

**ATTACHMENT 6: SUMMARY OF STATE HCD WRITTEN FINDINGS AND COUNTY
RESPONSES
2015-2023 HOUSING ELEMENT**

Note: All page references in the following responses refer to pages in the final Housing Element (January 8, 2015).

HCD FINDING

A.1, Extremely Low-Income Households – Projected Number: “...include an estimate of the projected number of ELI [extremely low income] households and analyze the existing housing needs...”

County Response

Amended per HCD Finding: The County estimated the projected number of ELI households based on the methodology, established by Government Code section 65583(a)(1), that 50 percent of the very low-income households qualify as ELI households. The text in Chapter 6, *Land Inventory and Quantified Objectives*, was revised to include the projected ELI housing needs (pages 6-1 and 6-2). Furthermore, an analysis of the ELI household needs was added under a new subsection titled “Extremely Low-Income Households” (pages 2-26 and 2-26), including new Tables 2.20 – Occupational Employment and Wage Data for Santa Barbara County (page 2-25) and 2.21 – Extremely Low-Income Households (page 26).

HCD FINDING

A.1, Extremely Low-Income Households – Analysis of Needs: “The...analysis of [ELI] needs should consider tenure and rates of overpayment and overcrowding.”

County Response

Amended per HCD Finding: The County added an analysis of the rates of overpayment and overcrowding by tenure and income category, including ELI. Specifically, the text in Chapter 2, *Housing Needs Assessment*, (page 2-16) was revised to include an analysis of overpayment and to reference data included in Table 2.15 – Households by Income Category Paying in Excess of 30% of Income towards Housing Cost (page 2-17). The County also added an analysis of the rates of overcrowding by tenure and income category, including ELI. In particular, the text in Chapter 2, *Housing Needs Assessment*, (page 2-19) was revised to include an analysis and to reference data included in Table 2.18 – Overcrowded Housing (page 2-20), and Table 2.19 – Household Problems by Income Category (page 2-22).

HCD FINDING

A.2, Sites Inventory: “The sites inventory must identify the current zoning and general plan designations of the identified sites and the sites’ realistic capacity [in Isla Vista]...”

County Response

Amended per HCD Finding: The land inventory for Isla Vista (Appendix B) in the draft Housing Element was based on the zoning in the proposed Isla Vista Master Plan. In response to HCD Finding A.2, the County revised the land inventory and recalculated the realistic capacity for Isla Vista using the zoning in the adopted Coastal Zoning Ordinance (CZO) and the land use designations in the adopted County Coastal Plan. Therefore, the realistic capacity for Isla Vista in the final Housing Element is based on current zoning and land-use designations.

The land inventory includes 22 underutilized sites in Isla Vista; approximately half are zoned Retail Commercial (C-2) and half are zoned High- and Medium-Density Student Residential (SR-H, SR-M) under the CZO. The realistic capacity for sites zoned SR-H and SR-M under the CZO was based on the allowed density and physical and/or potential environmental constraints. The realistic capacity for sites zoned C-2 under the CZO was based on the analysis of development trends on C-2 sites in Isla Vista during the previous planning period (2009-2014).

The text in Chapter 6, *Land Inventory and Quantified Objectives*, was revised to include new subsections titled “Realistic Capacity” (pages 6-4 through 6-6) and “2015-2023 Land Inventory for Isla Vista” (pages 6-15 to 6-16) to explain the methodology used to estimate the realistic capacity for Isla Vista.

HCD FINDING

A.2, General Map: “The element must include a general map of identified sites...”

County Response

Amended per HCD Finding: The County added seventeen general reference maps of sites included in the land inventory (Appendix B).

HCD FINDING

A.2, Realistic Capacity: “...include analysis demonstrating the validity of the realistic capacity determination...”

County Response

Amended per HCD Finding: The County added an analysis to reflect land-use controls and site improvement requirements, and reflect recently built densities. Specifically, the text in Chapter 6, *Land Inventory and Quantified Objective*, was revised to include new subsections titled “Realistic Capacity” (pages 6-4 to 6-6) and “2015-2023 Land Inventory

for Isla Vista” (pages 6-15 and 6-16) to describe the methodology used to determine realistic capacity for all sites included in the land inventory.

HCD FINDING

A.2, Emergency Shelters: “The element must demonstrate the 13 identified SR-H, MU, C-3, CS, and M-1 zoned sites have sufficient capacity to accommodate the identified 1,855 housing need...for emergency shelters.”

