

City of Carpinteria Response to June 12, 2023 HCD Review Letter

All page references included herein refer to page numbers of the November 2023 redline version of the Housing Element.

HCD Comments	City Response
<p>A. Housing Needs, Resources, and Constraints 1. Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2...shall include an assessment of fair housing in the jurisdiction (Gov. Code, § 65583, subd. (c)(10)(A))</p>	N/A
<p>Enforcement: While the element was revised on pg. III-12 to 16 of the technical report to demonstrate compliance with state and federal law regarding special needs housing and adds program activities that will bring City into compliance with state and federal law if not already compliant, it must still analyze the City’s capacity to provide enforcement and outreach. Please see HCD’s prior review.</p>	<p>Appendix D, page D-15 has been updated to explain that because the City does not have in-house capacity to provide fair housing outreach and enforcement, it contracts with the Santa Barbara Rental Housing Mediation Program (RHMP) to provide these services to Carpinteria residents. Pages D-14 to 16 also describe the capacity and capabilities of RHMP and another local fair housing organization that serves the City, the Legal Aid Foundation of Santa Barbara County, with respect to enforcement and outreach.</p>
<p>Outreach: While the element was revised to include an updated stakeholder list that includes more groups that could be inferred to serve lower-income communities, there is no added analysis describing efforts to reach out to neighborhoods with relatively concentrated poverty for input related to housing and community development needs and access to opportunities. Additionally, while the element was revised to demonstrate some outreach was conducted in Spanish, this appears to be limited to one community survey. The element should be revised to include programs for more thorough outreach to this population.</p>	<p>As discussed on Appendix D, pages D-34 to 35, there are no R/ECAP or RCAA areas in the city. Analysis has been added on page D-34 indicating poverty status throughout the city is less than 10 percent and the city is generally racially integrated.</p> <p>As discussed in Appendix C, page C-1, the city worked to ensure individuals and groups representing lower-income populations and special needs groups were involved in the housing element process by direct mail and/or email to its list of stakeholders, which included housing advocates and non-profit organizations representing the interests of lower-income persons and special needs groups. Information has been added to indicate public outreach meetings were held both in-person and online to enable those with mobility difficulties to conveniently participate. The in-person location of most meetings was the Carpinteria City Hall. Given the city’s small size and City Hall’s location on a bus line, this location is readily accessible to residents throughout the city.</p> <p>The comment regarding outreach conducted in Spanish mischaracterizes the City’s outreach efforts. Appendix C, pages C-1 to C-2 state that all housing</p>

City of Carpinteria Response to June 12, 2023 HCD Review Letter

HCD Comments	City Response
	<p>element materials were published on the city website in both English and Spanish and transcription of meetings in real-time and meeting minutes were made available. A summary of this information and a cross reference to Appendix C has also been added to outreach discussion on Appendix D, page D-10.</p> <p>Program 17 includes expansion of specific outreach efforts related to fair housing education, including to the Spanish-speaking community. (See Housing Plan, pages 31-39.)</p>
<p><u>Integration and Segregation</u>: While the element was revised to provide additional regional analysis, this analysis is largely limited to comparing City trends to County data. A complete regional analysis must compare the City to the surrounding region, including other jurisdictions that border or are in close proximity to the City. Additionally, while further analysis added on geographic concentrations for race and ethnicity and familial status, this analysis must also be applied to disability and income. Future analysis should also address potential causes for geographic concentrations based on familial status, disability, and income. Finally, while the element was revised to discuss and analyze data for trends over time and patterns across census tracts for race, disabilities, and familial status, it must also do so for income.</p>	<p>The regional analysis of integration and segregation has been expanded to include analysis of the cities of Goleta and Santa Barbara and the reasons for similarities and differences in trends in these two cities also located on the south coast of Santa Barbara County. (See Appendix D, pages D-23 to 24.)</p> <p>Potential causes for the somewhat lower rate of people with disabilities in the northern portion of the city (<10% versus 10-20% in the rest of the city) is discussed on page D-26 to 27: “The lower rates of persons with disabilities in the northern portion of the City may be due to the lack of availability of housing that is both affordable and accessible and well as there being fewer public transit options in this area.”</p> <p>The percentage of children in married couple households is over 60% throughout the city and conversely, female-headed households are less than 20% throughout the city. Analysis has been added on pages D-29 to 31 comparing the relatively homogenous familial status in Carpinteria to the more varied rates in the nearby cities of Goleta and Santa Barbara. One reason for this difference may be that female-headed households, which have a greater need for accessible child and health care and other services choose to live in these larger cities where more of these services are available.</p> <p>Potential causes for the higher concentration of lower-moderate income population in the southwest portion of the city is that there is a higher</p>

City of Carpinteria Response to June 12, 2023 HCD Review Letter

HCD Comments	City Response
	percentage of rental housing in this area. A discussion of income trends over time and across census tracts has also been added. Generally, measures of income in the city have remained fairly consistent over time and throughout the city. This analysis has been added to pages D-31 to 33 .
<p><u>Disparities in Access to Opportunity</u>: While the element was revised to provide sufficient local and regional analysis for access to economic and transit opportunities, it must provide further information and analysis for access to educational and environmental opportunities. Specifically, while the adopted element provides further information on educational opportunities within the City, it does not provide any analysis on disparities in access to opportunities in different parts of the City. It also does not provide a regional comparison in access educational opportunities.</p> <p>Additionally, while additional information has been added to explain local and regional environmental opportunities, there must be additional analysis for potential causes of variations in scoring from local and regional data.</p>	<p>Appendix D, Figure D-22 and pages D-37 to 39 indicate that the entire City has uniform and relatively high educational opportunity scores. The analysis has been updated to clarify that residents are served by two elementary schools and one middle and high school. Given the small size of the city, there are not disparities in access to educational opportunities.</p> <p>Figure D-21 shows the regional trends in access to educational opportunity. Additional information comparing the city of Carpinteria to the cities of Santa Barbara and Goleta has been added to the regional analysis. (See page D-38.)</p> <p>Additional analysis has been added regarding the potential causes of variations in local and regional environmental opportunity scores on pages D-44 to 47.</p>
<p><u>Disproportionate Housing Needs Including Displacement</u>: While a sufficient regional analysis and analysis of patterns over time was added to the adopted element for displacement risk, overpayment, overcrowding, and persons experiencing homelessness, further analysis is needed to meet the requirements of this finding. Specifically, the element must provide a more detailed analysis of concentrations substandard housing within the City and include details on what contributes to overcrowding in certain areas of the City and how it relates to other fair housing factors. Additionally, the adopted element should be revised to provide additional local analysis of persons experiencing homelessness, including any demographics or characteristics for impacts on protected characteristics (e.g., race and disability) and access to shelter and services. Finally, the adopted element was not revised to analyze displacement risk both locally and</p>	<p>There are no substantial concentrations of substandard housing in the city. Analysis has been added to state this and to provide additional information on factors that may affect substandard housing in certain areas of the city. (See Appendix D, pages D-56 to 57.)</p> <p>Santa Barbara County recently published an online Homeless Management Information System (HMIS) dashboard which provides demographic and other information regarding people experiencing homelessness. Additional local and regional analysis has been added on pages D-57 to 60.</p> <p>Additional information has been added regarding displacement risk and causes of displacement on a local and regional level on pages D-60 to 63.</p> <p>The city added discussion of City Council Resolution No. 6235, which directed staff to evaluate six additional anti-displacement measures within the City on</p>

