



COUNTY EXECUTIVE OFFICE

COMPREHENSIVE PLANNING DIVISION

MEMORANDUM

DATE: May 2, 2006

TO: Board of Supervisors

FROM: Michael F. Brown, County Executive Officer

CC: Terri Maus-Nisich, Assistant County Executive Officer
John McInnes, Director, Strategic and Long Range Planning

SUBJECT: Housing Element Certification Amendment Hearing on May 9, 2006 (continued from April 4, 2006)

On April 4, 2006, the Board of Supervisors (Board) held a public hearing to consider adopting the Draft Revised 2003-2008 Housing Element. After receiving a staff presentation and public testimony, the Board continued the item to May 9, 2006 and directed staff to return with responses to questions and comments raised at the hearing. This document provides responses and clarification regarding the questions and issues raised by both the Board and the public on April 4th. The responses are organized into the following subject areas:

- Possible Additional Amendments to the Revised Housing Element
- Legal Analysis of State Housing Law
- Other California Jurisdictions
- Contents of Draft Revised Housing Element (DRHE)
- Housing Element Update Process and Timeline
- Rezones to Accommodate Remaining Housing Need
- Questions Specific to DRHE Policies or Analyses

Please note that if the Board chooses to make modifications to the Draft Revised Housing Element or discuss topics beyond those that were included in earlier staff submittals or discussed at the April 4th hearing the public hearing should be reopened to allow public input on these issues.

Possible Additional Amendments to the Revised Housing Element

Can Policy 8.1 (DRHE, p104) be modified by changing the word 'exemptions' to 'strategies'?
State HCD will accept a modification to Policy 8.1 so long as a list of examples describing the types of strategies the County will employ to promote affordable housing production is included in the policy. The policy could potentially be revised as follows:

Policy 8.1: *The county shall give high priority and/or provide ~~exemptions~~ strategies (e.g., fee waivers or reductions, regulatory incentives) for the development of affordable housing when preparing and amending land use and/or community plans, the zoning ordinance, and growth management plans, particularly with regard to policies and development standards related to the allocation of limited services and resources, including but not limited to water, sewage treatment capacity, and roadway and intersection capacity.*

Legal Analysis of State Housing Law

Have other jurisdictions submitted draft Housing Elements for state review prior to submitting final Housing Elements?

Yes, all jurisdictions are required to submit draft elements and draft amendments to State HCD for review prior to adoption. Government Code §65585(b) states:

At least 90 days prior to adoption of its housing element, or at least 60 days prior to the adoption of an amendment to this element, the planning agency shall submit a draft element or draft amendment to [State HCD]. [State HCD] shall review the draft and report its written findings to the planning agency within 90 days of its receipt of the draft in the case of an adoption or within 60 days of its receipt in the case of a draft amendment.

Why are revisions to the Housing Element necessary?

State law requires that jurisdictions submit their housing elements to State HCD for review and “certification” to ensure that the documents comply with all requirements of state housing law. The County submitted its adopted 2003-2008 Housing Element to State HCD in March 2004. Subsequently, State HCD found that the document was not sufficient to meet the requirements of the law. In order to be found in compliance with state law and achieve certified status, the County must amend its Housing Element as identified by the state in its letter of July 1, 2004 and described in the staff report to the Board dated March 9, 2006.

Is it possible for the County’s Housing Element to be found in compliance with state housing law without State HCD review or certification (i.e. self-certification)?

Self-certification is not an option available to Santa Barbara County at this time. Currently, a self-certification pilot program is available to San Diego County jurisdictions. Assembly Bill 2468, currently pending in the state legislature, would extend the self-certification process to the rest of the state. If passed into law, AB 2468 would take effect in the next housing element cycle and would authorize a jurisdiction to participate in a self-certification process. However, the bill specifies that in order for a jurisdiction to self-certify its housing element, it must still satisfy a number of criteria including:

- Have met or exceeded its RHNA allocation for the previous planning period (i.e., all of the allocated units were produced).
- Have land available to accommodate the maximum¹ number of housing units assigned by the RHNA allocation.

¹ The state assigns a range of units to each region. Most regions, including Santa Barbara, base their allocation to the various jurisdictions on the minimum required units rather than the maximum.

- Accommodate 100% of its very low and low income housing allocation:
 - on sites zoned for residential use by right,
 - with minimum densities, and
 - development standards that permit densities of at least 20 units/acre.

Have the legal requirements for noticing the proposed amendment to the county's Housing Element been followed?