County Response

Amended per HCD Finding: The County added an analysis to demonstrate sufficient capacity to accommodate the identified need for emergency shelters. The Point-in-time survey conducted in January 2014 identified 1,832 homeless (854 sheltered and 978 unsheltered) individuals in the unincorporated county and all the incorporated cities. Although the survey does not distinguish between the needs of incorporated cities and the unincorporated portions of the county, the County identified sufficient sites to accommodate the county-wide need for emergency shelters (978 beds). The text in Chapter 6, *Land Inventory and Quantified Objectives*, was revised to include a new subsection titled “Emergency Shelter Sites Inventory” (pages 18 and 19) to describe the methodology used to determine realistic bed capacity of emergency shelter sites. Table 6.13 – Emergency Shelter Sites Allowed without a Discretionary Permit (page 6-19), Appendix B – Land Inventory and Maps (page B-7), and Chapter 3, *Housing Constraints and Mitigating Opportunities*, subsection titled “Mitigating Opportunities” (page 3-58) were all revised to reflect the results of the realistic bed capacity analysis. The analysis demonstrates sufficient land capacity to accommodate the county-wide need of 978 beds. Therefore, the County did not include a program to amend its zoning ordinances to identify additional zones or sites that allow emergency shelters without a conditional use permit or other discretionary permit.

HCD FINDING

A.2, Emergency Shelters: “...clarify that the ministerial permit process is not a discretionary process and that the ministerial use permit requirement is required for other uses in the zones requiring a ministerial permit for as [sic] emergency shelters...”

County Response

Amended per HCD Finding: The County confirmed that the ministerial permit process is not a discretionary process and that the ministerial use permit requirement for emergency shelters is required for other residential uses in the zones requiring a ministerial permit. The text in Chapter 3, *Housing Constraints and Mitigating Opportunities*, under the subsection titled “Mitigating Opportunities” (page 3-58) was revised to clarify that emergency shelters are subject to a non-discretionary permit and are treated the same as other residential uses within the same zone.

HCD FINDING

A.2, Transitional and Supportive Housing: "...transitional housing and supportive housing must be permitted as a residential use in all zones allowing residential uses and only be subject to those restrictions that apply to other residential dwellings of the same type in the same zone...the current definitions [of transitional and supportive housing] should be reviewed to ensure compliance with SB 745..."

County Response

Amended per HCD Finding: The existing County zoning ordinances may not fully comply with state housing law regarding supportive and transitional housing. More specifically, the terms "transitional housing" and "supportive housing" are not defined nor are they explicitly listed as permitted uses in all zones allowing residential uses. Therefore, Program 2.8 – Transitional and Supportive Housing (page 5-13) was added to Chapter 5, *Goals, Policies, and Programs*, to evaluate and amend as appropriate the County zoning ordinances to be consistent with Government Code sections 65582 and 65583(a)(5), Senate Bill 745, and Senate Bill 2 regarding transitional and supportive housing.

HCD FINDING

A.2, Employee Housing: "...demonstrate the County's zoning is consistent with the EHA [Employee Housing Act] (HSC [Health and Safety Code] Section 17000 et seq.), specifically, Sections 17021.5 and 17021.6..."

County Response

Amended per HCD Finding: The existing County zoning ordinances may not fully comply with the state housing law regarding agricultural employee housing. More specifically, agricultural employee housing providing accommodations for six or fewer employees is deemed a single-family structure, however, it requires a conditional use permit. Also, agricultural employee housing consisting of no more than 36 beds in a group quarters or 12 units or spaces designated for use by a single-family or household is not identified as an agricultural use. Therefore, specific revisions were made to Program 2.3 – Farmworker Employee Housing Law Consistency Amendments (page 5-11) in Chapter 5, *Goals, Policies, and Programs*, to amend the County zoning ordinances to be consistent with state law regarding agricultural employee housing, including HSC sections 17021.5 and 17021.6.

HCD FINDING

A.2, Manufactured Housing: "...demonstrate that the zoning code allows the siting and permit process for manufactured housing in the same manner as a conventional or stick-built structure (GC Section 65852.3)..."

