

## HCD INITIAL DRAFT COMMENTS AND CITY RESPONSE IN THE ADOPTION DRAFT

#	HCD COMMENT	CITY RESPONSE
	<b>A. HOUSING NEEDS, RESOURCES, AND CONSTRAINTS</b>	
	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).)	
A1	<p><u>Disparities in Access to Opportunity</u>: While the element includes some information of disparities in access to opportunity across all four subcategories (education, transportation, economic, and environment), it should also compare concentrations of protected groups with access to transportation options, analyze combined housing and transportation cost impacts on protected groups and evaluate employment trends by protected groups.</p>	<p>The Technical Background Report (TBR p. 93-106) has been revised to strengthen analysis of Disparities in Access to Opportunity in the broader Affirmatively Furthering Fair Housing segment (AFFH, Section 4.5).</p> <p><i>Transportation</i> (TBR p. 97-100) - Data added relating to vehicle ownership among the City's workforce, SMART light rail development timeframes, Healdsburg Avenue complete streets project, and the City's revived bike share program.</p> <p><i>Economic</i> (TBR p. 100-106) - Added income data added, information on the City's vehicle miles traveled (VMT), which is the lowest in the County along with vehicle commute times; local context added on regional farmworker housing need. Figure 26 refers to information from the AFFH Data Viewer 2.0 to quantify jobs with 45 minutes on transit in the City's block groups.</p> <p><i>Education</i> (TBR p. 94-95) - Analysis strengthened with local knowledge of district conditions, including the recent charter school merger. Added declining enrollment analysis in connection to Contributing Factors. Analysis comparing grad rates of regional high schools, and more data on degree attainment.</p>

A1	<p><u>Local Data and Knowledge, and Other Relevant Factors:</u> 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. For instance, the element should analyze historical land use, zoning, governmental and nongovernmental spending including transportation investments, demographic trends, historical patterns of segregation, or other information that may have impeded housing choices and mobility.</p>	<p>The Housing Element process relied on a variety of local perspectives including City Planning, Building, and Housing Departments and local stakeholders involved throughout the formation of the document. Local data and knowledge has been integrated into the Adoption Draft (throughout the Housing Element &amp; Technical Background Report).</p>
A1	<p><u>Contributing Factors:</u> 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. The element includes Table 32: Fair Housing Issues, Contributing Factors, and Programs &amp; Actions on pg. 114; however, it should address more than one fair housing issue. 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.</p>	<p>Contributing factors connected throughout the additions to the TBR, with analysis connected to the Contributing Factors. Programs added and revised to reflect changes to Section 2 (Table 33, TBR p. 119).</p>
<p>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).)</p>		
A2	<p><u>Housing Conditions:</u> While the element provides information on substandard conditions based on ACS data, the element should supplement this information with local</p>	<p>The City estimated 75 homes in need of rehabilitation and 0 in need of replacement (TBR pg. 114).</p>

	estimates (code enforcement department) of units in need of rehabilitation (repair) and those in need of replacement (demolition).	Figure from the AFFH Data Viewer 2.0 on the age of structures added to consider current and future rehabilitation needs (Figure 33, TBR pg. 114).
	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).)	
A3	<u>Adequate Sites Alternatives</u> : Please note, under limited circumstances, a local government may credit up to 25 percent of their adequate sites requirement per income category through existing units. The element must clarify if the L&M Village meets the Adequate Sites Program Alternative Checklist per Government Code 65583.1(c)(2)(D). In addition, the element should clarify how the Scattered Sites Project meet the Adequate Sites Program Alternative per Government Code section 65583.1(c). Lastly, the element should update the status of the L& M Village and Scattered Sites Projects which had an anticipated occupancy date of August 2022 and Summer 2022. Please see the checklist at <a href="https://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/adequate-sites-alternatives/docs/adequate_site_alt_checklist.pdf">https://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/adequate-sites-alternatives/docs/adequate_site_alt_checklist.pdf</a> .	The Housing Element has been updated to reflect dates of occupancy and committed assistance. The Alternative Adequate Sites Checklist is included as Appendix F.
A3	<u>Electronic Sites Inventory</u> : For your information, pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD. Please see HCD's housing element webpage at <a href="https://www.hcd.ca.gov/planning-and-community-development/housing-elements">https://www.hcd.ca.gov/planning-and-community-development/housing-elements</a> for a copy of the form and instructions. The City can reach out to HCD at <a href="mailto:sitesinventory@hcd.ca.gov">sitesinventory@hcd.ca.gov</a> for technical assistance.	The Sites Inventory will be submitted concurrently with the Adopted Housing Element in May 2023.
A3	<u>Zoning for a Variety of Housing Types (Emergency Shelters)</u> : Please be aware Chapter 654, Statutes of 2022 (AB 2339),	Program 4.2 (Adopt Development Code Amendments) modified to ensure consistency with State parking and