Yes. To date, the County has held three public hearings regarding the DRHE. These included Planning Commission hearings on February 8 and 22, 2006 and a Board of Supervisors hearing on April 4, 2006. All of these hearings were noticed with legal advertisements in adjudicated newspapers. In addition, the County published display advertisements in the Santa Barbara New-Press and Santa Maria Times and sent postcards and emails to all persons who have request to be included on the Housing Element mailing list (over 1,100 addresses). The DRHE has been available on the internet since January 2006 at www.countyofsb.org/plandev/comp/programs/housing/2003. Public testimony regarding the proposed amendment was received at each of these hearings.

Is the Negative Declaration prepared for the original 2003-2008 Housing Element adequate for the DRHE?

A Negative Declaration (04NGD-00000-00004) was prepared and adopted concurrently with the Board's March 29, 2004 action to adopt the Housing Element. The Negative Declaration (ND) found that the updated Housing Element (a general plan for future action) would not result in any potentially significant adverse impacts to the physical environment, because the Housing Element itself does not increase development potential, increase the density or intensity of future development, or directly change any ordinance provisions that relate to development.

County Counsel has found that the DRHE likewise would not in itself result in any potentially significant adverse environmental impacts. Some specific Action Phase items could result in significant adverse effects. These include the rezoning of specific properties to higher residential densities, and ordinance changes to revise certain development standards to facilitate affordable housing projects and mixed-use developments. However, the implementation of such Action Phase items would involve the refinement of specific recommended actions and the future exercise of legislative discretion by the Board of Supervisors. In the absence of sufficiently detailed actions, their environmental effects cannot be predicted with enough certainty to perform a meaningful analysis, and the evaluation of such effects would be premature and unduly speculative at this time. Appropriate environmental documentation in the form of a focused Environmental Impact Report will be prepared prior to the Board's decisions regarding any specific actions. Therefore, County Counsel recommends that the prior ND (04NGD-00000-00004) be found adequate to address the effects of the current amendment and that no additional environmental document need be prepared at this time.

How do Housing Element policies and actions relate to community plan policies?

California Government Code Section 65300.5 requires that the general plan and elements comprise an integrated, internally consistent and compatible statement of policies. In preparing the Housing Element, the County evaluated the programs and policies in the updated document against regional planning goals, all other Comprehensive Plan elements, County zoning ordinances and subdivision regulations, and the Congestion Management Plan. The Housing Element was found to be consistent and compatible with these other adopted plans and policies. The Housing Element calls for implementation of Action Items that would require revisions to the County's community plans. Santa Barbara County is somewhat unique in that it has created a number of community plans which serve as extensions of the Comprehensive Plan for a number of communities. To maintain consistency, revisions to community plans would occur concurrently with implementation of all other Action Items.

What options are available to the county for resisting the state housing mandate?

Although some have advocated for simply resisting the state mandate, such an approach is not realistic. The mandate is state law and the County is a political subdivision of the state. Failure to comply with state law could cause the County to lose authority over land use decision making in the unincorporated County and result in the loss of substantial amounts of state and federal money currently available for housing and other community development purposes. It could also result in significant liability to the County.

What action has the county taken at the state level with regard to housing legislation?

The County's Legislative Committee, which consists of two members of the Board of Supervisors, County Counsel, the County Executive Officer, and the Auditor-Controller, monitors all pending state legislation and takes official positions on bills of particular interest to the county. The Board of Supervisors has opposed past and pending legislation that further reduces local governments' abilities to exercise discretionary land use controls. For example, the Legislative Committee has recommended that the Board of Supervisors formally oppose current legislation (Senate Bill 1800) which proposes to place additional requirements on jurisdictions when they update their housing elements.

Other California Jurisdictions

What is the status of other California jurisdictions with regard to compliance with state housing law?

The tables below summarize the housing element compliance status of California's jurisdictions as of April 5, 2006². Santa Barbara is the only county with a *draft* housing element that has been reviewed by the state but remains out of compliance with state law and is therefore not certified. Six counties have adopted housing elements that State HCD has found to be out of compliance (i.e., not certified): Plumas, San Bernardino, San Diego, Santa Cruz, Sierra, and Solano. Santa Barbara County was in this category until the Draft Revised Housing Element was forwarded to State HCD for review in September 2005.

² Per State HCD website, April 14, 2006.