County Response

Amended per HCD Finding: The County confirmed that its zoning ordinances are consistent with Government Code section 65852.3. Specifically, the text in Chapter 3, *Housing Constraints and Mitigating Opportunities*, under the subsection titled “Manufactured Housing” (page 3-9) was revised to clarify that the County zoning ordinances do not distinguish between manufactured homes and conventional single-family homes. As a result, manufactured homes are subject to the same development standards as conventional single-family homes. The text also clarifies that manufactured homes can be faster to permit, due to their state-certified structural design, than conventional homes.

HCD FINDING

A.3, Land Use Controls: “...identify and analyze all relevant land use impacts as potential constraints on a variety of housing types...Development standards to be identified and analyzed include, but are not limited to, the following: open space, minimum setbacks, height limits, parking requirements, structure coverage, floor area ratios, minimum unit sizes, and the Affordable Housing Overlay Zone...”

County Response

Amended per HCD Finding: Chapter 3, *Housing Constraints and Mitigating Opportunities*, of the draft 2015-2023 Housing Element Update (August 1, 2014) identifies and analyzes all but two of the land-use controls listed in HCD Finding A.3. Open space is discussed on pages 3-29 and 3-32; minimum setbacks are discussed on pages 3-32, 3-34, 3-36, and 3-37; height limits are discussed on pages 3-32, 3-37, 3-38, and 3-39; parking requirements are discussed on pages 3-32, 3-37, 3-39, and 3-40, including Tables 3.14 – LUDC Parking Requirements (page 3-39) and 3.15 – Orcutt Pedestrian Area Parking Requirements (page 3-40); and structure coverage is discussed on pages 3-32 and 3-37. The County zoning ordinances do not impose minimum unit sizes. Therefore, this land use control is not discussed. Chapter 3 also addresses other relevant land use controls not listed in HCD Finding A.3 such as growth management (pages 3-40 and 3-41), permit processing (pages 3-4 to 3-47), site improvements (pages 3-47 to 3-50), and design review (pages 3-50 to 3-54).

The two land-use controls not discussed are floor area ratios (FAR) and the AH Overlay Zone. To address HCD Finding A.3, staff added discussions of both FAR (pages 3-37 and 3-38) and the AH Overlay Zone (page 3-36) to Chapter 3, *Housing Constraints and Mitigating Opportunities*, of the final Housing Element (January 8, 2015).

HCD FINDING

A.3, Land Use Controls: "...evaluate the cumulative impacts of land use controls, including the ability to achieve maximum densities and cost and supply of housing..."

County Response

Amended per HCD Finding: The County reviewed affordable housing projects built over the last several years as a means of assessing the cumulative impact of housing constraints in relation to achievable densities and cost and supply of housing. Chapter 3, *Housing Constraints and Mitigating Opportunities*, was expanded to include a subsection titled "Cumulative Impact of Land Use Constraints" (page 3-69) to describe the analysis and the County's conclusion that cumulative impacts from land-use constraints do not appear to be a significant factor or impediment to realizing maximum densities.

HCD FINDING

A.3, Land Use Controls: "...describe past or current efforts to remove identified governmental constraints and include programs to address or remove the identified constraints..."

County Response

Amended per HCD Finding: The County identified and analyzed potential governmental constraints in Chapter 3, *Housing Constraints and Mitigating Opportunities*. Each potential constraint identified is followed by a corresponding "mitigation opportunities" section that details the existing or proposed program(s) intended to remove or mitigate the constraint. For example, the County identified its zoning ordinances as a potential local government constraint to housing (page 3-32). Corresponding mitigation opportunities are subsequently detailed on pages 3-35 and 3-36 to remove or mitigate the potential constraint. In this case, the following two new programs were added: Program 1.15 – Mixed-Use Zone (page 5-9) and Program 1.17 – Minimum Density Residential Zone (page 5-10). In addition, Program 2.3 – Farmworker Employee Housing Law Consistency Amendments (pages 5-11 and 5-12) was amended and continued.

HCD FINDING

A.3, Land Use Controls: "...clarify whether the County's zoning ordinance (non-coastal zone) complies with the state density bonus law ..."

County Response

Amended per HCD Finding: The County Land Use and Development Code and Montecito Land Use and Development Code currently comply with the State Density Bonus Law (SDBL) requirements. However, the County Coastal Zoning Ordinance only allows up to a 25% density bonus whereas SDBL allows up to a 35% density bonus. Housing Element Program 1.10 – State Density Bonus Law Consistency Amendments

(page 5-7) proposes to amend the Coastal Zoning Ordinance to ensure compliance with SDBL. In addition, the text in Chapter 3, *Housing Constraints and Mitigating Opportunities*, under the subsection titled “State Density Bonus Law” (pages 3-8 and 3-9) was revised to clarify the County’s existing zoning provisions and to discuss the purpose of the newly proposed program.

