

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

<b>HCD Comment (Letter of 8/19/2022)</b>	<b>Revised Draft Housing Element Page No.</b>	<b>Response/Revision</b>
A. Review and revision	Appendix A Table A-1	Appendix A has been revised to provide additional information regarding the actual results of the prior element's programs, compare those results to the objectives, and provide a description of how the objectives and programs of the updated element incorporate changes resulting from the evaluation.
B.1 Affirmatively furthering fair housing	Appendix D 70-73	The element has been revised to include additional analysis of fair housing (Appendix D). In addition, Program 22 has been revised to describe additional actions the City will take to affirmatively further fair housing.
B.2 Sites inventory	Appendix B	<u>Sites inventory</u> . East Area 1 has been removed from the inventory. The remaining sites are adequate to fully accommodate the RHNA in all income categories.
C.1 Programs that set forth a schedule of actions during the planning period	59 60/61 68 70-73	Programs 3, 7, 17 and 22 have been revised to include more specific timing and description to have a beneficial impact in the planning period.
C.2 Programs to make sites available during the planning period		<i>This comment states: "As noted in Finding B2, 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."</i>  Finding B2 stated that the analysis of East Area 1 was not sufficient for RHNA credit. RHNA credit for East Area 1 is not needed in order to demonstrate adequate sites, and therefore has been removed from the sites inventory.
C.3 Affirmatively furthering fair housing	70-73 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 affirmatively further fair housing.