

Attachment 3

Summary of HCD Comments and City Responses

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| <p align="center">HCD Comment (Letter of 9/27/2022)</p> | <p align="center">City of Goleta Response</p> | <p align="center">Adopted HE Reference</p> |
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| <p>A. Review the previous element to evaluate the appropriateness, effectiveness, and progress in implementation, and reflect the results of this review in the revised element. (Gov. Code, § 65588 (a) and (b).)</p> <p>The element (p. 10A-55 and Table 10A-24) mentions some recent housing approvals and the creation of a housing division as well as completion of zoning amendments to facilitate a variety of housing types. However, the element must still evaluate whether programs have been effective in addressing housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female headed households, farmworkers, and persons experiencing homelessness). For example, the element could discuss if recent approvals have resulted in housing for special needs populations or whether the new housing division makes a focused effort on special needs populations. The element could also discuss whether zoning amendments led to the creation of housing for special needs populations or could discuss that focused efforts were not made, programs were not effective or the magnitude of the remaining need. Based on the outcomes of this evaluation, the element should add or modify programs.</p> | <p>Sec. IV of the Technical Appendix was revised to provide additional evaluation of the City’s effectiveness in meeting the needs of special needs populations. Additional discussion includes ADU development through the changes in ADU regulations within the City, with a demonstrable increase in ADU permitting over the past four years. Additional discussion also added regarding the City’s responsiveness towards supporting new technologies to support housing construction as well as the City’s support for the Super 8 (Buena Tierra) Supportive Housing project.</p> <p>Amendments to housing programs are included to further support special needs housing, with added detail on timing of implementation actions to improve programs effectiveness. New and revised programs also focus on increased outreach and engagement to support special needs populations.</p> | <p>Sec. IV of the Technical Appendix, page 10A-61</p> <p>Housing Plan, various</p> |

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| B. Housing Needs, Resources, and Constraints | | |
| B.1 Affirmatively Furthering Fair Housing | | |
| <p><u>Assessment of Fair Housing:</u> In many cases, the element reports information from various maps but must also evaluate that information to better formulate policies and programs. An evaluation will discuss patterns, trends and integrate local knowledge and data and other relevant factors (See below for more information). For example, the element reports higher concentrations of lower- and moderate-income households in the northern part of the County and central and eastern portions of the City but then provides no evaluation of the pattern or trends. For example, the element could discuss the lack of affordability and housing choices in the southern portions of the County or historical land use practices, including coordination with the County and University. The element should provide analysis of the data for all components of the assessment of fair housing (e.g., segregation and integration, disparities in access to opportunity) and could summarize fair housing issues using common themes across the components of the assessment of fair housing.</p> | <p>The Technical Appendix was revised to include additional analysis of AFFH, including the assessment of fair housing, enforcement and outreach, concentrated areas of affluence, disproportionate housing needs and displacement risk, site inventory, local data and knowledge and other relevant factors, contributing factors to fair housing issues, and goals, priorities, metrics and milestones. Significant revisions to Policy HE 3.1 Affirmatively Further Fair Housing Opportunities made to describe additional actions the City will take to affirmatively further fair housing during the planning period. See below for specific responses.</p> | <p>Sec. VII of the Technical Appendix Housing Plan, p. 10-17</p> |
| <p><u>Enforcement and Outreach:</u> The element must address compliance with existing state and federal fair housing laws as well as any past or current fair housing lawsuits, findings, settlements, judgements, or complaints. For more information, please see HCD’s Guidance Memo (p. 28).</p> | <p>Additional detail added to Section VII.E.2, Fair Housing Complaints, to detail that the City does not have any pending lawsuits, enforcement actions, judgements, settlements, or findings related to fair housing and civil rights.</p> | <p>Technical Appendix, p. 10A-119</p> |
| <p><u>Concentrated Areas of Affluence:</u> While the element briefly notes disparities in incomes when comparing Goleta and the County, it should also discuss patterns within the City. To address this requirement, the City may utilize new data available on HCD’s Affirmatively Furthering Fair Housing (AFFH) Data viewer at https://www.hcd.ca.gov/affirmatively-furthering-fair-housing.</p> | <p>New figures (Figures 10A-15 and 10A-16) added to show racially concentrated areas of affluences within Santa Barbara County and within the City. Discussion added regarding these patterns, causes, and programs to address the issue added in Section VII.G.2, Racially Concentrated Areas of Affluence.</p> | <p>Technical Appendix, p. 10A-128, 10A-133, and 10A-134</p> |