Compliance Status of Counties			Compliance Status of Cities		
	Draft	Adopted		Draft	Adopted
In Compliance	0	45	In Compliance	5	336
Out of Compliance	1	6	Out of Compliance	54	56
In Review by State HCD	2	0	In Review by State HCD	4	4

Have other jurisdictions challenged the state housing mandate? If so, how and to what effect?

Jurisdictions throughout California have challenged state housing law. No jurisdiction has been relieved of the requirement to comply with state housing law. For many who have challenged the mandate, the consequences have been punitive. For example, a number of affordable housing advocacy organizations have sued California jurisdictions for housing element non-compliance. Litigants have included California Affordable Housing Law Project, California Rural Legal Assistance, Public Interest Law Project, and Legal Services of Northern California.

Please provide more information about the efforts of cities in the county to accommodate affordable housing for their local workforce.

All cities in the County have adopted Housing Elements with the exception of Goleta which is engaged in a general plan process (and is under a different schedule as the city was formed less than a year prior to the beginning of the current planning period). State HCD has reviewed two draft versions of Goleta’s housing element and continues to require significant revisions for the element to comply with state law. The cities of Carpinteria, Santa Barbara, Buellton, Lompoc and Guadalupe and received have received state certification of their housing elements. The cities of Solvang and Santa Maria have adopted housing elements that have been reviewed but not certified by State HCD. In Solvang, State HCD is requiring a stronger commitment to rezoning land (i.e., changing “will consider rezoning” to “shall rezone”) to meet the city’s remaining affordable housing allocation. In Santa Maria, the State has identified several required revisions, most significantly, the identification or commitment to identify sites for rezoning to accommodate its remaining affordable housing allocation. The table below shows the number of units produced in the current planning period by each jurisdiction as it relates their regional housing need allocation (RHNA):

Affordable Housing Production in Current Planning Period, Jan. 2001-Present			
Jurisdiction	Affordable Units Permitted	Affordable Units Assigned thru RHNA	% of RHNA Accomplished
Carpinteria	0	45	0%
Santa Barbara	404	1,354	30%
Goleta	49	1,313	4%
Solvang	0	182	0%
Buellton	29	308	9%
Lompoc	No response	574	Unable to calculate
Santa Maria	361	3,192	11%
Guadalupe	No response	53	Unable to calculate
Unincorporated County	508	3,484	15%

Note: The County and some cities have additional affordable housing projects pending.

Contents of Draft Revised Housing Element

Why has the number of pages in the Draft Revised Housing Element increased?

The existing adopted Housing Element includes 122 pages in the main document and 124 pages of appendices. The Draft Revised Housing Element (DRHE) consists of 130 pages in the main document and 294 pages of appendices. Thus the text of the document has increased by eight pages and 170 pages of appendices have been added.

The text is longer because it contains strike-through and underlines showing proposed changes to the original document³, in addition to expanded analyses and informational material required by the State Department of Housing and Community Development (HCD). The number of pages in the appendices has significantly increased due primarily to a requirement from State HCD to revise *Appendix E: Land Inventory*, which now includes a 111 page comprehensive listing of developable rural parcels. Previously, a summary table of rural parcels was included in the land inventory rather than a complete listing. In addition, State HCD required that several other appendices be added (*Appendices I, J, and K*), adding another 11 pages to the document.

All changes to the adopted 2003-2008 Housing Element are shown with deleted text ~~struck-through~~ and added text double-underlined with the exception of the appendices that were newly added, in which case a note at the beginning of the appendix indicates that it has been added. A detailed list of changes and affected pages is included as Attachment A of this document.

Housing Element Update Process and Timeline

What is the process and timeline for the Housing Element?

In January 2004 the County decided to split the Housing Element update into two phases: Adoption Phase and Action Phase. It is a very common practice among jurisdictions, and one encouraged by State HCD, to identify action items that are to be implemented following the adoption of the housing element.

The Adoption Phase involves preparing and adopting a Housing Element that identifies goals for addressing future housing needs in the county and the requirements of state housing law. This plan identifies goals and generally directs future actions necessary to carry out those goals. The table below lists the major steps to date related to the Adoption Phase of the Housing Element.

³ Strike-throughs would be omitted from the final published version of the Revised Housing Element.

