

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.

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	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

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		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-

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		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.