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| <p>Disproportionate Housing Needs and Displacement Risk: The element includes some local and county data on cost burdened households (overpayment) and overcrowding. However, the element must discuss persons experiencing homelessness, including any patterns relative to access to opportunities and disproportionate impacts on protected characteristic. In addition, the element briefly and generically mentions displacement but must still provide data, analysis, and conclusions.</p> | <p>The Housing Element was revised to add subprogram HE 3.1(b), Reduce Homelessness, to specifically highlight and address issues related to those experiencing homelessness. This new subprogram identifies the need to implement the recently adopted City Homelessness Strategic Plan.</p> <p>Additional information regarding displacement data as part of the new Section VII.C, Data Sources, of the Technical Appendix. Additional analysis of the City's sites inventory, as it relates to areas at risk of displacement, were also added (see Table 10A-36 and Figure 10A-37).</p> | <p>Housing Plan, p. 10-17</p> <p>Technical Appendix, p. 10A-112, p. 10A-159, 10A-166</p> |
| <p>Site Inventory: The element includes a brief statement that all sites are in higher resource areas (The whole City is higher resource) but must quantify and discuss the identified sites by area and income group then evaluate the impacts on the patterns across all components of the assessment of fair housing, especially income, areas of affluence, overpayment and displacement risk. HCD will send samples under separate cover.</p> | <p>Extensive revisions made to Section VII.J, Sites Inventory Analysis, in the Technical Appendix. Additions include a new Table 10A-36, Distribution of Potential Housing Sites by AFFH Indicator, and several new figures illustrating the sites inventory overlaid on various AFFH indicators.</p> | <p>Technical Appendix, p. 10A-159</p> |
| <p>Local Data and Knowledge, and Other Relevant Factors: The element does not address this requirement. The element must include local data, knowledge, and other relevant factors to discuss and analyze any unique attributes about the City related to fair housing issues. The element should complement federal, state, and regional data with local data and knowledge where appropriate to capture emerging trends and issues, including utilizing knowledge from local and regional advocates and service providers. Also, the element must include other relevant factors that contribute to fair housing issues in the jurisdiction. For instance, the element can analyze historical land use and investment practices or other information and demographic trends.</p> | <p>A discussion of historical development patterns was added as Section VII.B of the Technical Appendix, including early City rezoning efforts to support housing development. Also, additional information regarding data sources, including local data and knowledge, were added as Section VII.C of the Technical Appendix.</p> | <p>Technical Appendix, p. 10A-111, p. 10A-112.</p> |
| <p>Contributing Factors to Fair Housing Issues: Based on a complete analysis, the element should reassess and prioritize contributing factors to fair housing issues.</p> | <p>Table 10A-37, Fair Housing Impediments, Contributing Factors and Meaningful Actions significantly revised based on updated analysis.</p> | <p>Technical Appendix, p. 10A-167</p> |

