minimum affordability requirements

⁵ Municipal Code Section 16.35.10

for new residential development of 10 units or more. Generally, developers must provide one of the following, or a hybrid combination, as a condition for project approval:

- Reserve at least 15% of all dwelling units in a project for low-income households; or
- Reserve at least 10% of all dwelling units in a project for very-low-income households; or
- Construct off-site inclusionary housing for low-income households equivalent to 17% of all dwelling units in a project; or
- Construct off-site inclusionary housing for very-low-income households equivalent to 12% of all dwelling units in a project; or
- Pay an in-lieu fee as established by City Council resolution. In-lieu fees are determined on the basis of the affordability gap between the market price or rent and the affordable price or rent, and therefore will vary from project to project.
- As an alternative to the inclusionary housing ordinance, developers may seek approval of an Affordable Housing Plan that utilizes a combination of affordable housing production and in-lieu fees.

While the inclusionary ordinance could increase development costs due to subsidies necessary to facilitate construction of lower-income housing, these costs are offset by significant increases in land value that accrue from the development entitlements granted by the City. Incentives and concessions such as density bonus and modifications to development standards help to mitigate the financial impacts of these requirements in compliance with State law.

k. Mobile Homes/Manufactured Housing

There is often an economy of scale in manufacturing homes in a plant rather than on site, thereby reducing cost. State law precludes local governments from prohibiting the installation of mobile homes on permanent foundations on single-family lots. It also declares a mobile home park to be a permitted land use on any land planned and zoned for residential use, and prohibits requiring the average density in a new mobile home park to be less than that permitted by the Municipal Code.

There are six mobile home parks in Santa Paula with approximately 771 units. Larger mobile home parks include Rancho Santa Paula (149 spaces), Santa Paula West (195 spaces), The 400 Mobile Estates (165 spaces), the Oaks Mobile Home Estates (92 spaces), and the Anacapa Mobile Home Park (80 spaces). The majority of mobile home park residents are seniors and lower-income families. All six existing mobile home parks are located within a Mobile Home Park Zone. To ensure the affordability of the mobile home stock, the City has implemented the Mobile Home Rent Review Ordinance to regulate the amount of space rent increases. Manufactured homes are permitted in all residential zones, subject to design review.

I. Condominium Conversions

In order to reduce the impacts of condominium conversions on residents of rental housing and to maintain a supply of rental housing for low- and moderate-income persons, the City's SPMC provides for the following:

1. Tenants must be provided a 180-day notice of tenancy termination, and shall have the exclusive right to purchase the unit on at least as favorable terms and conditions as such units are offered to the general public. Any tenant over the age of 62, handicapped, or with minor dependent children, shall be given an additional 60 days to relocate.
2. The applicant must provide relocation assistance equal to three months rent at the time the notice of tenancy termination is given. Relocation assistance must also include provision of a complete and current list of available rental units within a three-mile radius of the building being converted. If the conversion project consists of 25 or more dwelling units, the developer must provide a relocation specialist to assist the tenants.

To maintain a supply of rental housing for low- and moderate-income persons, the SPMC requires that from the date of application for conversion, no tenant can be unjustly evicted, and places limitation on rent increases. In addition, conversions are only permitted if the current vacancy for rental units not less than 2.45%, or mitigating circumstances exist which justify approval of the conversion.

As a result of these requirements, the potential impact of condominium conversions is not a significant constraint on the preservation of affordable rental housing.

m. Building Codes

State law prohibits the imposition of building standards that are not necessitated by local geographic, climatic or topographic conditions and requires that local governments making changes or modifications in building standards must report such changes to the Department of Housing and Community Development and file an expressed finding that the change is needed.

The City's building codes are based upon the California Building, Plumbing, Fire, Mechanical, Electrical, Housing, Building Conservation and Energy Codes, and the International Property Maintenance Code. These are considered the minimum necessary to protect the public's health, safety and welfare. Although minor amendments have been incorporated to address local conditions, no additional regulations have been imposed by the City that would unnecessarily add to housing costs.

2. Residential Development Processing Procedures

State Planning and Zoning Law provides permit processing requirements for residential development. Within the framework of state requirements, the City has structured its development review process to minimize the time required to obtain permits while ensuring that projects receive careful review.

The City's development review process and approval periods are streamlined to the maximum extent possible. The City employs various strategies, in addition to being a "one-stop shop," in order to streamline the permitting process. Planning staff functions as a permit coordinator to assist the applicant with the process and to monitor the day-to-day status of the project. Also, Economic Development staff is available to advise applicants of financial assistance, which may be available in certain cases.

The City's land use entitlement process consists of various stages, including the initial filing of application, staff review, environmental review (if required), and in some cases, public hearings before the Planning Commission and/or City Council. Projects that are permitted by-right (Including residential in commercial zones) do not require a public hearing.

- *Pre-application* – At the applicant's discretion, the application process may begin with a meeting with representatives from the Planning Department and other departments requested by the applicant, including Building and Safety, Public Works, Fire, and Economic Development. Staff recommends that the applicant take advantage of pre-application meetings to clarify the submittal requirements and review potential problems before the applicant begins significant planning or preparation work on a project. When the applicant is ready to proceed, s/he submits application materials to planning staff for review.
- *Staff Review of Applications* – After submittal, the completed development application is distributed to various departments for a review typically lasting 7 to 14 days. Staff can usually respond so efficiently, compared to the 30 days allowed under the Permit Streamlining Act, because the City offers a "one-stop shop," whereby the Planning, Building and Safety, and Public Works departments, are all within close proximity to one another, with several of the departments located in the same building. This ensures close cooperation and expedited project review. Design review takes place during this stage of the process.

Project review is a semi-formal process intended to be helpful to applicants by providing them with constructive staff comments on projects. The Project Review Committee consists of the Planning Director, Public Works Director/City Engineer, Building and Safety Director and representatives of other departments that have an interest in the project, such as the Ventura County Fire and Santa Paula Police departments. The Committee reviews all projects requiring building permits except for single-family homes on existing lots, additions to single-family homes, accessory structures other than carports on single-family lots and interior modifications. The review focuses primarily on the functionality of the project, applicability of City codes and other laws, and secondarily on the aesthetic quality of the project. The Project Review Committee has final review on matters that do not go to Planning Commission or City Council. On Planning Commission and City Council items, the decision of the Committee is advisory only.

At the end of this review period, Planning staff informs the applicant of any corrections or changes needed to make the project conform to various City codes and requirements.

- *CEQA Review* – Once the application has been deemed complete by the Planning Department, staff determines whether CEQA analysis is necessary. Housing developments that are permitted by-right are exempt from CEQA analysis pursuant to CEQA Guidelines §15060, and other projects may be eligible for streamlined review under §15183.3. Residential developments that are not exempt are subject to environmental review (initial study) to determine whether the project will result in negative environmental impacts. In general, the larger the project, the more likely a review will be necessary. Environmental reviews may last as short as 30 days if no significant impacts are unresolved, or up to a year or longer if a comprehensive Environmental Impact Report (EIR) is required. Given the relatively small size of projects in Santa Paula, and the fact that most are infill, EIRs are rarely deemed necessary, with mitigated negative declarations (MND) more typically prepared. Preparation of an MND generally adds approximately 3 to 6 months to the process prior to the application being deemed ready for public hearing, including the 30-day public review period and a 10-day public comment period.
- *Public Hearings* – If required, staff schedules the project for a hearing to discuss the discretionary approval once the environmental review is completed. Some permits require Planning Director approval (Administrative Hearings) while others must be reviewed by the Planning Commission, while some may also require City Council review. For simpler projects requiring only Planning Director approval processing time averages 1 to 3 months. On average, a minimum of 2½ months is needed to schedule a simple project for a hearing before the Planning Commission and 3½ months to bring it to the City Council. More complex projects requiring legislative review, such as those requiring a General Plan Amendment (GPA) or zone change, generally take an additional three to six months. The City also offers “fast track” case processing at a cost of double the original application fee.

Required findings for approval. The Development Code establishes different review procedures for residential or mixed-use projects depending on the characteristics and location of the project. As discussed previously (see Table IV-6), residential developments may be “permitted uses” or “conditional uses” with different findings that must be made in order to approve a development project. Findings are legal requirements based on State planning law and cities are required to justify the findings with substantial evidence. The City is currently in the process of revising the Development Code to replace many discretionary permits with a ministerial process based only on objective standards to improve development certainty and minimize constraints (see Program 20).

As described above, Santa Paula’s development review process is streamlined and not overly burdensome. The City’s processing procedures are designed to cut development costs by eliminating unnecessary delays to developers and do not unduly constrain the development of housing in the City. These procedures help to ensure that the development review process meets all legal requirements without causing a significant unwarranted constraint to housing development. The typical time from entitlement approval to application for building permits is 60–90 days.

Requests to develop at less than the allowable density. Recent residential development applications have typically requested densities at or near the allowable maximum.

3. Development Fees and Improvement Requirements

State law limits fees charged for development permit processing to the reasonable cost of providing the service for which the fee is charged. Various fees and assessments are charged by the City and other public agencies to cover the costs of processing permit applications and providing services and facilities such as schools, parks and infrastructure. Almost all of these fees are assessed through a pro rata share system, based on the magnitude of the project's impact or on the extent of the benefit that will be derived.

Public agencies that levy fees in Santa Paula, either directly or indirectly through the City, include:

- City of Santa Paula, Building & Safety Department
- City of Santa Paula, Planning Department
- City of Santa Paula, Public Works Department
- The Santa Paula Unified School District
- The Briggs School District
- The Mupu School District
- The County of Ventura Flood Acreage Assessment Fee
- The County of Ventura Traffic Impact Mitigation Fee
- The State of California SMIP (strong motion instrumentation program) Fee.

Planning and building fees charged by the City are comparable to those levied in surrounding cities and thus not considered to be a constraint. In addition, the fees are evaluated by the City Council annually to ensure that they are reasonable and do not unduly constrain development. The most recent fee schedule update was adopted by the City Council in 2017.

Many California cities assess development or impact fees to finance the costs of providing additional public infrastructure, facilities and needed services for new residential development. The impact fees currently levied by the City of Santa Paula include fees for law enforcement, general government, library expansion, public meeting, parkland, storm drain facilities, water distribution facilities, sewer collection facilities, and traffic impact mitigation. As of 2019, the impact fee for single-family residential units is \$31,225 and for mobile homes the fee is \$25,774. In addition, through a reciprocal agreement with the City, the County levies a traffic impact fee within Santa Paula of approximately \$742 per single-family unit, \$520 for other unit types, and \$225 per senior housing unit.

Table IV-8 shows the development fees associated with a hypothetical 120-unit, market-rate apartment project. The development fees assume that the project is consistent with the General Plan and zoning.

**Table IV-8
Summary of Multi-Family Development Fees**

Number of Units		120
Square Footage		110,000
School Fees		
Mupu School District		
Santa Paula Unified School District	\$4.08/sft	\$448,800
Briggs School District		-
Santa Clara School District		-
Total School Fees		\$448,000
City of Santa Paula Public Works Fees		
Development Impact Fees	\$29,679/unit	\$3,561,480
Water Resource In-lieu Fee	\$8,360/unit	\$1,003,202
Engineering Plan Review		\$1,200
City of Santa Paula Building & Safety Fees		
Building Permit/Inspection Fee	\$500/unit	\$60,000
City of Santa Paula Planning Fees		
Concept/Pre-Application Review by staff		\$2,000
Design Review		\$1,000
Landscape Plan Review		\$1,000
Plancheck Review	\$645	\$645
Miscellaneous City Fees		
Legal Advertising/Noticing		\$2,000
Attorney Fee		\$1000
Inclusionary Housing In-Lieu Fee Calculations		\$800
County Traffic Impact Fees	\$720/unit	\$73,680
Total Estimated Fees (including all non-City fees)		\$4,775,225
Estimated Cost Per Unit		\$42,973
Estimated % of total development cost		12%

Source: City of Santa Paula, 2021

*Minimum deposit to cost

The total development fees identified in Table IV-8 represent the estimated fees to process and build a 120-unit apartment project. Because many of the fees are “deposit to cost,” the precise cost of development fees cannot be tabulated. However, the cost per unit and per square foot is useful as a general rule of thumb for estimating development fees. The City periodically evaluates the actual cost of processing the development permits when revising its fee schedule. The development permit fee schedule was most recently evaluated and revised in January 2017.

City road improvement standards vary by roadway designation as provided in Table IV-9.

**Table IV-9
Road Improvement Standards**

Roadway Designation	Number of Lanes	Right-of-Way Width (feet)	Curb-to Curb Width (feet)
Major Arterial (Divided)	4 to 6	112 to 128	96
Arterial	2 to 4	80	64
Minor Arterial	2	76	52
Residential Collector Street	2	60 to 72	40
Residential Street	2	56 - 68	36

Source: City of Santa Paula General Plan – Circulation and Mobility Element, 2021

A local residential street requires a 56- to 68-foot right-of-way, with two 18-foot travel lanes and 10- to 16-foot side/parkway areas. Residential estate streets require a 60-foot right-of-way with two 16-foot travel lanes with 4-foot gravel shoulders and 10-foot parkway areas without sidewalks. The City's road standards are typical for cities in Ventura County and do not act as a constraint to housing development.

After the passage of Proposition 13 and its limitation on local governments' property tax revenues, cities and counties have faced increasing difficulty in providing public services and facilities to serve their residents. One of the main consequences of Proposition 13 has been the shift in funding of new infrastructure from general tax revenues to development impact fees and improvement requirements on land developers. The City requires developers to provide on-site and off-site improvements necessary to serve their projects. Such improvements may include water, sewer and other utility extensions, street construction and traffic control device installation that are reasonably related to the project. Dedication of land or in-lieu fees may also be required of a project for rights-of-way, transit facilities, recreational facilities and school sites, consistent with the Subdivision Map Act.

The City's Capital Improvement Program (CIP) contains a schedule of public improvements including streets, bridges, overpasses and other public works projects to facilitate the continued build-out of the City's General Plan. The CIP helps to ensure that construction of public improvements is coordinated with private development.

Although development fees and improvement requirements increase the cost of housing, cities have little choice in establishing such requirements due to the limitations on property taxes and other revenue sources needed to fund public improvements.

B. Non-Governmental Constraints

1. Environmental Constraints

Environmental constraints include physical features such as steep slopes, fault zones, floodplains, sensitive biological habitat, and agricultural lands. In many cases, development of these areas is constrained by state and federal laws (e.g., FEMA floodplain regulations, the Clean Water Act and the Endangered Species Act, and the state Fish and Game Code and Alquist-Priolo Act). The City's land use plans have been

designed to protect sensitive areas from development, and to protect public safety by avoiding development in hazardous areas. While these policies constrain residential development to some extent, they are necessary to support other public policies.

2. Infrastructure Constraints

Infrastructure and public facilities are important in evaluating the potential of developing additional residential units. While Santa Paula has the major infrastructure components in place (e.g., wastewater treatment plant, water system), the significant issue is the continued maintenance of these facilities. The City has utilized a “pay as you go” system in which land developers must pay connection fees that cover utility line extensions and a pro-rata share of the cost of expansion of system capacities necessitated by new development.

Both the City's water and sewage treatment systems are adequate to serve current and foreseeable future needs. A new water recycling facility commenced operations in 2010 and is expected to be adequate to provide water treatment services through the planning period (2029).

Gas, electricity, and telephone services are provided by Southern California Gas Company, Southern California Edison, and Verizon Communications (telephone and DSL internet) respectively. All systems are adequate and are upgraded as demand increases.

Due to the City's long history of flooding, and continuing risks of new flooding events, proper drainage is a core component of the City's flood management strategy. Locally, storm water runoff is handled by a flood control collection system maintained by the City's Public Works Department. The local storm water collection system feeds into a regional system owned and maintained by the Ventura County Watershed Protection District. Surface drainage utilizes streets and gutters until it reaches catch basins. Individual development projects extend local storm drains or participate in reimbursement districts to defray installation costs for trunk lines. The Storm Drain Master Plan addresses areas within the city that currently have no storm drain systems or have systems in need of upgrading.

The five school districts serving Santa Paula charge school fees to help pay for buildings and facilities. Parks are developed and maintained by the City using fees or land dedication required as part of development approvals in compliance with the Quimby Act.

To the extent possible, the City requires developers to dedicate land and improve internal streets and bordering streets as part of the subdivision process.

A review of the City's on- and off-site improvement requirements indicates that current requirements are similar to those of surrounding communities. Required improvements such as street widths, covered parking, park dedication and circulation improvements are within the typical range of improvements required by surrounding communities.

3. Land and Construction Costs

Land represents one of the most significant components of the cost of new housing. Changes in land prices reflect the cyclical nature of the residential real estate market. Current (2021) estimates of residential land cost range from \$300,000 to \$375,000 per acre.

Per-unit land cost is directly affected by density – higher density allows the cost to be spread across more units, reducing the total price. The City has approved residential projects at densities up to 55 units per acre, which has facilitated the production of affordable housing.

Construction cost is affected by the price of materials, labor, development standards and general market conditions. The City has no influence over materials and labor costs, and the building codes and development standards in Santa Paula are not substantially different from most other cities in Ventura County.

Program 9 in the Housing Action Plan (Workforce and Senior Housing Development) responds to high land and construction costs directly through the granting of land write-downs, regulatory incentives, and direct financial assistance to private developers to provide both ownership and rental housing to lower- and moderate-income households. The program also assists non-profit developers in acquiring and assembling properties and in subsidizing on-site and off-site requirements. The program allows for the City to use a combination of CDBG and redevelopment set-aside funds to write down the cost of land to facilitate affordable housing development.

4. Cost and Availability of Financing

Santa Paula is similar to most other communities with regard to private sector home financing programs. The City's Mortgage Credit Certificate (MCC) Program provides a federal tax credit for income-qualified homebuyers equivalent to 15% of the annual mortgage interest. In addition, the City has assisted in financing affordable housing projects through HOME grant funds, mortgage revenue bonds and low income housing tax credits.

For those homebuyers with good credit who can qualify, interest rates are currently at historic lows, which improves housing affordability.

Under State law, it is illegal for real estate lending institutions to discriminate against entire neighborhoods in lending practices because of the physical or economic conditions in the area ("redlining"). In monitoring new construction sales, resales of existing homes, and permits for remodeling, it does not appear that redlining is practiced in any area of the city.

V. HOUSING ACTION PLAN

A. Goals and Policies

Chapters II, III and IV of the Housing Element evaluate the City's housing needs, opportunities and constraints, while Appendix A presents a review of the previous element. This Housing Action Plan sets forth the City's goals, policies, and programs to address the identified housing needs and issues for the 2021-2029 planning period. Quantified Objectives for new construction, rehabilitation and conservation are also identified for this planning period.

The goals and policies that guide the City's housing programs and activities are as follows:

Housing Conservation and Maintenance

GOAL 1 *To conserve and improve the quality of existing housing and residential neighborhoods in Santa Paula.*

Policy 1.1 Maintain and improve the quality of residential properties by ensuring compliance with housing and property maintenance standards.

Policy 1.2 Provide home improvement and rehabilitation assistance to lower- and moderate- income households, seniors, and the disabled.

Policy 1.3 Promote the repair, rehabilitation, or improvement of residential structures that are substandard or in disrepair.

Policy 1.4 Continue participation in State and federally sponsored programs designed to maintain housing affordability, particularly the Section 8 rental assistance program administered by the Santa Paula Housing Authority.

Policy 1.5 Continue to implement the mobile home rent review ordinance to ensure the affordability of mobile homes.

Policy 1.6 Replace any low- or moderate-income units removed by public actions on a one-for- one basis. Consider adopting a local Relocation Ordinance to provide tenant protections in the event of mobilehome park closures.

Provision of Housing

- GOAL 2** **To assist in the provision of adequate housing to meet the needs of the community. Establish a balanced approach to meeting housing needs that includes the needs of both renter and owner-households.**
- Policy 2.1 *Encourage the production of housing that meets all economic segments of the community, including lower-, moderate-, and upper-income households to achieve a balanced community.*
- Policy 2.2 *Provide financial and/or regulatory incentives where feasible to encourage the development of affordable housing.*
- Policy 2.3 *Participate in homeownership assistance programs to enable lower- and moderate-income renters to move into homeownership.*
- Policy 2.4 *Support the provision of rental housing to accommodate large families and agricultural workers.*
- Policy 2.5 *Facilitate the development of senior housing with supportive services.*
- Policy 2.6 *Pursue state, federal and other funding sources for housing activities to leverage local funds and maximize assistance.*
- Policy 2.7 *Continue implementation of the City's Inclusionary Housing regulations.*

Provision of Adequate Housing Sites

- GOAL 3** **To provide adequate housing sites through appropriate land use and zoning designations to accommodate the City's share of regional housing needs.**
- Policy 3.1 *Maintain an up-to-date inventory of potential sites available for future housing development, and provide to the development community. Identify sites for potential redesignation to multi-family residential use.*
- Policy 3.2 *Encourage infill and mixed-use housing development in downtown Santa Paula and other suitable infill locations, and provide, where appropriate, incentives to facilitate such development.*
- Policy 3.3 *Pursue phased annexation of land located within the City's Sphere of Influence to provide additional growth opportunities consistent with infrastructure capacities.*
- Policy 3.4 *Provide adequate housing sites for special needs groups, including the elderly, homeless, and agricultural workers, through appropriate zoning designations and regulations.*
- Policy 3.5 *Support the development of second units at appropriate locations as a means to provide additional housing opportunities on existing lots.*
- Policy 3.6 *Implement SB 2 in accordance with state law.*

Removal of Governmental Constraints

- GOAL 4** **To mitigate any potential governmental constraints to housing production and affordability.**
- Policy 4.1 Offer financial and/or regulatory incentives, including density bonuses, where feasible to off-set or reduce the costs of developing affordable housing.
- Policy 4.2 Periodically review City regulations, ordinances, and residential fees to ensure that they do not unduly constrain housing development.
- Policy 4.3 Incorporate positive incentives to the development of affordable housing in any future revisions to the Growth Management regulations.

Equal Housing Opportunity

- GOAL 5** **To promote equal opportunity for all residents to reside in the housing of their choice.**
- Policy 5.1 Continue to enforce fair housing laws prohibiting arbitrary discrimination in the building, financing, selling or renting of housing on the basis of race, religion, family status, national origin, physical disability or other such circumstances.
- Policy 5.2 Continue to financially support the provision of fair housing services to City residents.
- Policy 5.3 Promote housing which meets the special needs of large families, elderly persons, agricultural workers and the disabled.

Sustainable Growth

- GOAL 6** **To promote sustainable growth by encouraging well-planned new growth, maximizing existing infrastructure, and supporting vibrant city centers.**
- Policy 6.1 Recognize and preserve open space, watersheds, environmental habitats, and agricultural lands, while accommodating new growth in compact forms, in a manner that de-emphasizes automobile dependency, integrates the new growth into existing communities, creates a diversity of affordable housing near employment centers, and provides for job opportunities for people of all ages and income levels.
- Policy 6.2 Accommodate additional growth by first focusing on the use and reuse of existing urbanized lands supplied with infrastructure, with an emphasis on reinvesting in the maintenance and rehabilitation of existing infrastructure.

Policy 6.3 Give preference to the redevelopment and reuse of city centers and existing transportation corridors by supporting and encouraging: (1) mixed use development; (2) housing opportunities for all income levels; (3) safe, reliable and efficient multi-modal transportation systems; (4) retaining existing businesses; and (5) promoting new business opportunities which produce quality local jobs.

B. Housing Programs

This section describes the City's housing programs for the 2021-2029 planning period. Housing programs define the specific actions the City will undertake to achieve the goals and policies listed above.

Housing Conservation and Maintenance

1. Owner-Occupied Housing Rehabilitation Program

The Owner-Occupied Housing Rehabilitation Program aims to upgrade the housing stock by facilitating the correction of substandard conditions in owner-occupied homes. Through this CDBG-funded program, the City offers low-interest loans to lower-income homeowners to assist them in making necessary home repairs.

Responsible Agency: Community Development Department

2021-2029 Objectives: Assist 40 owner-households during the planning period, 10 households each in income levels extremely-low, very-low, low and moderate.

2. Rental Housing Rehabilitation Program

To help improve the quality of the rental housing stock, the City offers the Rental Housing Rehabilitation Program. This CDBG-funded program provides low-interest improvement loans for rental property owners to address substandard conditions. Due to the limited availability of funds and State contracting requirements, eligible projects are limited to rental properties consisting of four or fewer units with a minimum of 51% of the units occupied by lower-income (80% of Median Family Income) renters.

Responsible Agency: Community Development Department

2021-2029 Objectives: Provide loans to 3 rental housing developments for low-income tenants during the planning period.

3. Housing Code Enforcement Program

The City has adopted and enforces the Uniform Housing Code which establishes minimum habitability requirements. Potential code violations are identified on a complaint basis. Once a potential violation is identified, Code Enforcement staff performs a property inspection and if necessary, code citations are issued to the property owner. The owner is informed of rehabilitation assistance programs available through the City, and is given a reasonable amount of time to correct

the code violation(s). City staff may also meet with property owners to assist in resolving the violations.

Responsible Agency: Community Development Department

2021-2029 Objectives: Continue to implement the Code Enforcement program to bring all substandard housing units into compliance with the Uniform Housing Code. The City's objective is to maintain a staffing level of 1 full-time person to continue implementing the Code Enforcement Program. City sponsoring of a neighborhood workshop to inform residents of assistance programs will be conducted.

4. Section 8 Rental Assistance Program

The Section 8 Rental Assistance Program extends rental subsidies to very-low-income households (50% or less of Median Family Income) who spend more than 30% of their gross income on housing. Rental assistance not only addresses housing affordability, but also overcrowding by allowing families that may be "doubling up" to afford their own housing. In addition to tenant-based Section 8 voucher assistance, the Housing Authority owns the 22-unit El Dorado Apartments restricted for occupancy by very-low-income households.

Responsible Agency: Santa Paula Housing Authority

2021-2029 Objectives: Assist the Housing Authority in publicizing the Section 8 rental assistance program on the City website and conduct a minimum of two community engagement events per year to encourage property owners to list available rentals with the Housing Authority.

5. Mobile Home Park Tenant Protections

The City is committed to the preservation of mobile home parks as affordable housing for Santa Paula's working families and seniors. As part of the Land Use Element update in 1998, the City established the Mobile Home Park residential land use designation for the long-term preservation of mobile home parks. With this designation in place, a park owner seeking closure would have to first justify a zone change to the Planning Commission and City Council, and comply with State regulations governing mobile home closures. Six existing mobile home parks currently have the Mobile Home Park land use designation, including the Anacapa Mobile Home Park (80 mobile home spaces), Rancho Santa Paula (149 spaces), the Santa Paula West Mobile Home Park (195 spaces), The 400 Mobile Estate (165 spaces), The Oaks Mobile Home Estates (92 spaces), the Peppertree (44 spaces) and the Mountain View Mobile Home Park (46 spaces).