City of Carpinteria Response to June 12, 2023 HCD Review Letter

HCD Comments	City Response
<p>regionally including displacement due to investment, disinvestment, and disaster driven displacement. Please see HCD’s prior review.</p>	<p>pages D-8 to 9 and included the resolution as Attachment D-3. Appendix D also includes discussion of the City’s adoption of City Council Ordinance No. 770 which establishes additional protections for tenants in the event of a no-fault just cause termination of their residential tenancy. (See pages D-62 and Attachment D-4.)</p>
<p><u>Identified Sites and Affirmatively Furthering Fair Housing (AFFH):</u> The element was largely not revised to address this requirement. For example, while the adopted element was revised to provide TCAC opportunity maps in relation to sites and their location in high to low resource areas, it must analyze the location of these sites and their impact on improving access to educational opportunities, transit, jobs, and a healthy environment for all income levels. Additionally, the element states that sites are all in “moderate” resource areas and cites this as evidence for a lack of concentration of sites to accommodate lower income in low resource areas. The element should be revised to include analysis of affordable opportunities in high resource areas and include programs as necessary to encourage housing mobility. Please see HCD’s prior review.</p>	<p>Additional analysis has been added to Appendix D, pages D-63 to 67 regarding the location of sites relative to AFFH factors. The city is relatively homogenous in terms of many AFFH factors including educational and economic opportunity, access to transit, poverty rate, and integration. Nonetheless, the city’s criteria for identifying sites for the sites inventory included measures intended to affirmatively furthering fair housing by prioritizing proximity to transit, services, and employment and avoiding areas with significant environmental constraints.</p> <p>Nearly the entire city is designated as moderate resource area. As stated on pages D-64 to 67 and depicted in Figure D-41, the only areas designated high resources in the city are small portions of census tracts that are largely outside of the city. Within the city, the high resource areas contain Carpinteria High School and Sandpiper Mobile Home Park. There is no undeveloped or underdeveloped land available for additional residential development in high resource areas within the city. Therefore, there is no opportunity for potential housing development in the city in any areas other than moderate resource areas.</p>
<p><u>Local Data and Knowledge, and Other Relevant Factors:</u> While the adopted element was revised to include some historical context and analysis on local and regional land use policies and market trends’ effect on housing mobility and opportunities in the City, some of the information seems to be anecdotal and sources are not cited. The element should be revised to clearly show how the City utilized knowledge from local and regional advocates, service providers and other planning documents or processes to inform its analysis, policies, and programs.</p>	<p>Additional information on participants involved in the Housing Element update process has been added on pages D-1 to 2. Participants in the Housing Element update included affordable housing developers including People’s Self Help Housing; fair housing organizations including the Rental Housing Mediation Program and Gray Panthers Network of Santa Barbara; housing advocates including Californians for Homeownership, YIMBY Law, and California Housing Defense Fund; and community-based and faith-based organizations, including family service agencies, senior programs, and health and human services; and residents. The city also directly worked with People’s Self Help Housing, which serves the interests of lower-income</p>

City of Carpinteria Response to June 12, 2023 HCD Review Letter

HCD Comments	City Response
	<p>households and special needs groups and has several successful lower-income housing projects in the City, to solicit comments and recommendations on housing needs, barriers to fair and affordable housing, and opportunities for development. (See email from People’s Self Help Housing in Appendix C, pages C-52 to 53.) All comments received and how those comments were incorporated into the Housing Element are detailed in Appendix C, paged C-15 to 78. Additional discussion of outreach efforts is included in Appendix D, pages D-9 to 12.</p> <p>Citations to data sources are included where available throughout the Housing Element and where information is based on staff observations/local knowledge this has been noted.</p>
<p><u>Contributing Factors to Fair Housing Issues:</u> While the adopted element was revised to add priority levels, all contributing factors are listed as “high” priorities. The element should re-assess contributing factors upon completion of analysis and make revisions as appropriate, including clearer prioritization.</p>	<p>The analysis has been revised to prioritize the fair housing contributing factors as follows: (1) Housing affordability, (2) Homelessness, (3) Fair housing education. See Appendix D, pages D-68 to 76.</p>
<p><i>2. An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality’s housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)</i></p>	<p>N/A</p>
<p><u>Progress in Meeting the Regional Housing Needs Allocation (RHNA):</u> While Table B-2 and B-3 have been revised to provide more detailed information as to the status and anticipated completion date of each pending and approved project, analysis should also address any barriers to development and other relevant factors such as build out horizons, phasing, and dropout rates to demonstrate the availability or likelihood of development in the planning period. Additionally, Table B-3 appears to list multiple projects as “approved” that are still in the review process. In order to be counted as an approved project, a project must be issued a building permit. The element should be revised to separate completed</p>	<p>The discussion of completed, approved, and pending projects on Appendix B, pp. B-2 to 3 has been updated to provide additional analysis regarding the likelihood of development of approved and pending projects during the planning period.</p> <p>The “Status” columns in Tables B-2 and B-3 have also been updated to clarify projects that are completed, under construction, have building permits issued, have planning permit approval, or are pending planning review. A new column has been added to Table B-3 indicating the anticipated completion date for projects that are not yet completed.</p>