March 2004	County adopts 2003-2008 Housing Element
July 2004	State HCD requires changes to comply with state law and gain certification
May 2005	Ad Hoc Housing Subcommittee forms and recommends pursuing certification
September 2005	County submits Draft Revised Housing Element to State HCD
December 2005	State HCD finds conditional certification can be granted upon adoption of proposed revisions
February 2006	Planning Commission adopts a resolution recommending that the Board of Supervisors adopt the Draft Revised Housing Element

The Action Phase involves implementing the actions identified in the County’s housing plan which are necessary to accomplish the goals of the plan. This includes preparing a Notice of Preparation for an Environmental Impact Report (EIR), gathering public input, conducting environmental analysis, and holding public hearings to consider rezoning land and making other amendments to County ordinances and policies. The table below lists the anticipated process for the Action Phase of the Housing Element.

Spring 2006	Circulate Notice of Preparation of an EIR
Spring 2006	Scoping period and scoping hearings to gather public input into potential impacts to be analyzed in the EIR
Summer 2006	Release Draft EIR for public comment
Fall 2006	Release Final EIR
Winter 2006/07	Planning Commission hearings to consider Final EIR and recommend sites for rezoning
Winter 2006/07	Board of Supervisors hearings to consider Final EIR and select sites for rezoning
Spring 2007	Analyze and verify cumulative impacts based on selected sites and ordinance amendments
Spring 2007	Board of Supervisors hearings to adopt rezones and ordinance amendments

What will be analyzed in the Housing Element Action Phase EIR?

The EIR will analyze the potential environmental impacts associated with implementing the DRHE’s action items. These Action Items include changes to the County’s zoning ordinance to encourage mixed use development, modify development standards that can constrain well-designed housing development, and establish a variable density program.

In addition, one action item commits the County to rezoning 62 acres of land to higher density. The EIR will include detailed analysis of all potential traffic, air quality, water, sanitation, biologic and other impacts associated with potentially developing identified sites at 20 units per acre. The EIR will also identify potential mitigation measures to reduce or eliminate potential impacts, which could include site specific development standards that could be applied in conjunction with a rezone of a particular site to mitigate potential environmental impacts to the greatest extent feasible.

What opportunities has there been/will there be for public participation and input during the Housing Element process?

Since 2001, the County has provided many opportunities for public and other agency input and participation in the Housing Element update process, including workshops and meetings with community groups and numerous public hearings. A complete listing of the County's public outreach efforts is included in Appendix C of the DRHE.

Should the Board adopt the Revised Housing Element and direct staff to proceed with implementation of the Housing Element, the public would continue to play a significant role in shaping how the goals of the County's Housing Element will ultimately be implemented. The next official opportunities for public input would be during the scoping of the Housing Element EIR (anticipated in late May/early June 2006). However, the County welcomes input and suggestions from the public on an ongoing basis. The public may contact staff at any time with suggestions or questions related to County housing policies.

Rezones to Accommodate Remaining Housing Need

Is it possible to count residential second units (RSUs) toward meeting the county's affordable housing allocation?

Yes. The County has counted RSU production toward its affordable housing allocation. Projections for RSU production are based on past production and anticipated increased production as a result of 2003 changes to the County's zoning ordinance which reduced permit requirements for second units in some zone districts. RSUs as well as farm employee units and mixed use units were counted toward the County's RHNA allocation (as shown in Table 52 on page 123 of the DRHE). While production of these units does reduce the remaining allocation it is not enough to meet fulfill the entire obligation. The county must rezone 62 acres of land countywide to densities of 20 dwelling units per acre to accommodate the remaining housing allocation (see Table 55, DRHE page 126).

Is it possible to count illegal or unpermitted units toward meeting the county's affordable housing allocation?

The County may count units which were permitted as guest houses, artist studios or other secondary structures and are being converted to RSUs toward its RHNA allocation. Such conversions have been factored into the county's projection for RSU production and deducted from the RHNA allocation. However, State HCD does not allow units that were built illegally (i.e. without permits) to be counted toward the RHNA allocation even if these units are permitted after the fact.

What is the possibility of identifying a new town, and counting those acres toward our RHNA allocation in the current planning period?

State law requires that the County identify lands which are reasonably developable within the current planning period, which ends June 30, 2009. It is not realistic that the County could conduct the public process that would be necessary to identify, plan for, and build the infrastructure for a new town prior to June 30, 2009. However, staff suggests that the Board of Supervisors consider this as a long range and thoughtful strategy option for the next as well as future housing element planning periods.

Is the land inventory included in the Draft Revised Housing Element a list of sites to be studied for rezoning?

No. State law requires that the county conduct an inventory of all vacant and underdeveloped parcels that are currently zoned to allow residential development. This includes residentially zoned parcels, agriculturally zoned parcels, and commercially zoned parcels where mixed use development is permitted. The land inventory analysis is described in Section VI of the DRHE and a comprehensive list of all vacant and underdeveloped parcels is included in Appendix E. The land inventory is not a list of sites to be studied for rezoning.