For parks not deemed economically viable, most of which are travel trailer parks, the Land Use Element update process defined appropriate long-term use for the sites on which these parks are located. These parks may maintain their current use. However, at such time as a park owner chooses to convert a facility, the City will enforce State-established mobile home park closure requirements (*Government Code §65863.7*), including the preparation of a relocation impact report (RIR) to assess the impact of park closure on park residents. The RIR must

address the availability of adequate replacement housing in mobilehome parks and relocation costs.

Responsible Agency: Community Development Department

2021-2029 Objectives: Preserve the existing viable mobile home stock as affordable housing for lower- and moderate-income residents, seniors, and persons on fixed income. Where parks are proposed for closure, the City will ensure adherence to State closure requirements and local relocation requirements to provide appropriate tenant protections.

6. Rent Stabilization and Just Cause Eviction Protections

Recognizing that mobile homes are often owned by seniors, persons on fixed incomes, and low- and moderate-income persons, the City maintains the Mobile Home Rent Stabilization Program to protect residents of mobile home parks from excessive rent increases. The program regulates the amount of an allowable space rent increase upon vacation, either by sale or when a resident leaves a mobile home space in a park, while at the same time providing a just and reasonable return to park owners. A three-member Mobile Home Rent Review Commission was established to review and determine rent adjustment applications, to adjust maximum rents either upward or downward or maintain rents. The maximum permitted rent is the rent in effect on December 31, 1991, plus adjustments made since then. Under this program, annual rent adjustments based on the consumer price index (CPI) are permitted. In February of each year, the rent may be increased to an amount equal to the rent in effect on January 31st of the prior year adjusted by 75% of the increase in the CPI. Rent adjustments may also be made based on capital improvements, upon vacancy, on discontinuance or reduction of a service or amenity, or by appeal.

In addition to mobile home residents, other low- and moderate-income tenants may have difficulty affording increasing rents.

Responsible Agency: Community Development Department

2021-2029 Objectives:

Continue to implement the Mobile Home Rent Stabilization Program to maintain the affordability of mobile home spaces.

The City will conduct a study by October 2023 of the feasibility of maintaining affordable rental housing through a variety of means, including expanding the Mobile Home Rent Stabilization Program to other residential rentals and adopting local just cause eviction regulations.

7. Mobile Home Park Resident Ownership Program

The State Mobile Home Park Resident Ownership Program (MPROP) assists resident organizations, non-profit housing providers, or local public agencies in acquiring mobile home parks in order to preserve their long-term affordability.

Responsible Agency: Community Development Department

2021-2029 Objectives: Provide information on the MPROP program on the City website and distribute information directly to interested mobile home park tenants bi-annually. Where parks are deemed economically viable, the City will support tenant applications for funding through MPROP.

Assisting in the Provision of Housing

8. Mortgage Credit Certificate

The Mortgage Credit Certificate (MCC) program is a federal program that allows qualified first-time homebuyers to take an annual credit against federal income taxes of up to 15% of the annual interest paid on the applicant's mortgage. This enables homebuyers to have more income available to qualify for a mortgage loan and make the monthly mortgage payments. The value of the MCC must be taken into consideration by the mortgage lender in underwriting the loan and may be used to adjust the borrower's federal income tax withholding. The MCC program has covenant restrictions to ensure the affordability of the participating homes for a period of 15 years. The City of Santa Paula participates in the MCC program through the County of Ventura.

Responsible Agency: County of Ventura

2021-2029 Objectives: Through the County, the Successor Agency will continue to provide MCCs to qualified first-time homebuyers. The objective is to provide a minimum of eight MCCs over the planning period, subject to availability through the County. The Successor Agency will advertise the availability of this program through program brochures at the public counter and posting on the City's website.

9. Workforce, and Special Needs Housing Development

A significant number of Santa Paula households are lower-income. Most of these are working families with wage earners in low-paying occupations, including farm laborers, factory workers, and service workers. Because of their limited incomes, many families live in overcrowded and/or substandard conditions. In addition, persons with special needs, such as seniors, large families, single-parent families, farmworkers and persons with disabilities, also have significant housing needs.

Non-profit housing organizations have played a key role in providing affordable housing for lower-income working families and persons with special needs in Santa Paula. The City can provide financial and regulatory incentives to developers of affordable housing for lower- and moderate-income households, including working families and those with special needs.

The City will work with non-profit developers and self-help housing organizations to provide additional rental and ownership housing opportunities for extremely-low-income and very-low-income households, such as agricultural workers. The City may assist developers in acquiring and assembling properties and in subsidizing on- and off-site improvements. The City may also use a combination of Affordable Housing Trust Fund, the Housing Trust Fund of Ventura County and

State or federal grant funds to write down the cost of land to facilitate affordable housing development.

Underutilized multi-family parcels provide opportunities for infill affordable housing projects in existing neighborhoods. Such projects can not only provide quality housing to needy residents, but also help to stabilize and improve older neighborhoods. To promote housing development on underutilized sites, the City will provide financial assistance when feasible, grant regulatory concessions, or incentives to encourage and facilitate new, or more intense, residential development on the sites, and evaluate the effectiveness of these efforts to encourage housing development on nonvacant sites annually.

Responsible Agency: Community Development Department

2021-2029 Objectives: Provide financial and regulatory incentives to developers to increase the supply of affordable and special needs housing in Santa Paula, including infill projects in underutilized multi-family neighborhoods. The City will focus a portion of assistance towards rental and ownership projects meeting the needs of extremely-low-, very-low- and low-income renters, including large families, agricultural workers, and persons with developmental disabilities. The City will support the efforts of the Housing Trust Fund of Ventura County contributing funds (from sources such as in-lieu fees, development agreements, inclusionary housing and/or grant funding) to support its provision of short-term, pre-development, acquisition, and construction funding to developers of affordable housing. In addition, the City will support creation of a county-wide dedicated source of funding for affordable housing.

10. Multi-Family Housing Acquisition and Rehabilitation

The acquisition and rehabilitation of existing duplexes and apartment complexes can assist in stemming neighborhood deterioration and in providing decent affordable housing to lower-income households. Under this program, the City provides funds from such programs as CDBG, HOME, or Rural Housing and Economic Development funds to a developer (typically a non-profit organization) to purchase a deteriorated multi-family rental property. Typically, City staff would work with a developer to assist in securing grant funds from these entities. City involvement could include review of pro forma analyses, provision of available demographic or other background data necessary to complete applications, letters of support, City Council actions in support of the application, and willingness to monitor compliance with provisions of the grant within the limitations of existing workload. Many "third-party" grants require some form of local financial commitment. In such cases, the City would review the financial terms of the transaction and, within legal limits that may apply, would work to provide such financial commitment.

At such time as the financing is completed, the property is then rehabilitated and the units are made available to lower-income households for a minimum period of time. Successful implementation of this program depends upon the availability of outside funding sources, City staff resources, the interest of local non-profits, and a developer to secure such funding. The 56-unit Santa Paula

Village provides an example of a deteriorated project that was acquired by a non-profit, rehabilitated and made available at affordable rents.

Responsible Agency: Community Development Department

2021-2029 Objectives: Identify deteriorated apartment complexes and cooperate with non-profit housing corporations to acquire and rehabilitate 10 units during the planning period with long-term affordability controls.

11. Affordable Housing Funding Sources

To effectively implement Housing Element programs that create affordable housing depends on a variety of county, state, federal, and local funding sources. The various funding programs available to Santa Paula are outlined in Chapter IV, Resources and Opportunities. The City will assist affordable housing developers in seeking grant funds by providing background data necessary to complete applications, review and comment on draft applications, providing letters of support, City Council resolutions or other actions in support of applications, and assistance in monitoring compliance with grant requirements to the extent feasible.

Other affordable housing funding options the City will explore include:

- City and County affordable housing trust funds in collaboration with other Ventura County jurisdictions and housing organizations,
- Housing Land Trust Ventura County to facilitate the donation of land suitable for development in the short-term (5-8 years) for permanent affordable housing sites,
- A local rental assistance program funded through a variety of sources including CDBG and HCD, and
- Affordable housing linkage fees on large-scale commercial or industrial developments that significantly increase the need for affordable housing.

Responsible Agency: Community Development Department; Housing Land Trust Ventura County

2021-2029 Objectives: Actively monitor and pursue state, federal and private funding sources as a means of leveraging local funds and maximizing assistance. The City will support housing grant applications both through regulatory relief offered through the Density Bonus Ordinance and through City Council endorsement/support of funding applications.

The city will partner with Housing Land Trust Ventura County (HLTV) (incorporated December 17, 2020, 501(c)3 status pending.) HLTV will acquire and hold property indefinitely, primarily for conveyance under long-term ground leases to low- and moderate-income households and organizations operating affordable rental housing and whereby these same households and organizations will own the improvements located on leased properties. This allows key community assets to be preserved and kept accessible and

affordable forever. Land Trust homeowners are able to build personal wealth, which creates security and stability. Renters gain security from long-term affordable rental rates. Communities benefit by not being vulnerable to gentrification and displacement. Local governments have the assurance that affordability covenants associated with the developments are monitored and enforced.

By October 2023 the City will study the feasibility of establishing a local rental assistance program including baseline affordability survey, landlord workshops, inclusionary in-lieu fees, project-based vouchers (HUD, HCD), commercial linkage fees, housing trust funds, recalculate California "Fair Market Rents."

By October 2023 the City will study the feasibility of requiring large-scale commercial or industrial developments that significantly increase the need for affordable housing to contribute to affordable housing funds.

To the extent feasible, the City will defer the payment of development impact fees for 15 years, which would allow affordable housing projects to count that as a public funding source, which helps increase competitiveness when applying for low income housing tax credit allocations.

12. Inclusionary Housing

In 2005 the City adopted inclusionary housing regulations that require developers constructing 10 or more dwelling units to provide one of the following or a hybrid combination as a condition of approval: 1) Reserve at least 15% of all dwelling units in a project for low-income households; or, 2) Reserve at least 10% of all dwelling units in a project for very-low-income households; or, 3) Construct off-site inclusionary housing for low-income households equivalent to 17% of all dwelling units in a project; or, 4) Construct off-site inclusionary housing for very-low-income households equivalent to 12% of all dwelling units in a project; or, 5) Pay an in-lieu fee as established by City Council resolution.

In the large tracts of land remaining to be developed in the City's Sphere of Influence, the inclusionary housing regulations will ensure that a portion of this new development is made affordable to lower- and moderate-income households. The City will study the feasibility of increasing these inclusionary requirements in 2022-23.

Responsible Agency: Community Development Department

2021-2029 Objectives: Continue to implement the inclusionary housing regulations and annually monitor both affordable units produced and the potential adverse impacts on the cost and supply of market-rate housing. If monitoring reveals that the cost and supply of market-rate housing is being impacted, this program will be expanded to process an amendment to the inclusionary housing regulations in a timely manner.

Study the feasibility of increasing inclusionary requirements in 2022-23.

13. Accessory Dwelling Units

Accessory dwelling units (ADUs) provide an important source of affordable housing for seniors, young adults and other low- and moderate-income households. The City is currently processing an amendment to the Development Code to incorporate recent changes to State ADU law, and will continue to encourage ADU production through public information available at City Hall and on the City website. As part of the Code amendment process the City will also consider additional provisions to incentivize ADU development that exceed the minimum requirements of State law. The City will also evaluate the feasibility of adopting requirements on short-term ADU rentals.

Consider additional incentives for ADU construction as permanent long-term housing via programs such as pre-approved ADU plans, grant-funded financial assistance to construct ADUs (if the homeowner agrees to deed restrict the unit and cap the rent at rents affordable to very low income households), monitoring ADU rents and regulating short-term ADU rentals. Also, encourage the County to prepare a case study template ordinance that all jurisdictions could adopt to regulate use of ADUs as short-term rentals.

Responsible Agency: Community Development Department

2021-2029 Objectives: Process a Development Code amendment consistent with current ADU law by October 2022 and continue to encourage construction of ADUs through an informational handout available at City Hall and on the City website throughout the planning period.

14. Short-term Rentals

The use of privately owned residential dwellings as short-term rentals can negatively impact housing affordability by reducing permanent long-term housing supply. Restrictions on short-term rentals range from outright prohibition to licensure and taxation – regulating to strictly to preserve local culture and keep local residents from being priced out, or taking a more permissive approach allowing it to thrive and reap the financial benefits of tourism.

Responsible Agency: Community Development Department

2021-2029 Objective: Study the feasibility of implementing short-term rental regulations by October 2023.

Providing Adequate Housing Sites

15. Adequate Sites for Housing Development

The 2040 General Plan update (adopted in 2020) significantly expanded the potential for additional housing by adding multi-family housing as an allowable use by-right in commercial land use designations.

The housing sites analysis (Appendix B) demonstrates that Santa Paula has adequate capacity to accommodate its assigned share of regional housing needs for all income categories.

The City will continue to encourage consolidation of small parcels by offering incentives such as reduced processing fees, density bonus and modified development standards to enhance the feasibility of multi-family and mixed-use infill development.

Pursuant to AB 1397 of 2017, the City will require the replacement of affordable housing units demolished or converted as part of a development project on any sites listed in the Housing Element for satisfying RHNA purposes as a condition of project approval. Replacement requirements shall be consistent with State Density Bonus Law.

The City will also review City-owned properties annually to determine whether any are no longer needed and could be made available for affordable housing development.

Responsible Agency: Community Development Department

2021-2029 Objectives: Continue to facilitate residential and mixed-use development to meet the City's RHNA objectives for new housing. The City will encourage lot consolidation by granting incentives. Review City-owned properties to determine whether any are no longer needed and could be made available for affordable housing.

16. Phased Annexation of Sphere of Influence

To accommodate additional residential growth, the City will continue to pursue the phased annexation of areas in its Sphere of Influence. The annexation of these areas will increase the City's capacity to accommodate future housing growth. The Sphere of Influence includes opportunities for the development of both workforce and "move-up" or higher-end housing, thereby allowing Santa Paula to move towards the goal of a more economically balanced community.

Two additional Expansion Areas are Fagan Canyon (2,173 acres, 450 units) and Adams Canyon (5,413 acres, 495 single-family units). The annexation of these areas will be initiated by developers and may occur in any order. The remaining Expansion Areas are unsuitable for residential development. The General Plan designates West Area 2, South Mountain, and East Area 2 for industrial, recreational or commercial uses.

Areas annexed by the City in the future will be subject to the Inclusionary Housing regulations. Under these regulations, all new developments over 10 units in size are generally required to deed-restrict a certain percentage of units as affordable. In those circumstances where on-site provision of affordable units is deemed economically infeasible, provisions will be made for development of units off-site or payment of an in-lieu housing fee. Thus future development of annexed areas will assist the City in addressing its low- and moderate-income housing needs either through direct development of affordable units or contribution of funds in support of affordable development.

Responsible Agency: Community Development Department

2021-2029 Objective: Continue to pursue the phased annexation of areas within the Sphere of Influence and integrate affordable units within market rate development. The annexation and development schedule will be dependent on the landowners' business plans and the real estate market.

Removing Governmental Constraints

17. Housing for Persons with Special Needs

Emergency Shelters, Transitional and Supportive Housing

An emergency shelter is a facility that provides shelter to homeless families and/or individuals on a limited short-term basis (generally up to 6 months). Transitional housing is temporary (often six months to two years) housing for a homeless individual or family who is transitioning to permanent housing or for youth that are moving out of the foster care system. Supportive housing includes a services component (e.g., job skills training, rehabilitation counseling) to allow individuals to gain necessary life skills in support of independent living.

Emergency shelters are permitted by-right in the Commercial/Light Industrial (C/LI) zone, consistent with State law. The Municipal Code also provides that transitional and supportive housing are considered residential uses that are only subject to those requirements and procedures that apply to other residential uses of the same type in the same zone. The City will continue to encourage the provision of emergency shelters and transitional/supportive housing consistent with State law and support the Ventura County Continuum of Care to end homelessness within Ventura County. In addition, AB 139 (2019) revised State law regarding parking requirements for emergency shelters. An amendment to City regulations will be processed in 2022 to provide that sufficient parking be provided for shelter staff and do not require more parking for emergency shelters than other residential or commercial uses within the same zone.

AB 101 (2019) added the requirement that low barrier navigation centers meeting specified standards be allowed by-right in areas zoned for mixed use and in non-residential zones permitting multi-family uses pursuant to Government Code §65660 et seq.

In 2018 AB 2162 amended State law to require that supportive housing be a use by-right in zones where multi-family and mixed uses are permitted, including non-residential zones permitting multi-family uses, if the proposed housing development meets specified criteria.

The City is currently processing a Code amendment to allow supportive housing and low barrier navigation centers consistent with State law.

Farm Worker Housing

The majority of farm laborers in the greater Santa Paula area are permanent non-migrant and seasonal laborers. As such, the housing needs of farmworkers are primarily addressed through the provision of permanent affordable housing, such as apartments, lower-cost single-family homes, and mobile homes.

Nevertheless, to provide additional sites for farmworker housing, especially for migrant farm workers, the City permits migrant farm labor camps/housing in the R-4 and C/LI and LI zones, subject to a CUP. Such farm labor housing is typified by (but not exclusively) dormitory style structures, and not individual dwelling units, designed for temporary occupancy by migrant workers. Housing for migrant families and single male farmworkers is accommodated through this process. The SPMC establishes standards for farm labor housing to ensure livability and compatibility with surrounding uses tied to the use and not the user, and is not a constraint to development. In compliance with the Employee Housing Act (Health and Safety Code §17021.5 and §17021.6), the Municipal Code also allows farmworker housing for up to 12 units or 36 persons in group quarters by-right (i.e., without a CUP or other discretionary approval) in zones allowing agricultural uses, as well as group quarters in single-family zones for up to six persons.

In addition to these regulations, the City will (1) work cooperatively with the County of Ventura, advocacy groups, and agricultural organizations to plan, fund, and implement a countywide survey of farmworkers, employers, and housing providers to further define housing conditions, needs and barriers: 2) participate in the development of targeted programs and strategies to address farmworker housing needs.

Residential Care Facilities

To ensure that City regulations encourage and facilitate the provision of residential care facilities consistent with State law, the Municipal Code will be amended to allow State licensed residential care facilities serving up to 6 persons as a single-family use and ensure that permitting requirements and necessary findings for residential care facilities for 7 or more persons are consistent with State law and fair housing requirements.

Responsible Agency: Community Development Department

2021-2029 Objectives: Code amendments by October 2022; continue to encourage the provision of emergency shelters, transitional/supportive housing, farmworker housing and residential care facilities consistent with State law; participate in countywide efforts to address farmworker housing needs.

18. Measure L6 and Growth Management Ordinance

The City will annually monitor the effects of Measure L6 and the Growth Management Ordinance (GMO) on housing development. Should these ordinances be triggered, the Housing Element will be amended to include an analysis of the impacts and address potential constraints to housing production.

Responsible Agency: Community Development Department

2021-2029 Objective: Monitor the effects of Measure L6 and the GMO on an annual basis.

19. Density Bonus Ordinance

The Santa Paula Municipal Code describes density bonus regulations (SPMC Sections 16.13.310, *et seq.*). The City will continue to monitor changes to State density bonus law and process Code amendments as necessary to ensure conformance with Government Code §65915. The City will continue to encourage the provision of affordable housing consistent with density bonus law.

Responsible Agency: Community Development Department

2021-2029 Objective: Continue to encourage the provision of affordable housing and update City regulations as necessary consistent with State density bonus law.

20. Objective Development Standards and Transparency

Objective development and design standards help to reduce the cost of housing by reducing the time and uncertainty of the permit process. In some circumstances, cities are limited to using only objective standards in reviewing housing developments. The City will amend residential development standards in 2022 to identify objective standards.

Pursuant to the transparency requirements of Government Code §65940.1(a)(1), the City will post development fees and zoning information on the City website continuously throughout the planning period.

Responsible Agency: Community Development Department

2021-2029 Objective: Adopt objective residential development standards in 2022; ensure that development fees and zoning requirements are available on the City website throughout the planning period.

21. Affordability by Design

Housing cost may be reduced through design or construction features such as reduced size, varied product types, or alternative materials and construction methods (e.g., multiplexes, "tiny houses" or container housing) where such techniques do not conflict with building code or public health and safety requirements. The City will explore potential alternative design and construction techniques and amend the Municipal Code to allow such housing alternatives where feasible.

Excessive parking standards that are not reflective of actual parking demand can pose a significant constraint to housing development by increasing development costs and reducing the potential land available for project amenities or additional units.

Responsible Agency: Community Development Department

2021-2029 Objective: Evaluate housing design alternatives in FY 2021-22. Conduct periodic updates of parking standards by zones permitting residential to ensure that parking standards

- do not impede a developer's ability to achieve maximum densities,
- contain joint-use (shared parking) provisions to maximize parking utilization rates, particularly for infill housing development,
- provide for parking reductions where less demand is demonstrated, particularly for persons with disabilities, the elderly, affordable housing, and infill and transit-oriented development,
- comply with density bonus ordinance parking requirements per Government Code §65915,
- ensure implementation of safety and security measures – specifically, Public Services & Utilities Element program (PSU 1.b) Crime Prevention through Environmental Design, and
- explore potential alternative design and construction techniques and amend the Municipal Code to allow such housing alternatives where feasible.

Promoting Equal Housing Opportunity

22. Affirmatively Furthering Fair Housing

As a participating jurisdiction in the Ventura Urban County CDBG program, the City is provided fair housing services through a contract with the Fair Housing Council of San Gabriel Valley. The Fair Housing Council offers a variety of services promoting fair housing, including counseling and investigative services for instances of housing discrimination, public education and outreach sessions for community groups, and housing discrimination prevention program.

Jurisdictions are required to analyze constraints to the development of housing for persons with disabilities and take measures to remove the constraints. This Housing Element includes a review of zoning code and building code requirements and identifies actions to remove potential barriers to the provision of accessible housing. In addition, SPMC Sec. 16.13.500 et seq. establishes procedures to ensure reasonable accommodation for persons with disabilities. To assist persons with disabilities in obtaining approval of a reasonable accommodation, the City will post information on the website and assist in preparing application materials upon request.

As discussed in Appendix D – Fair Housing Assessment, the Ventura County Analysis of Impediments to Fair Housing Choice (“AI”) identifies a number of actions that can be taken by local governments to address fair housing impediments. While some of the recommended actions are beyond the authority of cities, the following actions will be taken by the City of Santa Paula to affirmatively further fair housing during the planning period:

1. Support the County and fair housing organizations in random testing on a regular basis to identify suspected discriminatory practices.
2. Support stronger and more persistent enforcement activity by fair housing service providers when financially feasible.

3. Support the County and fair housing organizations in expanding fair housing education and outreach efforts, with specific efforts outreaching to small rental properties where the owners or managers may not have education or training in state and national fair housing laws.
4. Ensure that the City website provides narrative defining Fair Housing, examples of discriminatory practices, a summary of local, state, and federal fair housing laws, and information on available services, including links to Housing Rights Center or other relevant fair housing agencies. Conduct an annual review of Fair Housing information on the City website, including updates of information and verification of links to outside agencies.
5. Continue efforts to distribute informational materials on tolerance, focusing on sexual orientation, racial and ethnic relations, and religion.
6. Continue to update the Housing Element and local regulations as necessary to ensure conformance with State fair housing law.
7. Explore ways to develop supportive housing for persons with disabilities through non-profit housing developers and service providers.
8. Support the County and other organizations in job training and business development opportunities for women to ensure that earning opportunities are available in Santa Paula.
9. Continue to encourage the availability of a range of housing options, including affordable housing, to allow residential mobility for all races and ethnicities.
10. Continue to facilitate the availability of housing rehabilitation programs for low- and moderate-income households.
11. Continue to promote housing accessibility improvements to enable existing renters and homeowners with disabilities to remain in their homes, and promote universal design principles in new rental and owner-occupied housing developments.
12. Continue ongoing efforts to develop new ADA compliant rental housing units and provide financial assistance for accessibility improvements for both renters and homeowners.
13. Continue ongoing outreach efforts to inform lower-income households of special local, state, and federal homebuyer assistance in partnership with lending institutions, local associations of realtors and fair housing providers.
14. Support transit-oriented development to better connect workers with jobs within the region.

15. Assist in disseminating information regarding fair lending practices applicable to financial institutions.

Responsible Agency: Community Development Department

2021-2029 Objectives: Continue to promote fair housing practices, and provide educational information on fair housing to the public through its newsletter, website, and distribution of fair housing brochures in both English and Spanish at the public counter, library, post office, and other community locations. The City will refer fair housing complaints to the Fair Housing Council. In addition, the City will continue to fund the activities of the Fair Housing Council. The City will also continue to implement the provisions of the Reasonable Accommodation Ordinance to facilitate full access to housing for persons with disabilities. The City will continue to administer its programs and activities relating to housing and community development in a manner to affirmatively further fair housing and take no action that is materially inconsistent with its obligation to affirmatively further fair housing in compliance with Government Code §8899.50(b).

Sustainable Growth

23. Promote Triple-Bottom-Line Sustainability

The City recognizes and supports the value of enhancing livability through three types of sustainability measures incorporated into housing projects:

Cultural Amenities

Establish zoning provisions and in-lieu fee structure for forms of cultural expression within large housing and commercial developments, such as

- public art,
- spaces for celebration,
- gathering, etc.

The Built Environment

Establish zoning provisions to encourage sustainable measures are incorporated into the built environment, such as

- integrating new housing growth into existing communities,
- diversifying affordable housing near employment centers,
- reallocating road space to more climate friendly forms of transportation,
- enhance local accessibility via walking, biking and transit more optimal.

Environmental Resources

Establish zoning provisions for compact housing that recognize and preserve, and/or provide connectivity to our environmental assets, such as

- open space,
- watersheds,
- environmental habitats, and
- agricultural lands.

Responsible Agency: Community Development Department

2021-2029 Objectives: Promote sustainability through City development policies, plans and regulations.

C. Quantified Objectives

The City's quantified objectives for new construction, rehabilitation and conservation are presented in Table V-1.

**Table V-1
Quantified Objectives 2021-2029**

	Income Category					Totals
	Ex. Low	V. Low	Low	Mod	Above Mod	
New Construction	51	51	99	121	335	657
Rehabilitation	10	10	10	10	--	40
Conservation*	725 mobile home units					--

* As discussed in Chapter II, there are no assisted units at risk during this planning period.