City of Carpinteria Response to June 12, 2023 HCD Review Letter

HCD Comments	City Response
<p>projects and approved projects and provide additional evidence to support the assertion that the pending projects will be completed in the planning period.</p>	<p>Two additional projects for which formal applications have recently been submitted have been added to Table B-3. These projects are located on sites that had been identified as candidate sites for rezoning in Table B-6, specifically Candidate Sites 5 and 17. Therefore these sites have been removed from Table B-6.</p>
<p><u>Parcel Listing</u>: While Table B-4 has been revised to add the parcel number and parcel size for each site, and Table B-6 has been revised to clarify that all sites listed in it are to address lower-income RHNA, Table B-5 still appears to assume a density bonus will be applied to Site 5, and this assumes a capacity of 32 dwelling units per acre. As stated in HCD’s prior review, unless this site is a pending or approved project, the table should revise its capacity assumptions for this site to reflect the underlying zoning, which is 20 dwelling units per acre.</p>	<p>Table B-5 has been revised to indicate the anticipated capacity of Site 5 is 31 units based on the underlying zoning of 20 units per acre.</p>
<p><u>Realistic Capacity</u>: While the realistic capacity analysis has been revised to cite pending and approved projects as evidence for capacity on nonvacant sites, it does not link the characteristics of sites in Table B-2 and B-3 to the sites in the inventory in Tables B4 and B-5. More analysis is needed connecting developed projects to sites in the inventory in terms or size, affordability level and other similar characteristics, and this analysis should also address how land use controls and site improvements were factored into capacity calculations. Please see HCD’s prior review for more information.</p>	<p><u>Linking Characteristics of Sites in Trends Analysis to Site Inventory</u>. The analysis of Completed, Approved and Pending Projects (Table B-3) determined sites allowing 100% multi-family residential uses (i.e., those sites in with PRD zoning) are being developed on average at 78% of the maximum allowed density. The PRD zoned sites in Tables B-3 and B-4 are of similar size, with an average size of 0.21 and 0.24 acres, respectively. Columns have been added to Table B-3 indicating the site identification criteria applicable to each site (see discussion of site identification criteria below). For the purposes of calculating realistic development potential of vacant multi-family residential sites, the city conservatively assumed they would be developed at 75% of allowed density. For single-family zoned sites, the analysis assumes one unit per lot. No vacant site is anticipated to yield more than 3 units. (See analysis of Completed, Approved, and Pending Projects and Vacant Sites in Appendix B, pages B-2 to 3.)</p> <p>To identify potentially developable sites on non-residentially zoned land, the City reviewed development trends on non-residentially zoned properties from 2015 to March 2023 to identify the common characteristics of these sites. Based on the common characteristics identified, the city developed a</p>

City of Carpinteria Response to June 12, 2023 HCD Review Letter

HCD Comments	City Response
	<p>list of site criteria that was used to identify potentially developable non-vacant sites. (See list of criteria on page B-4.) Columns have been added to Tables B-2, B-3, B-5, and B-6 indicating the criteria applicable to each of the sites.</p> <p><u>Affordability Assumptions.</u> The city generally used the default density provisions of state law (Gov. Code, § 65583.2(c)(3)(B)) for the affordability assumptions in the site inventory analysis. However, in some cases, the city used more conservative assumptions regarding affordability. The specific affordability assumptions used for each type of site (e.g., vacant, underutilized, etc.) are specified in the footnotes of Tables B-3 through B-6.</p> <p><u>Land Use Controls & Site Improvements.</u> Discussion has been added to indicate how land use controls and site improvement requirements have been incorporated into build out assumptions. (See page B-5.)</p>
<p><u>Suitability of Nonvacant Sites:</u> While the element includes specific information on each nonvacant site in the inventory including various characteristics about the site and existing uses, it only includes a general description of the methodology used to select these sites but does not describe how these factors relate to the potential to redevelop in the planning period. To support these factors, the element could relate the characteristics of example projection on Table B-2 to the characteristics outlined in the site descriptions and include market conditions or trends that support the assumptions.</p>	<p>As stated above, the City developed a list of site identification criteria based on characteristics of recently developed sites. Columns have been added to Tables B-2, B-3, B-5, and B-6 indicating the criteria applicable to each of the sites.</p>
<p><u>Small and Large Sites:</u> The element was not revised to meet this requirement. While the adopted element seems to indicate that no sites larger than ten acres or smaller than half an acre are being used to accommodate lower income RHNA, analysis in Figure 3 appears to indicate that sites 1, 2, 6, 11, 14, 15, 16, 18 and 20 are all larger than ten acres or smaller than half an acre and are being used to accommodate lower-income units. Since the City relies on both large and small site to accommodate its RHNA, the element must provide specific examples of past development in the City on similar site, with the densities,</p>	<p><u>½ Acre Threshold.</u> Parcels were grouped into “sites” listed in Tables B-5 and B-6 when they were adjacent and had the potential for lot consolidation. All of the sites listed in Table B-5 are larger than one-half acre. However, some sites include multiple adjacent parcels that are less than one-half acre individually. Government Code Section 65583.2(c)(2)(A) does not define “site” for purposes of the half acre threshold, nor limit the definition of site to one parcel. The city has revised the analysis to assign all sites smaller than one acre and all individual parcels smaller than one-half acre to the moderate-income category for purposes of the sites inventory analysis. (See</p>