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| <p>Goals, Priorities, Metrics, and Milestones: The element must be revised to add or modify goals and actions based on the outcomes of a complete analysis. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have specific commitment, geographic targeting, metrics or numeric targets and milestones as appropriate and must, as appropriate, address housing mobility enhancement, new housing choices and affordability in higher opportunity areas, place-based strategies for community preservation and revitalization and displacement risk.</p> | <p>See above. Table 10A-37 includes many new actions, objectives, and goals to address fair housing issues based on the updated analysis. These additions are also reflected in the significantly revised Program HE 3.1 Affirmatively Further Fair Housing Opportunities. The updated program’s quantified objectives are also reflected in the updated Table 10-3, Summary of Implementation Actions.</p> | <p>Technical Appendix, p. 10A-167 Housing Plan, p. 10-17 and p. 10-27</p> |
| <p>B.2 Extremely Low-Income Housing While the element quantifies existing and projected extremely low-income (ELI) households, it must also analyze their housing needs. The analysis of ELI housing needs should consider tenure and rates of overpayment. To assist the analysis, see a sample analysis at http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/extremely-low-income-housing-needs.shtml.</p> | <p>Technical Appendix Section I.B.3, Household Income and Overpayment, includes analysis of ELI households by tenure and rates of overpayment (Table 10A-5). This section was expanded to describe programs to address the needs of ELI households, including the expanded HE 3.1.</p> | <p>Technical Appendix, p. 10A-4</p> |
| <p>B.3 Land Inventory. Parcel Listing: The element lists parcels by various factors such as size, zoning, general plan designation and existing use. However, the description of existing use is generic and must include sufficient detail to facilitate an analysis of the potential for additional development on nonvacant(underutilized) sites. For more information, see the HCD’s Housing Element Sites Inventory Guidebook at https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml.</p> | <p>The sites inventory was expanded to provide additional detail such as age of structures and improvement to land value ratios (Table 10A-31, Underutilized Sites). An additional table (Table 10A-30, Recent Redevelopment Interest on Nonvacant Sites) added to identify sites with expressed interest in residential development.</p> | <p>Technical Appendix, p. 10A-92, p. 10A-93</p> |

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| <p>Realistic Capacity: The calculation of residential capacity must account for the likelihood of residential development in zoning where 100 percent nonresidential uses are allowed. The analysis should be based on factors such as development trends including nonresidential, performance standards requiring residential uses or other relevant factors such as enhanced policies and programs. For example, the element could analyze all development activity in these nonresidential zones, how often residential development occurs and adjust residential capacity calculations, policies, and programs accordingly.</p> | <p>The sites inventory was expanded to provide additional detail such as age of structures and improvement to land value ratios (Table 10A-31, Underutilized Sites). An additional table (Table 10A-30, Recent Redevelopment Interest on Nonvacant Sites) added to identify sites with expressed interest in residential development. Additional information was also added highlighting the densities of recent mixed-use projects within the City.</p> | <p>Technical Appendix, p. 10A-92, p. 10A-93</p> |
| <p>Small and Large Sites: The element (pgs. Table 10A-28 and Table 10A-30) lists small and large sites. However, sites larger than ten acres in size or smaller than a half-acre in size are deemed inadequate to accommodate housing for lower-income households unless it is demonstrated, with sufficient evidence, that sites are suitable to accommodate housing for lower-income households. While the element (Table 10A-29) includes a few examples of recent multifamily developments with densities, it should discuss affordability and relate these examples to the sites identified to accommodate the regional housing need allocation (RHNA) for lower-income households to demonstrate that these sites can adequately accommodate the City's lower-income housing need. The element may also remove small and large sites being utilized toward the lower-income RHNA. Based on a complete analysis, the City should add or modify programs to include incentives for facilitating development affordable to lower-income households on small and large sites.</p> | <p>One vacant site larger than 10 acres (Heritage Ridge) and one underutilized site smaller than ½ acre (5720 Hollister) were identified as accommodating lower-income units in the previous draft element. The inventory was revised to reassign the 3 units for 5720 Hollister to the moderate income category, and additional analysis has been provided to support the income assumptions for Heritage Ridge (pending projects recently reviewed by the Planning Commission).</p> | <p>Technical Appendix, p. 10A-96</p> |

