

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

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August 19, 2022

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) Adopted Housing Element

Thank you for submitting the City of Santa Paula's (City) housing element adopted May 18, 2022, and received for review on June 21, 2022. Pursuant to Government Code section 65585, subdivision (h), the California Department of Housing and Community Development (HCD) is reporting the results of its review. Our review was facilitated by a conversation on August 15, 2022, with Mr. Tom Tarantino, Associate Planner, and John Douglas, Consultant.

The adopted housing element addresses most statutory requirements described in HCD's November 15, 2021 review; however, additional revisions are necessary to fully comply with State Housing Element Law (Article 10.6 of the Gov. Code). The enclosed Appendix describes revisions needed to comply with State Housing Element Law.

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 must continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available while considering and incorporating comments where appropriate. Please be aware, any revisions to the element must be posted on the local government's website and to email a link to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the 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 will meet housing element requirements for these and other funding sources.

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

HCD 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", with a stylized flourish at the end.

Paul McDougall
Senior Program Manager

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).)

As stated in our previous review, 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. While the element included some additional information on Program 4, no other analysis was included to address this finding. Please see HCD's prior review.

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).)*

The adopted element (Appendix D) was amended to include additional maps and information, including concentrated areas of poverty, race, and contributing factors to fair housing issues. However, the analysis largely did not provide analysis utilizing both qualitative and quantitative data sources are needed to address the assessment of fair housing and this requirement.

Integration and Segregation: While the element (p. D-4) includes some data and maps on integration and segregation, it must generally discuss and analyze trends over time and across census tracts for all socioeconomic characteristics (i.e., race, disability,

familial status, income). This analysis should also compare characteristics at a city to region level.

Disparities in Access to Opportunity: The element (D-11) provides some information on disparities in access to opportunity. However, this section must generally discuss and analyze trends over time and across census tracts for all socioeconomic characteristics (i.e., education, economic, transportation, environmental). This analysis should also compare characteristics at a city to region level. A complete analysis should include the local and regional disparities of the educational, environmental, transportation, and economic scores through local, federal, and/or state data; and provide a description of education, environment, and employment. It should also include analyses for persons with disabilities as well as access to transit. Please refer to page 35 of the Affirmatively Furthering Fair Housing (AFFH) guidebook (link: <https://www.hcd.ca.gov/community-development/affh/index.shtml#guidance>) for specific factors that should be considered when analyzing access to opportunities as it pertains to educational, employment, environmental, transportation, and any factors that are unique to Santa Paula and provide programs as appropriate.

Disproportionate Housing Needs including Displacement Risk: While the element analyzes cost burden, it must analyze patterns and trends for overcrowding, substandard housing, homelessness, displacement at the regional level (comparing the City to the region).

Local Data and Knowledge, and Other Relevant Factors: The element must include local data, knowledge, and other relevant factors to discuss and analyze any unique attributes about the City related to fair housing issues. The element should complement federal, state, and regional data with local data and knowledge where appropriate to capture emerging trends and issues, including utilizing knowledge from local and regional advocates and service providers. Also, the element must include other relevant factors that contribute to fair housing issues in the jurisdiction. For instance, the element can analyze historical land use and investment practices or other information and demographic trends.

Contributing Factors to Fair Housing Issues: The element must list and prioritize contributing factors to fair housing issues. Contributing factors create, contribute to, perpetuate, or increase the severity of fair housing issues and are fundamental to adequate goals and actions. Examples include community opposition to affordable housing, housing discrimination, land use and zoning laws, lack of regional cooperation, location and type or lack of affordable housing and lack of public or private investment in areas of opportunity or affordable housing choices. The analysis shall result in strategic approaches to inform and connect goals and actions to mitigate contributing factors to affordable housing.

Sites Inventory and AFFH: The element does not address this requirement. The analysis must identify whether sites improve or exacerbate conditions and whether sites are isolated by income group. A full analysis should address the income categories of

identified sites with respect to location, the number of sites and units by all income groups and how that affects the existing patterns for all components of the assessment of fair housing (e.g., segregation and integration, access to opportunity). The element should also discuss whether the distribution of sites improves or exacerbates conditions. If sites exacerbate conditions, the element should identify further program actions that will be taken to promote equitable quality of life throughout the community (e.g., anti-displacement and place-based community revitalization strategies).

Goals, Actions, Metrics, and Milestones: Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have specific commitment, metrics, geographic targeting and milestones as appropriate and must address housing mobility enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for community preservation and revitalization and displacement protection.

For more information, please contact HCD and visit <https://www.hcd.ca.gov/affirmatively-furthering-fair-housing>

2. *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 adopted element (Appendix B) included additional information and stated that the Lower Income regional housing need allocation (RHNA) will no longer be allocated to the East Area 1 Specific Plan area. However, to utilize residential capacity in Specific Plans, the element must still describe the following:

- any development agreements, and conditions or requirements such as phasing or timing requirements, that impact development in the planning period;
- expiration dates of the plan; and
- necessary approvals or steps for entitlements for new development (e.g., design review, site plan review, etc.).

C. Housing Programs

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

The adopted element (p. 58) includes revisions and additional information in programs. However, programs must demonstrate that they will have a beneficial impact within the planning period. As stated in the previous review, 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. Programs requiring revisions include:

- *Program 3 (Housing Code Enforcement Program)*: include measurable metrics or objectives and quantifiable outcomes. This can include the amount of code violations that the City is expecting to assist and address.
- *Program 7 (Mobile Home Park Resident Ownership Program)*: include measurable metrics or objectives and quantifiable outcomes. This can include the number of tenants that the program expects to support during the planning period.
- *Program 17 (Housing for Persons with Special Needs)*: the program needs to be revised to show objectivity and approval certainty to ensure that there are opportunities for housing for persons with disabilities and special needs.
- *Program 22 (Affirmatively Furthering Fair Housing)*: the program should be revised to remove unclear language (e.g., “Evaluate”; “Consider”; “Encourage”; etc.) and include more specific and measurable actions.

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... (Gov. Code, § 65583, subd. (c)(1).)*

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.

3. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics... (Gov. Code, § 65583, subd. (c)(5).)*

As noted in B1, the adopted element does not include a complete assessment of fair housing. Depending on a complete analysis, the element must add or revise programs as appropriate.