City of Carpinteria Response to June 12, 2023 HCD Review Letter

HCD Comments	City Response
<p>affordability and, if applicable, circumstances leading to consolidation. Additionally, while Program 8 was revised to include incentives for consolidating small parcels and subdividing large parcels and implement SB 9 requirements by 2024, it should be more specific as to what incentives will be offered and provide quantifiable objectives to match or exceed RHNA expectations.</p>	<p>discussion on Appendix B, page B-11 and footnotes in Tables B-5 and B-6 which reference this change.)</p> <p><u>10 Acre Threshold.</u> One parcel included in the inventory, a portion of Candidate Site 2 (Table B-6) is larger than 10 acres. Per Government Code Section 65583.2(c)(2)(B), for the purposes of the 10 acre threshold, “‘site’ means that portion of a parcel or parcels designated to accommodate lower income housing needs pursuant to this subdivision.” The city revised the analysis to consider only a 10 acre portion of the 14.09 acre parcel as a candidate for rezoning with the R Overlay to accommodate lower income housing. (See footnote and changes to Table B-6.)</p> <p><u>Lot Consolidation & Subdivision.</u> Program 8 has been revised to list specific incentives to encourage lot consolidation and commits the city to establishing the lot consolidation incentive program by December 2024. Further, Program 8 includes a quantified objective of approving 5 residential or mixed use projects involving lot consolidations during the planning period. Program 8 also includes a commitment to amend the zoning code to implement SB 9 to promote urban lot splits by December 2024. As the city has only identified one site in its site inventory that exceeds 10 acres and has adequate buffer such that it is not reliant on this site to meet its RHNA shortfall, it is not proposing a separate incentives program for subdivisions but is committed to continuing to encourage subdivisions through discussions with developers during preliminary project reviews. (See Housing Plan, pages 18-19.)</p>
<p><u>Accessory Dwelling Units (ADU):</u> While the adopted element provides some additional analysis stating its updated ADU ordinance will increase ADU production, and Program 2 (Accessory Dwelling Units) was revised to include monitoring of ADU production throughout the planning period, it is not clear if this production level will be achievable in the planning period. As a result, the element should be updated to include a realistic estimate of the potential for ADUs. Please see HCD’s prior review.</p>	<p>Based on methodology described in HCD’s Site Inventory Guidebook, the city conducted an analysis of regional production of ADUs to estimate the number of ADUs that would be produced in Carpinteria in the current planning period. Given the lack of historic ADU production in the city, the city used estimated ADU production in the city of Santa Barbara to estimate a “base” ADU production rate.</p> <p align="center">Regional ADU Trends Analysis</p>

City of Carpinteria Response to June 12, 2023 HCD Review Letter

HCD Comments	City Response											
	<table border="1" data-bbox="1096 228 1896 418"> <thead> <tr> <th colspan="2" data-bbox="1096 228 1896 261">City of Santa Barbara</th> </tr> </thead> <tbody> <tr> <td data-bbox="1096 261 1621 293">Estimated ADUs in planning period</td> <td data-bbox="1621 261 1896 293">629</td> </tr> <tr> <td data-bbox="1096 293 1621 326">ADUs per capita</td> <td data-bbox="1621 293 1896 326">.007</td> </tr> <tr> <td data-bbox="1096 326 1621 358">ADUs per housing unit</td> <td data-bbox="1621 326 1896 358">.016</td> </tr> <tr> <td data-bbox="1096 358 1621 418">Trend applied on per capita and per housing unit basis to Carpinteria for planning period</td> <td data-bbox="1621 358 1896 418">Approx. 90-100 total or 12 annually</td> </tr> </tbody> </table> <p data-bbox="1096 423 1896 456">Based on Census 2020 ACS data for population and housing units.</p> <p data-bbox="1037 492 1896 594">Based on trends in the nearby city of Santa Barbara, the city estimates a “base” ADU production of 12 units per year or 96 units for the planning period.</p> <p data-bbox="1037 634 1955 1019">In addition, there is deferred demand for ADU development in Carpinteria as compared to the city of Santa Barbara where State law changes that expanded ADU production went into effect in January 2017. This deferred demand is evidenced by the fact that in the first six months the city’s current ADU regulations have been in place, the city has received 20 permit applications and has issued seven building permits. Given the current trend of pending and approved ADUs over the past six months, the city conservatively estimates that in addition to the base ADU production, the annual rate of production in 2023 and 2024 will include an additional 8 units per year. Therefore, estimated ADU projection during the planning period is as follows:</p> <p align="center" data-bbox="1173 1060 1818 1092">96 base units + 16 deferred demand units = 112 ADUs</p> <p data-bbox="1037 1114 1659 1146">(See ADU analysis on Appendix B, pages B-12 to 13.)</p>		City of Santa Barbara		Estimated ADUs in planning period	629	ADUs per capita	.007	ADUs per housing unit	.016	Trend applied on per capita and per housing unit basis to Carpinteria for planning period	Approx. 90-100 total or 12 annually
City of Santa Barbara												
Estimated ADUs in planning period	629											
ADUs per capita	.007											
ADUs per housing unit	.016											
Trend applied on per capita and per housing unit basis to Carpinteria for planning period	Approx. 90-100 total or 12 annually											
<p><u>Environmental Constraints:</u> The adopted element was not revised to meet this requirement. Please see HCD’s prior review. In addition, as stated in third party comments from the Coastal Commission sites expected to be rezoned may be inconsistent with the City existing Local Coastal Plan and sites located in proximity to the Carpinteria Salt Marsh raise issues with flooding and other coastal hazards, particularly with anticipated sea level rise. The Coastal Commission also raised concerns related potential sites that contain or are adjacent to creeks or other environmentally sensitive</p>	<p data-bbox="1037 1149 1955 1325">The Housing Element describes site specific environmental constraints in Figures B-3 and B-4. The city added additional analysis of how environmental constraints, particularly those identified by the Coastal Commission, could impact housing development on identified sites. (See Appendix B, page B-15.)</p> <p data-bbox="1037 1365 1955 1427">The City’s RHNA shortfall is 292 lower income units. Based on realistic development assumptions for these non-vacant sites (described in Appendix</p>											

City of Carpinteria Response to June 12, 2023 HCD Review Letter

HCD Comments	City Response
<p>areas, raise issue with regard to ESHA protection, water quality, and flooding hazards in consideration of sea level rise. The element must describe and analyze these and other known conditions that preclude development (e.g., size, shape, easements, contamination, coastal policies).</p> <p><u>Prior Comment:</u> While the element generally describes a few environmental conditions within the City (p. II-26), it must describe how these conditions relate to identified sites including any other known environmental or other constraints within the City that could impact housing development in the planning period.</p>	<p>B, pages B-3 to 6) candidate sites for rezoning listed in Table B-6 can accommodate 1,932 lower income units. The city identified this surplus of seven times the RHNA shortfall such that if the Coastal Commission determines certain sites cannot be rezoned due to Local Coastal Plan inconsistency, there are adequate other sites to meet the RHNA shortfall.</p>
<p><u>Sites with Zoning for a Variety of Housing Types:</u></p> <ul style="list-style-type: none"> • <u>Emergency Shelter Capacity:</u> While the adopted element appears to indicate that new emergency shelter requirements brought on by AB 2339 will be addressed through Program 11 (Special Needs Housing), it is not clear in the program language that this is the case. The element must be revised to provide adequate emergency shelter capacity analysis, as well as program actions as necessary to accommodate the needs of the community. Please see HCD’s prior review for more information. • <u>By-Right Permanent Supportive Housing:</u> While the adopted element appears to indicate that Program 11 will adopt zoning amendments pursuant to Government Code section 65651 regarding by-right permanent supportive housing, the element must indicate exactly how the City’s current policies do not align with state law, and what the program will change to bring them into compliance. 	<p>The analysis of compliance with emergency shelter requirements brought on by AB 2339 has been expanded. (See Technical Report, pages III-14 to 15.) The city’s zoning ordinance complies with the requirement that emergency shelters be allowed by right in a zone that also allows residential uses. The city has objective development standards for emergency shelters consistent with Gov. Code Sec. 65583(a)(4)(B). And the city has adequate vacant sites included in its site inventory to accommodate the needed emergency shelter capacity in addition to its RHNA shortfall. Based on the most recent point in time survey multiplied by 200 square feet per person of land area, the city needs 4,200 square feet (0.096 acre) of land for emergency shelters. The city has 7.86 acres of vacant land zoned to meet this requirement and additional underutilized acreage that could also accommodate emergency shelters by right.</p> <p>Program 11 has been updated to specify in the Actions & Timeframes, under the Emergency Shelters subheading, that the city will amend regulations for emergency shelters consistent with AB 139 and AB2339 by April 2024. (See Housing Plan, pages 21-24.)</p> <p>Program 11 commits the city to amending regulations to comply with state law. The city has not yet completed analysis to identify exactly what sections of its code must be amended to comply with state law. This will be part of</p>