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| <p>Sites Identified in Prior Planning Periods: While Table 10A-28 identifies sites used in prior planning periods, Table 10A-30 (Underutilized Sites) must also clarify if sites were identified in prior planning periods and if so, which sites and include a program if utilizing previously identified sites in the current planning period toward the lower-income RHNA. For more information on program requirements, please see the Department’s Housing Element Sites Inventory Guidebook at https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml.</p> | <p>The Technical Appendix was revised to confirm that no non-vacant sites were identified in a prior planning period. In addition, Program HE 2.1 was revised (see new Program HE 2.1(g)) to include a Title 17 amendment to ensure conformance with State requirements.</p> | <p>Technical Appendix, p. 10A-92 Housing Plan, p. 10-11</p> |
| <p>Environmental Constraints: While the element generally describes a few environmental conditions within the City, it must describe how these conditions relate to identified sites including any other known constraints that could impact housing development in the planning period. For additional information and sample analysis, see the Building Blocks at http://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/analysis-of-sites-and-zoning.shtml#environmental.</p> | <p>The Technical Appendix was revised to provide additional analysis addressing this comment. Government Code Section 65583.2(b)(4) requires the sites analysis to include “A general description of any environmental constraints to the development of housing within the jurisdiction, the documentation for which has been made available to the jurisdiction. This information need not be identified on a site-specific basis.” An evaluation of potential environmental constraints on housing development is included in Section III.B, including geological conditions, flood hazards, noise, hazardous materials, biological resources, agricultural resources, historic and archeological resources, and aircraft hazards. That analysis includes a general description of any environmental constraints to the development of housing consistent with statutory requirements and concluded that those environmental conditions are not expected to prevent housing development commensurate with the RHNA allocation. Additional discussion was added to that section explaining why the environmental conditions will not prevent such housing. Additional discussion of environmental constraints was also added to the sites discussion in Section V.B of the Technical Appendix. In addition, Tables 10A-28 and 10A-31 identify known specific environmental conditions that could affect development of sites listed in the inventory in the “Notes” column. As noted in Section III.B, the analysis of potential sites to accommodate the City’s RHNA allocation has taken into account any environmental constraints that affect development.</p> | <p>Technical Appendix, p. 10A-54, p. 10A-87, p. 10, p. 10A-92, and p. 10A-93</p> |

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| <p>Nonvacant Sites: The element must include an analysis demonstrating the potential for additional development on nonvacant sites. While the element discusses that nonvacant sites were identified based on staff knowledge such as long-term vacancies and expressed interest from property owners, it does not discernably relate this information to identified sites. To address this requirement, the element should analyze the extent that existing uses may impede additional residential development, past experiences converting existing uses to higher density residential development, market demand for the existing use, existing leases or contracts that would perpetuate the existing use or prevent additional residential development. The element could also consider indicators such as age and condition of the existing structure existing versus allowable floor area, low improvement to land value ratio, and other relevant factors.</p> <p>In addition, if the housing element relies upon nonvacant sites to accommodate more than 50 percent of the RHNA for lower-income households, the housing element must demonstrate existing uses are not an impediment to additional residential development and will likely discontinue in the planning period (Gov. Code, § 65583.2, subd. (g)(2)). Absent findings (e.g., adoption resolution) based on substantial evidence, the existing uses will be presumed to impede additional residential development and will not be utilized toward demonstrating adequate sites to accommodate the RHNA.</p> | <p>The sites inventory was expanded to provide additional detail, such as age of structures and improvement to land value ratios (Table 10A-31, Underutilized Sites). An additional table (Table 10A-30, Recent Redevelopment Interest on Nonvacant Sites) was added to identify sites with expressed interest in residential development. Additional information was also added highlighting the densities of recent mixed-use projects within the City.</p> | <p>Technical Appendix, p. 10A-92, p. 10A-93</p> |