Appendix A – Evaluation of the 2013-2021 Housing Element

Section 65588(a) of the *Government Code* requires that jurisdictions evaluate the effectiveness of the existing Housing Element, the appropriateness of goals, objectives and policies, and the progress in implementing programs for the previous planning period. This appendix contains a review the housing goals, policies, and programs of the previous housing element and evaluates the degree to which these programs have been implemented during the previous planning period. This analysis also includes an assessment of the appropriateness of goals, objectives and policies. The findings from this evaluation have been instrumental in determining the City's 2021-2029 housing policies and program.

Table A-1 summarizes the programs contained in the previous Housing Element along with the source of funding, program objectives, accomplishments, and implications for future policies and actions.

Table A-2 presents the City's progress in meeting the quantified objectives from the previous Housing Element.

Effectiveness in meeting the housing needs of special needs populations

The City has made significant progress during the previous planning period addressing the housing needs of lower-income households and persons with disabilities or other special needs. Recent accomplishments include the following:

- Jackson House Rehabilitation Center. Jackson House is a 16-bed mental health community care facility located in a converted multi-tenant office building. The City expedited development the project by issuing a temporary certificate of occupancy in October 2021 three months before the final



- permanent certificate of occupancy was issued. This facility provides daily group therapy sessions, life skills classes, peer support groups, and individual counseling. (<https://jacksonhousecares.com/about-us/locations/santa-paula/>)
- Spirit of Santa Paula Emergency Shelter. Spirit of Santa Paula is a non-profit corporation formed in 2002 by six local business people to do "good things" for our community (<https://www.spiritofsantapaula.org/work>). Services provided range from serving hot meals to 600 people per week to assisting the community with rental assistance and utility payments, advocacy in Homeless Court, and counseling for people who are homeless, hungry and lonely. In 2019 the City expedited permit processing for a 44-bed year-round emergency shelter in a renovated commercial building located at 1498 E. Harvard Blvd. As part of the

approval the City waived the 30-bed limit and also modified the Municipal Code to allow an increase in maximum length of stay beyond the normal 6-month limit.

In addition to these special needs projects, the City has recently facilitated approval of several housing projects that provide deed-restricted lower-income units, including 100% affordable projects by People's Self Help Housing and Habitat for Humanity (see Appendix B, Table B-2).

**Table A-1
2013-2021 Housing Element Program Evaluation
City of Santa Paula**

Program	Program Objectives	Timeframe	Accomplishments
1. Owner-occupied Housing Rehabilitation Program	Assist 16 owner-households, including 6 very-low- and 10 low-income households.	2013-2021	Assistance program advertised 2013-2015. No applications received. Program terminated 2016.
2. Rental Housing Rehabilitation Program	Provide loans to 3 rental housing projects	2013-2021	No applications received. No loans provided.
3. Housing Code Enforcement Program	Maintain a staffing level of 1 full-time person to continue implementing the Code Enforcement Program. City sponsoring of a neighborhood workshop to inform residents of assistance programs will be conducted.	2013-2021	Preserving housing code enforcement through CDBG funds
4. Section 8 Rental Assistance Program	Maintain current levels of Section 8 rental assistance, and encourage property owners to list available rentals with the Housing Authority.	2013-2021	In 2012, the Santa Paula Housing Authority constructed 20 senior units restricted for very low income households. The Santa Paula Housing Authority currently provides xxx vouchers to very low and extremely low-income residents.
5. Mobile Home Tenant Protection	Preserve the existing viable mobile home stock as affordable housing for lower- and moderate-income residents, seniors, and persons on fixed income. Where parks are proposed for closure, the City will ensure adherence to State closure requirements and local relocation requirements to provide appropriate tenant protections.	2013-2021	The mobile home rent control ordinance has been in place for its 6 parks since 1989. No parks were closed during the planning period.
6. Mobile Home Rent Stabilization Program	Continue to implement the Mobile Home Rent Stabilization Program to maintain the affordability of mobile home spaces.	2013-2021	The Mobile Home Rent Control Board continues to meet when needed.
7. Mobile Home Park Resident Ownership Program	Provide information on the MPROP program to interested mobile home park tenants. Where parks are deemed economically viable, the City will support tenant applications for funding through MPROP.	2013-2021	Ongoing – No Activity
8. Mortgage Credit Certificate (MCC)	Through the County, the Successor Agency will continue to provide MCCs to qualified first-time homebuyers. The objective is to provide a minimum of eight MCCs over the planning period, subject to availability through the County. The Successor Agency will advertise the availability of this program through program brochures at the public counter and posting on the City's website.	2013-2021	The City continues to participate in this countywide program administered through County of Ventura.
9. Workforce & Senior Housing Development	Provide financial and regulatory incentives to private developers to increase the supply of affordable housing in Santa Paula, including small infill projects in underutilized multi-family-zoned neighborhoods. The City will focus a portion of assistance	2013-2021	In 2020, the City provided assistance to the Habitat for Humanity, which will provide 6 deed-restricted apartments.

Program	Program Objectives	Timeframe	Accomplishments
	towards rental and ownership projects meeting the needs of extremely-low-, very-low- and low-income renters, including large families, non-migrant agricultural workers, and persons with developmental disabilities. The City will continue to conduct annual workshops with the development community to discuss potential opportunities in Santa Paula, the availability of funding sources and regulatory incentives, and other related issues.		
10. Multi-Family Housing Acquisition & Rehabilitation	Identify deteriorated apartment complexes, and cooperate with non-profit housing corporations to acquire and rehabilitate units with long-term affordability controls.	2013-2021	No projects acquired.
11. Affordable Housing Funding Sources	Actively pursue state, federal and private funding sources as a means of leveraging local funds and maximizing assistance, with a goal of securing three new funding sources. The City will provide information on available funds to affordable housing developers through an annual developers' workshop. The City will support housing grant applications both through regulatory relief offered through the Density Bonus Ordinance, and through City Council endorsement/support of funding applications.	2013-2021	In 2020, the City provided assistance to the People's Place, which will provide 69 deed-restricted apartments. The East Area 1 (Harvest at Limoneira) development currently under construction will yield approximately \$6.5M in-lieu inclusionary housing fees.
12. Inclusionary Housing Ordinance	Continue to implement the inclusionary housing regulations and annually monitor both affordable units produced and the potential adverse impacts on the cost and supply of market-rate housing. If monitoring reveals that the cost and supply of market-rate housing is being impacted, this program will be expanded to process an amendment to the inclusionary housing regulations in a timely manner.	2013-2021	The City continued to implement this program.
13. Adequate Sites for Housing Development	To address its share of regional housing needs, the City will continue to facilitate residential development and annexation of Sphere areas to meet the City's RHNA objectives for new housing. The City will encourage lot consolidation by granting incentives throughout the planning period. Additionally, the City will continue to encourage affordable housing development in the Housing Opportunities Overlay Zone.	2013-2021	The City continued to maintain sufficient sites to accommodate the RHNA allocation. No lot consolidations or AHO projects.
16. Phased Annexation of Sphere of Influence	Continue to pursue the phased annexation of the Sphere of Influence surrounding Santa Paula and integrate affordable units within market rate development. The annexation and development schedule will be dependent on the landowners' business plans and the real estate market. The City may provide assistance to the developer through expedited processing of additional approvals or other incentives needed prior to construction such as subdivision maps to encourage the creation	2013-2021	The most recent annexation occurred in 2013 for the East Area 1 Specific Plan, which is currently under construction. Full build-out is anticipated to yield approximately 1,500 dwellings, 110 of which will be market-rate affordable to 200% of county median income level.

Program	Program Objectives	Timeframe	Accomplishments
	of building sites at appropriate sizes (e.g., 1 to 10 acres) to facilitate housing for lower-income households and infrastructure improvement plans. The City will report annually to HCD regarding progress in making annexation area development sites available commensurate with RHNA allocations for the current planning period.		
17. Zoning for Transitional & Supportive Housing, Emergency Shelters & Migrant Farmworker Housing	Continue to encourage the provision of emergency shelters, transitional/supportive housing, and farmworker housing consistent with state law.	2013-2021	The City granted one temporary use permit for an emergency shelter in 2020.
18. Measure L6 and Growth Management Ordinance	Monitor the effects of Measure L6 and the GMO on an annual basis.	2013-2021	The City continued to monitor the effects of Measure L6 and the GMO on an annual basis. No projects triggered in 2020.
19. Density Bonus Ordinance	Continue to encourage the provision of affordable housing consistent with state density bonus law.	2013-2021	No projects received density bonus.
20. Fair Housing Program	Continue to promote fair housing practices and provide educational information on fair housing to the public through its newsletter, website, and distribution of fair housing brochures in both English and Spanish at the public counter, library, post office, and other community locations. The City will refer fair housing complaints to the Fair Housing Council of San Gabriel Valley. In addition, the City will continue to fund the activities of the Fair Housing Council. The City will also continue to implement the provisions of the Reasonable Accommodation Ordinance to facilitate full access to housing for persons with disabilities.	2013-2021	The City continued to provide fair housing information and referrals. No requests for reasonable accommodation were made in 2020.

**Table A-2
Progress in Achieving 2013-2021 Quantified Objectives
City of Santa Paula**

Program Category	Quantified Objective	Progress
New Construction		
Extremely Low	144	0
Very Low	144	11
Low	201	10
Moderate	241	6
Above Moderate	555	1
Total	1,285	28
Rehabilitation		
Extremely Low	10	
Very Low	10	124
Low	10	
Moderate	10	-
Above Moderate	--	-
Total	40	124
Conservation		
Extremely Low		
Very Low		
Low	1,302	1,302
Moderate		
Above Moderate	--	
Total	--	

Source: City of Santa Paula, 2022

Appendix B – Residential Land Inventory

State law requires the Housing Element to include an inventory of sites with the potential for residential development during the planning period. The detailed assumptions and methodology for the residential land inventory are provided below. This analysis demonstrates that the City’s land inventory exceeds the RHNA allocation in all income categories for the current planning period.

**Table B-1
Land Inventory Summary**

	Very Low	Low	Moderate	Above Moderate	Total
East Area 1 (Table B-2)	-	-	-	1,218	1,218
Approved and Pending Projects (Table B-3)	93	224	-	359	676
Vacant Residential Sites (Table B-4)	-	-	22	101	123
Vacant Commercial Sites (Table B-5)	75	76	905	-	1,056
ADUs*	5	11	15	3	34
Total Capacity	173	311	942	1,681	3,107
RHNA (2021-2029)	102	99	121	335	657
Adequate Sites? (shortfall)	Yes	Yes	Yes	Yes	Yes

Notes:

*Affordability categories for ADUs based on SCAG analysis

Income Assumptions

State law⁶ identifies “default” densities that are assumed to be appropriate to facilitate the development of lower-income housing. For Santa Paula, and other small jurisdictions in Ventura County, the default density is 20 units/acre. The R-3 (maximum 21 units/acre) and R-4 (maximum 29 units/acre) residential zones as well as all commercial zones allow higher than the default density, and therefore are assumed to be suitable for lower-income housing. The R-2 zone allows multi-family development at up to 15 units/acre (excluding density bonus) and is assumed to accommodate moderate-income housing. All single-family detached sites were assigned to the above-moderate category. Pursuant to State law, multi-family and commercial sites that are smaller than 0.5 acre are assigned to the moderate-income category.

Although all of the vacant sites in commercial zones listed in Table B-5 are suitable for lower-income housing pursuant to the State default density, the City has conservatively assumed only 15% of the potential units on these sites will be affordable to lower-income households with the remainder assigned to the moderate income category.

⁶ California Government Code §65583.2.c.3.B

Realistic Development Capacity

Approved and Pending Projects

Housing units completed after the beginning of the 6th cycle RHNA projections period (June 30, 2021) may be counted in the sites inventory to accommodate the RHNA. Approved projects or pending development applications are summarized in Tables B-2 (East Area 1) and B-3 (other approved projects). These units are based on the actual affordability levels for these units based upon deed restrictions.

Residential Zones

Vacant parcels with residential zoning designations are listed in Table B-4. The realistic development capacity of these sites is based on applicable development standards and previous projects as summarized below.

- Single-Family Residential (R-1, R2-PD, HR2-PD) – Sites zoned for single-family development assume one above-moderate-income unit per parcel.
- Medium Density Residential (R-2) – Maximum density is 15 units/acre in the R-2 zone; however, a conservative yield of 12 units/acre has been assumed based on recent development trends. Although a Habitat for Humanity project shown in Table B-2 included 6 lower-income units at a density of 13 units/acre in the R-2 zone, potential housing units in this zone are conservatively assigned to the moderate-income category.
- East Area 1 Specific Plan

The largest single project with potential for residential development during the planning period is the East Area 1 Specific Plan (“Harvest at Limoneira”). This specific plan encompasses approximately 501 acres located east of Santa Paula Creek, west of Haun/Orcutt Creeks, south of the Topatopa Mountains, and north of Telegraph Road. The specific plan and development agreement were adopted by the City Council in 2008 and the annexation was recorded in 2013. At buildout, the Specific Plan anticipates 1,500 residential units, 25,000 square feet of light industrial, 215,000 square feet of commercial, and 20.2 acres of institutional uses. A total of 225.3 acres of open space will also be provided, including agricultural preserve, open space preserve, parks/greenways and public athletic fields (see Figure B-1).

Planning areas and development phases are summarized below (see Figure B-1).

Phase I (Haun Creek Neighborhood)

This phase allows a total of 632 homes and is currently under development by four different builders, with 528 homes have been sold as of April 2022. Of those, 282 homes were completed prior to the beginning of the 2021-2029 projection period and only 350 units are counted toward the 6th cycle RHNA. All of these units are conservatively assigned to the above-moderate income category.

Phase II (Foothill Neighborhood)

Phase II occupies the northeast quadrant of East Area 1. This neighborhood rises from the relatively flat terrain of the southerly half of East Area 1 up the shallower portions of the slopes of the hills to the north. Development is limited to those portions of the foothills that require only moderate grading, leaving the steeper and more visible portions of the hills untouched and in agricultural production. This neighborhood will be characterized by almost exclusively single-family detached residences. A total of 492 homes are allocated for this area. Development is expected to occur in 2023. All of these units are conservatively assigned to the above-moderate income category.

Phase III (Santa Paula Creek Neighborhood)

Phase III is located in the northwest quadrant of East Area 1, along the east bank of Santa Paula Creek, north of the Civic District and west of the foothills. Similar to the Haun Creek Neighborhood in its street layout, this neighborhood will emphasize connections to the permanent open space of Santa Paula Creek and the bluffs to the north and east. It is planned to include a range of residence types, but will be characterized by a predominance of single-family residences, some attached but most detached. The neighborhood will be flanked by parks and open space including a broad open space buffer along Santa Paula Creek, and park space along the north edge of the Civic District. The neighborhood is anticipated to include a neighborhood park and one or more smaller neighborhood greens. This phase anticipates 376 total units with development is expected to occur in 2025. All of these units are conservatively assigned to the above-moderate income category.

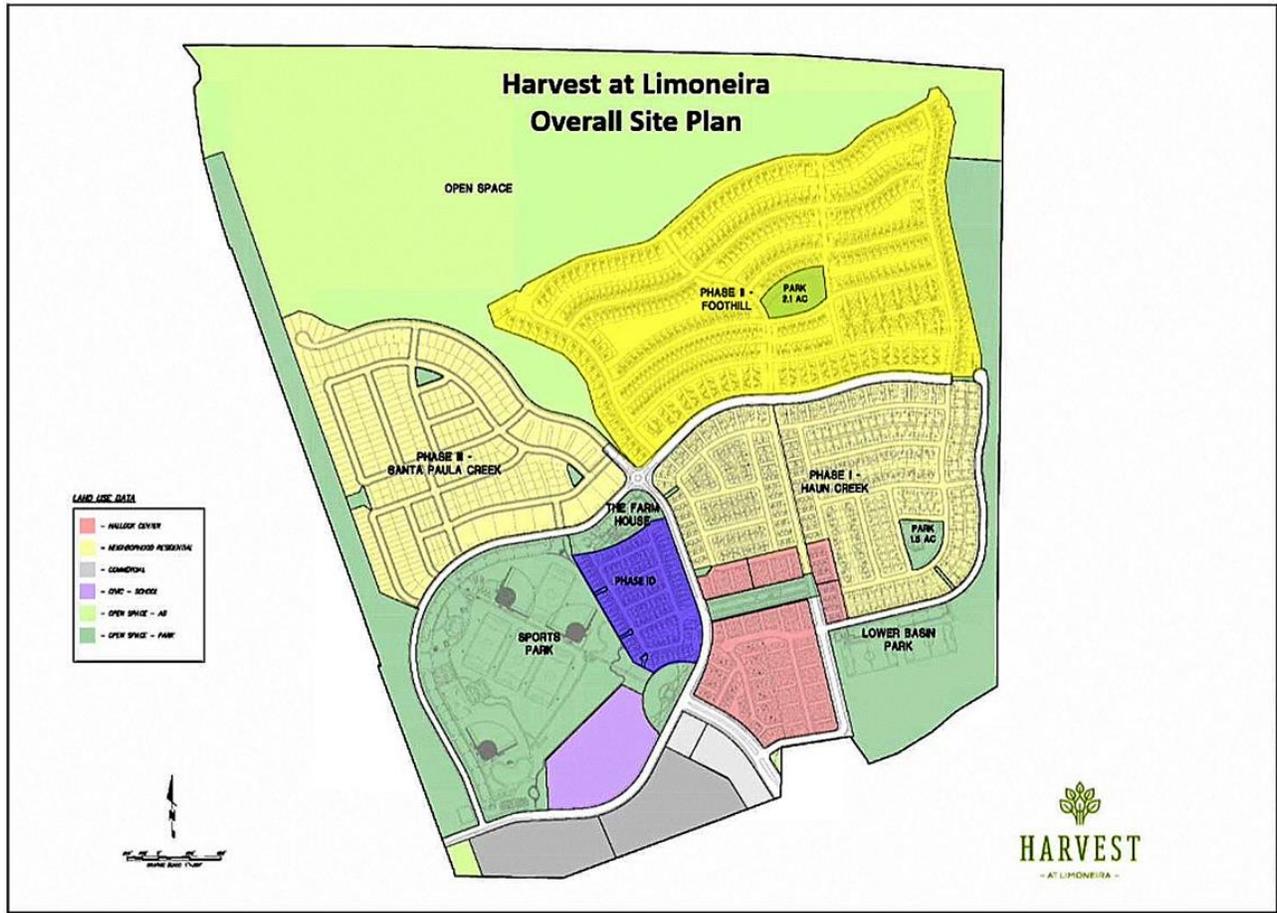
Table B-2 summarizes residential development in East Area 1 by planning area.

Table B-2
East Area 1 Residential Summary

	Phase I Haun Creek	Phase II Foothill	Phase III Santa Paula Creek	Totals
Units completed prior to 6/30/2021	282	0	0	282
Remaining units	350	492	376	1,218
Total Units	632	492	376	1,500

Note: All units presumed to be above-moderate-income

Figure B-1



Commercial Zones

After adoption of the new Santa Paula General Plan in 2020 and subsequent Development Code amendments intended to encourage housing in commercial zones the City has seen strong interest in residential development in commercial areas. The inventory of sites includes vacant parcels in the C-G, C-O and C-LI zones (Table B-5). Mixed-use or stand-alone residential development is permitted by-right in each of these zones with allowable densities of 29 units/acre in the C-G and C-O zones and 21 units/acre in the C-LI zone. The realistic capacity for housing development on these commercially-zoned vacant sites is based upon recent project experience.

As shown in Table B-3, six residential projects and one large community care facility have recently been approved or are under review in commercial zones. Densities of recent projects in the C-G district have ranged from 25 to 67 units/acre while projects in the C-O and C-LI districts have ranged from 24 to 26 units/acre. Based on these trends, a conservative realistic density of 25 unit/acre is assumed for the C-G district and 20 units/acre for the C-O and C-LI districts. Although non-residential development is allowed in these zones, due to the strong demand for new housing there have been no non-residential projects proposed recently in these zones. Since these densities are greater than the default density of 20 units/acre, sites at least one-half acre in size are considered suitable for lower-income housing while smaller sites are assigned to the moderate-income

category. Additional analysis of development standards and permit procedures are provided in Chapter IV – Constraints.

Non-vacant Sites

When considering the City's capacity to accommodate the RHNA allocation for the planning period, it is important to recognize that the sites inventory includes only vacant sites, and there are many non-vacant properties with redevelopment potential during the planning period as evidenced by the recent residential projects on non-vacant parcels as shown in Table B-2.

Accessory Dwelling Units

Accessory dwelling units (ADUs) represent a significant opportunity for affordable housing, particularly for single persons or small households including the elderly, college students, young adults, and caregivers. Recent changes in State law have made the construction of ADUs more feasible for homeowners.

Over the past few years interest in ADUs has increased, and during 2018-2021 the City has approved a total of 17 ADU permits, or an average of 4.25 per year. At that rate, it is estimated that approximately 34 additional ADUs will be approved during the 2021-2029 planning period. The assumption of 4.25 ADUs per year is considered to be very conservative given that in 2021 the City issued 12 ADU permits and in just the first three months of 2022 there have been 3 ADU applications submitted.

Based on recent analysis conducted by SCAG approximately 88% of future ADUs in Ventura County are expected to be affordable to low- and moderate-income households.

Sites Used in Prior Planning Periods

Government Code §65583.2(c) requires that any vacant sites listed in two previous consecutive Housing Element sites inventories must allow residential development by-right when a housing project provides at least 20 percent of the units affordable to lower-income households. All of the vacant sites listed in Tables B-4 and B-5 were listed in two previous planning periods. However, since all residential developments are permitted by-right, this requirement is satisfied.

Availability of Infrastructure

Sufficient water, sewer, and dry utilities are expected to be available to serve projected development during the planning period.

**Table B-3
Approved and Pending Projects**

Project/ Address	APN	GP/ Zoning	Parcel Size (ac)	Type	No. Units*	Density (du/ac)	Status	Existing Use	Comments
People's Self-Help Housing/ 714 W. Harvard Blvd.	1020191295	Commercial/ C-G	1.95	Apartments	7 VL* 62 Low*	35.4	Approved. Currently in construction plan check	Former mobile home park, decommissioned under CA state oversight.	City waived \$1,000 filing fee and approx. \$571,000 water resource in-lieu fee.
Habitat for Humanity/ 430, 434, 438 N. 14 th St.	1010151175 1010151185 1010151195	RMD/ R-2/PC	0.46	SFR (own w/H4H CCRs)	3 VL 3 Low*	13.0	Approved entitlements and lot merger / split. Awaiting construction plan check submittal.	Infill vacant lots	City is also working with H4H to preserve and enhance access to abutting City park through property.
Telegraph Road Apts./ 18004 E. Telegraph Rd.	1070042015	MU C-LI/ C-LI	11.28	Apartments	33 EL* 50 VL* 83 Low* 132 Market	25.5	Awaiting formal application submittal	Vacant lot	City anticipates requiring only ministerial Design Review approval for planning entitlements, via Oct 2020 Dev Code update allowing all residential uses by-right in commercial zones.
K-Mart site/ 895 Faulkner Rd.	0980020275 0980020335 0980020345 0980020355 0980020365	Commercial C-G/PD	9.72	Townhomes (rent)	37 Low* 207 Market	25.1	Awaiting formal application submittal	Partially developed retail commercial. Kmart closed in 2020 and building has since been vacant.	City anticipates requiring only ministerial Design Review approval for planning entitlements via Oct 2020 Dev Code update allowing all residential uses by-right in commercial zones.
Main Street Senior Living/ 603 E. Main St.	1030082225	Commercial/ C-G	0.63	Senior Apartments	7 Low* 20 Market	42.9	Approved. Awaiting construction plan check submittal.	Rear vacant portion of existing developed lot.	Ministerially approved by staff in Nov 2021 via Oct 2020 Dev Code revisions.
"Tiny Quad" Apartments/ 720 E. Main St.	1030092045	Commercial/ C-G	0.18 (rear of parcel only)	Apartments	12 Low*	66.7	Approved. Awaiting construction plan check submittal.	Existing developed lot. Project will utilize a combination of vacant and cleared (via demolition of existing structures) areas.	Ministerially approved by staff in May 2021 via Oct 2020 Dev Code revisions. Parking and setback waivers granted via State regs.
Mill Street Apartments/ 129-133 N. Mill St.	1030111245 1030111255	Commercial/ C-O	0.85	Apartments	20 Low*	23.5	Approved. Awaiting construction plan check submittal.	Currently vacant existing building (Faulkner Hall) formerly part of church complex and used for offices and classrooms.	Approved by PC in Nov 2020 and permitted by-right via Oct 2020 Dev Code revisions.
TOTALS					93 VL 224 Low 359 Market				

Notes:

*deed-restricted units

This table does not include units in East Area 1 (see Table B-2)