City of Carpinteria Response to June 12, 2023 HCD Review Letter

HCD Comments	City Response
	<p>the code amendment process. The program action has been revised to commit the city to both analyzing and amending regulations as necessary for consistency with AB 2162 by April 2024. (See Housing Plan, pages 21-24, Actions & Timeframes section under Transitional and Supportive Housing subheading.)</p>
<p><i>3. 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. The analysis shall also demonstrate local efforts to remove governmental constraints that hinder the locality from meeting its share of the regional housing need in accordance with Government Code section 65584 and from meeting the need for housing for persons with disabilities, supportive housing, transitional housing, and emergency shelters identified pursuant to paragraph (7). (Gov. Code, § 65583, subd. (a)(5).)</i></p>	<p>N/A</p>
<p><u>Land-Use Controls:</u> While the adopted element was revised to provide additional analysis on density, lot coverage, building height, lot size and site requirements, floor area ratio, setbacks, and open space requirements, the analysis is generalized and does not provide any determination stating if these controls constitute constraints in any particular areas of the City. Additionally, while the element was revised to add additional analysis on the 30-foot height limit for buildings up to three stories, program actions must still be added to address height limits as constraint.</p>	<p>Tables III-3 and III-4 on Technical Report, pages III-9 to 11 list the development standards applicable to residential and non-residential zones, respectively. The development controls discussed on Technical Report, pages III-1 to 7 apply throughout the city in the zones described. Additional analysis has been added on page III-2 describing where specific zone districts are generally located within the city and on page III-7 discussing how the cumulative effect of development standards could be a constraint to residential development in certain zone districts and areas within the city.</p> <p>Program 1 has been amended to specifically address the 30-foot height limit and includes the following action: “Adopt General Plan and Zoning Code amendments and submit Local Coastal Plan amendments to the Coastal Commission, including rezoning of at least 14.6 acres of land to provide adequate sites to accommodate the city’s RHNA allocation, amendments to</p>

City of Carpinteria Response to June 12, 2023 HCD Review Letter

HCD Comments	City Response
	development standards <u>including 30-foot height limit</u> , and establishment of affordability requirements consistent with statutory deadlines.” (See Housing Plan, pages 6-9.)
<p><u>R-Residential Overlay</u>: The element was not revised to meet this requirement. Please see HCD’s prior review.</p> <p><u>Prior Comment: R-Residential Overlay</u>: The element relies on sites in commercial and industrial zones that allow residential through the Residential Overlay. While some information was provided on how the overlay allows residential uses, the element must include a complete description and analysis of the Overlay, including a breakdown of affordability requirements if applicable.</p>	<p>Discussion of the R Overlay has been updated to specify maximum density, applicable development standards, and that there is currently no affordability requirement applicable to the R Overlay other than through the inclusionary housing program which encourages the development affordable for-sale units in the above-moderate income category in an effort to provide housing for middle-income and critical workforce households. The inclusionary program applies to subdivisions of 5 or more lots. (See Technical Report, pages III-3 to 4.)</p> <p>Also note, per Program 1, the city has committed to modify the R Overlay to allow a minimum density of 20 units per acre and will review development standards in consultation with local architects and developers and amend standards as necessary to ensure that allowable densities can be achieved and that standards do not pose unreasonable constraints on the cost and supply of housing. Program 1 also includes a commitment to establish affordability requirements as part of the R Overlay zoning amendment for candidate sites. (See Housing Plan, pages 6-9.)</p>
<p><u>Processing and Permit Procedures</u>: While the element was revised to provide adequate analysis of the conditional use permit (CUP) and development plan process, it must still describe coastal zone regulations and provide an analysis of whether the City’s coastal preservation policies will impact future or existing housing development within the coastal zone, particularly for sites that require rezoning.</p>	<p>The processing and permit procedures analysis have been updated to explicitly state that because the city is located entirely within the coastal zone, all development is subject to applicable coastal zone regulations including the city’s certified Coastal Land Use Plan, which is combined with the city’s General Plan and its certified Implementation Programs, including the city’s Zoning Code. The analysis of coastal resource preservation policies has also been expanded to further address how these policies impact housing development, particularly for sites in the site inventory. (See Technical Report, pages III-23 to 24.)</p>
<p><u>Building Codes and Enforcement</u>: The element was not revised to meet this requirement. Please see HCD’s prior review.</p>	<p>The Housing Element states on Technical Report, page III-19 that the city utilizes the California Building Code with amendments primarily related to geotechnical review and provisions for adequate drainage. The analysis</p>