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| <p>Water Sewer Priority: Local governments are required to immediately deliver the housing element to water and sewer service providers and, if applicable, establish written procedures to grant priority to developments with units affordable to lower-income households. The element should discuss compliance with these requirements and if necessary, add or modify programs to establish a written procedure by a date early in the planning period. For additional information and sample cover memo, see the Building Blocks at http://www.hcd.ca.gov/community-development/building-blocks/other-requirements/priority-for-water-sewer.shtml.</p> | <p>Program HE 5.2 Community and Regional Collaboration was expanded to include notice to water/sewer providers regarding priority service to lower-income housing (HE 5.2(g)).</p> | <p>Housing Plan, p. 10-25</p> |
| <p>Employee Housing: The element contains some information on employee housing. However, the element must demonstrate zoning is consistent with the Employee Housing Act (Health and Safety Code, § 17000 et seq.) or add or modify programs. Specifically, section 17021.5 requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone.</p> | <p>The Technical Appendix includes analysis of City regulations for employee housing consistent with the Employee Housing Act. Clarification was added to address this comment in the “Farmworker Housing” discussion as this is what the State employee housing regulations seek to regulate.</p> | <p>Technical Appendix, p. 10A-37</p> |
| <p>Emergency Shelters: While the element contains information on the development standards of emergency shelters across various zones, the element should clarify shelters are permitted without discretionary action and discuss typical parcel sizes.</p> | <p>The Technical Appendix was revised to clarify that Emergency Shelters are permitted without discretionary review in three zone districts in the City and detail was added to describe parcel sizes within the zones in the City where Emergency Shelters are allowed.</p> | <p>Technical Appendix, p. 10A-38</p> |
| <p>B.4 Governmental Constraints</p> | | |

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| <p>Land Use Controls: The element must identify and analyze all relevant land use controls impacts as potential constraints on a variety of housing types. The analysis should analyze land use controls independently and cumulatively with other land use controls. The analysis should specifically address all development standards such as parking, heights, lot coverage and limits on allowable densities. The analysis should address any impacts on cost, supply, housing choice, affordability, timing, approval certainty and ability to achieve maximum densities and include programs to address identified constraints.</p> | <p>Technical Appendix Table 10A-21, Development Standards for Residential Uses By Zone District, was significantly expanded to detail additional development standards found in Title 17 of the GMC for zones that allow any type of housing development. Discussion also added regarding the cumulative effect of development standards, including reference to Table 10A-29, which shows that the density for recent multi-family projects varied from 78% to 105% of the maximum residential density allowed under the City’s land use regulations.</p> | <p>Technical Appendix, p. 10A-34, p. 10A-35</p> |
| <p>Inclusionary Requirements: The element must describe and analyze the inclusionary housing requirements and their impacts as potential constraints on the development of housing for all income levels, specifically on housing supply and affordability. The analysis must evaluate the inclusionary policy’s implementation framework, including levels of mandated affordability and the types of options and incentives offered to encourage and facilitate compliance with the inclusionary requirements. The City could engage the development community to facilitate this analysis.</p> | <p>Technical Appendix Section II.A.1.h., Inclusionary Housing, was revised to provide additional analysis of inclusionary housing requirements and their impacts as potential constraints on housing supply and affordability, including a discussion of AB 1505 (2017).</p> | <p>Technical Appendix, 10A-47</p> |
| <p>Zoning and Fees Transparency: The element should clarify compliance with new transparency requirements for posting fees and all zoning and development standards for each parcel on the jurisdiction’s website.</p> | <p>The Housing Element was revised to clarify compliance with new transparency requirements for posting fees and all zoning and development standards for each parcel on the City website by adding new subprogram HE 2.1(g) Website Posting.</p> | <p>Housing Plan, p. 10-11</p> |
| <p>Fees: While the element evaluates total fees for a typical single family and multifamily development, it must also list and evaluate planning and permit fees (e.g., general plan amendments, rezone, conditional use permit, variance).</p> | <p>Technical Appendix Section III.A.3, Development Fees and Improvement Requirements, was revised to provide additional detail regarding the methodology for estimating total fees shown in Table 10A-23, Planning and Development Fees, including a discussion of the types of approvals required for the multiple-unit project used to estimate City Review Fees (including a General Plan Amendment, rezone, and Development Plan). Table 10A-23 was also updated to reflect more recent permit and development impact fees.</p> | <p>Technical Appendix, p. 10A-52, p. 10A-53</p> |