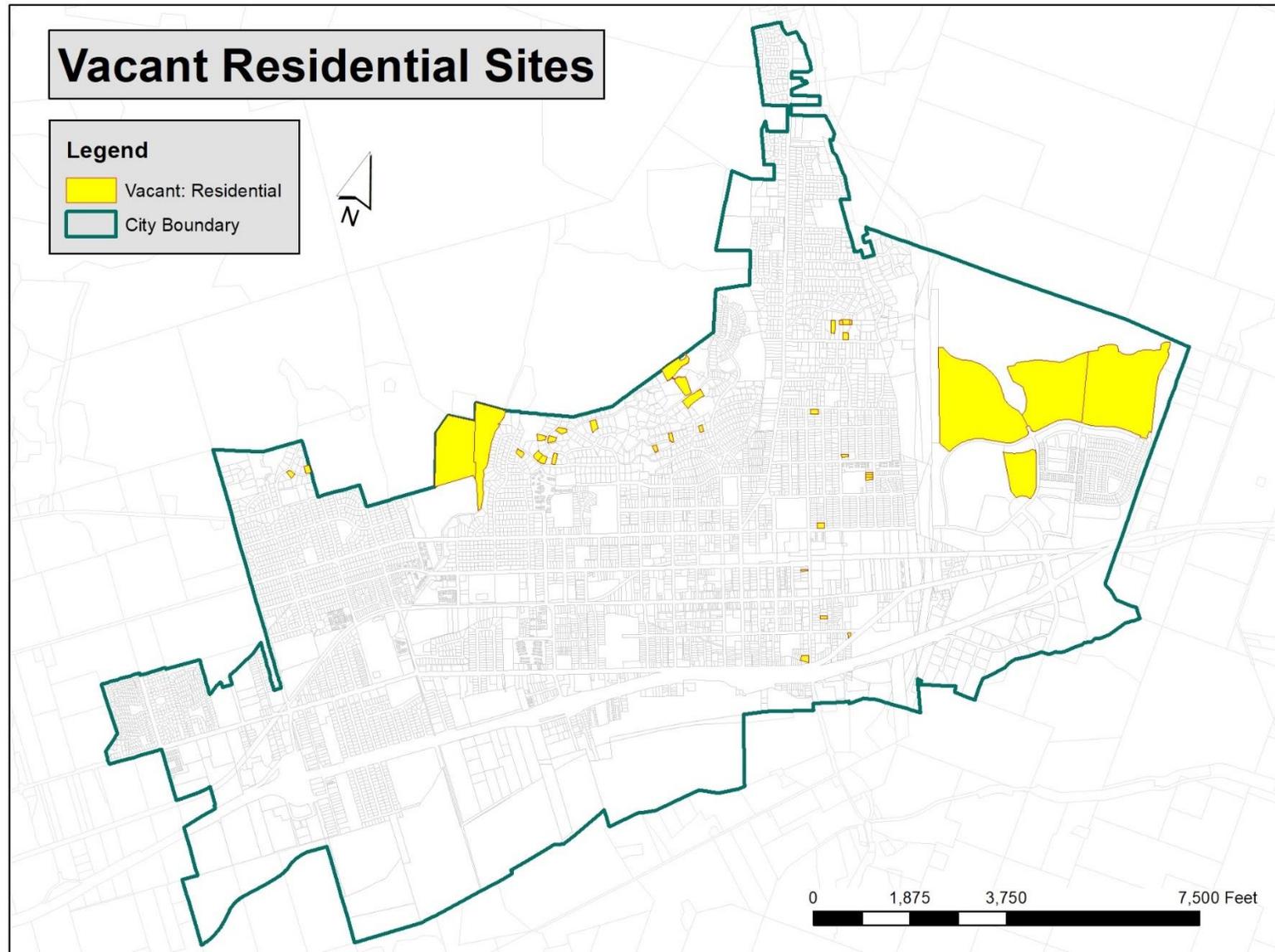
**Table B-4
Vacant Residential Sites**

Site Address	APN	GP/Zoning	Acreage	Density* (du/ac)	Units by Income Category			
					Lower	Mod	Above	Total
RIDGECREST/SHASTA	0380160045	HR/HR2PD	0.29	2			1	1
SHASTA DR	3080160115	HR/HR2PD	0.33	3			1	1
18 MCKEVETT HTS	1000101125	HR/HR2PD	0.23	3			1	1
LOMA VISTA PL	1000111075	HR/HR2PD	0.28	3			1	1
LOMA VISTA PL	1000111225	HR/HR2PD	0.19	3			1	1
480 MONTE VISTA DR	1000220165	HR/HR2PD	0.55	3			1	1
508 GLADE DR	1000250015	HR/HR2PD	0.37	3			1	1
593 GLADE DR	1000250045	HR/HR2PD	0.4	3			1	1
563 GLADE DR	1000250095	HR/HR2PD	0.37	3			1	1
566 GLADE DR	1000250165	HR/HR2PD	0.37	3			1	1
VIEW DR	1000250255	HR/HR2PD	0.44	3			1	1
VIEW DR	1000250265	HR/HR2PD	0.44	3			1	1
VIEW DR	1000250325	HR/HR2PD	0.44	3			1	1
MONTCLAIR DR	1000300045	HR/HR2PD	2.42	1			2	2
MONTCLAIR DR	1000300105	HR/HR2PD	1.58	1			1	1
MONTE VISTA DR	1000300155	HR/HR2PD	1.44	1			1	1
SAY RD	1010062305	SFR/R-1	0.45	4			1	1
WOODLAND DR	1010062415	SFR/R-1	0.14	4			1	1
WOODLAND DR	1010062485	SFR/R-1	0.28	4			1	1
WOODLAND DR	1010062495	SFR/R-1	0.1	4			1	1
WOODLAND DR	1010062565	SFR/R-1	0.33	4			1	1
RICHMOND DR	1010112195	RMD/R-2	0.39	12		4		4
13TH ST/ORCHARD ST	1010122265	RMD/R-2	0.15	12		1		1
438 14TH ST	1010151175	RMD/R-2	0.15	12		2		2
434 14TH ST	1010151185	RMD/R-2	0.15	12		2		2
430 14TH ST	1010151195	RMD/R-2	0.15	12		2		2
306.5 SYCAMORE ST	1010182115	RMD/R-2	0.31	12		3		3
140 N 12TH ST	1010221045	MHDR/R-3	0.09	18		1		1
129 GARCIA ALLEY	1010242325	SFR/R-1	0.2	4			1	1
1306 E VENTURA ST	1010283025	RMD/R-2	0.12	12		1		1
12 ST/HARVARD BL	1010380095	RMD/R-2	0.52	12		6		6
FAGAN AREA	1020140015	HR/HR2PD	20.56	2			41	41
FAGAN AREA	1020140035	HR/HR2PD	12.35	3			37	37
TOTALS					0	22	101	123

*Assumed density of R-2 and R-3 zones has been adjusted downward to reflect realistic capacity based on recent projects.

Source: City of Santa Paula, 2022

Figure B-2

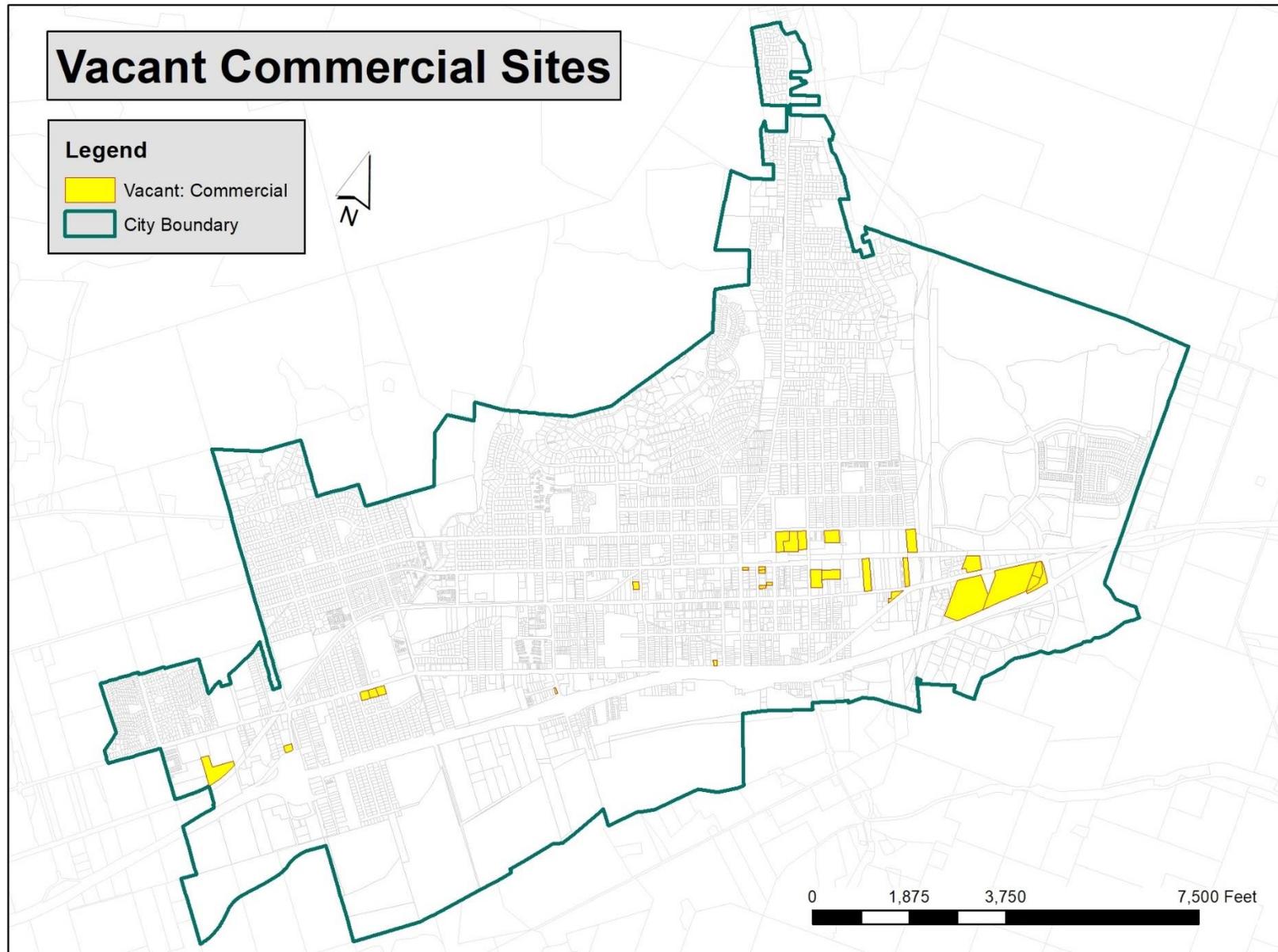


**Table B-5
Vacant Commercial Sites**

Address	APN	GP/ Zone	Size (ac)	Realistic Density	Potential Units			
					Lower	Mod	Above	Total
145 N. 10TH ST	1010212145	C-O/C-O	0.14	25		4		4
(NO ADDRESS)	1010211165	C/C-G	0.17	25		4		4
143 N. OJAI ST	1010211155	C/C-G	0.17	25		4		4
113 N. OJAI ST	1010211125	C/C-G	0.17	25		4		4
120 N. 11TH ST	1010211055	C/C-G	0.15	25		4		4
937 E. HARVARD BLVD	1030241615	C/C-G	0.19	25		5		5
326 S. PALM AVE	1050103155	C/C-G PD	0.12	25		3		3
(NO ADDRESS)	1020221015	C/C-G	0.64	25	2	14		16
(NO ADDRESS)	1020221025	C/C-G	0.64	25	2	14		16
(NO ADDRESS)	1020221035	C/C-G	0.64	25	2	14		16
(NO ADDRESS)	1030082405	CO/C-O	0.40	25		10		10
(NO ADDRESS)	0980030465	C/C-G PD	0.47	25		12		12
18004 E. TELEGRAPH RD	1070042015	C-LI/C-LI	11.28	20	34	192		226
18114 E. TELEGRAPH RD	1070042070	C-LI/C-LI	11.01	20	33	187		220
18212 E. TELEGRAPH RD	1070042080	C-LI/C-LI	1.02	20	3	17		20
(NO ADDRESS)	1070042045	C-LI/C-LI	0.91	20	3	15		18
(NO ADDRESS)	1070042065	C-LI/C-LI	1.27	20	4	22		25
1435 E. HARVARD BLVD	1010260145	C/C-G	0.55	25	2	12		14
1260 E. SANTA PAULA ST	1010183395	C-LI/C-LI	1.60	20	5	27		32
132 N. 13 TH ST	1010241185	C-LI/C-LI	1.53	20	5	26		31
980 W TELEGRAPH RD	0980020305	C-LI/C-LI	4.0	20	12	68		80
(NO ADDRESS)	1010172055	C-LI/C-LI	1.4	20	4	24		28
(NO ADDRESS)	1010172085	C-LI/C-LI	1.9	20	6	32		38
(NO ADDRESS)	1010172095	C-LI/C-LI	2.1	20	6	36		42
(NO ADDRESS)	1010241135	C-LI/C-LI	1.8	20	5	31		36
1485 E. MAIN ST	1010250025	C-LI/C-LI	1.2	20	4	20		24
1345 E MAIN ST	1010250115	C-LI/C-LI	2.0	20	6	34		40
(NO ADDRESS)	1070170250	C-LI/C-LI	2.0	20	6	34		40
18029 E. TELEGRAPH RD	1070041015	C-LI/C-LI	2.2	20	7	37		44
Totals			51.67		151	905	0	1,056

Source: City of Santa Paula, 2022

Figure B-3



Appendix C – Public Participation Summary

Public participation is an important component of the planning process in Santa Paula, and this update to the Housing Element has provided residents and other interested parties numerous opportunities for involvement.

A Housing Task Force comprised of stakeholders with local knowledge and expertise in housing issues was formed to help advise City staff throughout the update process, and several informal events were held at Main Street Open Houses to gather opinions.



Housing Element Update advertisement banner



Main Street Open House #1

Public notices of all workshops, events and hearings were published in the local newspaper (in English and Español) in advance of each meeting, as well as posting the notices on the Channel 10 Community Access Bulletin Board and on the City's website.

The draft Housing Element was made available for review at City Hall and posted on the City's Housing Element website (www.mysantapaula.com).

Notice of the availability of the draft Housing Element was also circulated to housing advocates and nonprofit organizations representing the interests of lower-income persons and special needs groups (see Table C-1 containing a list of organizations notified of opportunities for participation).

After receiving comments on the draft Housing Element from the State Housing and Community Development Department, a proposed final Housing Element was prepared and made available for public review on the City website on April 21, 2022 prior to review and adoption by the Planning Commission and City Council.

During the Housing Element update process, the most frequent public comments were related to the high cost of housing in Ventura County and the limited availability of affordable housing for the local workforce, particularly farmworkers and other service sector employees.

The City has made significant efforts to address these issues, most notably through the adoption of the new General Plan and zoning amendments that allow residential development in all commercial zones, including stand-alone multi-family projects.

As shown in Appendix B (Table B-2) these regulatory changes have directly led to the approval of over 300 lower-income units in commercial zones.



Main Street Open House #2



<https://www.mysantapaula.com/>

The following is a list of meetings and other events held during the preparation of this Housing Element. Public meetings were televised on Channel 10, the local public access channel.

- **Project website (English & Español) – www.MySantaPaula.com**
- **Project timeline**



Housing Element Update proposed timeline

- **Frequently Asked Questions**
- **Opinion survey**



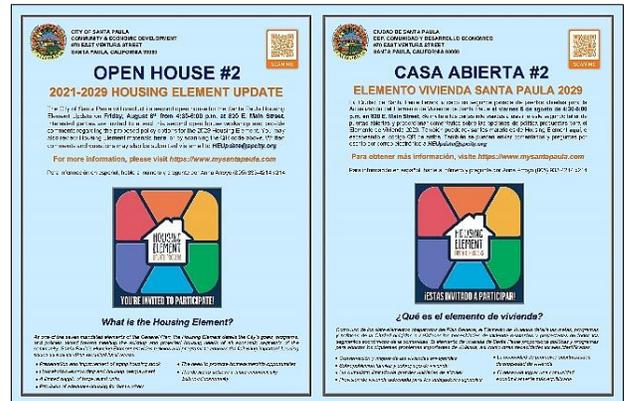
MySantaPaula. 'Comments & Surveys' page

- **Stakeholder interviews**
- **Santa Paula Times**
- **Social Media**



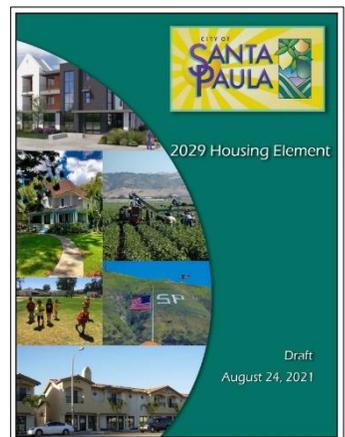
Facebook social media outreach

- **07/07/2021, Planning Commission/City Council Study Session**
- **07/15/2021, Main Street Open House #1**
- **07/30/2021, Publication of potential new Goals, Policies, Programs**
- **08/06/2021, Main Street Open House #2**



Main Street Open House #2 notice

- **08/16/2021, Publication of Recommended Draft Housing Element – Full Document**
- **08/24/2021, Planning Commission Hearing**
- **09/15/2021, City Council Hearing**
- **60-Day HCD and Public Review**
- **11/17/2021, Publication of Revised Draft Housing Element**



Draft 2029 Housing Element

- **11/23/2021, Planning Commission Hearing**
- **12/15/2021, City Council Hearing**
- **12/18/2021, Planning Commission/City Council Study Session**
- **3/22/2022, Planning Commission hearing**
- **4/21/2022 Publication of Revised Draft Housing Element**
- **4/26/2022, Planning Commission hearing**
- **TBD, City Council hearing**

Table C-1 Housing Element Notification List

PEOPLE'S SELF-HELP HOUSING
56 E. MAIN ST., SUITE 200
VENTURA, CA 93001
(805) 781-3088

BLANCHARD COMMUNITY LIBRARY
ATTN: NED BRANCH, DISTRICT DIR.
119 N. 8TH ST
SANTA PAULA, CA 93060

SO CAL EDISON COMPANY
ATTN: GLEN GOODRICH, PLANNING
10060 TELEGRAPH RD.
VENTURA, CA 93004

S.P. DOWNTOWN MERCHANTS ASSN
P.O. BOX 214
SANTA PAULA, CA 93061

S.P. HOUSING AUTHORITY
PO BOX 404
SANTA PAULA, CA 93061

SO CAL GAS COMPANY
ATTN: JIM HAMMEL, TECH SERVICES
9400 OAKDALE AVE.
CHATSWORTH, CA 91313-230

VERIZON COMMUNICATIONS INC
ATTN: ENGINEERING/PLANNING DEPT
201 FLYNN RD.
CAMARILLO, CA 93012

S.P. CHAMBER OF COMMERCE
PO BOX 1
SANTA PAULA, CA 93061

VENTURA COUNTY STAR
ATTN: MARY SELZNICK
550 CAMARILLO CENTER DRIVE
CAMARILLO, CA 93010

FILLMORE GAZETTE
P.O. BOX 865
FILLMORE, CA 93016

SANTA PAULA TIMES
ATTN: PEGGY KELLY
120 DAVIS ST
SANTA PAULA, CA 93060

CHILD DEV. RESOURCES VTA COUNTY
ATTN: LINDA ROSEBURR, MANAGER
221 VENTURA BLVD
OXNARD, CA 93036

LIMONEIRA COMPANY
1141 CUMMINGS RD.
SANTA PAULA, CA 93060

MEXICAN AMERICAN CHAMBER OF
COMMERCE
P.O. BOX 497
SANTA PAULA, CA 93061

V.C. HUMAN SERVICES AGENCY
ATTN: MELISSA LIVINGSTON, DIRECTOR
855 PARTRIDGE DR
VENTURA, CA 93003

SANTA PAULA LATINO TOWN HALL
P.O. BOX 128
SANTA PAULA, CA 93061

SUPERVISOR KELLY LONG
BROWN MAIL # L1880
800 S. VICTORIA AVE
VENTURA, CA 93009

V.C. HOMELESS & HOUSING COALITION
ATTN: RICK SCHROEDER
4001 MISSION OAKS BLVD
CAMARILLO, CA 93012

MANY MANSIONS
ATTN: DOUGLAS MENGES, VP
1259 E. THOUSAND OAKS BLVD
THOUSAND OAKS, CA 91362

HABITAT FOR HUMANITY VTA COUNTY
ATTN: DARCY TAYLOR, CEO
1850 EASTMAN AVE
OXNARD, CA 93030

S.P. UNIFIED SCHOOL DISTRICT
ATTN: JEFFREY WEINSTEIN, SUPT.
201 S. STECKEL DR
SANTA PAULA, CA 93060

AMCAL MULTI-HOUSING INC.
ATTN: FRANK B. CHANG, VP
30141 AGOURA RD., STE 100
AGOURA HILLS, CA 91301-4332

BIA OF SOUTHERN CALIFORNIA
ATTN: DIANA CORONADO, VP VTA CNTY
24 EXECUTIVE PARK, SUITE 100
IRVINE, CA 92614

BRIGGS SCHOOL DISTRICT
12465 FOOTHILL RD
SANTA PAULA, CA 93060

CABRILLO ECONOMIC DEV CORP
ATTN: MARGARITA DE ESCONTRIAS
702 COUNTY SQUARE DR
VENTURA, CA 93003

HOUSE FARMWORKERS
ATTN: DEBBIE BROKAW JACKSON
P.O. BOX 402
SANTA PAULA, CA 93061

MUPU SCHOOL DISTRICT
4410 N. OJAI RD
SANTA PAULA, CA 93060

Frequently Asked Questions

Santa Paula 2021-2029 Housing Element Update

1. What is a Housing Element?

State law¹ requires each city to adopt a comprehensive, long-term General Plan for its physical development. General Plans include several “elements” that address various topics. The Santa Paula General Plan² was comprehensively amended in 2020 and is organized into the following elements:

- Land Use
- Circulation and Mobility
- Environmental and Cultural Resources
- Hazards and Public Safety
- Public Services and Utilities
- Economic Development and Downtown
- Housing

The Housing Element establishes goals, policies, and actions to maintain and improve the existing housing stock and expand housing opportunities for families of all economic levels and those with special needs such as farmworkers and persons with disabilities.

Most components of the General Plan have a “horizon year” of 2040; however, State law requires that the Housing Element be updated every 8 years. Housing Element planning periods are sometimes referred to as “cycles”. The City’s current Housing Element covers the planning period extending from 2013 to 2021, which is referred to as the “5th Housing Element cycle” in reference to the five required updates that have occurred since a major revision to State Housing Element law in 1980. Every city in the Southern California Association of Governments (“SCAG”) region³ is required to prepare a Housing Element update for the 6th planning cycle, which spans the 2021-2029 period, regardless of when the other elements of the General Plan were adopted.

State law⁴ establishes detailed requirements for Housing Elements, which are summarized in California Government Code Section 65583:

The housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, mobile homes, and emergency shelters, and shall make adequate provision for the existing and projected needs of all economic segments of the community.

¹ California Government Code Sec. 65300 *et seq.*

² <https://spcity.org/213/Long-Range-Planning-Special-Studies>

³ The SCAG region includes Los Angeles, Orange, Riverside, San Bernardino, Ventura and Imperial counties.

⁴ California Government Code Sec. 65580 *et seq.*



Santa Paula 2021 Housing Element FAQ

2. What are the most important issues that must be addressed in the Housing Element?

The major issues that must be addressed in the Housing Element are: 1) how City policies, plans and regulations help to meet the region's housing needs for people at all income levels; and 2) how City land use regulations accommodate the special housing needs of persons with disabilities or other difficulties.

- **Accommodating Regional Housing Needs.** Every community is dependent on a variety of low- and moderate-income workers in jobs such as child and elder care, medical support, business and personal services, retail trade, agriculture, construction and property maintenance. While Federal and State programs provide funding assistance for affordable housing, city plans and regulations determine the type and location of new housing that can be built. Therefore, a sufficient supply of affordable housing is dependent on both housing subsidies and city development regulations.

Under State law⁵ all cities are required to plan for additional housing to accommodate population growth and existing housing problems such as overcrowding and high housing cost. State law recognizes that most housing is built by private developers, not cities. However, cities are required to adopt policies, plans, and development regulations to encourage a variety of housing types that are affordable for persons at all income levels, including multi-family rental housing and accessory dwelling units ("ADUs"). The Regional Housing Needs Assessment ("RHNA") is the method by which each jurisdiction's share of new housing needs is determined (see #4 below).

- **Housing for Persons with Special Needs.** Under State law⁶ cities must also ensure that their plans and regulations encourage the provision of housing for persons with special needs including:
 - ✓ Reasonable accommodation for persons with disabilities
 - ✓ Transitional housing
 - ✓ Supportive housing
 - ✓ Residential care facilities
 - ✓ Emergency shelters and "navigation centers"
 - ✓ Large (5+) families
 - ✓ Farmworker housing

3. What is "affordable" housing?

By definition, housing is usually considered "affordable" when total housing cost, including utilities, is no more than 30% of a household's gross income. State law describes five income categories, which are based on county median income as shown in Table 1.

⁵ California Government Code Sec. 65583

⁶ California Government Code Sec. 65583(a)(5)



Santa Paula 2021 Housing Element FAQ

Table 1. Household Income Categories

Income Category	% of county median income
Extremely low	Up to 30%
Very low	31-50%
Low	51-80%
Moderate	81-120%
Above moderate	Over 120%

Source: California Government Code Sec. 65584(f)

Affordable housing costs for all jurisdictions in Ventura County that correspond to these income categories are shown in the following table. Affordability figures are adjusted each year and are based on family size. Table 2 provides figures for a 4-person family in 2021.

Table 2. Income Categories and Affordable Housing Costs – Ventura County

Income Category	Maximum Income	Maximum Affordable Rent	Maximum Affordable Price (est.)
Extremely low	\$33,850	\$845	*
Very low	\$56,450	\$1,411	*
Low	\$90,350	\$2,259	*
Moderate	\$118,550	\$2,964	\$500,000
Above moderate	Over \$118,550	Over \$2,964	Over \$500,000

Assumptions:

- Based on a family of 4 and 2021 State income limits
- 30% of gross income for rent or principal, interest, taxes & insurance plus utility allowance
- 10% down payment, 3.75% interest, 1.25% taxes & insurance, \$300 HOA dues

* For-sale affordable housing is typically at the moderate-income level

Source: Cal. HCD; JHD Planning LLC

4. What is the RHNA why is it important?

Each California city is required to plan for new housing to accommodate a share of regional needs. The Regional Housing Needs Assessment (“RHNA”) is the process established in State law⁷ by which each city’s housing needs are assigned.

Prior to each Housing Element planning cycle the region’s total housing need is determined by the California Department of Housing and Community Development (“HCD”) based upon economic and demographic trends, existing housing problems such as overcrowding and overpayment, and additional housing needed to ensure reasonable vacancy rates and replace units lost due to demolition or natural disasters. The total housing need for the region is then distributed to cities and counties by SCAG based upon criteria established in State law.⁸

In 2019 HCD determined that the total new housing need for the entire SCAG region in the 6th Housing Element cycle is 1,341,827 units. SCAG then prepares a RHNA plan that fully allocates the total RHNA to jurisdictions in the SCAG region.⁹ Table 3 shows the

⁷ California Government Code Sec. 65584 et seq.

⁸ California Government Code Sec. 65584(d)

⁹ <https://scag.ca.gov/housing>



Santa Paula 2021 Housing Element FAQ

RHNA allocations for Santa Paula, Ventura County, and the entire SCAG region. SCAG adopted the final RHNA plan in March 2022.

Table 3. 6th Cycle RHNA - Santa Paula, Ventura County and SCAG Region

	Santa Paula	Ventura County	SCAG Region
RHNA allocation 2021-2029 (housing units)	657	24,452	1,341,827

Source: SCAG, 3/4/2021

The RHNA distributes each jurisdiction’s total housing need by the income categories shown in Tables 1 and 2 above (the extremely-low and very-low categories are combined for RHNA purposes). The 6th cycle RHNA allocation for Santa Paula by income category is shown in Table 4.

Table 4. 6th Cycle RHNA by Income Category - Santa Paula

Very Low	Low	Moderate	Above Moderate	Total
102	99	121	335	657

Source: SCAG, 3/4/2021

5. Is the RHNA a construction quota or mandate?

The RHNA allocation identifies the amount of additional housing a jurisdiction would require in order to have enough housing at all price levels to fully meet the needs of its existing population plus its assigned share of projected growth over the next 8 years while avoiding problems like overcrowding and overpayment. The RHNA is a planning requirement that determines housing need, *not a construction quota or mandate*. Jurisdictions are not required to build housing or issue permits to achieve their RHNA allocations, but some provisions of State law establish specific requirements when housing production falls short of RHNA allocations. One such requirement is streamlined review and approval of housing development applications that meet specific standards.¹⁰ Other than requirements for streamlined permit processing, there are currently no legal or financial penalties imposed on cities that do not achieve their RHNA allocations.