City of Carpinteria Response to June 12, 2023 HCD Review Letter

HCD Comments	City Response
<p><u>Prior Comment: Building Codes and Enforcement:</u> The element must describe and analyze which building code is enforced, any local amendments to the building code and their enforcement for impacts on housing supply and affordability. For additional information and a sample analysis, see the Building Blocks at https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/codes-and-enforcement-and-onsite-offsite-improvement-standards.</p>	<p>states that these modifications to state regulations do not pose unreasonable constraints to housing supply or affordability.</p>
<p><u>Constraints on Housing for Persons with Disabilities:</u> While the adopted element was revised to state that group homes of six or fewer are allowed by-right, and group homes of seven or more require a CUP, it does not state that this differentiation is a constraint and commit to amending it as part of Program 11 (Special Needs Housing). Program 11 must also be revised to commit to removing the reasonable accommodations findings mentioned in HCD’s prior review.</p>	<p>Program 11 has been revised to clarify the city’s commitment to amending regulations to (1) amend permit requirements and necessary findings for residential care facilities serving seven or more persons and (2) remove subjective findings for approval of reasonable accommodation requests. These are listed in the actions section of Program 11 under the subheadings Residential Care Facilities and Reasonable Accommodation, respectively. (See Housing Plan, pages 21-24.)</p>
<p><u>Zoning, Development Standards and Fees:</u> The element was revised to add a commitment in Program 1 to “post and update all zoning regulations and fees on the City website annually”, this does not address the requirements of this finding. Please see HCD’s prior review.</p> <p><u>Prior Comment: Zoning, Development Standards and Fees:</u> The element must clarify compliance with new transparency requirements for posting all zoning, development standards and fees on the City’s website and add a program to address these requirements, if necessary.</p>	<p>The Actions & Timeframes portion of Program 1 has been updated as follows: “Continue to post and update all zoning regulations, <u>development standards</u>, and fees on the City website annually throughout the planning period.” (See Housing Plan, page 9.)</p>
<p><i>4. 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, the price of land, the cost of construction, the requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Government Code section 65583.2, and the length of time between receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality’s share of the regional housing need in accordance with Government Code section 65584. The analysis shall also demonstrate local efforts to remove</i></p>	<p>N/A</p>

City of Carpinteria Response to June 12, 2023 HCD Review Letter

HCD Comments	City Response
<p><i>nongovernmental constraints that create a gap between the locality's planning for the development of housing for all income levels and the construction of that housing. (Gov. Code, § 65583, subd. (a)(6).)</i></p>	
<p><u>Approval Time and Requests Lesser Densities</u>: While the element was revised to state that time from project approval to receiving a building permit is 3-4 months, the element does not include adequate analysis of requests to develop housing at densities below those identified. Specifically, while the element states that projects have been developed at densities lower than those identified, it provides no analysis as to what the projects consisted of or why they developed at lower densities.</p>	<p>The analysis has been expanded to discuss the reasons projects have been developed at lower than maximum allowed densities. (See Technical Report, page III-26.)</p>
<p><i>5. 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).)</i></p>	<p>N/A</p>
<p><u>Special Housing Needs</u>: While the adopted element was revised to provide an adequate analysis for female-headed households, it must still be revised to provide an estimate as to the number of permanent and seasonal farmworkers and provide the number of persons with developmental disabilities within the City.</p>	<p>Prior HCD review stated “Specifically, the element should address the total number of permanent, seasonal farmworkers (e.g., <i>USDA county level data</i>).” (Emphasis added.) The city provided county level data on Technical Report, page I-15. The analysis has been updated to state that while the USDA does not provide farmworker data at the city-level and no other source for this data could be located, the proportion of permanent farmworkers in the Carpinteria Valley, including the city, is likely higher than in the county overall given the concentration of greenhouses in the area, which allows for year-round production.</p> <p>Technical Report, pages I-12 to 13 includes information on people with developmental disabilities. The analysis has been edited to clarify that people in Carpinteria with developmental disabilities are served by Tri-Counties Regional Center (TCRC). Approximately 164 clients in Carpinteria received services from TCRC, of which 138 lived in the home of a family member or guardian.</p>
<p>B. Housing Programs <i>1. Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may</i></p>	<p>N/A</p>

City of Carpinteria Response to June 12, 2023 HCD Review Letter

HCD Comments	City Response
<p><i>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 through the administration of land use and development controls, the provision of regulatory concessions and incentives, and the utilization of appropriate federal and state financing and subsidy programs when available. The program shall include an identification of the agencies and officials responsible for the implementation of the various actions. (Gov. Code, § 65583, subd. (c).)</i></p>	
<p>To address the program requirements of Government Code section 65583, subdivision (c)(1-6), and to facilitate implementation, programs should include: (1) a description of the City’s specific role in implementation; (2) definitive implementation timelines; (3) objectives, quantified where appropriate; and (4) identification of responsible agencies and officials. Programs to be revised include the following:</p> <p><u>Program 5 (Affordable Rental Housing)</u>: The program was not revised to address this finding. Please see HCD’s prior review.</p> <p><u>Prior Comment</u>: This program should be revised to provide a specific timeline stating when the assistance and incentive actions will be implemented.</p> <p><u>Program 8 (Facilitate Lot Consolidation)</u>: While the program was revised to state that lot consolidations would be implemented on a “project-by-project basis”, it must provide a more specific timeline of how actions and incentives to encourage lot consolidation will be put in place and implemented.</p> <p><u>Program 9 (Regulatory Concessions and Incentives for Affordable Housing)</u>: The program was not revised to adequately address this requirement. Specifically, it must provide a clearer implementation</p>	<p>Program 5 has been updated to clarify that the city’s affordable rental housing program is an existing program which will continue. The city provides assistance and incentives to developers of affordable housing on an ongoing basis as projects are proposed and processed. (See Housing Plan, pages 14-15.)</p> <p>Program 8 has been revised to include specific incentives that may be offered to encourage lot consolidation and to commit the City to establishing the lot consolidation incentive program by December 2024. (See Housing Plan, pages 18-19.)</p> <p>The action and timeframe language in Program 9 has been revised to clarify that the city will continue to provide concessions and incentives for affordable housing through a program that is already in place. (See Housing Plan, page 20.)</p> <p>Program 11 has been revised to list the City’s specific commitments to bring policies and procedures into compliance with state law for each category of special needs housing and has include a quantified objective of completing all zoning code amendments by April 2024. (See Housing Plan, pages 21-24.)</p> <p>Program 14 has been updated to indicate the city’s quantified objective to complete two surveys during the planning period, contact property owners</p>