HCD FINDING

A.3, Land Use Controls: “...demonstrate that the County’s local density bonus ordinance that provides a density bonus for workforce housing ...does not undermine state density bonus law’s intent...”

County Response

Amended per HCD Finding: The existing County zoning ordinances do not include a local density bonus ordinance. However, Program 1.14 – Supplemental Density Bonus (page 5-9) was added in Chapter 5, *Goals, Policies, and Programs*, to facilitate a supplemental density bonus program that would provide additional density bonus in specific zones beyond that allowed by SDBL. In addition, the text in Chapter 3, *Housing Constraints and Mitigating Opportunities*, under the subsection titled “State Density Bonus Law” (pages 3-8 and 3-9) was revised to clarify the County’s existing zoning provisions and to discuss the purpose of the newly proposed program.

HCD FINDING

A.3, Land Use Controls: “...describe the status of amending the CZO in regard to the Isla Vista Master Plan, state density bonus law, SB 2, SB 745, Employee Housing Act, reasonable accommodation procedure...”

County Response

Amended per HCD Finding: The County described the status of amending the County zoning ordinances (i.e., CZO, Land Use Development Code (LUDC), Montecito Land Use Development Code (MLUDC)) in Chapter 4. The timelines for amending the County zoning ordinances are included in Chapter 5. In addition, the text in Chapter 3 under the subsection titled “California Coastal Act and Regulations” (page 3-19) was expanded to describe the County Local Coastal Program/CZO amendment process.

- Isla Vista Master Plan (IVMP) – The status of adopting the IVMP and associated amendments to the CZO is discussed under Program 1.13 (pages 4-17, 4-18) and Program 1.7 (page 4-13) in Chapter 4, *Evaluation of the County of Santa Barbara’s 2009-2014 Housing Element*. Chapter 5, *Goals, Policies, and Programs* carries forward the revised Program 1.7 – Isla Vista Master Plan (page 5-6) and the revised Program 1.13 – Isla Vista Monitoring (page 5-8) into the 2015-2023 Housing Element planning period. The revised Program 1.7 – Isla Vista Master Plan directs the County to adopt and resubmit the IVMP to

the California Coastal Commission for certification in Summer 2015. In part, the revised Program 1.13 – Isla Vista Monitoring requires the County to monitor the effectiveness of the IVMP in producing varied housing types. The text in Chapter 6, *Land Inventory and Quantified Objective*, under the subsection titled “Isla Vista” (pages 6-13 and 6-14) provides additional details on the status of the IVMP adoption process.

- State Density Bonus Law (SDBL) – The status of amending the CZO to comply with SDBL is discussed under Program 1.10 (pages 4-15 and 4-16) in Chapter 4, *Evaluation of the County of Santa Barbara’s 2009-2014 Housing Element*. Chapter 5, *Goals, Policies, and Programs* carries forward Program 1.10 – State Density Bonus Law Consistency Amendments (page 5-7) into the 2015-2023 Housing Element planning period. Program 1.10 directs the County to amend the CZO to comply with the SDBL within three years of the adoption of the 2015-2023 Housing Element.
- Senate Bill 2 (SB 2) and Senate Bill 745 (SB 745) – The status of amending the County zoning ordinances (i.e., CZO, LUDC, MLUDC) to comply with SB2 and SB 745 is discussed under Program 2.2 (pages 4-19 and 4-20) in Chapter 4, *Evaluation of the County of Santa Barbara’s 2009-2014 Housing Element*. Chapter 5, *Goals, Policies, and Programs* carries forward the revised Program 2.2 – Special Needs Housing Regulations (page 5-11), and a new Program 2.8 – Transitional and Supportive Housing (pages 5-13 and 5-14) into the 2015-2023 Housing Element planning period. Program 2.2 directs the County to adopt zoning ordinance amendments that allow combined emergency shelters, single room occupancy projects, treatment facilities, and temporary housing with a ministerial permit in certain zones. Program 2.8 will facilitate the adoption of zoning ordinance amendments to include definitions of transitional and supportive housing, consider transitional and supportive housing to be a residential use, and explicitly permit transitional and supportive housing subject only to those zoning regulations that apply to other residential dwellings of the same type in the same zone.
- Employee Housing Act – The status of amending the County zoning ordinances (i.e., CZO, LUCD, MLUDC) to comply with the Employee Housing Act is discussed under Program 2.3 (pages 4-20 and 4-21) in Chapter 4, *Evaluation of the County of Santa Barbara’s 2009-2014 Housing Element*. Chapter 5, *Goals, Policies, and Programs* carries forward the revised Program 2.3 – Farmworker Employee Housing Law Consistency Amendments (pages 5-11 and 5-12) into the 2015-2023 Housing Element planning period. The revised Program 2.3 directs the County to adopt zoning ordinance amendments to deem any employee housing providing accommodations for six or fewer employees a single-family structure (Health and Safety Code Section 17021.5) and to deem any employee housing consisting of no more than 36 beds in a group quarters or 12 units or spaces designed for use