6. What must cities do to comply with the RHNA?

Each Housing Element update must analyze the city’s capacity for additional housing based on an evaluation of land use patterns, development regulations, development constraints (such as infrastructure availability and environmental conditions) and real estate market factors. The analysis must be prepared at a parcel-specific level of detail and identify properties (or “sites”) where additional housing could be built consistent with current regulations. This evaluation is referred to as the “sites analysis” and State law requires the analysis to demonstrate that the city has adequate capacity to fully accommodate its RHNA allocation in each income category. If the sites analysis does not demonstrate that adequate capacity exists to fully accommodate the RHNA, the Housing Element must describe what steps will be taken to increase capacity commensurate with the RHNA – typically through amendments to land use and zoning regulations that could facilitate additional housing development.

¹⁰ California Government Code Sec. 65913.4 (SB 35 of 2017)



Santa Paula 2021 Housing Element FAQ

7. How does Santa Paula propose to accommodate its RHNA allocation and remain in compliance with State housing law?

The Housing Element must include an analysis of potential capacity for additional housing based on land use plans and development regulations, and determine whether sufficient capacity is available to accommodate the RHNA allocation in all income categories. Capacity for additional housing can be provided either through new housing or mixed-use development or through accessory dwelling units (“ADUs”).

The City’s preliminary analysis indicates that capacity for additional housing based on current land use regulations is sufficient to fully accommodate the City’s RHNA allocation. Significant opportunities for new housing exist in areas zoned for residential development as well as in areas where a mix of residential, commercial and/or light industrial uses are allowed. Under State law, properties that are zoned to allow residential or mixed-use development at a density of at least 20 units/acre are considered appropriate to facilitate production of affordable housing. ADUs will also provide a portion of future housing need, particularly in the low- and moderate-income categories.

As part of the Housing Element update, the City will evaluate the potential for new housing development at a parcel-specific level of detail to confirm that existing plans and regulations provide adequate capacity to accommodate the RHNA allocation.

8. Housing development is very expensive in the urban areas of Southern California. How can Santa Paula meet its affordable housing needs?

Housing development is very expensive in Southern California, and housing that is affordable to low- and moderate-income families typically requires large financial subsidies. While State housing law is based on the premise that every city has an obligation to use its governmental powers to encourage housing development at all income levels, it is recognized that the City’s financial resources alone are not sufficient to produce all of the affordable housing needed. Major funding sources for affordable housing include Low Income Housing Tax Credits (“LIHTC”) and other Federal housing programs, State housing bonds, and private charitable foundations. While cities typically do not have the resources to provide significant financial assistance to housing developments, they can support affordable housing through programs that reduce development cost such as density bonuses, modified development standards and streamlined permit review.

9. What is “certification” of the Housing Element and why is it important?

The State Legislature has delegated authority to the California Department of Housing and Community Development (“HCD”) to review Housing Elements and issue findings regarding the elements’ compliance with the law.¹¹ When HCD issues a finding that the Housing Element is in substantial compliance with State law it is referred to as

¹¹ California Government Code Sec. 65585



Santa Paula 2021 Housing Element FAQ

“certification” of the Housing Element. In 2013 HCD determined that Santa Paula’s current Housing Element was in full compliance with State law. The City is now preparing a Housing Element update for the 2021-2029 period.

Housing Element certification is important for two main reasons:

- **Local control.** The General Plan provides the foundation for the City’s land use plans and zoning regulations, and the Housing Element is part of the General Plan. If the City were challenged in court on a planning or zoning matter and the Housing Element were found by the court to be out of compliance, the court could order changes to City land use plans or regulations and assume control over some City land use decisions. HCD certification establishes a “rebuttable presumption of validity”¹² that the Housing Element is in compliance with State law, which would support the City’s legal defense. Recent laws also allow for courts to impose fines if a jurisdiction fails to adopt a compliant Housing Element.¹³
- **Eligibility for grant funds.** Some State grant funds are contingent upon Housing Element certification.

...

¹² California Government Code Sec. 65589.3.
¹³ AB 101 of 2019

Appendix D – Fair Housing Assessment

Assembly Bill (AB) 686 requires housing elements to contain an Assessment of Fair Housing (AFH) consistent with the core elements of the analysis required by the federal Affirmatively Furthering Fair Housing (AFFH) Final Rule of July 16, 2015.

Under California law, AFFH means “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.”

To comply with AB 686, the City has completed the following outreach and analysis. The Analysis of Impediments to Fair Housing⁷ prepared by the County of Ventura in 2020 (the “AI”) provides extensive data and policy recommendations that supplemented City data used in this AFFH analysis. The AI was a collaborative effort between the HUD Entitlement Cities of Camarillo, Oxnard, San Buenaventura, Simi Valley, and Thousand Oaks, and the Ventura Urban County including the Cities of Fillmore, Moorpark, Ojai, Port Hueneme, Santa Paula, and the unincorporated areas of Ventura County.

1. Outreach

As discussed in the Public Participation appendix, early in the Housing Element update process the City developed a list of stakeholders with local expertise in housing issues, including fair housing. The stakeholder list included local service providers, affordable housing developers, and fair housing organizations in an effort to include the interests of lower-income residents and persons with special needs in the community.

Over the course of the Housing Element update process the City conducted a series of public meetings. Public notice of each meeting was posted on the City’s dedicated Housing Element website⁸ and was also sent directly to persons and organizations on the stakeholder list. Public meetings were held both online and in person to encourage those with mobility difficulties to participate. Agendas and other information for each meeting was posted on the City website to allow interested stakeholders to access to this information throughout the process. Interested persons were also encouraged to provide input or ask questions via telephone or email. Please refer to Appendix C: Public Participation Summary for additional information regarding the outreach efforts and how public input was incorporated into the Housing Element. Notices and other information were made available in both English and Spanish.

In addition to public workshops and hearings, the City also convened an Affordable Housing Task Force that included housing advocates, housing service providers, and community organizations who serve the interests of lower-income households and special needs groups to solicit comments and recommendations on housing needs, barriers to fair and affordable housing, and opportunities for development.

7 http://vcportal.ventura.org//CEO/community-dev/docs/Combined_AI.pdf

8 <https://www.cityofgoleta.org/city-hall/planning-and-environmental-review/advance-planning-division/housing-element-and-implementation/housing-element-2023-2031>

In addition to the public outreach conducted by the City of Santa Paula for the Housing Element update, the AI update included extensive public participation. Over a period of three months, Ventura County's community engagement efforts included six community meetings, six stakeholder meetings, three focus groups, two surveys (one administered to residents and another to stakeholders), and a 30-day public review period. In addition, the County's public outreach campaign included a general public relations component in which a project web page hosted by Ventura County, social media posts, and paper fliers were made publicly available to encourage public participation.

To encourage continuing stakeholder involvement in local housing issues throughout the planning period, Program 22 includes a commitment to conduct ongoing, proactive outreach to engage members of all socio-economic groups and recruit members of underrepresented groups to participate in City meetings.

2. Fair Housing Assessment

This section provides an assessment of fair housing issues in Santa Paula including fair housing enforcement and outreach capacity, patterns of integration and segregation, racial or ethnic patterns of concentration, disparities in access to opportunities, and disproportionate housing needs, including displacement risk.

A. Fair Housing Enforcement and Outreach Capacity

The AI conducted an analysis of fair housing discrimination cases and enforcement that evaluated private and public compliance with existing fair housing laws, regulations, and guidance, and provided an assessment of fair housing infrastructure in Ventura County. The AI analysis examined fair housing complaints; mortgage lending practices; and a review of relevant public policies.

The Ventura County contracts with the Housing Rights Center (HRC) of Los Angeles to assist in the administration of its Fair Housing Program and provide services on a regional basis to prevent or eliminate discriminatory housing practices. Participating entities include the Ventura Urban County areas of Fillmore, Moorpark, Ojai, Port Hueneme, and Santa Paula, and the Entitlement Jurisdictions Camarillo, Simi Valley, Thousand Oaks, and San Buenaventura. A private non-profit organization, HRC provides a range of free educational and advocacy services throughout the county in furtherance of the region's shared commitment to providing equal housing opportunities for all residents, regardless of income. Allegations of housing discrimination are investigated and litigated by HRC on behalf of the County.

A total of 35 housing discrimination cases in Ventura County were opened by HRC between 2017 and the first half of 2019, with a majority of the allegations of housing discrimination filed by the residents of Simi Valley (31 percent), Camarillo (29 percent) and Thousand Oaks (14 percent). Complaints pertaining to physical disability (66 percent) and mental disability (20 percent) were the most common.

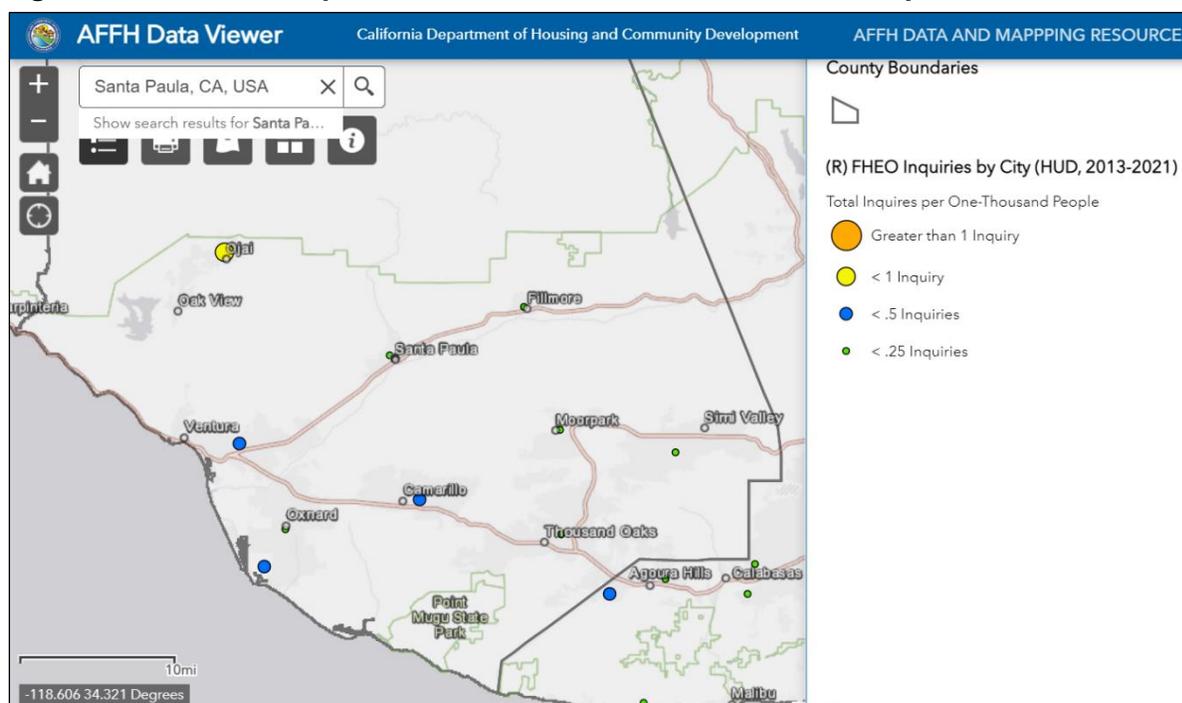
Discrimination based on national origin (6 percent), familial status (6 percent), and religion (3 percent) were less frequently reported. Over half of the complaints (57 percent) were successfully conciliated by HRC, with roughly a quarter either withdrawn by the client (17 percent) or closed with no enforcement action taken (9 percent). Fourteen percent (5

complaints) were reported as pending as of October 2019. The sole complaint of discrimination based on national origin, filed by a Camarillo resident in 2017, was referred to HRC's litigation department.

The services provided by HRC are augmented by the State of California's Department of Fair Employment and Housing (DFEH), which has the authority to investigate and prosecute violations of state civil rights laws on a state-wide basis, including the use of discriminatory language in housing advertisements. A complaint filed in 2017 by the Department of Fair Employment and Housing against a Moorpark landlord alleged discrimination because of marital and familial status and sexual orientation, as evidenced by the language used to advertise an available rental unit. Mediation efforts were unsuccessful, and a civil complaint was filed in Ventura County Superior Court the following year. The case was settled in March 2019, with the landlord required to pay damages and attorney fees in addition to reimbursing costs incurred by DFEH. The landlord was also required to participate in mandatory fair housing training and submit periodic compliance reports.

As seen in Figure D-1, the HCD AFFH Data Viewer reported a Fair Housing Enforcement and Outreach (FHEO) inquiry rate of less than 1 per 1,000 persons for the 2013-2021 period in Santa Paula.

Figure D-1 FHEO Inquiries – Santa Paula and Ventura County



Section IV: Constraints of this Housing Element describes ways the City of Santa Paula works to address potential impediments to fair housing choice, such as through reasonable accommodation procedures and zoning regulations for special needs housing (Program 17).

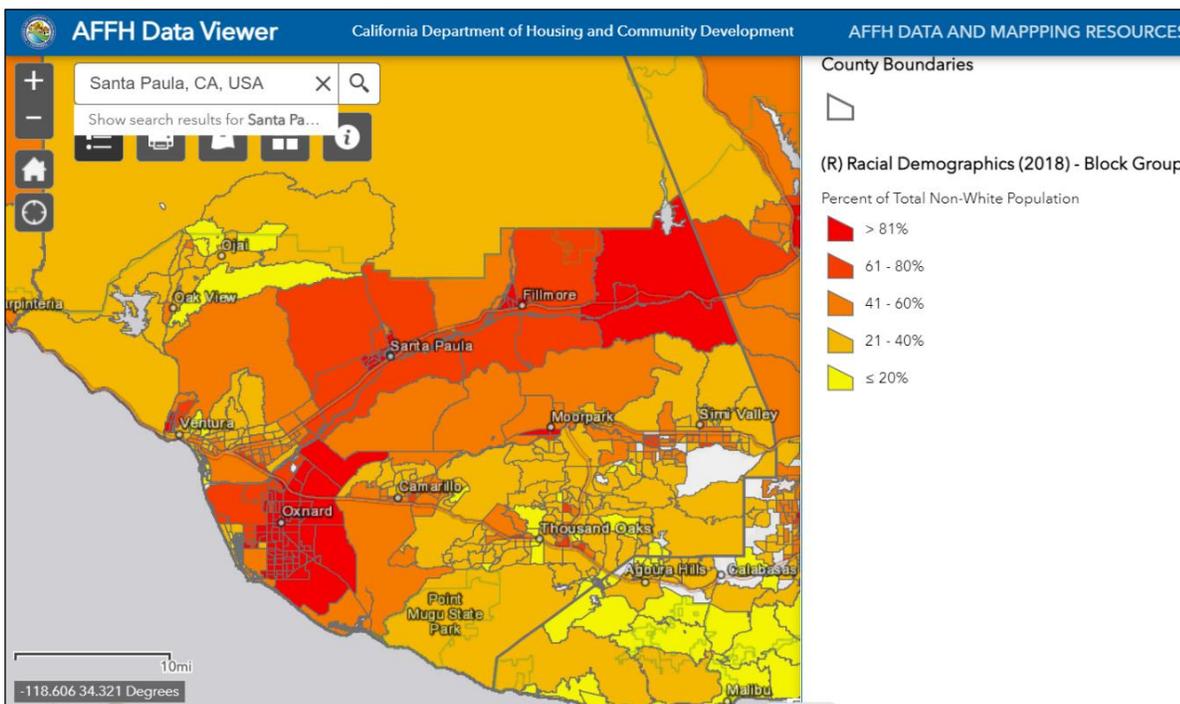
B. Patterns of Integration and Segregation

1) Race and Ethnicity

Ventura County is racially and ethnically diverse. Between 1980-2010, people who are Hispanic or non-White rose from 28 percent to 51 percent of the population. Within the same period, the Hispanic population increased from 20 percent to 40 percent of the County population. Likewise, the Asian and Pacific Islander population rose from 3 percent to 7 percent of the County population.

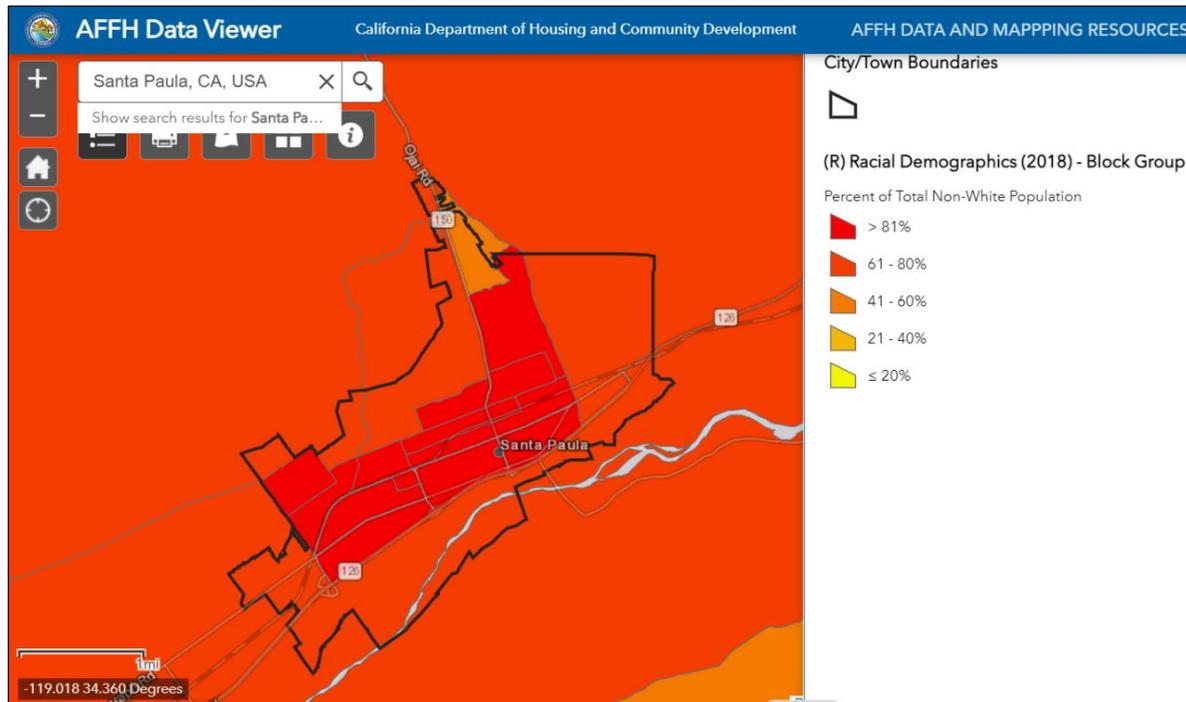
The population of Ventura County identifying as of Asian descent is currently 7 percent. Today the Hispanic population of Ventura County is just over 40 percent, though individual census tracts range from 5 to 97 percent. The resident population of Oxnard and the center of the County, through the cities of Santa Paula, Fillmore, and Piru, is a Hispanic majority. Oxnard has the highest overall Hispanic population of the HUD entitlement communities within Ventura County at 74 percent and Thousand Oaks has the lowest at 18 percent. The northern and far southeastern areas of Ventura County are predominantly non-Hispanic. Among Hispanic residents, the highest ancestry category is “Mexican”, with “Other Hispanic or Latino” as the second-highest category. Puerto Rican and Cuban are represented in very small percentages of the population. Countywide racial demographics are illustrated in Figure D-2.

Figure D-2 Racial Demographics – Ventura County



As seen in Figure D-3, the percentage of non-White population is more than 60 percent in all areas of Santa Paula with the exception of a small area in the northern tip of the city to the east of Ojai Road.

Figure D-3 Racial Demographics – Santa Paula

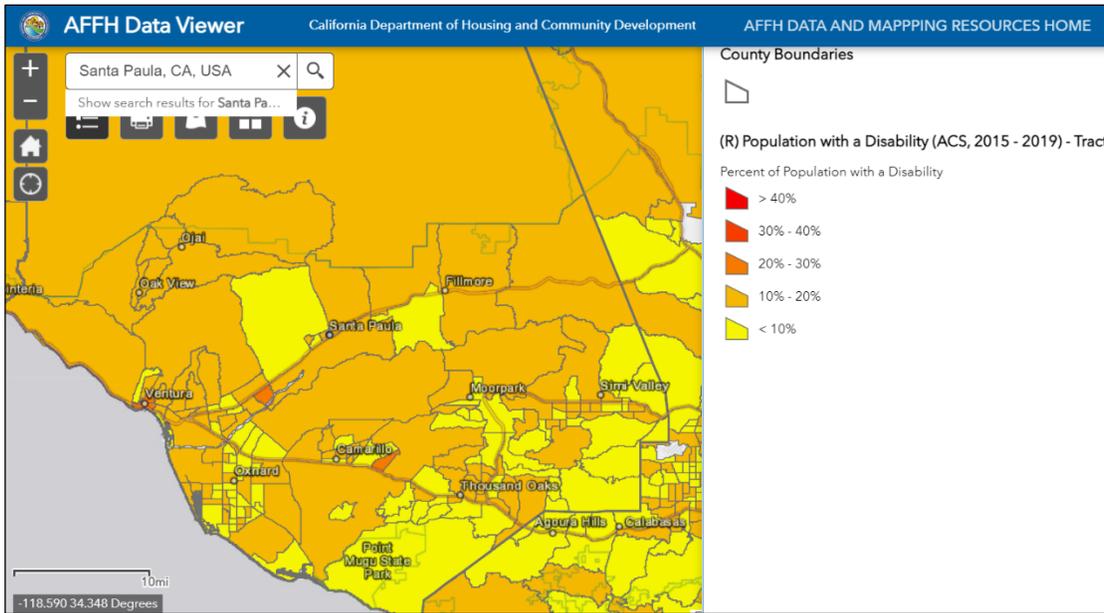


2) Persons with Disabilities

Residents reporting having some sort of disability is high in the senior population (over age 65) which, in areas with a high number of seniors, indicates a high need for specific services and disability accommodations (changing a rule or policy for a person based on disability) and modifications (changing a physical structure for a person based on disability). Disability accommodations and modifications may be needed in any number of venues like rental and homeowner housing, government service counters, community centers, and walkways. Services in demand for persons with disabilities include meal programs, home care and medical services, transportation, and other social services. Subsidies to provide these services to low- and moderate-income residents are particularly needed in these areas.

Figure D-4 shows the population reporting some type of disability in Ventura County census tracts.

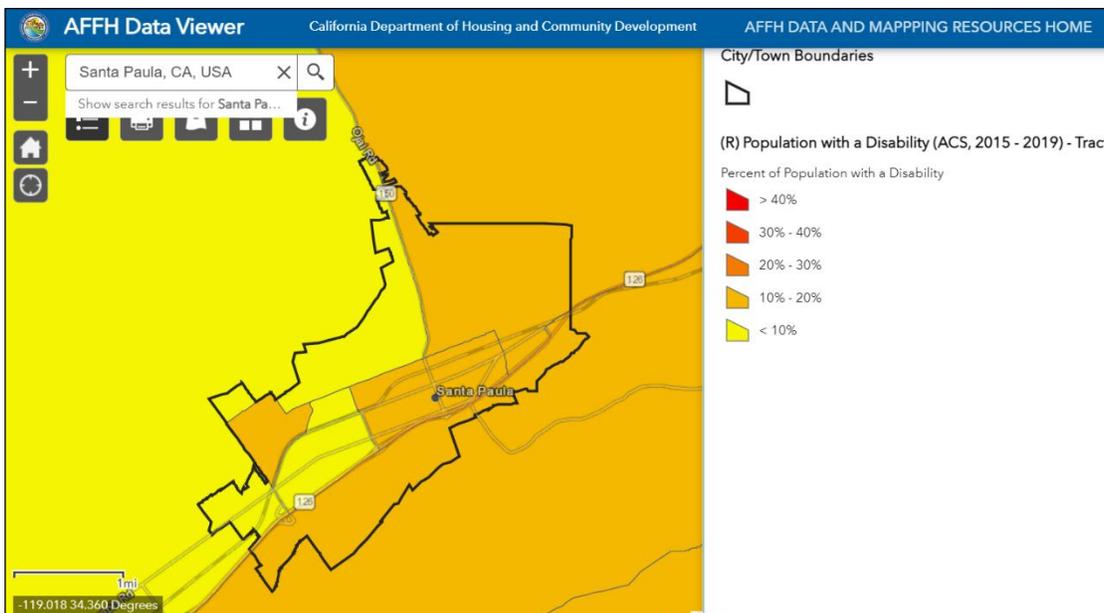
Figure D-4 Population with a Disability – Ventura County



As shown on Figure D-5, in most areas of Santa Paula the percentage of persons reporting a disability ranges from 10 to 20% while the disability rate in some areas in the western portion of the city is under 10%.

Additional data regarding the number of people with disabilities by disability type in Santa Paula is provided in Section II.E of the Housing Needs Assessment. Some individuals may experience more than one disability, and some disability types are not recorded for children below a certain age.

Figure D-5 Population with a Disability – Santa Paula



The housing needs of persons with disabilities vary, but generally include accessible and affordable housing, and access to supportive services. More severely disabled individuals may require a group living environment where supervision is provided, and the most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. The City of Santa Paula facilitates housing for persons with disabilities through its Reasonable Accommodation procedures and regulations to encourage production of supportive housing.

3) Familial Status

Familial status refers to the presence of children under the age of 18, whether the child is biologically related to the head of household, and the marital status of the head of households. Families with children may face housing discrimination by landlords who fear that children will cause property damage. Some landlords may have cultural biases against children of the opposite sex sharing a bedroom. Differential treatments such as limiting the number of children in a complex or confining children to a specific location are also fair housing concerns.

Single-parent households are also protected by fair housing law. Female-headed households with children require special consideration and assistance because of their greater need for affordable housing and accessible day care, health care, and other supportive services. Figure D-6 shows the percentage of children living in married couple households for the county as a whole while Figure D-7 shows the distribution in Santa Paula.