City of Carpinteria Response to June 12, 2023 HCD Review Letter

HCD Comments	City Response
<p>timeframe, and state if concessions are already in place or if they are still being developed.</p> <p><u>Program 11 (Special Needs Housing):</u> The program was not revised to address this requirement. Please see HCD’s prior review.</p> <p><u>Prior Comment:</u> This program should be revised to specifically state what the City will be doing to bring policies and procedures into compliance with state law for each element of housing for special needs listed in the program. Each activity should have accompanying timeline and quantifiable metrics where applicable.</p> <p><u>Program 14 (Housing Code Compliance):</u> While the program was revised to commit to proactive outreach, it must still provide a quantifiable objective as to the number of units that will be preserved through code compliance efforts.</p>	<p>and landlords with nonconforming conditions following each survey, and post annual announcements regarding property maintenance and code compliance. (See Housing Plan, pages 27-28.)</p>
<p><i>2. Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city’s or county’s share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory 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).)</i></p>	<p>N/A</p>
<p>As noted in Finding A2, 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</p>	<p>Program 1 has been updated to include the quantified objective that the program will “[p]rovide adequate sites to accommodate the City’s entire 2023-2031 RHNA allocation of 901 units including rezoning land to</p>

City of Carpinteria Response to June 12, 2023 HCD Review Letter

HCD Comments	City Response
<p>shortfall of sites or zoning available to encourage a variety of housing types. Additionally, the element should be revised as follows:</p> <p><u>Program 1 (Adequate Site to Accommodate RHNA):</u> While the element was revised to provide the acreage of sites that will be rezoned to accommodate RHNA, it must provide a quantifiable metric of the number of units that will be rezoned to demonstrate the City is addressing its RHNA shortfall. Additionally, this program must still be revised to provide definitive implementation timelines for each activity. The program must also include specific commitments and timing related to required Coastal Commission Approvals for amendments to the Local Coastal Plan. HCD encourages the City to coordinate with Coastal Commission staff on revisions to the housing element to ensure sites to be rezoned are consistent with the Local Coastal Plan and free from potential constraints.</p> <p>In addition, please be aware, the recent California appellate decision in <i>Martinez v. City of Clovis</i>⁴ found that while overlays can be used in a rezone, when the base zone allows residential development, both the base zone and the overlay zone must comply with the minimum density requirements of Government Code section 65583.2, subdivision (h). The City should analyze how this decision may impact its current rezone strategy using the R-Residential Overlay and may need to adjust accordingly.</p>	<p>accommodate a shortfall of 292 lower-income units.” (See Housing Plan, pages 6-9.)</p> <p>Program 1 states that city will submit a rezone application to CCC its General Plan and Zoning Code amendments consistent with statutory deadlines. Implementation timeframes specific to the other actions included in Program 1 have also been added and/or clarified. (See Housing Plan, pages 6-9.)</p> <p>As HCD is aware, the city has been coordinating with Coastal Commission and HCD staff to address Coastal Commission concerns regarding consistency of rezone candidate sites with the Local Coastal Plan as well as potential site constraints. Based on coordination to date and revisions to the site inventory, the city believes the site inventory substantially complies with the statutory requirements of State Housing Element law and provides an adequate buffer of potential sites to accommodate the City’s RHNA shortfall even if the Coastal Commission ultimately does not support rezoning of some of the sites.</p> <p>The city will continue to work expeditiously to process Local Coastal Plan amendments to implement the Housing Element Programs. However, the city has no authority to dictate the Commission’s schedule since it is an independent state agency and therefore cannot commit to specific timing related to Coastal Commission approvals in the Housing Element.</p> <p>The city is aware of and intends to implement Program 1 consistent with <i>Martinez v. City of Clovis</i>. Program 1 states that “consistent with Government Code Section 65583.2(h) and (i), the Zoning Code amendment will ensure that sites rezoned with the R Overlay District to accommodate the city’s RHNA shortfall do not retain underlying residential densities lower than 20 units per acre.” (See Housing Plan, page 7.)</p>

City of Carpinteria Response to June 12, 2023 HCD Review Letter

HCD Comments	City Response
<p><u>Nonvacant Sites Reliance to Accommodate RHNA</u>: The element was not revised to specifically address this requirement. Please see HCD’s prior review.</p> <p><u>Prior Comment: Nonvacant Sites Reliance to Accommodate RHNA</u>: As the element relies upon nonvacant sites to accommodate the regional housing need for lower-income households, it should include a program(s) to promote residential development of those sites. The program(s) could commit to provide financial assistance, regulatory concessions, or incentives to encourage and facilitate new, or more intense, residential development on the sites. Examples of incentives include identifying and targeting specific financial resources and reducing appropriate development standards.</p>	<p>The Housing Element includes several programs that promote residential development of nonvacant sites by providing financial assistance, regulatory concessions, and incentives and reducing development standards to encourage new, or more intense, lower-income residential development on these sites.</p> <p>Specifically, Program 1 (Adequate Sites to Accommodate RHNA) commits the city to amending development standards as necessary to ensure allowable densities can be achieved including amending the 30-foot height limit to allow 3-story development, and reducing parking standard. (See Housing Plan, pages 6-9.)</p> <p>Program 8 (Lot Consolidation and Subdivision) has been revised to include specific examples of incentives for lot consolidation to encourage consolidation of smaller lots which can improve the feasibility of lower-income housing development and to commit the city to implement the incentive program by December 2024. These incentives will increase the feasibility of redevelopment of nonvacant sites at maximum densities, particularly those smaller than 0.5 acres. (See Housing Plan, pages 18-19.)</p> <p>Cost is one of the biggest constraints to housing development in the city and region. Program 5 (Affordable Rental Housing Development Assistance) is an existing program that will be continued, which offers assistance to nonprofit housing developers including fee reductions, waivers, or deferrals; reduced parking or other modifications to development standards; the provision of surplus property at no cost; funding support through the city’s Housing Trusts fund; and support in funding applications for tax credits or other housing grant programs. (See Housing Plan, pages 14-15.)</p> <p>Program 10 (Fee Mitigation) is an existing program that encourages redevelopment or more intense use of nonvacant lots by providing fee deferrals, reductions and waivers for projects with minimal public service</p>