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| <p>Processing and Permit Procedures: While the element includes information about processing times, it should also describe the procedures for a typical single family and multifamily development. The analysis should address the approval body, the number of public hearing if any, approval findings and any other relevant information. The analysis should address impacts on housing cost, supply, timing and approval certainty. For example, the element should identify and analyze approval findings for impacts on approval certainty, the presence of processes or guidelines to promote certainty and add or modify programs as appropriate.</p> | <p>The Technical Appendix was revised to provide additional detail regarding processing and permit procedures. Section III.A.2.a, Residential Permit Processing, was significantly expanded to include the findings required for the typical approvals needed for various housing projects, including a Land Use Permit, Design Review, and a Development Plan. Additional revisions to text and Table 10A-22, Land Use Decision Authority, were made to detail the typical number of hearings required for housing projects. Updates on the recently adopted objective design standards for streamlined processing were also added.</p> | <p>Technical Appendix, p. 10A-47, p. 10A-49, p. 10A-51</p> |
| <p>B.5 Non-governmental Constraints The element must analyze potential nongovernmental constraints, including availability of financing, the price of land, the cost of construction and the length of time between receiving approval for a housing development and submittal of an application for building permits. The analysis should address any hinderances on the jurisdiction's ability to accommodate RHNA by income category and include programs as appropriate.</p> | <p>Additional detail and analysis was added throughout various subsections of the nongovernmental constraints analysis in Section III.B of the Technical Appendix.</p> | <p>Technical Appendix, 10A-54 to 60</p> |
| <p>B.6 Analysis of Special Needs Population While the element quantifies the City's special needs populations, it must also analyze their special housing needs. For a complete analysis of each population group, the element should discuss challenges faced by the population, the existing resources to meet those needs (availability senior housing units, # of large units, # of deed restricted units, etc.), an assessment of any gaps in resources, and proposed policies, programs, and funding to help address those gaps.</p> | <p>The Technical Appendix was revised to provide additional analysis of special housing needs, including challenges faced by the population, the existing resources to meet those needs, gaps in resources, and proposed programs in the Housing Plan to help address those challenges.</p> | <p>Technical Appendix, 10A-9 to 15</p> |