Figure D-6 Percentage of Children in Married Couple Households – Ventura County

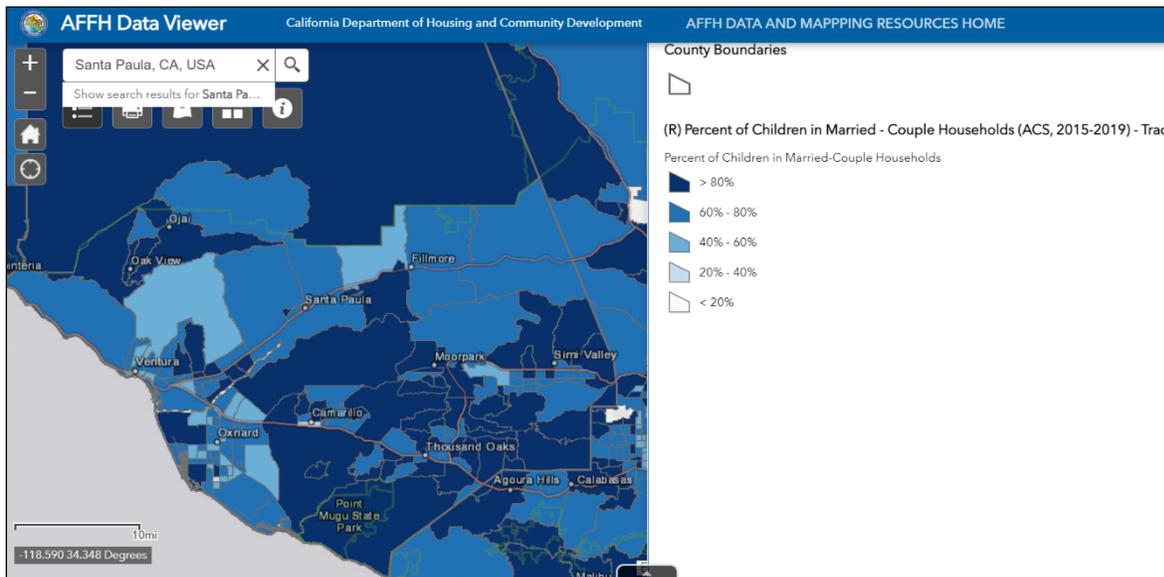
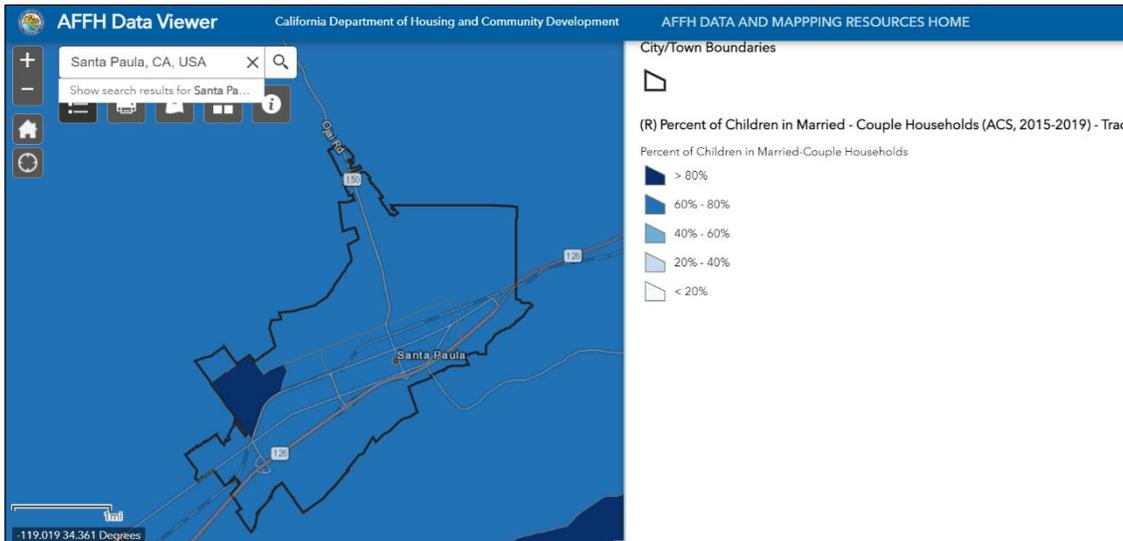


Figure D-7 Percentage of Children in Married Couple Households – Santa Paula



4) Income

Identifying low/moderate-income (LMI) areas is an important aspect in understanding patterns of segregation. HUD defines a LMI area as a Census tract or block group where over 51 percent of the population is LMI (based on HUD income definition of up to 80 percent of the AMI).

As seen in Figure D-8, higher LMI concentrations are located in the Santa Paula-Fillmore area, the Oxnard-Port Hueneme area and the area between of Ventura and Ojai. In Santa Paula, the central portion of the city has the highest percentages of LMI households (Figure D-9).

Figure D-8 Low/Moderate Income Population – Ventura County

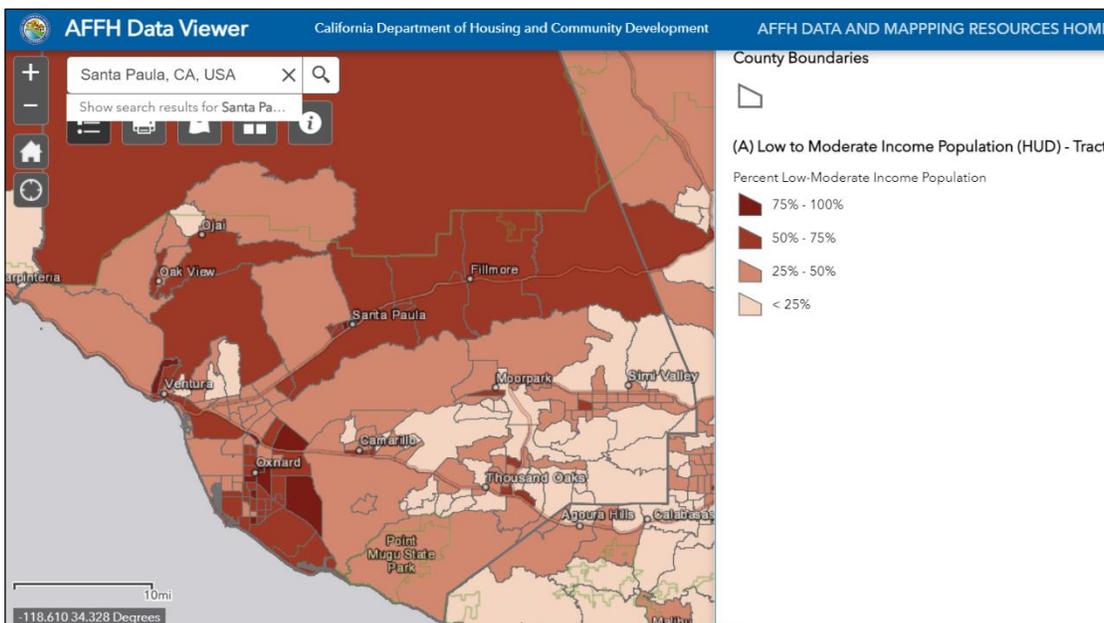
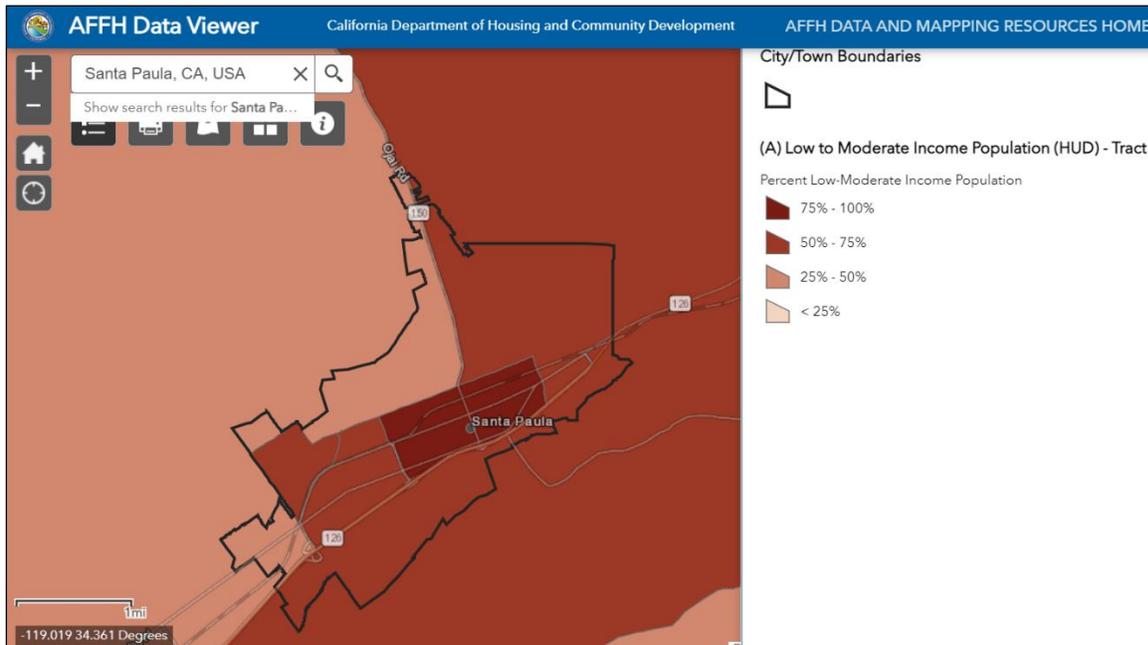


Figure D-9 Low/Moderate Income Population – Santa Paula

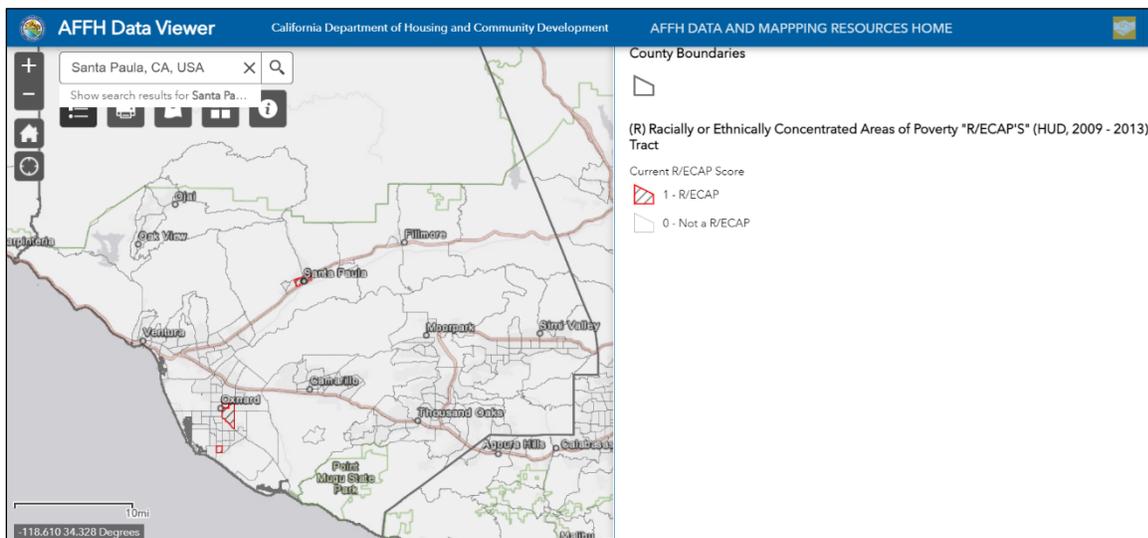


C. Racially/Ethnically Concentrated Areas

1) Racially/Concentrated Areas of Poverty

According to HUD, a racially or ethnically concentrated area of poverty (R/ECAP) is an area in which 50 percent or more of the population identifies as non-White and 40 percent or more of residents are living in poverty. Figure D-11 shows designated R/ECAP areas in Ventura County.

Figure D-10 Racially/Ethnically Concentrated Areas of Poverty – Ventura County

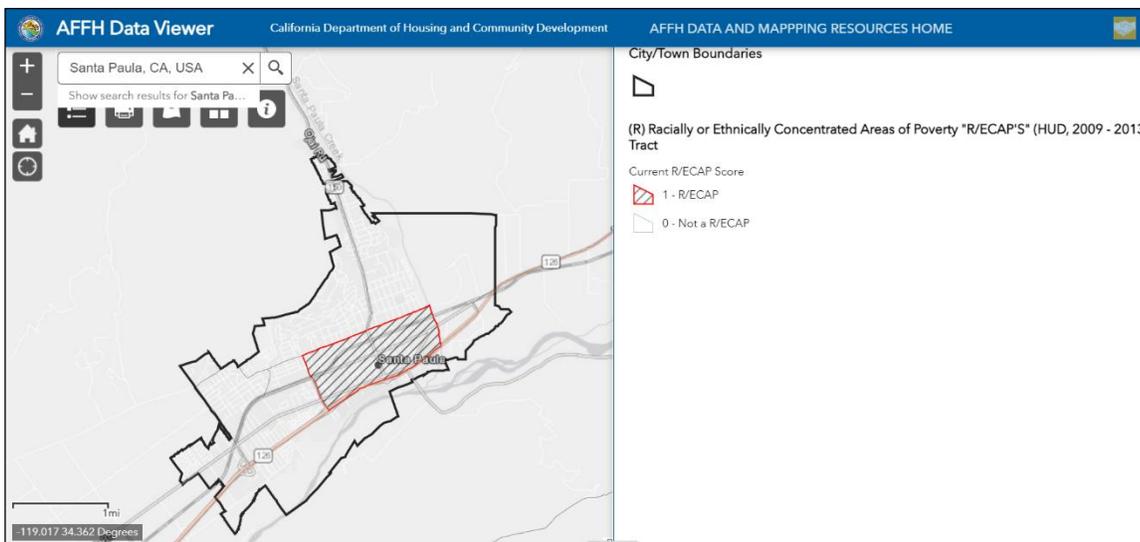


Households within R/ECAP tracts frequently represent the most disadvantaged households within a community and often face a multitude of housing challenges. R/ECAPs are meant to identify where residents may have historically faced discrimination and continue to be challenged by limited economic opportunity. Ventura County has seven census tracts designated as R/ECAP (in five contiguous areas), located in the cities of Ventura, Santa Paula, Oxnard, and Port Hueneme.

In 2013, one in 20 residents in Ventura County were living in a R/ECAP, equating to approximately 43,000 people. Every R/ECAP has a majority of households that are cost burdened (i.e., spending more than 30 percent of income on housing). R/ECAPs in the County are correlated with concentrations of Hispanic/Latino households, with all R/ECAPs having either a predominant (gap > 50 percent) or sizeable (gap between 10 percent to 50 percent) Hispanic/Latino majority. In the County in 2019, White residents and Asian residents have lower poverty rates relative to other racial and ethnic groups, at 5 percent and 3 percent, respectively; Hispanic/Latino households and those identifying as some other race alone have the highest rates, at 12 percent and 13 percent, respectively.

As shown in Figure D-11, the central portion of Santa Paula is a designated R/ECAP area. Program 22 in the Housing Plan includes training to landlords on requirements under fair housing law, such as the acceptance of Housing Choice Vouchers, and programs such as 15 (Adequate Sites), 20 (Objective Development Standards) and 21 (Affordability by Design) will help to expand the supply of affordable housing to provide more options for lower-income households throughout the city.

Figure D-11 Racially/Ethnically Concentrated Areas of Poverty – Santa Paula



2) Racially/Concentrated Areas of Affluence

According to the Housing and Community Development AFFH Guidance Memo, “segregation is a continuum, with polarity between race, poverty, and affluence, which can be a direct product of the same policies and practices.” Therefore, both sides of the continuum must be examined.

In Ventura County, most of the eastern portions of the county have higher median incomes and lower racial/ethnic diversity in comparison to areas along the Highway 126 corridor including Santa Paula. Non-Hispanic Whites are the predominant racial/ethnic group in the county, with established predominance in the northwestern agricultural communities near Meiners Oaks and the City of Ojai; and the eastern communities of Newbury Park, Bell Canyon, and Box Canyon.

While HCD does not provide a standard definition for RCAAs and the HCD Data Viewer does not provide RCAA maps, available data regarding the percentage White population and median household income can provide insight into racially concentrated areas of affluence. Table D-1 compares the median household incomes of White/non-Hispanic residents in Santa Paula and Ventura County as a whole to the median incomes for the total population of the city and county. This table shows that in Santa Paula, the median income for non-Hispanic White households is about 9% higher than for the city's population as a whole. Countywide, the median income for non-Hispanic White households is about 11% higher than for the population as a whole. These data suggest that there is somewhat less racial concentration of affluence in Santa Paula than in Ventura County as a whole.

Table D-1: Median Household Income by Race – Santa Paula and Ventura County

Median Household Income	Santa Paula	Ventura County
All Households	62,241	89,295
White Alone (not Hispanic)	67,926	98,731

Source: U.S. Census ACS 2015-2019
B19013 (all)
B19013H (white alone, not Hispanic)

D. Disparities in Access to Opportunity

1) Overview and Historic Context

California housing law requires cities to analyze disparities in access to opportunity as part of the fair housing assessment. The California Tax Allocation Committee (TCAC) and the California Department of Housing and Community Development (HCD) have developed maps showing access to various types of opportunities such as education, economic, transportation, and environmental indicators.

The City Project's report, *Healthy Parks, Schools, and Communities: Mapping Green Access and Equity for Southern California*⁹, provides the following historical context of segregation patterns in Ventura County:

The history of the land that is now Ventura County stretches back for centuries. Its first inhabitants were the Chumash tribe of Native Americans. Though the first European explorers arrived in the 1500s, it was not until 1769 that Spaniards began settling on the land. Spanish religious leaders named the area Buenaventura, meaning "good fortune." In the middle of the 1800s, large

⁹ The City Project, *Healthy Parks, Schools and Communities: Mapping Green Access and Equity for Southern California*.
(https://scag.ca.gov/sites/main/files/fileattachments/thecityprojsouthern_california_report_final_medium_res.2.pdf?1605983124)

migrations of white Europeans, land ownership, and commercial agricultural production changed the landscape.

By the 1860s, development of municipal infrastructure such as a post office, schools, rights to the ownership of land, and the incorporation of cities had begun in earnest. Non-Hispanic white Europeans began buying parcels of land based on the land's capability for agricultural production and, to a lesser extent, petroleum extraction. Within a short period of time, a small number of white landowners controlled large areas of land throughout Ventura County. The need for laborers brought an influx of immigrants, particularly from Mexico. Keenly aware that they were severely outnumbered by the immigrant workers, these wealthy landowners set up a political and economic power system that ensured that the labor force would be subservient.

A series of discriminatory laws were passed preventing Mexicans and Native Americans from owning land, voting, or sending their children to the same schools the white children attended. The same laws applied to the Chinese and Japanese immigrants, as well as the few African Americans who had migrated to the area. These ethnic groups were relegated to live only in either certain designated areas of cities or in villages of farm worker housing. These housing conditions further segregated populations into ghettos and restricted access to parts of the county where non-Hispanic whites lived. Non-Hispanic white landowners also kept their workers' wages low so the workers would remain dependent on the landowners. This also meant that workers were forced to work long hours to earn enough money to support their families and thus had less time to enjoy recreational activities such as visiting a park.

In the 1940's a new wave of migration came to Ventura County when two military bases were built along the coast to support the U.S. Navy during World War II. This wave of migration brought many U.S. citizens from other parts of the country, including a significant number of African Americans, to Ventura County in search of employment.

Discriminatory policies and political and economic power imbalances remained intact in Ventura County through the 1950s and into the 1960s. People of color faced discrimination in housing, schools, retail stores, movie theaters, transportation services, parks, pools, and beaches. Racially restrictive housing covenants were used in Ventura County up until the late 1960s. Non-white farmers, including Chinese, Japanese, and Mexicans, were not allowed to own the land they farmed. Moreover, Latino, black, and Asian residents were only permitted to live in certain sections of town, sometimes referred to as "set asides." This led to the creation of ghettos, such as La Colonia in Oxnard and the Santa Paula's east side, often called "Mexican Town."

TCAC/HCD Opportunity Maps

Across the nation, affordable housing has been disproportionately developed in Non-White communities of color with higher poverty rates and not in more affluent areas, thereby reinforcing the concentration of poverty and racial segregation in low opportunity and low resource areas. Several agencies, including HUD and HCD, in coordination with the

California Tax Credit Allocation Committee (TCAC), have developed methodologies to assess and measure geographic access to opportunity (including education, poverty, transportation, and employment) in areas throughout California.

The HCD/TCAC Opportunity Maps rate geographic areas according to level of resources for various topics such as educational, economic and environmental opportunity. High resource areas are areas, which according to research, offer low-income children and adults the best chance at economic advancement, high educational attainment, and good physical and mental health. As shown in the TCAC maps below, communities in El Rio, Saticoy, Piru, North Ventura Avenue, and along Highway 126 have the lowest resources in the unincorporated County. The highest resource areas are located just outside the cities of Ojai near Meiners Oaks and Casitas Springs, Santa Rosa Valley, Box Canyon, Bell Canyon, and the Santa Monica Mountains area.

2) Educational Opportunity

Educational opportunity scores for Ventura County as a whole are shown in Figure D-12. As shown in Figure D-13, TCAC educational opportunity scores are relatively low in Santa Paula, and are lowest in the western areas of the city.

Figure D-12 TCAC Educational Opportunity Areas – Ventura County

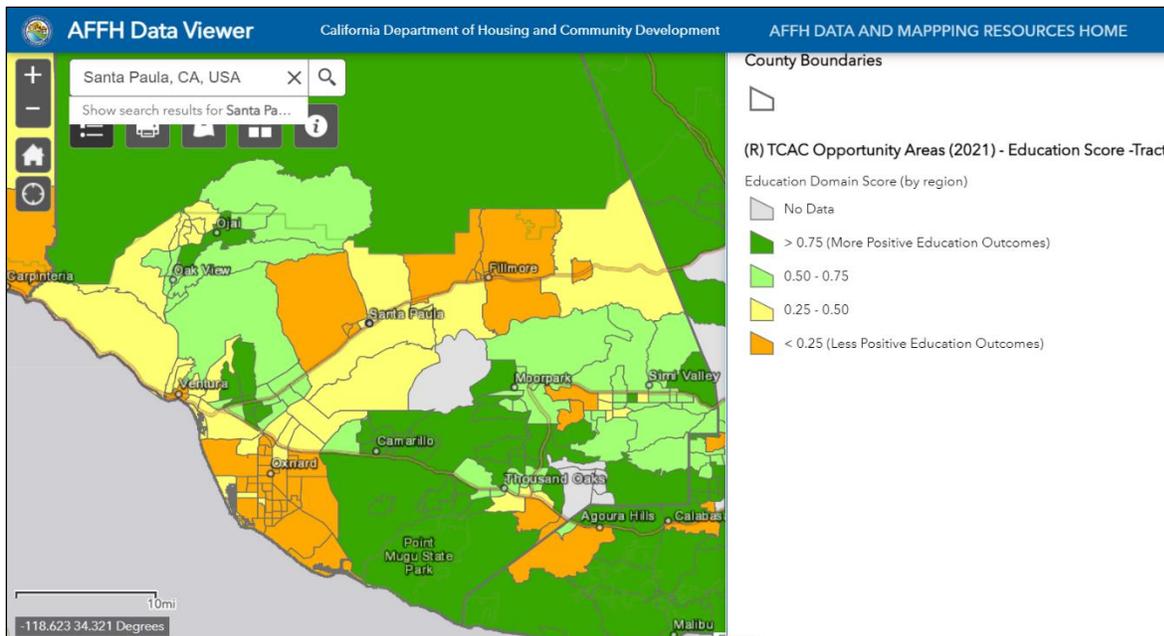
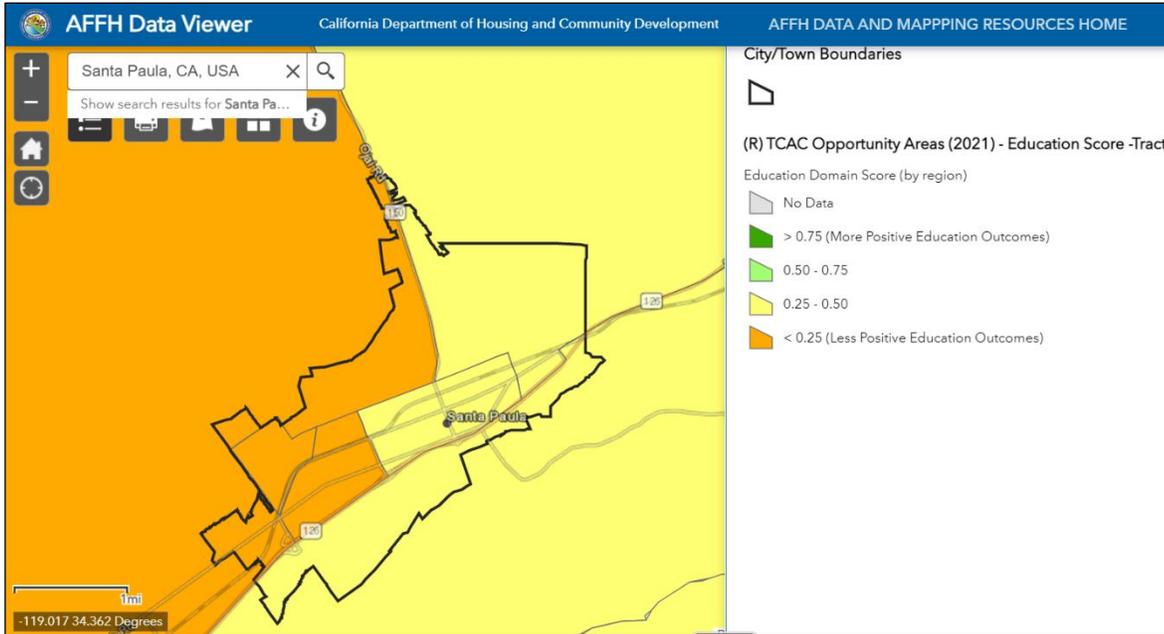


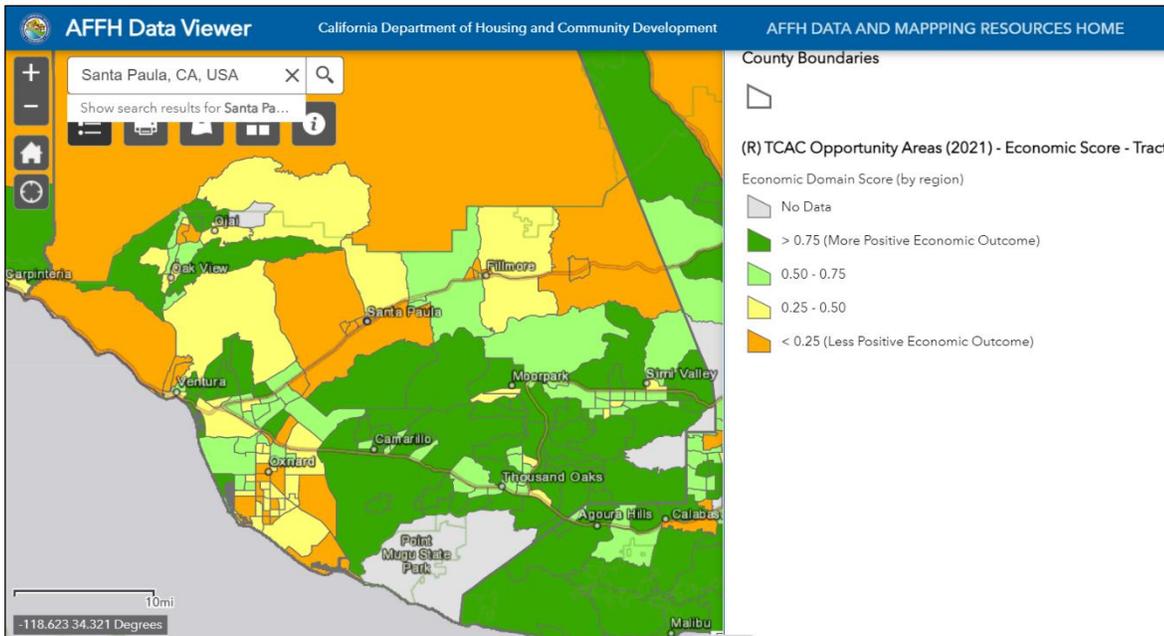
Figure D-13 TCAC Educational Opportunity Areas – Santa Paula



3) Economic Opportunity

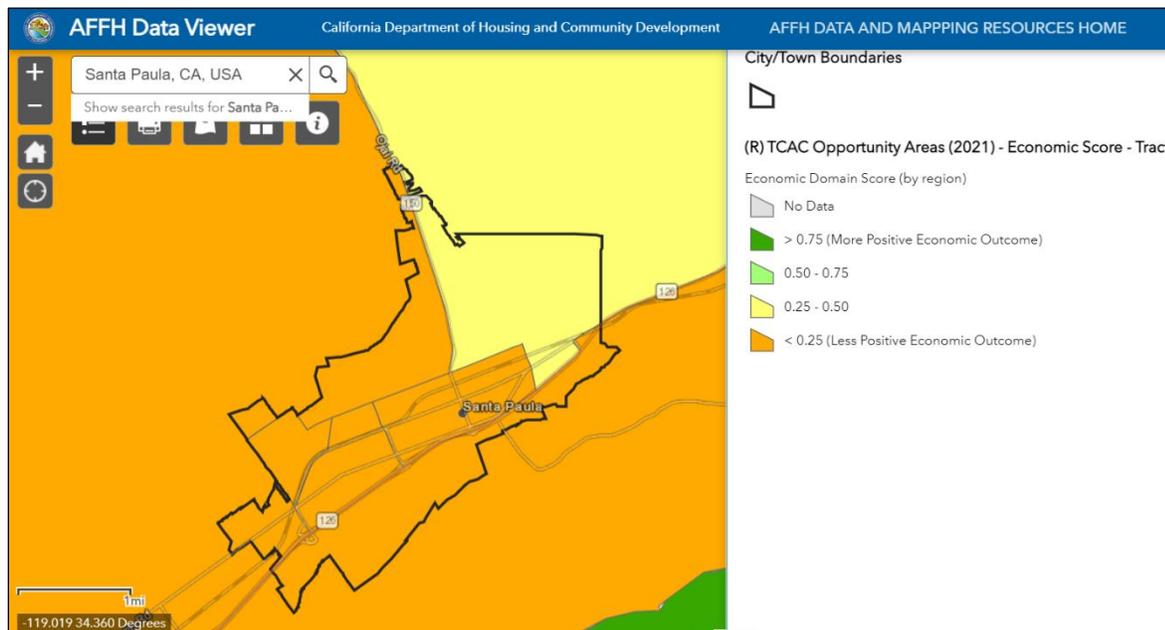
In Ventura County, the highest access to economic opportunity is found in the areas including Ventura, Ojai and the southeastern portions of the county including Camarillo, Thousand Oaks, Moorpark and Simi Valley, as seen in Figure D-14.