by a single-family or household an agricultural use (Health and Safety Code Section 17021.6).

- Reasonable Accommodation Policy – The status of amending the County zoning ordinances (i.e., CZO, LUCD, MLUDC) to comply with fair housing laws is discussed under Program 2.5 (pages 4-21 and 4-22) in Chapter 4, *Evaluation of the County of Santa Barbara’s 2009-2014 Housing Element*. Chapter 5, *Goals, Policies, and Programs* carries forward the revised Program 2.5 – Fair and Safe Special Needs Housing (pages 5-12 and 5-13) into the 2015-2023 Housing Element planning period. Under the revised Program 2.5, the County will adopt a revised “Reasonable Accommodations Policy” that complies with state law.

HCD FINDING

A.3, Fees and Exaction: “...clarify whether Tables 3-23 and 3-24...include all the required fees for single family and multifamily housing development, including impact fees, and analyze their impact as potential constraints on housing supply and affordability...”

County Response

Amended per HCD Finding: The County revised Table 3.24 – Building Permit Processing and Development Impact Fees for Single-Family Development (pages 3-64 and 3-65), and Table 3.25 – Actual Fees Charged for Multifamily Development (pages 3-6 and 3-67) to include all required fees for single-family and multifamily housing developments. It also analyzed whether the fees are potential constraints on housing supply and affordability. In addition, new text was added in Chapter 3, *Housing Constraints and Mitigating Opportunities*, (page 3-64) to specify total fees and the proportion of the fees to the development costs. Please note that these data tables were renumbered from the Draft Housing Element (August 1, 2014).

HCD FINDING

A.3, Code and Enforcement: “...describe the County’s building code, including any local amendments to the building code, and analyze their impact as potential constraints on housing supply and affordability...”

County Response

Amended per HCD Finding: In response to HCD Finding A.3, the County revised the text in Chapter 3, *Housing Constraints and Mitigating Opportunities*, under the subsection titled “Codes and Enforcement” (page 3-68) to describe and analyze the County’s building code and code enforcement program. Therefore, the County’s code enforcement program and building code help maintain existing housing stock without imposing significant constraints on housing supply and affordability.

HCD FINDING

A.3, Constraints on Persons with Disabilities: "...include a program to revise the definition of family..."

County Response

Amended per HCD Finding: The existing County zoning ordinances include a definition of "family." However, the definition does not clearly meet State HCD's requirements. In response to State HCD Finding A.3, Program 2.7 – Definition of Family (page 5-13) was added to Chapter 5, *Goals, Policies, and Procedures*, to evaluate and revise the definition of "family." In addition, the text in Chapter 3, *Housing Constraints and Mitigating Opportunities*, under the subsection titled "Housing for Persons with Disabilities" (pages 3-55 and 3-56) was revised to address constraints and identify mitigating opportunities for persons with disabilities.

HCD FINDING

A.3, Constraints on Persons with Disabilities: "...include a program to revise the reasonable accommodation procedure..."

County Response

Amended per HCD Finding: The text in Chapter 3, *Housing Constraints and Mitigating Opportunities*, under the subsection titled "Housing for Persons with Disabilities" (pages 3-55 and 3-66) was revised to address the constraints and identify mitigating opportunities for persons with disabilities. In summary, the County's existing reasonable accommodation policy may not comply with fair housing laws. As a result, Program 2.5 – Fair and Safe Special Needs Housing (pages 5-12 and 5-13) was revised in Chapter 5, *Goals, Policies, and Procedures*, to evaluate and revise as appropriate the existing reasonable accommodation policy.