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| C. Housing Programs | | |
| <p>C.1. Beneficial Impact and Timing Programs must demonstrate that they will have a beneficial impact within the planning period. Beneficial impact means specific commitment to deliverables, measurable metrics or objectives and definitive timelines. Deliverables should occur early in the planning period to ensure actual housing outcomes. Programs that should be revised with discrete timing include:</p> <ul style="list-style-type: none"> • Program 1.4 (Preserve Mobile Home Parks and Facilitate Mobile Home Park Ownership Opportunities) • Program 2.2 (Linkage of Housing and Jobs) • Program 2.4 (Facilitate Affordable Housing Development) • Program 2.6 (Encourage Accessory Dwelling Units) | <p>Programs HE 1.4 (Preserve Mobile Home Parks and Facilitate Mobile Home Park Ownership Opportunities), HE 2.2 (Linkage of Housing and Jobs), HE 2.4 (Facilitate Affordable Housing Development), and HE 2.6 (Encourage Accessory Dwelling Units) were revised to provide more discrete actions and timing, with a focus on actions early in the planning period.</p> | <p>Housing Plan, p. 10-7 to 10-16</p> |
| <p>C.2. As noted in Finding B3, the element does not include a complete site analysis; therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types.</p> | <p>As noted under B.3 above, the sites analysis has been expanded to demonstrate the adequacy of sites and zoning to accommodate the RHNA.</p> | <p>Technical Appendix, p. 10A-89, p. 10A-93</p> |
| <p><u>Program HE 5.2 (Community and Regional Collaboration):</u> The Program should include specific commitment and discrete timing beyond coordination to seek additional water resources in the planning period.</p> | <p>Program HE 5.2 Community and Regional Collaboration was revised to provide discrete timing for coordination with the Goleta Water District (annually) to seek additional water resources (see subprogram HE 5.2(f)).</p> | <p>Housing Plan, p. 10-25</p> |
| <p><u>Program HE 3.2 (Housing for Special Needs):</u> The Program should include actions beyond “review” and specifically commit to amend zoning to ensure permanent supportive housing by-right (AB 2162).</p> | <p>Program HE 3.2 was revised to include specific timing (by December 2023) of any Title 17 amendments to address supportive housing regulations (see subprogram HE 3.2(d)).</p> | <p>Housing Plan, p. 10-21</p> |
| <p><u>Program HE 2.1 (Diverse Range of New Housing):</u> The Program should commit to revise ordinances or procedures for replacement requirements by a specified date.</p> | <p>Program HE 2.1 was revised to include a specific commitment to revise Title 17 by December 2023 to ensure compliance with legal protections and replacement housing requirements for existing tenants who may be displaced by new developments (see subprogram HE 2.1(f)).</p> | <p>Housing Plan, p. 10-11</p> |

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| <p><u>Previously Identified Nonvacant and Vacant Sites</u>: If utilizing nonvacant sites identified in prior planning periods toward the lower-income RHNA, the element must include a program to rezone within one or three years of the beginning of the planning period to allow residential use at appropriate densities and by right for housing developments in which at least 20 percent of the units are affordable to lower income households.</p> | <p>The Sites Inventory was revised to clarify that nonvacant sites were not used in the previous Housing Element.</p> | <p>Technical Appendix, p. 10A-92</p> |
| <p>C.3. Programs to assist in the development of affordable housing Program HE 2.4 (Facilitate Affordable Housing Development): The Program should specifically commit to facilitate development for lower-income households, including extremely low-income and all special needs households. In addition, the Program should commit to:</p> <ul style="list-style-type: none"> • a specified date for updating the density bonus ordinance (e.g., within 1 year); • proactive outreach with developers of affordable housing at least annually to identify opportunities for development; • fund or assist with funding on a regular basis (e.g., at least annually and ongoing); and • other actions such as priority processing, incentives beyond density bonus law. | <p>Reference to Special Needs housing added to Program HE 2.4. Timing for review of density bonus laws (annually) added, but no commitment to a specific ordinance was included because such an ordinance is not necessary at this time. Outreach to affordable housing developers annually was also added to the program (see subprogram HE 2.4(b)). Financial equivalent option consideration given timing (annually) (see subprogram HE 2.4(d)). Also, a priority processing program for affordable housing projects was added (see new subprogram HE 2.4(h)). Assistance to developers also included in new subprogram HE 2.7(d).</p> | <p>Housing Plan, p. 10-13, p. 10-16</p> |
| <p><u>Program HE 2.7 (Funding for Affordable Housing)</u>: The Program should commit to discrete timing and action beyond auditing and developing plans.</p> | <p>Specific timing was added into HE 2.7(c) (by December 2024). Subprogram HE 2.7(d) also added to annually monitor affordable housing funds and assist developers in applying for funding.</p> | <p>Housing Plan, p. 10-16</p> |
| <p><u>Program 3.2 (Housing for Persons with Special Needs)</u>: The Program should commit to discrete timing (e.g., at least annually) for actions related to assisting in the development of special needs housing.</p> | <p>Specific timing was added into HE 3.2(g) (annually).</p> | <p>Housing Plan, p. 10-21</p> |