Figure D-14 TCAC Economic Opportunity – Ventura County



In Santa Paula, economic opportunity scores are relatively low with the highest economic opportunity in the eastern portion of the city (Figure D-15). These disparities are similar to those for educational opportunity scores.

Figure D-15 TCAC Economic Opportunity – Santa Paula



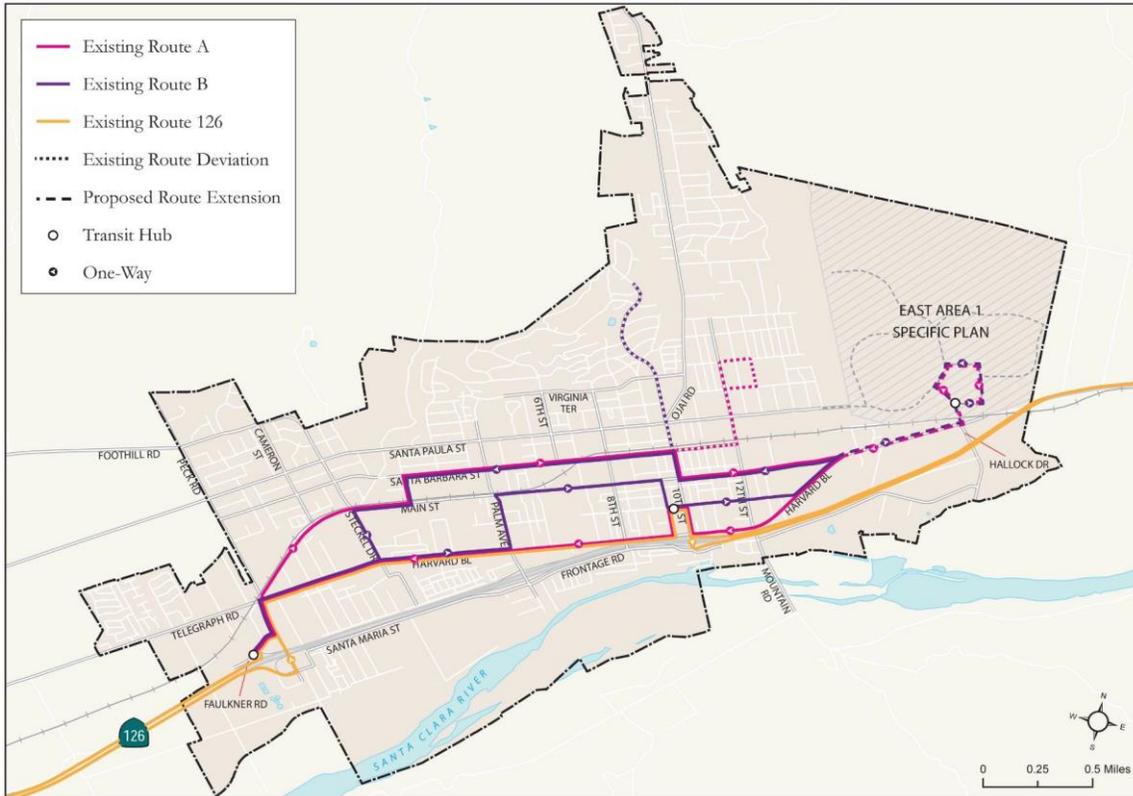
4) Transportation Opportunities

Transportation access plays an important part in equal access to neighborhoods, employment, healthcare, and other services for those who cannot or choose not to drive a car due to disability, financial constraints, legal barriers or other factors. Public transportation exists within Ventura County as regional bus systems, city bus systems, ADA paratransit services, and stops along the interstate train system.

Bus service in Santa Paula is provided by Ventura County Transportation Commission (VCTC) through a combination of VCTC inter-city transit routes and local services operating under the name Valley Express. The Valley Express offers bus routes serving Santa Paula High School, Glen City Elementary School, Blanchard Elementary School, Isbell Middle School, Grace Thille Elementary School, and demand-based service to Barbara Webster Elementary School. These services are offered in addition to inter-city bus service along SR 126 between Ventura and the unincorporated community of Piru, by way of Santa Paula.

Santa Paula's bus stops provide access throughout the city as well as to the SR 126 corridor, which provides access to adjacent areas such as Fillmore and Ventura (Figure D-16). An expansion of the multi-modal hub located in Downtown Santa Paula at the intersection of Ventura and Mill Streets has long been planned to include a variety of public transit options including bus, taxi, and shuttle service. Mobility hubs can serve as regional connection points that make transit transfers and connections easier.

Figure D-16 Public Transportation Routes – Santa Paula



5) Environmental Opportunities

Environmental Opportunity scores are based on the California Fair Housing Task Force Methodology for the 2021 TCAC/HCD Opportunity Map¹⁰ as described below.

The environmental domain relies on twelve of the indicators that are used in the California Office of Environmental Health Hazard Assessment (OEHHA)'s CalEnviroScreen 3.0 tool under the “exposures” and “environmental effect” subcomponents of the “pollution burden” domain. To mirror the CalEnviroScreen 3.0 approach to calculating pollution burden scores, the exposure indicators are weighed twice as heavily as the environmental effects burden indicators because they are considered to have more of an impact on pollution burden. The indicators for each category are listed below:

Exposure indicators:

1. Ozone Concentrations
2. PM2.5 Concentrations
3. Diesel PM Emissions
4. Drinking Water Contaminants
5. Pesticide Use
6. Toxic Releases from Facilities
7. Traffic Density

Environmental effects indicators:

8. Cleanup Sites
9. Groundwater Threats
10. Hazardous Waste Generators and Facilities
11. Impaired Water Bodies
12. Solid Waste Sites and Facilities

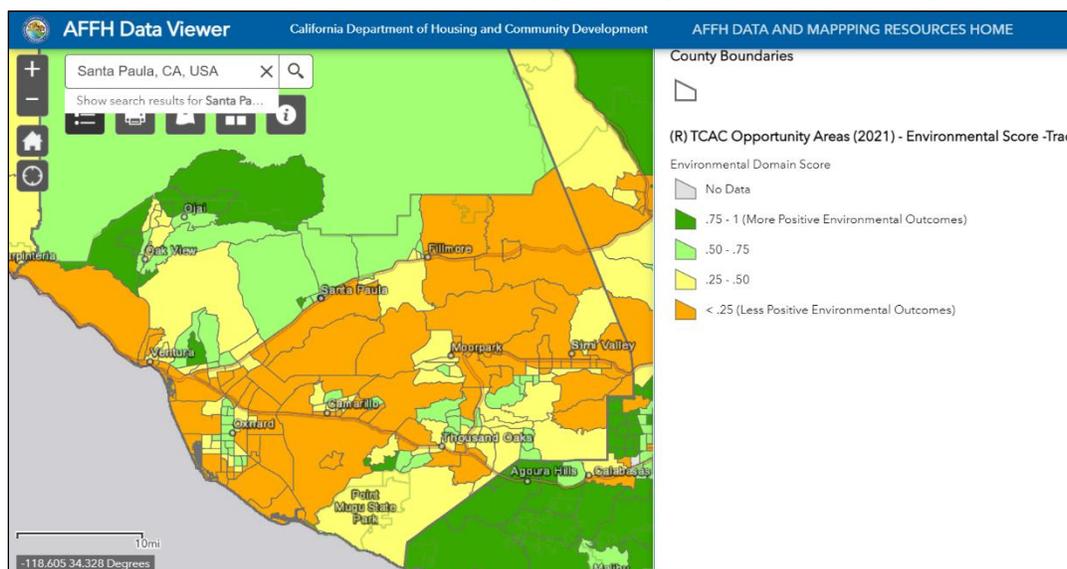
¹⁰ <https://www.treasurer.ca.gov/ctcac/opportunity/2021-hcd-methodology.pdf>

CalEnviroScreen 3.0 is a statewide risk assessment tool that measures the cumulative impacts of multiple sources of pollution. The indicators were selected based on scientific literature that confirms their detrimental effects on human, and especially child, health; the completeness, accuracy, and currency of the data; and the widespread concerns about each indicator in California. CalEnviroScreen 3.0 was developed to support the Affordable Housing and Sustainable Communities program and other programs that allocate funding from sale of cap-and-trade revenue, but it is explicitly acknowledged as a tool that can be used for a variety of policy and planning purposes. For more information on CalEnviroScreen 3.0, see the OEHHA website.¹¹

One limitation of the environmental quality indicators is that the levels of a pollutant are generally measured at a limited number of points statewide; the levels of the pollutant are then estimated for other areas that are not immediately adjacent to the measurement site. Additionally, there are some indicators which may have a large impact in one area of a census tract, but which could have only a marginal effect at another location in the same census tract. This is particularly true of stationary polluting sources (for example, impaired water bodies like lakes), where the impact decreases as the distance from the site decreases.

Environmental opportunity scores for Ventura County as a whole are shown in Figure D-17. This map shows that the highest scores are found in the mountainous area north of Ventura as well as a few other areas.

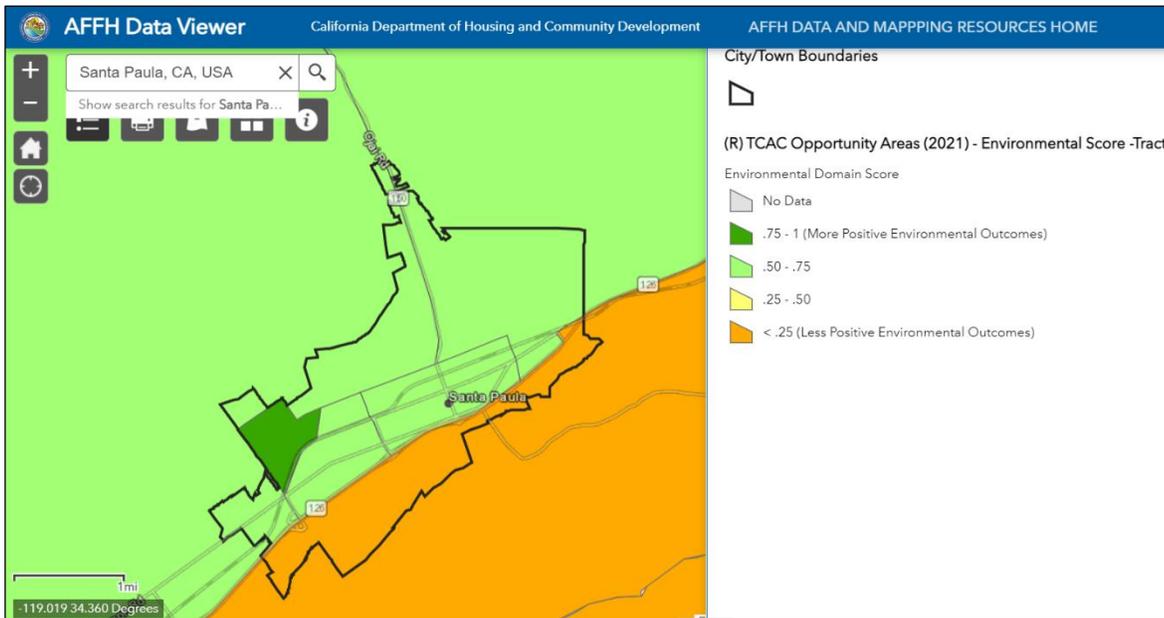
Figure D-17 TCAC Environmental Opportunity – Ventura County



¹¹ California Office of Environmental Health Hazard Assessment (OEHHA) CalEnviroScreen 3.0 website: <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30>.

In Santa Paula, the highest environmental opportunity scores are found in the northern portions of the city (Figure D-18) while neighborhoods south of the SR-126 freeway show lower scores.

Figure D-18 TCAC Environmental Opportunity – Santa Paula



6) Disadvantaged Communities

Senate Bill 1000 (SB 1000) requires cities with designated disadvantaged communities to include environmental justice goals and policies in the General Plan. Per SB 1000, the California EPA uses CalEnviroScreen, a mapping tool to identify disadvantaged communities. CalEnviroScreen examines various indicators to characterize pollution and socioeconomic factors. As seen in Figure D-19 below, disadvantaged communities in Ventura County are located in the Ventura, Oxnard and Santa Paula areas. Figure D-20 shows that the portion of Santa Paula designated as a disadvantaged community is located south of the SR-126 freeway.

Figure D-19 Disadvantaged Communities – Ventura County

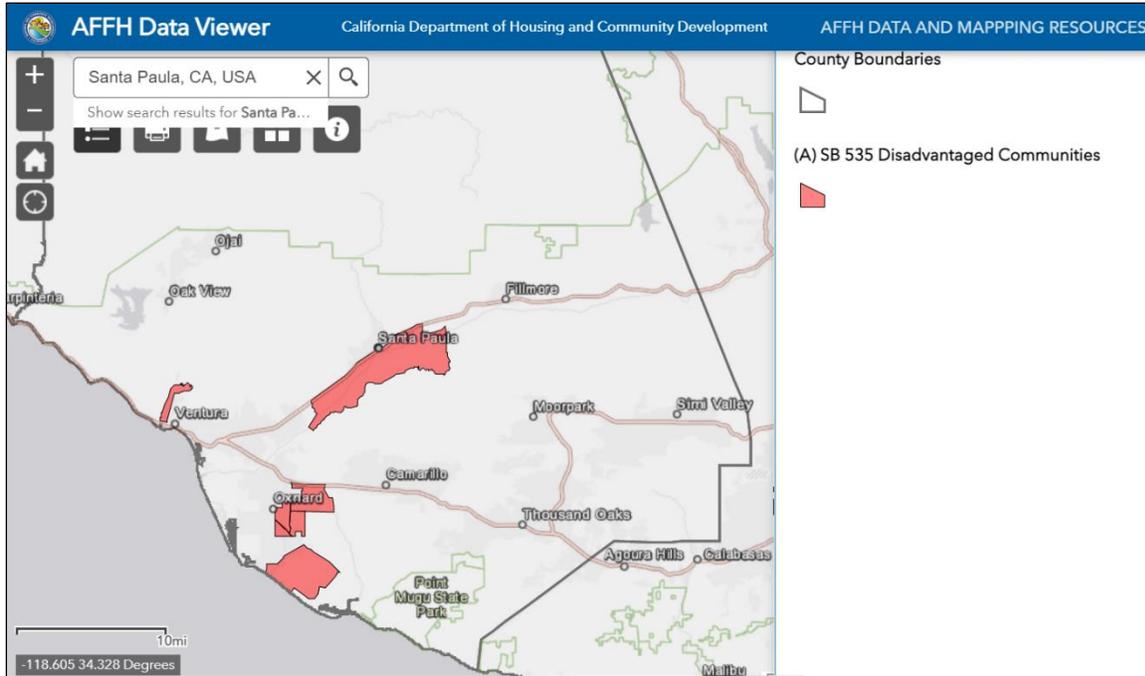
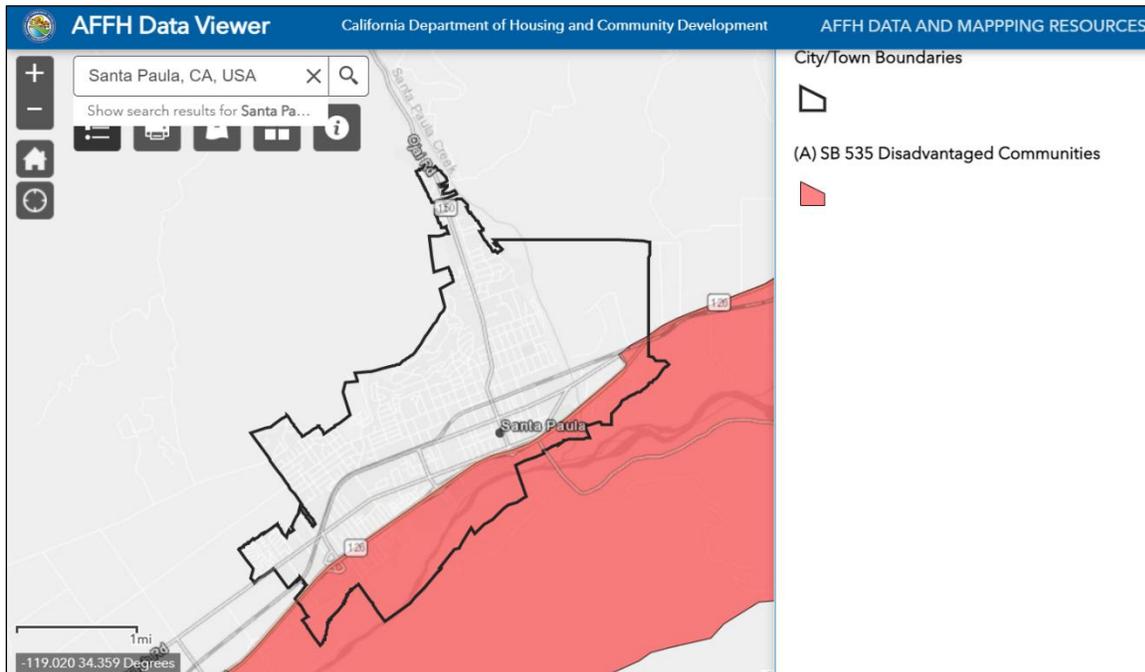


Figure D-20 Disadvantaged Communities – Santa Paula



E. Disproportionate Housing Needs and Displacement Risk

The AFFH Rule Guidebook (24 C.F.R. § 5.152) defines “disproportionate housing needs” as “a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing needs when compared to the proportion of a member of any other relevant groups or the total population experiencing the category of housing need in the applicable geographic area.” The analysis is completed by assessing cost burden, severe cost burden, overcrowding, and substandard housing. In addition, this analysis examines homelessness and displacement risk.

1) Cost Burden (Overpayment)

A household is considered cost-burdened if it spends more than 30 percent of its income in housing costs, including utilities. Reducing housing cost burden can also help foster more inclusive communities and increase access to opportunities for persons of color, persons with disabilities, and other protected classes.

The County AI¹² reported that about 21 percent of Ventura County households are considered lower and moderate income, earning less than 80 percent of the County Area Median Income (AMI). Among the household types, elderly and other households had the highest proportion of extremely-low-income households, at 18 percent and 12 percent, respectively. At least 35 percent of renter households in every jurisdiction in Ventura County had a housing cost burden. Rates of renter cost burden were highest in the cities of Fillmore, Moorpark, and Santa Paula. While housing affordability per se is not a fair housing issue, when minority, senior, and disabled households are disproportionately impacted by housing cost burden issues, housing affordability has a fair housing implication. Also, housing affordability tends to disproportionately affect minority populations. In Ventura County, Hispanic (56 percent) and Black (42 percent) households had a considerably higher percentage of lower- and moderate-income households than the County as a whole (36 percent). Non-Hispanic Whites (30 percent) had the lowest proportion of households in the lower- and moderate-income categories. In this regard, housing affordability is a fair housing concern.

Figure D-21 and Figure D-22 show the geographic distribution of overpayment rates for renters and homeowners in Ventura County.

¹² Ventura County Analysis of Impediments 2020, p. 8

Figure D-21 Renters Overpaying for Housing – Ventura County

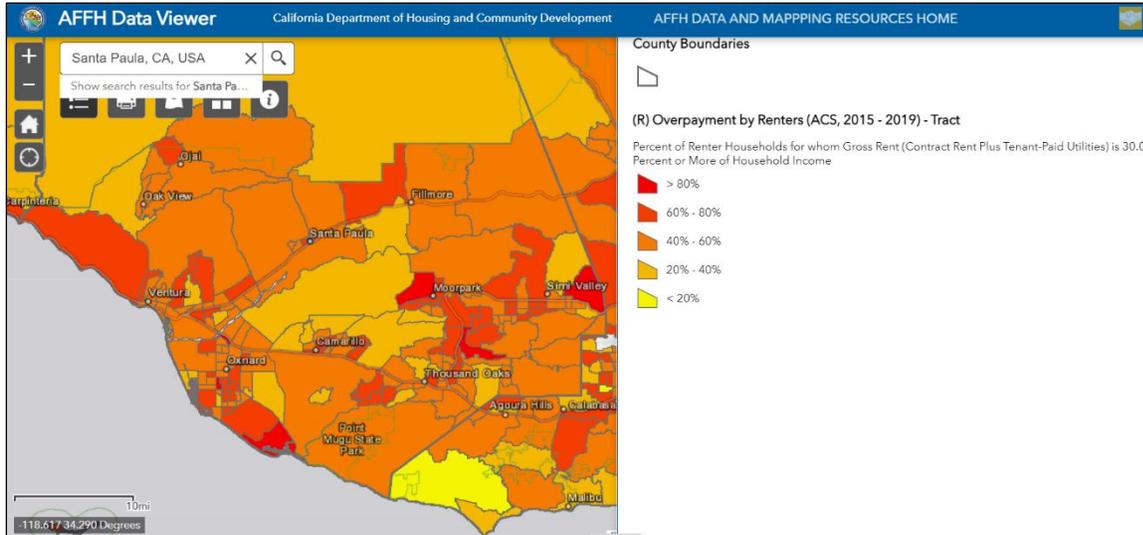
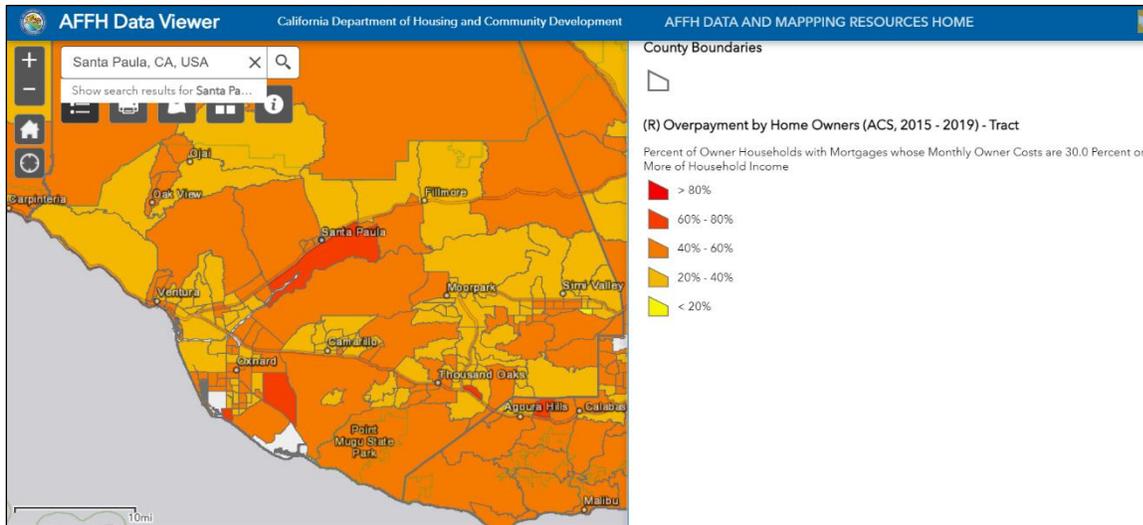


Figure D-22 Homeowners Overpaying for Housing – Ventura County



According to recent HUD estimates (Figure D-23) approximately 2,383 renter households (59% of all renters) and 1,525 owner households (31% of all owners) in Santa Paula were paying more than 30% of income for housing. The highest rates of overpayment occur among very-low-income and extremely-low-income households. The impact of housing overpayment on lower-income households is particularly significant for special needs populations such as seniors, persons with disabilities, and female-headed households with children.