	adds specificity on how cities and counties plan for emergency shelters and ensure sufficient and suitable capacity. Future submittals of the housing element may need to address these statutory requirements. For additional information and timing requirements, please see HCD's memo at <a href="https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/ab2339-notice.pdf">https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/ab2339-notice.pdf</a> .	development standards for emergency shelters.
	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... (Gov. Code, § 65583, subd. (a)(5).)	
A4	<u>Growth Control</u> : The element states the City is exempted from the prohibition on growth management ordinances stipulated by SB 330, as Healdsburg is a jurisdiction in an eligible County with a voter-approved initiative prior to the year 2005. However, the element must support this statement by describing if the County also meets the "predominantly agricultural county" designation pursuant to Government Code 66300. Subdivision (b)(1)(E).	Analysis added to Section 4.4 (Governmental Constraints) to confirm the GMO was passed before 2005, and Sonoma County is a predominantly agricultural county as defined by the California Farmland Conversion Report produced by the Department of Conservation. The County has over 550,000 acres of farmland and more than 50% of the total area is agricultural.
A4	<u>Zoning Fees and Transparency</u> : The element must list all fees and clarify its compliance with new transparency requirements for posting all zoning and development standards, and fees for each parcel on the jurisdiction's website pursuant to Government Code section 65940.1(a)(1).	Program 7.1 (Update and Reform Development Impact Fees and Charges) includes provisions to ensure City fees are consistent with AB 602 (2021) and that transparent development impact fee schedules are available on the City's website.
	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... (Gov. Code, § 65583, subd. (a)(6).)	
A5	<u>Availability of Financing</u> : The element should discuss whether housing financing, including private financing and government assistance programs, is generally available in the community. This analysis could indicate whether mortgage deficient areas or underserved groups exist in the	Table and analysis added to Disparities and Access to Opportunities (Table 26, TBR p. 101-102) to assess the availability of FDIC-regulated brick and mortar financial institutions in Healdsburg.

	community. The financing analysis may also identify the availability of financing from private foundations (including bank foundations) corporate sponsors, community foundations, community banks, insurance companies, pension funds, and/or local housing trust funds.	Pursuit and attainment of competitive State and Federal funds has been emphasized throughout the document, including CDBG, Project Homekey, and the MTC Regional Active Transportation Program.
	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).)	
A6	<u>Farmworkers</u> : While the element provides an estimate on how many farmworkers live in the City, it should also provide a description of any existing resources or programs, and an assessment of unmet needs, including a description of different housing types (e.g. single-family, multifamily, group quarters) appropriate to accommodate the housing needs of permanent and seasonal farmworkers.	Information added on existing farmworker housing, including the 44-unit Harvest Grove development specifically for farmworkers and their families (TBR pg. 10).  Program 8.5 (pg. 62) includes details on the City's plan to support farmworker housing throughout the planning cycle with detailed metrics and milestones on regional coordination and pursuit of funding.
	<b>B. HOUSING PROGRAMS</b>	
	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).)	
B1	Programs must be revised to 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 (month, year), dates, or benchmarks for implementation. Deliverables should occur early in the planning period to ensure actual housing outcomes. Examples of programs that should be revised with specific commitments include Programs 2.1 (Acquire Multifamily Housing), 5.1 (Continue to implement the Inclusionary Housing Ordinance (IHO)), 5.3 (Incentivize Affordable Accessory Dwelling Units), 6.7 (Improve Infrastructure in Lower Resource Areas), 8.1 (Develop Extremely Low-	Programs have been comprehensively revised to specify deliverables, measurable metrics or objectives, definitive deadlines (month, year), dates, and/or benchmarks for implementation. These revisions include all programs directly listed.