City of Carpinteria Response to June 12, 2023 HCD Review Letter

HCD Comments	City Response
	impacts, retrofit projects, and projects that include affordable housing. (See Housing Plan, pages 20-21.)
<p>3. <i>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).)</i></p>	N/A
<p>While Program 5 (Affordable Rental Housing Development Assistance) was revised to state that projects with extremely low-income units would receive “priority processing”, it must specify what this process entails, and what the requirements are to qualify for it.</p>	<p>The list of involvement and assistance offered to nonprofit developers in Program 5 has been updated to specify that priority processing means that city staff prioritizes projects with ELI units over other projects while balancing workload with competing deadlines. As stated in Program 5, priority processing is provided for all projects that include ELI units. (See Housing Plan, pages 14-15.)</p>
<p>4. <i>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. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)</i></p>	N/A
<p>As noted in Findings A3 and A4, 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.</p>	<p>The city identified the cumulative effect of development standards (e.g., parking, height limits, setback requirements) as a constraint to mixed use development, a 30-foot height limit in all zone districts as a potential constraint to achieving allowed densities, and potential inconsistencies with state law related various types of special needs housing as potential constraints to development of housing for persons with disabilities and/or special needs. (See Constraints Analysis, Technical Report, pages III-5 to 7.)</p> <p>Program 1 (Adequate Sites to Accommodate RHNA) includes a commitment to evaluate and amend development standards as necessary to ensure allowable densities can be achieved, including the current 30-foot height limit. Program 1 also includes a commitment to review and amend the development review process to improve certainty and objectivity. (See Housing Plan, pages 6-9.)</p>

City of Carpinteria Response to June 12, 2023 HCD Review Letter

HCD Comments	City Response
	<p>Program 11 (Special Needs Housing) includes a commitment to amend zoning regulations by April 2024 to comply with state laws related to emergency shelters, low barrier navigation centers, and SRO housing. It also commits the city to amending reasonable accommodation regulations to remove subjective findings for approval and amending permit requirements and required findings for residential care facilities of seven or more persons to ensure consistency with state law and fair housing requirements by April 2024. (See Housing Plan, pages 21-24.)</p> <p>In addition, the city’s existing Density Bonus program (Program 7) and fee mitigation programs (Programs 5 & 10) help to reduce or remove governmental and non-governmental constraints to housing by allowing modifications to development standards to achieve allowed densities (including bonus density) and reducing the cost of housing development.</p>
<p><i>5. 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 protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, 65583, subd. (c)(5).)</i></p>	<p>N/A</p>
<p>As noted in Finding A1, the element requires a complete AFFH analysis. Depending upon the results of that analysis, the City may need to revise or add programs.</p> <p>Additionally, the adopted element did not revise other program actions to address the City’s obligation to AFFH including how programs address housing mobility enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for community preservation and revitalization and displacement protection. Program 5A also was not revised to describe how all the City’s housing programs</p>	<p>The AFFH analysis has been expanded and revised based on the comments under Finding A1. Based on the revisions and as described below, the city does not believe revisions or additions to programs are necessary to substantially comply with state housing element law.</p> <p>As discussed in Appendix D, pages D-64 to 65, there is no land available for residential development in the very limited high opportunity areas that exist in the city. Further, the city is relatively homogenous in terms of many AFFH factors including educational and economic opportunity, access to transit, low poverty rate, and integration. Nevertheless, the city’s criteria for</p>

City of Carpinteria Response to June 12, 2023 HCD Review Letter

HCD Comments	City Response
<p>comply with and further the requirements and goals of Government Code section 8899.50, subdivision (b).</p>	<p>identifying sites for the sites inventory included measures intended to affirmatively further fair housing opportunities and mobility. The criteria prioritizes sites in close proximity to public transit, grocery stores, health care services, schools, recreation, and employment and avoids sites with significant environmental constraints. Site identification criteria is discussed in detail in Appendix B, page B-4.</p> <p>The Housing Element does not have a Program 5A. This statement appears to have been inadvertently included in HCD’s letter.</p>
<p>C. Quantified Objectives <i>Establish the number of housing units, by income level, that can be constructed, rehabilitated, and conserved over a five-year time frame. (Gov. Code, 65583, subd. (b) (1 & 2).</i></p>	<p>N/A</p>
<p>While the element was revised to include units to be constructed, rehabilitated, and conserved in the planning period, the number of mobile homes must still be broken down by income category.</p>	<p>A footnote has been added to Table H-1 describing the breakdown of conservation units by income category as follows: 177 units through Section 8 Rental Assistance (Program 4) in extremely low and very low income categories. 861 units through Conservation of Mobile Home Parks & Rent Stabilization (Program 12), assumes 33% in extremely low and low, 33% in low, and 33% in moderate income categories. (See Housing Plan, page 41.)</p>
<p>D. Public Participation <i>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).)</i></p>	<p>N/A</p>
<p>While the element was revised to add additional information as to the number of groups that were contacted to take part in the public participation process, it still does not describe who participated in the public participation process, nor does it describe where the comments in Table C-2 come from. Additionally, while Program 17 commits to reaching out to special needs groups and neighborhoods of more concentrated lower-income residents, it must still describe what</p>	<p>Participants in the Housing Element update included affordable housing developers including People’s Self Help Housing; fair housing organizations including the Rental Housing Mediation Program and Gray Panthers Network of Santa Barbara; housing advocates including Californians for Homeownership, YIMBY Law, and California Housing Defense Fund; and community-based and faith-based organizations, including family service agencies, senior programs, and health and human services; and residents. The City also directly worked with People’s Self Help Housing, which serves the</p>

City of Carpinteria Response to June 12, 2023 HCD Review Letter

HCD Comments	City Response
<p>methods of outreach will be employed, and how often they will be carried out.</p>	<p>interests of lower-income households and special needs groups and has several successful lower-income housing projects in the City, to solicit comments and recommendations on housing needs, barriers to fair and affordable housing, and opportunities for development. (See Appendix D, p. D-1 to 2 and email from People’s Self Help Housing in Appendix C, pages C-52 to 53.)</p> <p>All written public comments received on the Housing Element are all included in Appendix C. Table C-2 (pages C-15 to 31) lists each comment received and how those comments were addressed in the Housing Element. The names of speakers providing comments at the initial Planning Commission and City Council Housing Element update study sessions were not recorded and instead a summary of the comments made by one or more stakeholders was prepared. Table C-2 has been updated to indicate that general public comments were from first three housing element meetings. All other public comments are attributed to specific commenters.</p> <p>As the city does not have concentrated areas of lower-income residents, outreach efforts are generally citywide with a focus on fair housing issues specific to renters and people with disabilities. Program 17 has been updated to clarify that outreach will be through:</p> <ul style="list-style-type: none"> • Printed materials available at City Hall on an ongoing basis and updated annually by April each year, • Workshops and other in-person gatherings facilitated by the Rental Housing Mediation Program at least once per year, and • Information posted on the City website and updated annually by April each year. (See Housing Plan, pages 31-39.)