Figure D-23 Cost Burden by Tenure and Income Category – Santa Paula

Income by Cost Burden (Renters only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income less-than or= 30% HAMFI	1,130	950	1,260
Household Income >30% to less-than or= 50% HAMFI	890	240	1,160
Household Income >50% to less-than or= 80% HAMFI	319	4	845
Household Income >80% to less-than or= 100% HAMFI	40		285
Household Income >100% HAMFI	4		515
Total	2,383	1,194	4,065
Income by Cost Burden (Owners only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income less-than or= 30% HAMFI	190	150	315
Household Income >30% to less-than or= 50% HAMFI	340	200	715
Household Income >50% to less-than or= 80% HAMFI	415	85	1,005
Household Income >80% to less-than or= 100% HAMFI	245	85	755
Household Income >100% HAMFI	335	10	2,125
Total	1,525	530	4,915

As shown in Figure D-24, overpayment among Santa Paula renters is most prevalent in the central portion of the city and ranges between 60 and 80 percent of renter households. Outside of the central core area, overpayment affects 40 to 60 percent of renter households. As seen in Figure D-25, the highest rates of overpayment for Santa Paula homeowners (60-80 percent) occurs in the southern portion of the city.

Figure D-24 Renters Overpaying for Housing – Santa Paula

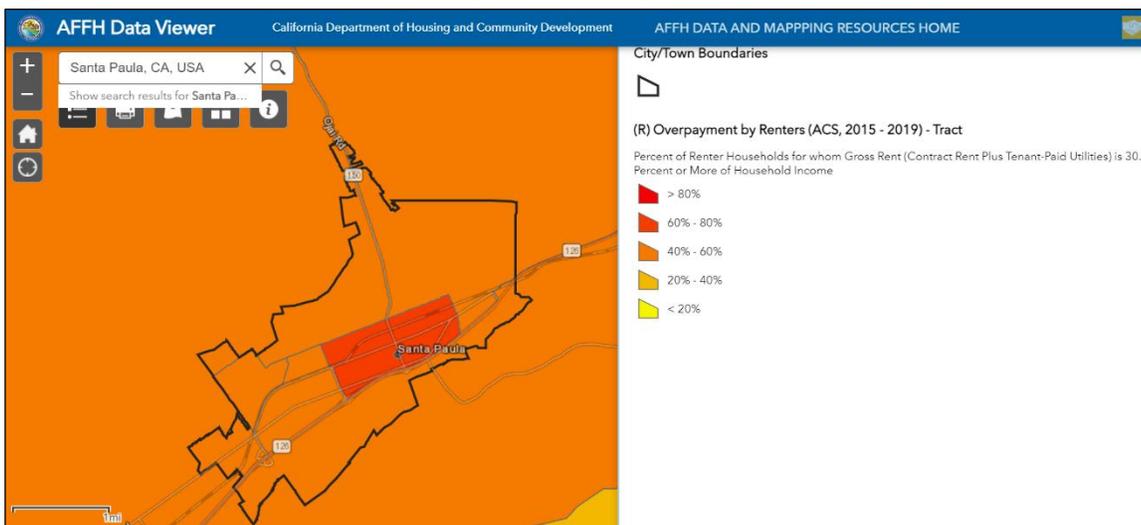
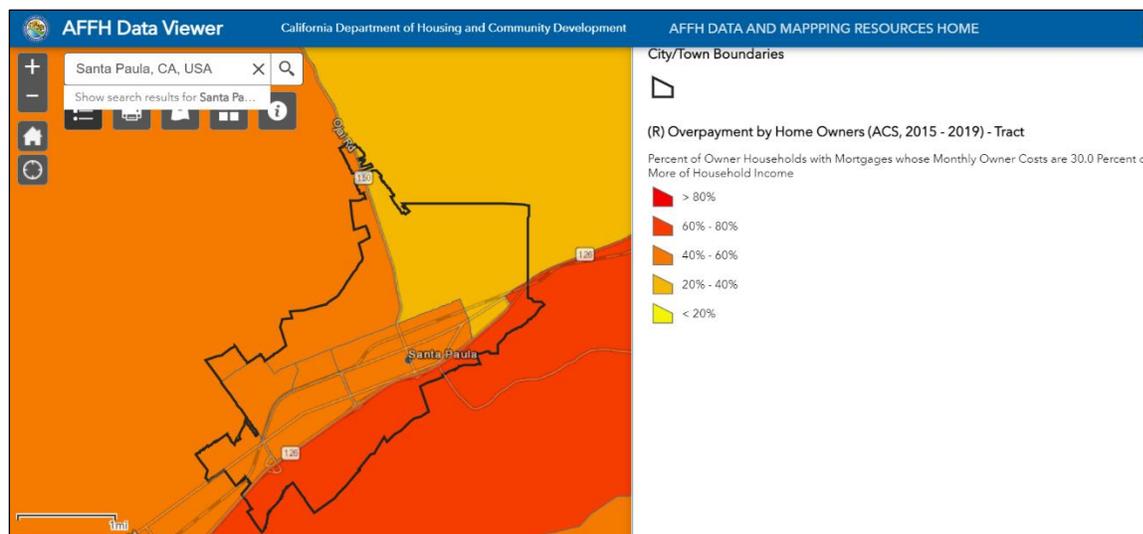


Figure D-25 Homeowners Overpaying for Housing – Santa Paula

The problems of overpayment are addressed in the Housing Plan through efforts to facilitate production and preservation of affordable housing, such as Program 4-Section 8 Rental Assistance, Program 9-Workforce and Special Needs Housing Development, Program 10-Multi-Family Housing Acquisition and Rehabilitation, Program 11-Affordable Housing Funding Sources, 12-Inclusionary Housing.

2) Overcrowding

“Overcrowding” is defined as a housing unit occupied by more than 1.01 persons per room (excluding kitchens, porches, and hallways). A unit with more than 1.51 occupants per room is considered “severely overcrowded.” The incidence of overcrowded housing is a general measure of whether there is an available supply of adequately sized housing units. Overcrowding is also related to overpayment, because households may not be able to afford a large enough home to accommodate their needs. Overcrowding can lead to a variety of other problems such as lower educational performance among children, psychological stress and adverse health impacts.

For Ventura County as a whole, overcrowding is most common in the Santa Paula and Oxnard areas (Figure D-26). Within Santa Paula, the highest rates of overcrowding (over 20 percent) occur in the south-central and southwestern portions of the city (Figure D-27).

Figure D-26 Overcrowded Households – Ventura County

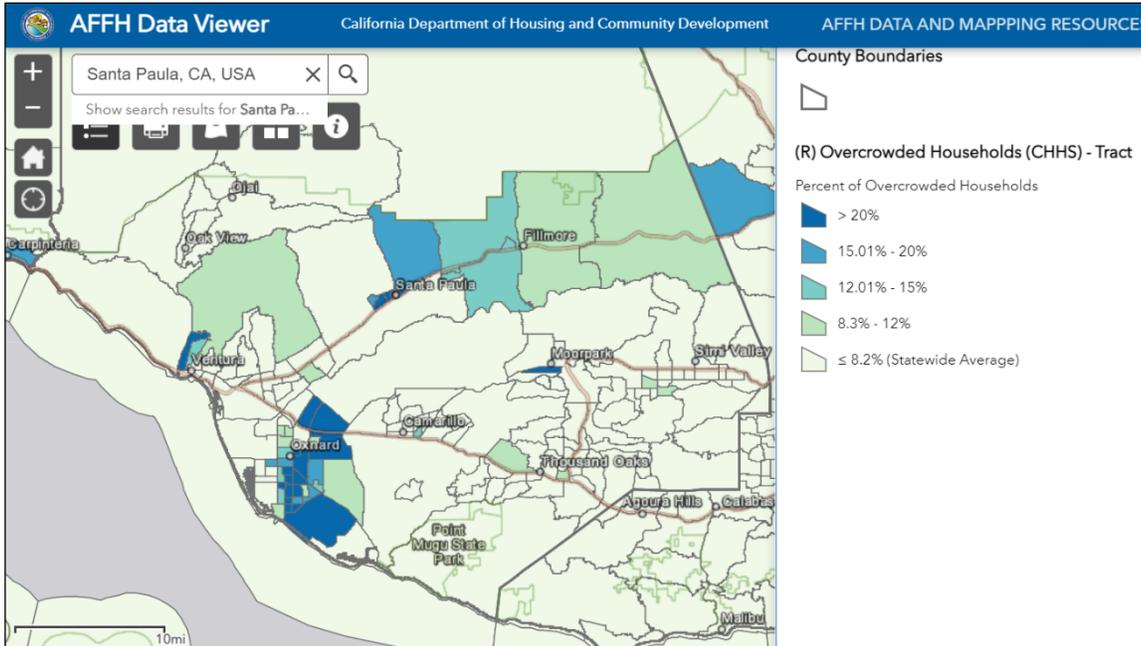
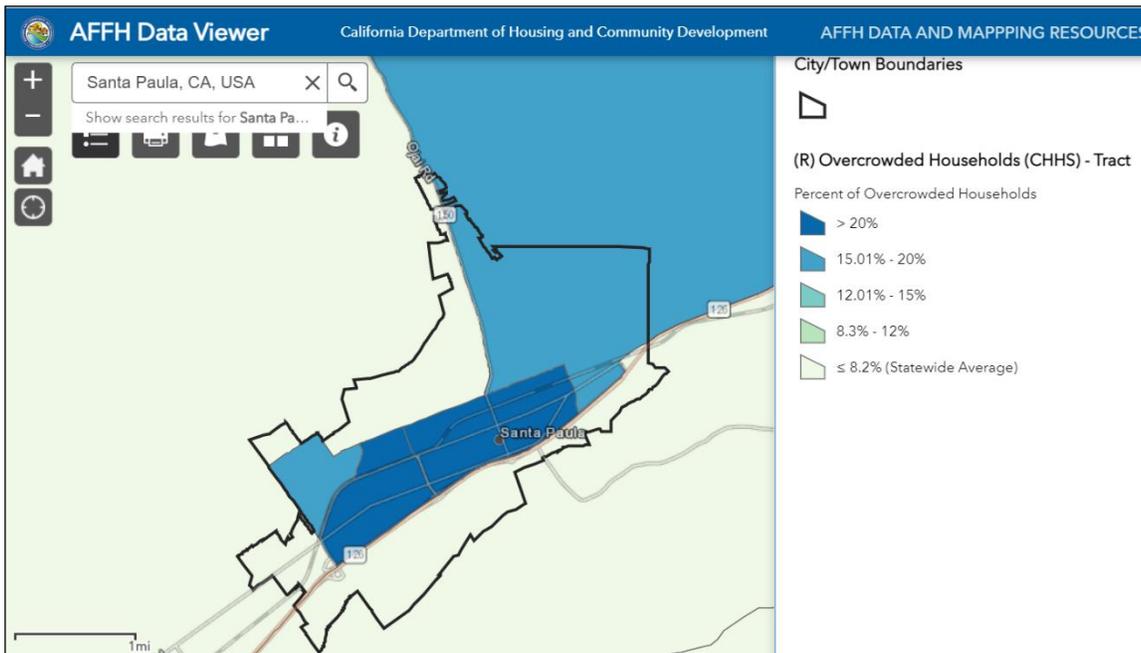


Figure D-27 Overcrowded Households – Santa Paula



The problems of overcrowding are addressed in the Housing Plan through efforts to facilitate production and preservation of affordable housing such as Program 4-Section 8 Rental Assistance, Program 9-Workforce and Special Needs Housing Development, Program 10-Multi-Family Housing Acquisition and Rehabilitation, Program 11-Affordable Housing Funding Sources, 12-Inclusionary Housing.

3) Substandard Housing

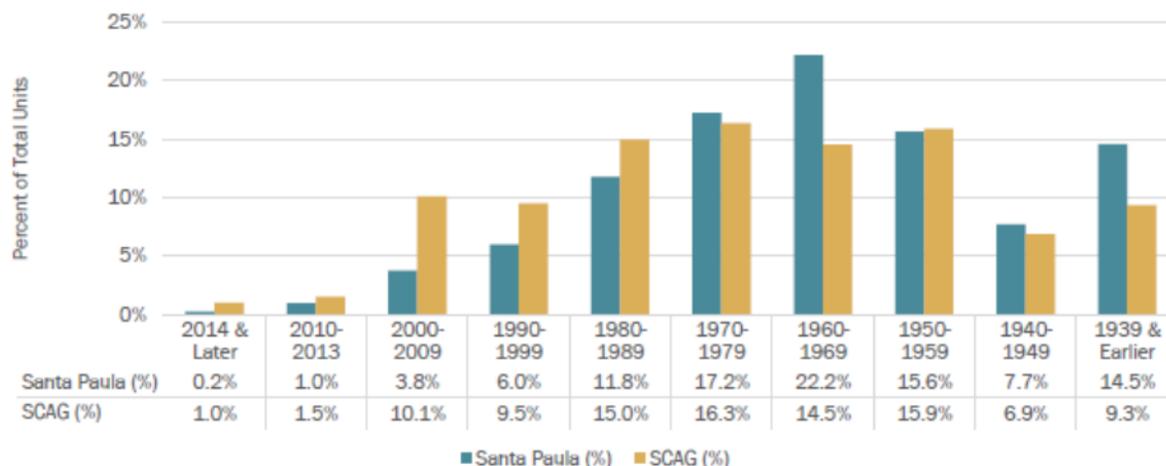
Housing age is often an important indicator of housing condition. Housing units built prior to 1978, before stringent limits on the amount of lead in paint were imposed, may have interior or exterior building components coated with lead-based paint. Housing units built before 1980 are the most likely to need rehabilitation and to have lead-based paint in deteriorated condition. Lead-based paint becomes hazardous to children under age 6 and to pregnant women when it peels off walls or is pulverized by windows and doors opening and closing.

Figure D-28 shows the age characteristics of the housing stock in Santa Paula compared to the entire SCAG region as reported in recent U.S. Census data. This table shows that the majority of owner-occupied and rented units in Santa Paula were constructed prior to 1970. These findings suggest that there may be substantial need for maintenance and rehabilitation, including remediation of lead-based paint, for a large proportion of the city's housing stock.

Single-family neighborhoods in Santa Paula are generally well-maintained and contain only isolated properties in deteriorated condition that require moderate rehabilitation. However, the denser, older residential neighborhoods to the south and east of downtown are in need of varying degrees of upgrading, and some units are likely to qualify for rehabilitation assistance. Based on observations of City staff, it is estimated that approximately 40% of the total housing stock (3,600 units) are in need of some type of repair to correct deficiencies, or complete replacement.

The City currently administers several programs to facilitate upgrade of the housing stock and stabilization of neighborhoods, including Code Enforcement, owner and renter rehabilitation programs, and the Remove and Replace Program.

Figure D-28 Age of Housing Units – Santa Paula vs. SCAG Region



American Community Survey 2014-2018 5-year estimates.

4) Homelessness

HUD defines homeless as (1) an individual who lacks a fixed, regular and adequate nighttime residence; and (2) an individual who has a primary nighttime residence that is:

- A supervised publicly- or privately-operated shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelters, and transitional housing for the mentally ill).
- An institution that provides a temporary residence for individuals intended to be institutionalized; or a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.

The most recent Ventura County Continuum of Care Alliance homelessness survey report published in 2020 estimated that there were 1,743 homeless persons in Ventura County at the time of the survey. The cities of Oxnard and Ventura accounted for nearly two-thirds (63%) of the total (567 persons representing 32.5% and 531 persons representing 30.5%, respectively). The survey identified 95 homeless persons in Santa Paula, which represents about 5% of the county total. Of the 95 homeless persons, 21 were sheltered and 74 were unsheltered.

There is one homeless services facility within the City of Santa Paula, operated by SPIRIT of Santa Paula at 1498 E. Harvard Boulevard. In addition to its 42 beds, this facility provides services for the homeless such as meals, financial assistance, counseling and outreach. In addition, there is a 15-bed recovery and sober living facility (Jackson House) and a permanent supportive housing facility (Harvard Place). The Santa Paula Housing Authority also provides public housing assistance. Program 15 in the Housing Plan describes City efforts to address the problems of homelessness.

5) Displacement Risk

Displacement refers to any involuntary household move caused by landlord action or market changes. Displacement can be caused by rising housing costs, insufficient affordable housing opportunities, expiration of affordability covenants, evictions, housing discrimination, or the physical demolition of existing housing to make way for new development.

Displacement mitigation strategies include tenant protections, physical maintenance and conservation of the existing affordable housing stock, preservation of existing deed-restricted affordable units at-risk of conversion to market-rate, acquisition and rehabilitation of existing housing units, requiring the replacement of existing affordable units demolished as part of redevelopment, and facilitating construction of additional affordable housing. The Housing Plan includes programs to implement all of these strategies.

As noted in the Housing Plan, Program 15 includes a commitment to ensure compliance with legal protections and replacement housing requirements for existing tenants who may be displaced by new developments.

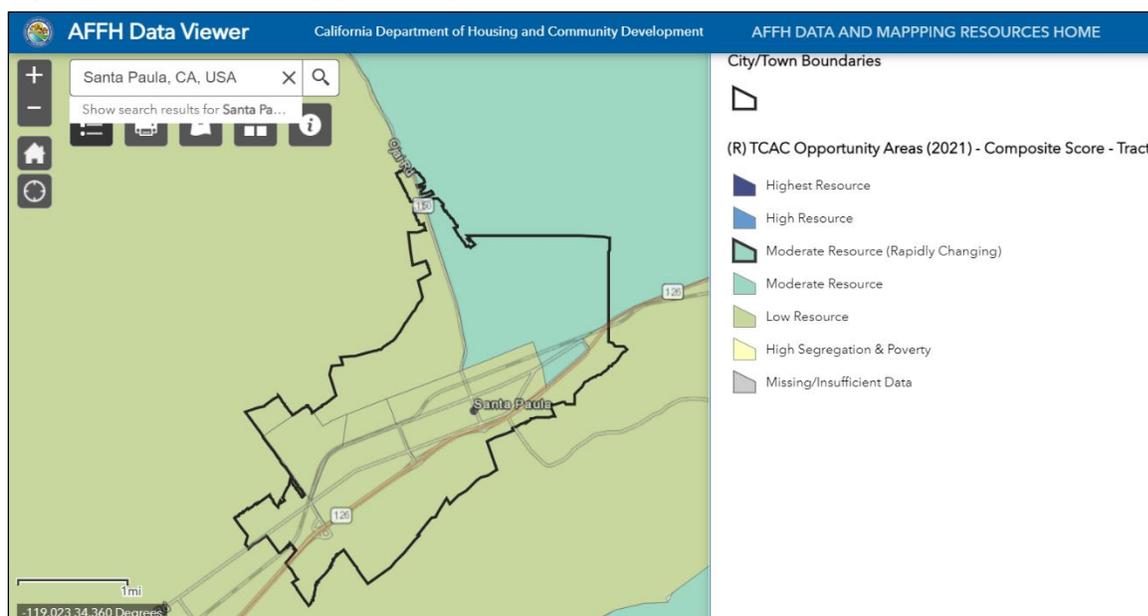
As discussed in Section II.F of the Housing Needs Assessment, none of the assisted low-income housing developments in Santa Paula is at risk of conversion to market rate in the next 10 years.

3. Sites Inventory Analysis

The City's inventory of sites for potential housing is presented in Appendix B. As summarized in Table B-1, the inventory is comprised of approved projects, vacant sites, non-vacant underutilized sites and future ADUs.

Figure D-29 shows TCAC Opportunity Areas Composite Scores for Santa Paula. The northeastern portion of the city has the highest opportunity rating. The major component of that area is the new Harvest at Limoneira development, which provides a range of single-family and multi-family housing opportunities (see additional discussion of this project in Appendix B).

Figure D-29 TCAC Opportunity Areas Composite Score – Santa Paula



In addition to Harvest at Limoneira, the City recently amended General Plan and zoning regulations to encourage housing and mixed-use development in commercial and light industrial areas. New housing opportunities in single-family neighborhoods are also available through ADUs and SB 9 urban lot splits.

4. Contributing Factors

The housing element must include an identification and prioritization of significant contributing factors to segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs. "Fair housing contributing factor" means a factor that creates, contributes to, perpetuates, or increases the severity of one or more fair housing issues. Contributing factors should be based on all the prior efforts and analyses: outreach, assessment of fair housing, and site inventory. Contributing factors must also be prioritized in terms of needed impact on fair housing choice and strongly connect to goals and actions.

Through the participation of stakeholders, fair housing advocates, and the assessment of fair housing issues described in this appendix, the City has identified fair housing issues, impediments and contributing factors as well as meaningful actions to address those issues as described in Table D-2.

5. Goals, Policies and Actions

Based upon the analysis presented above, the City has identified fair housing issues, impediments, contributing factors, and meaningful actions relevant to Santa Paula that will be taken to address those issues during the planning period. The Analysis of Impediments to Fair Housing 2020 prepared by the County of Ventura, with the participation of the City of Santa Paula, was of key importance in helping to identify these issues, contributing factors and actions.

As noted in the County AI (p. 122) "These impediments constitute actions, omissions, or decisions taken on the basis of protected class that restrict housing choice. Recommendations to remove or reduce the listed impediment follow, and the responsibility to act on these recommendations lies with all Ventura County residents, policymakers, administrative staff, housing providers and developers, lenders, government employees, neighborhood groups, and fair housing advocates."

For each fair housing impediment listed in the table below, a corresponding action is provided in the Santa Paula Housing Action Plan (Section V, Program 22) that addresses the impediment.

Table D-2: Fair Housing Impediments, Contributing Factors and Meaningful Actions

Fair Housing Impediment	Contributing Factors	Meaningful Actions
Fair housing services and education	Housing discrimination on the basis of protected class continues throughout Ventura County. Community feedback, cases filed with HUD and DFEH, and information provided to nonprofit and government organizations show that housing discrimination, intentional or not, occurs within the county.	Ventura County jurisdictions should continue conducting comprehensive and county-wide random testing on a regular basis to identify suspected discriminatory practices. Testing can also identify current discriminatory housing issues and trends. Stronger and more persistent enforcement activity by fair housing service providers is recommended when financially feasible. Lastly, the jurisdictions should expand education and outreach efforts, with specific efforts outreaching to small rental properties where the owners or managers may not have education or training in state and national fair housing laws.
	While many jurisdictions include mention of fair housing requirements on their websites, the extent of the information provided and the format in which the information is presented varies greatly.	Establish and implement procedures for the annual review and maintenance of the Fair Housing website, providing updates as needed and verifying links to outside agencies.
	Between 2014 and 2019, 90 hate crimes were reported in Ventura County on the basis of race, ethnicity, ancestry, religion, and sexual orientation	Continue efforts to develop and distribute public education and information materials on tolerance, focusing on sexual orientation, racial and ethnic relations, and religion.
	Limited fair housing testing of discriminatory practices in private rental and home sales markets.	Expand scope of services of contract for fair housing services with HRC to include expanded fair housing testing for discriminatory practices impacting both renters and homebuyers, and require routine reporting of activity by jurisdictions.
Public policies	Local governments are required by state law to include housing and land-use elements in their General Plans detailing their strategy for addressing the housing needs of their jurisdiction and regulating existing and future housing development. The housing element is subject to review by the Department of Housing and Community Development (HCD) for compliance with state law. The law acknowledges that for the private market to adequately address housing needs and demand, local governments must adopt land-use plans and regulatory systems that provide opportunities for, and do not unduly constrain, housing development. According to HCD, of the 11 participating jurisdictions (including the county), each of their housing elements were determined to comply with state laws.	Continue to monitor and update local policies and regulations as necessary to ensure conformance with fair housing law.
	Several communities, including Santa Paula and unincorporated Ventura County, have limited community care options for persons with special needs.	Explore ways to develop supportive housing through non-profit housing developers and service providers. Review the zoning ordinance and permit processing to ensure that they are not inhibiting the development of housing for persons with disabilities.
	The average wage gap between men and women widens as the level of education increases.	Research the availability of job training and business development opportunities for women to ensure that earning opportunities are available throughout the county. If an education gap is found, fund these programs when possible.

Fair Housing Impediment	Contributing Factors	Meaningful Actions
Housing market	In Ventura County, the region is moderately segregated in relation to race and ethnicity, and is not segregated in relation to housing value. While the county is more racially and ethnically diverse than in any time in the past, housing prices have risen for all residents, regardless of race or ethnicity.	Offer a range of housing options, including affordable housing, to allow the greatest residential mobility among its residents and allow current residents of all races and ethnicities to continue living in Ventura County.
	Nearly 60% of the county's housing stock was built before 1980. Ojai, Port Hueneme, Santa Paula, and the City of San Buenaventura have the oldest housing stock in the county. Older housing units are potentially most in need of rehabilitation. Home rehabilitation can be an obstacle for low- and moderate-income homeowners who are disproportionately members of minority racial and ethnic groups, people with disabilities, and seniors.	Facilitate the availability of housing rehabilitation programs. Additional funding for housing rehabilitation programs from the private sector is encouraged.
	The senior population in Ventura County is growing and many seniors have some form of physical disability which, if no modifications to the property occur, will impede these residents from continuing to live within their home and neighborhood. Universal Design also helps people with physical disabilities live in a house without modification.	Home accessibility modifications help existing residents continue to reside in their home. Jurisdictions should promote housing rehabilitation programs to make accessibility improvements available for renters and homeowners. All jurisdictions should promote universal design principles in new rental and owner-occupied housing developments.
	In a tight housing market such as that found in Ventura County, seniors and individuals with disabilities often face increased difficulty in finding housing accommodations. A majority of the allegations of housing discrimination filed with the Housing Rights Center by Ventura County residents were complaints pertaining to physical disability (66 percent) and mental disability (20 percent).	Continue ongoing efforts to develop new ADA compliant rental housing units and provide financial assistance for accessibility improvements for both renters, as well as homeowners.
	An average of 36 percent of the housing units available in the county are renter-occupied. In general, renters are more likely to experience discriminatory lending practices due to conditions in the housing market that are beyond their control.	Continue outreach efforts to inform lower-income households of homebuyer assistance programs in partnership with lending institutions, realtors and fair housing providers.
	If the transportation arrival times are not convenient or overall travel times are long, this can be an impediment to employment for those who cannot or do not drive a car.	Encourage transit-oriented development to better connect workers with jobs within the region.