HCD FINDING

A.4, Persons with Developmental Disabilities: "...quantify the total number of persons with developmental disabilities..."

County Response

Amended per HCD Finding: The County obtained the data necessary to quantify the total number of persons with developmental disabilities. Per HCD Finding A.4, the text in Chapter 2, *Housing Needs Assessment*, under the subsection titled "Persons with Disabilities" (pages 2-29 to 2-31) was revised to include the data.

HCD FINDING

A.5, At-Risk Affordable Housing: "...identify the likelihood of the [at risk] units converting to market rent..."

County Response

Amended per HCD Finding: The County assessed the likelihood of the at-risk units converting to market rent and concluded that the risk of conversion is low. Specifically, the text in Chapter 2, *Housing Needs Assessment*, under the subsection titled "At-Risk Housing Developments" (pages 2-42, 2-43), was revised to describe the assessment. In addition, the County found that Shifco Apartments was not a County-funded project. Therefore, Table 2.33 – County Funded At-Risk Assisted Rental Units (2015-2025) (page 2-43) was updated to exclude Shifco Apartments, resulting in a lower number of at-risk units. Please note that this data table was renumbered from the Draft Housing Element (August 1, 2014).

HCD FINDING

B.1, Housing Programs – Timelines for Implementation: "For each specific program action there should be a definitive timeline for implementation or completion..."

County Response

Amended per HCD Finding: The text for Programs 1.3, 1.4, 1.9, 1.12, 1.15, and 1.17 (pages 5-4 to 5-10) in Chapter 5, *Goals, Policies, and Programs* was revised to include definitive timelines for implementation and/or completion of proposed programs.

HCD FINDING

B.1, Housing Programs – Status of Continued Programs: "...programs...continued from the prior planning period...should be revised to identify which actions have been completed in the prior planning period."

County Response

The status and the County's intent to either continue, revise, or remove each program in the 2009-2014 Housing Element are included in Chapter 4, *Evaluation of the County of Santa Barbara's 2009-2014 Housing Element*, of the Draft 2015-2023 Housing Element Update. As a result, no revisions were necessary to address HCD Finding B.1 or comply with state housing law.

HCD FINDING

B.1, Housing Programs – Subsequent Specific Actions: "...[proposed] programs must describe subsequent specific actions that will be taken..."

County Response

Amended per HCD Finding: In response to HCD Finding B.1, the text for Programs 1.2, 1.3, 1.4, 1.12, 1.13, 1.14, 1.15, 1.16, 2.2, 2.4, 2.6, and 3.1 (pages 5-3 to 5-15) in Chapter

5, *Goals, Policies, and Programs* was revised to identify clear actions for implementation of proposed programs. For example, the action “consider” used in the Draft Housing Element was replaced with more definitive actions such as “evaluate and adopt as appropriate.”

HCD FINDING

B.2, Site Inventory Analysis: “As noted in Finding A.2, the element does not include a complete site analysis and therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the County may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types...”

County Response

Amended per HCD Finding: HCD Finding A.2 states that the land inventory and analysis in the Draft Housing Element Update were incomplete because they did not fully address the following six factors: sites inventory, realistic capacity, emergency shelters, transitional and supportive housing, employee housing, and manufactured housing. In response, the County analyzed these factors, and, as necessary revised the land inventory and analysis. Each of the six factors identified in HCD Finding A.2 are addressed on pages 2 to 5 of this response. For example, the text in Chapter 6 was revised to include a new subsection titled “Realistic Capacity” (pages 6-4 to 6-6) that describes the methodology used to determine realistic capacity for all sites included in the land inventory.

The expanded analysis (Chapter 6) and land inventory (Appendix B) demonstrate that the County has adequate capacity to accommodate its 2014-2022 RHNA for all income categories. Adequate capacity also exists to accommodate emergency shelters, transitional and supportive housing, employee housing, and other special housing needs. As a result, the County did not need to add or revise programs to accommodate or encourage a variety of housing types.

HCD FINDING

B.3, Governmental Constraints: “...Depending upon the results of [potential governmental constraints] analysis, the County may need to revise or add programs and address and remove or mitigate any identified constraints...”

County Response

Amended per HCD Finding: As discussed in the response to HCD Finding A.3 on pages 5 to 10 this response, the County identified and analyzed potential governmental constraints in Chapter 3, *Housing Constraints and Mitigating Opportunities*. Each

potential constraint is followed by a corresponding “mitigation opportunities” section that details the existing or proposed program(s) intended to remove or mitigate the constraint.