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| HCD Comment (Letter of 9/27/2022) | City of Goleta Response | Adopted HE Reference |
|--|---|-------------------------------|
| <p>C.4. Remove governmental and nongovernmental constraints As noted in Findings B4 and B5, 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>This comment is addressed in items B.4 and B.5 above</p> | |
| <p>In addition, Program HE 2.3 (Housing Design Principles) must include action beyond reviewing parking standards and specifically commit to reduce parking requirements.</p> | <p>Subprogram HE 2.3(d) was revised to provide more specific commitment to reduce parking standards, changing “review” standards to “reduce” standards and to provide a specific timing for the Title 17 amendments (by February 2025).</p> | <p>Housing Plan, p. 10-12</p> |
| <p>C.5 Promote and affirmatively further fair housing As noted in Finding B1, the element must include a complete analysis of AFFH. The element must be revised to add goals and actions based on the outcomes of a complete analysis.</p> | <p>Program HE 3.1 has been significantly revised to incorporate additional analysis in Section VII of the Technical Appendix</p> | <p>Housing Plan, p. 10-17</p> |
| <p>C.6 Preserve for low-income household the assisted housing developments Program HE 1.3 (Preserve Assisted Housing): The Program should be modified to assist tenants with education and support as appropriate</p> | <p>Program HE 1.3 was revised to add a new subprogram (HE 1.3(d)) to assist tenants of lower-income units at risk of conversion to market rate with education and support.</p> | <p>Housing Plan, p. 10-7</p> |
| <p>C.7 Incentivize and promote the creation of accessory dwelling units. Program 2.6 (Encourage Accessory Dwelling Units (ADU)) should commit to when the City will establish incentives for ADUs. In addition, the Program should monitor permitted ADUs and affordability every other year and take appropriate action such as adjusting assumptions or rezoning within a specified time (e.g., 6 months) if assumptions are not realized.</p> | <p>Program HE 2.6 was revised to provide additional commitments (such as exploring a funding program, homeowner/applicant assistance tools, and ongoing monitoring of ADUs) and schedule to facilitate those new commitments. A new subprogram HE 2.6(c) also includes consideration of additional incentives for ADUs if assumptions regarding ADU production are not being met.</p> | <p>Housing Plan, p. 10-16</p> |

Attachment 3: Summary of HCD Comments and City Responses

| <p style="text-align: center;">HCD Comment (Letter of 9/27/2022)</p> | <p style="text-align: center;">City of Goleta Response</p> | <p style="text-align: center;">Adopted HE Reference</p> |
|---|--|--|
| <p>D. Quantified Objectives While the element includes quantified objectives for new construction, rehabilitation and conservation by income group, it could consider quantified objectives for conservation (beyond at-risk preservation). For your information, the quantified objectives do not represent a ceiling, but rather set a target goal for the City to achieve, based on needs, resources, and constraints.</p> | <p>In addition to Program HE 1.3 (Monitor & Preserve Assisted Affordable Units) several other programs include quantified objectives to facilitate housing preservation, including Programs HE 1.2 Housing Rehabilitation, HE 1.4 Preserve Mobile Home Parks and Facilitate MHP Ownership, and HE 4.1 Rehabilitation and Energy Loan Programs. Table 10-2, Quantified Housing Objectives 2023-2031 was updated to include preservation of all mobile home units (approximately 650 spaces) during the planning period.</p> | <p>Housing Plan, p. 10-6</p> |
| <p>E. Consistency with the General Plan As part of the housing element update, the City should review the general plan to ensure internal consistency and discuss how internal consistency has been achieved and will be maintained throughout the planning period.</p> | <p>The Housing Element was revised to include discussion of how General Plan internal consistency will be maintained throughout the planning period.</p> | <p>Housing Plan, p. 10-4</p> |