Why aren't potential rezone sites and maps identified in the Draft Revised Housing Element?

The DRHE outlines the plan for providing housing in the County for the current planning period (2003-2008). This plan identifies the need to rezone land to accommodate the county's remaining affordable housing allocation and includes an action item to do so within one year of adoption of the DRHE. The identification of specific sites will occur as part of the Action Phase of the document. All potential sites will be analyzed in the Action Phase EIR as described above so that the full impact of rezoning each site is known prior to any decision by the Board on which sites to rezone.

Is there a guarantee of affordable housing on lands rezoned to meet the County's RHNA requirements?

The County currently requires affordable housing be included in any project of five or more units (with some exceptions) through either the Inclusionary Housing Program or the State Density Bonus Program.

Can water and sanitation purveyors provide services to the rezoned sites?

In 2003, when preparing the original 2003-2008 Housing Element, staff conducted a survey of all water and sanitation providers to gain a general understanding of their capacity and ability to accommodate future development. A summary of their responses is included in the DRHE on page 59 and the survey form is shown in Appendix F. A brief analysis of the responses indicates that the County's water and sanitation districts collectively have the capacity to serve in excess of 11,000 new units. However, this is a countywide figure. The water or sanitation district assigned to each potential rezone site must be analyzed for its ability to provide service as part of the Action Phase EIR.

Once potential sites are identified for rezone analysis, the County will conduct a full site specific analysis through the Housing Element EIR (as described above) which will determine

whether adequate services are available to accommodate development at 20 units per acre on each site being studied. If the EIR finds that a particular site cannot be serviced with water and sewer, that site would not be rezoned as it would not be considered an “adequate site” as defined in state housing law.

What will happen if major environmental impacts are associated with every potential rezone site that is studied in the EIR?

When identifying sites to study for potential rezoning in the EIR, it is important to include sufficient acreage above the 62 acre requirement in order to avoid this circumstance. In addition, preliminary analysis of potential sites should be conducted to identify known constraints such as environmentally sensitive habitat, flood prone areas, slopes, etc. and eliminate sites that are known to be incapable of supporting development at higher densities.

If, after efforts to identify sufficient reasonable sites for study, the EIR identifies major environmental impacts on all the sites analyzed the Board of Supervisors would have several options:

- Make a finding to override significant impacts and rezone sites anyway,
- Identify other sites and analyze them in the EIR,
- Notify the state that the County does not have the infrastructure or other capacity to rezone land to meet its affordable housing allocation.

Will design standards for future housing development be established?

The Housing Element includes an action (DRHE p. 98, Policy 5.2, Action 1) to adopt residential design standards to guide future housing development in the county. In addition, residential design guidelines and requirements already exist or are currently being developed for many communities of the unincorporated County. Further, site specific design requirements and/or development standards could be established concurrent with the rezoning of a particular site based upon the findings of the EIR. For example, if visual impacts are identified as a potential impact of development on a particular site, a development standard could be established which limits height on all or a portion of the site in order to mitigate the visual impacts.

Questions Specific to Draft Revised Housing Element Policies or Analyses

How does the Housing Element address the need for housing for safety personnel?

Although, several policies and actions contained in the Housing Element relate to the need for housing for the local workforce no policies or actions are specific to safety personnel. However, several examples of how the needs of this workforce are incorporated into existing policies and actions are:

- Policy 1.10, Actions 1, 4, and 5 (DRHE p. 92) commits the County to rezoning sites to accommodate affordable housing need, which could ultimately result in housing for safety personnel who qualify for affordable housing.
- Policy 8.3, Development Standard 8.3.1 (DRHE p. 105) directs the County to give preference to the local workforce when conducting lotteries for affordable units.

- Several policies reiterate the County's efforts to pursue funding for affordable housing development (Policy 9.1, DRHE p. 108) and commit to make housing a high priority when considering the future use of County-owned lands (Policy 9.4, DRHE p. 109).

Does the county's in-lieu fee policy allow a developer to ignore Housing Element policies? (DRHE p. 88, Policy 1.3)

No. The Housing Element applies to all residential development projects. The County's in-lieu fee policy allows a developer to pay a fee that is deposited in the County's Affordable Housing Trust Fund and used to produce affordable housing in the Housing Market Area (HMA) in which it was collected in lieu of including affordable units in a project. California Civil Code Section 1954.50 prevents the County from requiring that affordable units be built on-site without allowing an alternative to on-site construction. However, the County's in-lieu fees are structured to strongly encourage developers to build moderate and workforce income units on-site and encourage the payment of fees for very low and low income unit requirements because the County can leverage these funds to build a greater number of very low and low income units in the same area than could be built as part of typical development project.