HCD FINDING

B.4, Existing Affordable Housing Stock: “...include program(s) to conserve or improve the condition of the existing stock...”

County Response

Amended per HCD Finding: In response to HCD Finding B.4, the County added text and two programs to conserve or improve the condition of existing housing stock.

Specifically, a subsection titled “Conserve and Improve Existing Affordable Housing Stock” (pages 2-23 and 2-24) was added to Chapter 2, *Housing Needs Assessment*. This subsection analyzes existing housing stock and discusses the County’s support for programs that conserve, improve, and rehabilitate the condition of existing low-income housing stock. Program 4.5 – Code Enforcement (pages 5-17 and 5-18) was added in response to complaints regarding dangerous buildings and building code violations. This program will facilitate the use of CDBG and HOME grant funds for code enforcement activities. Program 4.3 – Housing Rehabilitation (page 5-17) was added to support organizations that improve and rehabilitate existing affordable housing stock. Program 1.9 – Energy Efficiency Policy and Financing (pages 5-6 and 5-7) is continued from the 2009-2004 Housing Element to support energy efficiency and renewable energy improvements for the market rate and affordable housing stock in the county.

HCD FINDING

C. Quantified Objectives: “...include an estimate of the number of new, rehabilitated, and conserved units during the planning period by income category, including extremely low-income...include both private and County planned activities...”

County Response

Amended per HCD Finding: Chapter 6, *Land Inventory and Quantified Objectives*, includes a subsection titled “Quantified Objectives” (pages 6-16 and 6-17) that was expanded to include an estimate of the units to be constructed, rehabilitated, and conserved during the planning period. In addition, Table 6.11 (page 6.17) was expanded to include every income category, including extremely low-income.

HCD FINDING

D. Public Participation – Meetings, Workshops, and Other Efforts: “...demonstrate diligent efforts were made to involve all economic segments of the community in the development of the element...”

County Response

Amended per HCD Finding: The County made diligent efforts to achieve public participation of all economic segments of the community in the development of the housing element. From April 2014 to July 2014, the County facilitated eight meetings and workshops (i.e., two public workshops, three stakeholder meetings, two Planning Commission public workshops, and one Board of Supervisors public workshop). In addition, the County maintained a project website, conducted a housing survey, published newspaper notices, and emailed notices to the stakeholders and interested parties. Appendix E was expanded significantly to include a description of the County’s outreach efforts. In addition, the text in Chapter 1, *Introduction*, was revised to clarify the summary of the public participation process (page 1-2).

HCD FINDING

D. Public Participation – Responses to Public Comments: “...describe how they [public comments received] were considered and incorporated into the housing element...”

County Response

Amended per HCD Finding: The County received valuable input throughout all stages of the Housing Element Update. The public input was primarily received via the housing survey, stakeholder meetings, public workshops, and comments letters. The County reviewed and considered all public input received, and made diligent efforts to address the raised housing issues. Table E.1 – Public Comments and 2015-2023 Housing Element Programs (pages 17 and 18) added to Appendix E of the Housing Element Update highlights the housing issues raised throughout the public participation process and the County’s corresponding proposed programs to address them.

HCD FINDING

E. Consistency with General Plan: “...describe how consistency [of the element with other elements of the General Plan] will be maintained during the planning period...”

County Response

Amended per HCD Finding: In response to HCD Finding E, text was added to Chapter 1, *Introduction*, (page 1-4) to describe the means by which consistency of the 2015-2023 Housing Element will be maintained with other Comprehensive Plan elements during the planning period. In summary, the County’s required findings for approving

Comprehensive Plan amendments require that the Board of Supervisors affirmatively find the amendment consistent with other portions of the Comprehensive Plan.

HCD FINDING

F. Coastal Zone Localities: "...the element indicates the number of low and moderate income units constructed or demolished during the last planning period, 2009-2013, it must include information since 1982..."

County Response

Amended per HCD Finding: Chapter 3, *Housing Constraints and Mitigating Opportunities*, was expanded to include the number of residential units constructed and demolished by year, income category, and location (i.e., within the Coastal Zone, or within three miles of the Coastal Zone) from January 1982 through January 2014. Tables 3.9, 3.10, 3.11, and 3.12 were added in Chapter 3, *Housing Constraints and Mitigating Opportunities*, (pages 3-22 to 3-25).