	Income Housing) and 8.3 (Provide Emergency and Transitional Housing).	
B1	In addition, examples of programs that should be revised with specific commitment and geographic targeting include Programs 1.2 (Continue to Assist Affordable Housing Developers) and 8.4 (Provide Assistance to Female Head of Households). Finally, Programs 6.4 (Conduct Spanish Language Outreach) and 8.10 (Coordinate with the North Bay Regional Center) should be revised to include geographic targeting.	Metrics, milestones, and geographic targeting have been added to programs throughout.
<p>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).)</p>		
B2	As noted in Finding A3, 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.	The Sites Inventory is submitted concurrently with the Adopted Housing Element.
B2	In addition, Program 8.13 (Eliminate Constraints to Emergency Shelters) states that the City will update emergency shelter parking to be consistent with SB 2. The Program should be revised to ensure consistency with Government Code section 65583, subdivision (a)(4)(A) which allows 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.	Program 4.2 (Adopt Development Code Amendments) modified to ensure consistency with State parking and development standards for emergency shelters.

	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).)	
B3	Program 8 (Extremely Low-Income, Homeless, and Special Needs Housing Program): While the element includes Program 8 to assist in the development of extremely low income, homeless and special needs, it should consider expanding the Program to all lower-income households. In addition, the Program should consider including other commitments such as adopting priority processing, granting fee waivers or deferrals, modifying development standards, granting concessions and incentives for housing developments that include units affordable to lower and moderate-income households.	<p>Housing Program 5 was renamed Developing Housing Affordable to Very Low, Low, Moderate, and Middle-Income Households (previously Developing Affordable and Middle-Income Housing) to reflect the spectrum of support for affordable housing at a variety of income level.</p> <p>While the City will utilize the provisions of the growth management ordinance exempting units up to 160% AMI, VLI and LI households are a high priority for the City with distinct needs from ELI households and people experiencing homelessness. The City’s commitment to VLI/LI households is reflected in subprograms to streamline housing development, preserve and acquire naturally occurring affordable housing, and support housing opportunities for special needs groups.</p>
	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... (Gov. Code, § 65583, subd. (c)(3).)	
B4	As noted in Findings A4 and A5 the element requires a complete analysis of potential governmental and nongovernmental 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.	The Constraints analysis was partially revised to address HCD’s findings. No further programmatic needs were identified beyond existing revisions to the Housing Element in the Adoption Draft.
B4	In addition, the element includes Program 2.5 (Measure and Consider Strategies to Mitigate Loss of Housing Stock to Second Homes) to track and report second home conversions as part of the Annual Progress Report, however the Program should also include specific actions to mitigate the loss of housing to second homes within a reasonable timeframe.	Program 2.5 (pg. 48) revised to include commitment to bring a second homes action plan to City Council with action taken by the end of 2024.
	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).)	
B5	As noted in Finding A1, the element requires a complete Affirmatively Furthering Fair Housing (AFFH) analysis. The element must be revised to add or modify goals and actions based on the outcomes of a complete analysis. In addition, 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, geographic targeting, metrics or numeric targets, and milestones and, as appropriate, must address, housing mobility enhancement, new housing choices and affordability in relatively higher opportunity or income areas, place-based strategies for community revitalization and displacement protection.	Fair housing programs revised to include geographic targeting, metrics, and milestones to address housing mobility enhancement, new housing choices and affordability in relatively higher opportunity or income areas, place-based strategies for community revitalization and displacement protection.
	<b>C. PUBLIC PARTICIPATION</b>	
	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)(9).)	
C1	The element must demonstrate diligent efforts were made to involve all economic segments of the community in the development of the housing element. While the element describes public outreach strategies including mailers, door-to-door canvassing, and digital media resources distributed by the City (p. 13), it should also describe the efforts to involve stakeholders and organizations that work directly with lower income residents as well as special needs groups.	<p>The Housing Element Work Group (HEWG) extensively guided the formation of the Housing Element Update and was comprised of a diverse array of local residents and service providers, including a member with lived experience of homelessness, a member from the Healdsburg business community, a member from a local non-profit organization, a member that rents their primary residence, a member of the Healdsburg Planning Commission, a member representing the faith-based community, and three members of the community at-large.</p> <p>In addition to the HEWG, Appendix C references the results of the stakeholder survey on housing constraints. This engagement covered a wide range of affordable and</p>



		<p>market-rate housing providers including representatives of organizations who serve special needs groups including people experiencing homelessness.</p> <p>Complete survey results have been added in full to Appendix E following the results of the Community Housing Needs &amp; Opportunities Survey.</p>
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