Is there a link between the analysis of land banking included in the Housing Element and eminent domain? (DRHE p. 38)

No. State law requires that the County identify constraints to housing development and further discuss possible options for mitigating those constraints. One constraint to housing development in Santa Barbara County is the high cost of land. The document discusses land banking as a method that could be used to mitigate the constraint of high land costs. Land banking is a practice in which the County or another entity acquires land that is not currently used for housing but is suitable for higher densities. This land could be resold at a reduced price to a non-profit developer who would construct affordable housing. The County is not currently in the practice of land banking and the Housing Element does not include a policy requiring the implementation of this potential mitigation option. However, if the county were to pursue land banking as a way of reducing the cost of development it would not require the use of eminent domain. Rather, land banking could be implemented through voluntary purchases by the County.

Does the Housing Element propose to change the appeal process for follow-up Land Use Permits? (DRHE p. 43)

No. Discussion of the proposed change to the appeal process is only included as informational material in the Housing Element. The proposal is being considered by the County Planning Commission and Board of Supervisors as part of the process improvement efforts currently being undertaken by the Planning and Development Department.

ATTACHMENT A: PROPOSED CHANGES REQUIRED BY STATE HCD FOR CERTIFICATION

Topic	Description	Location in DRHE
Land Inventory & Projections for Housing Production	Added tables to show approved and pending projects that can be counted toward RHNA.	Appendix E, Tables E-1 & E-2
	Revised land inventory analysis to all projected units (except RSUs) to specific parcels. Includes refined production assumptions which reduce acreage needed to rezone.	Section VI, pages 117-129; Appendix E
	Added examples of historic affordable housing development patterns and reuse and infill trends.	Section VI, pages 124-125; Appendix J
Rezoning	Modified Policy 1.10, Action 1 to commit County to rezone 62 acres to 20 units/acre and comply with requirements of state law for processing of developments on these sites.	Section V, page 92
Action Language	Revised specific actions to show County's commitment to implementing them by changing "shall consider" to "shall". These include: Policy 1.8, Actions 1 & 2 – Mixed Use Policy 1.10, Actions 1, 2, 3 – Meeting RHNA Policy 2.2, Action 1 – Farm Employee Housing Policy 3.1, Action 1 – Persons w/ Disabilities Policy 5.2, Action 1 – Residential Design Standards Policy 8.1, Actions 1, 2, 3 – Affordable Housing Priority Policy 8.4, Action 1 – Development Incentives	Section V
Inclusionary Housing Program	Added discussion of analysis of and methods to mitigate potential impacts.	Section III, pages 49-50; Appendix K
	Added Policy 1.2, Action 2, restating commitment to annually review program.	Section V, page 87
Housing for People with Disabilities	Expanded analysis of potential constraints to development of housing for people with disabilities.	Section III, page 57; Appendix I
Farm Employee Housing	Added information on permit requirements for farm employee housing.	Section III, page 55
	Added information regarding projections for farm employee units.	Section VI, page 121
	Added Policy 2.2, Action 6, which states the commitment to an annual review of production and commits the County to identify additional sites should 2006-07 Annual Report show total affordable housing production falls short of projections.	Section V, pages 93-94

Topic	Description	Location in DRHE
Residential Second Units	Added Policy 1.6, Action 4, which restates the commitment to develop and distribute promotional material regarding RSUs.	Section V, page 89
	Added Policy 1.6, Action 5, which restates the commitment to annual review of program and to consider ordinance revisions and incentives should production fall short of projections.	Section V, page 89
Mobile Homes	Added Policy 2.4, Action 3, which commits the County to establishing incentives for mobile home development.	Section V, page 94
Design Residential (DR) Zone District	Modified Policy 8.2, Action 5 to which clarifies the County's commitment to amend DR to remove constraints to housing development at permitted densities.	Section V, page 104
Development Standards	Revised Policy 8.4, Action 1 to clarify County's commitment to modify development standards to accommodate development at permitted densities. This could include building coverage, parking, setbacks, open space.	Section V, page 106
Public Outreach	Updated information on public outreach efforts with meetings that have occurred since HE adoption.	Appendix C