

Planning Commissioners,

Please find attached my comments on Chapter 8 of the Current Hearing Draft, the Housing Element. I have made some additions, modifications, and deletions that are necessary to make this document palatable. Note that my silence on a particular goal, policy, standard, or implementation measure by no means implies that I support that item. In particular, I do support **H-P7**, but I do not wish to express support for any other items at this time. In general, I believe this document has wandered too far from its predecessor. This is disturbingly similar to the overall General Plan Update process which has turned into a complete rewrite of the Plan. Do not be afraid to utilize existing documents in your deliberations and decision making. I hope you find my comments both useful and enlightening.

Respectfully,
Hans Parshall

To begin, there are three policies from the 2004 Housing Element that I would like to see retained. **Policy 3.1a**, **Policy 3.1b**, and **Policy 3.1c** should remain in the Housing Element without modification.

Policy 3.1a The County shall reduce uncertainty, risk, and delay in the planning, environmental, and permitting process through a commitment to targeted timelines.

Policy 3.1b The County shall target 30 days from the submission of a complete application as a maximum review time for multifamily projects which require administrative approval by the Planning Department.

Policy 3.1c Minimize increases to application processing fees which adversely impact housing affordability.

For **H-G1**, I propose language consistent with **Goal 1.1*** of the 2004 Housing Element which provides for the future housing needs of the community instead of the fair share housing needs allocation.

H-G1. Housing Production. Sufficient housing production on an annual basis for all income levels in accordance with the County's projected future housing needs of the community.

It is not the role of the County to decide whether or not housing is artistic or pleasing in appearance. Nor is it the role of the County to guarantee aesthetic housing. Thus, I propose the word "aesthetic" be removed from **H-G6**.

H-G6. Safe Housing Accessible to All. Housing maintained in a safe ~~and aesthetic~~ condition, accessible to all residents without regard to race, color, age, gender, religion, nationality, family status or disability.

* **Goal 1.1** To provide for the projected future housing needs of the community.

Reducing the cost of housing sounds an awful lot like reducing property values. The goal of **H-G8** should then be, consistent with **Goal 5.1*** of the 2004 Housing Element, to allow and incentivize lower costs for new residential construction.

H-G8. Constructing Low-Cost, Resource-Conserving Housing. Regulatory allowances and incentives for techniques and programs that reduce ~~housing costs of new residential construction~~ and minimize the environmental impacts of housing development.

With respect to **H-P1**, the County should not prioritize infill or redevelopment; encouragement of re-use would be acceptable. The County should not be making the determination that a property is underdeveloped. I propose “land” be changed to “residential properties”, as this is both more targeted and more consistent with **Policy 1.1e†** of the 2004 Housing Element. This is not a strategy for affordable housing, economic stimulus, or community reinvestment.

H-P1. Promote Infill, Reuse and Redevelopment. The County ~~should encourage~~ shall prioritize infill, re-use and redevelopment of vacant and under-developed land ~~residential properties~~ within Urban Development Areas as a strategy to create affordable housing, provide an economic stimulus and re-vitalize community investment.

I do not support the requirement of various housing types and sizes in subdivisions chosen at will by the County, nor any subdivisions for that matter. Nor is an in-lieu fee acceptable. This is counter to both **H-G1** and **H-G3**, as it will be counterproductive to the production of affordable housing for all income levels, as it will discourage residential construction of all types and drive up the cost of even the projects not directly affected. I propose that **H-P3** be deleted and that **Policy 1.1b‡** and **Policy 1.1d§** of the 2004 Housing Element be retained in its stead. Similarly, I recommend the deletion of **H-S5** and **H-IM3**.

~~**H-P3. Requirements for a Mixture of Housing Sizes and Types.** The County shall require a variety of housing types and sizes in specified major subdivisions to ensure a mix of very low, low, moderate and above moderate housing opportunities necessary to meet the Regional Housing Needs Allocation Plan. The County shall allow payment in lieu of meeting these requirements under specified circumstances.~~

~~**H-S5. Requirements for a Mixture of Housing Sizes and Types.** The County shall require a mix of housing types and sizes in specified major subdivisions in general proportion to the ratio of housing needs for designated income levels in the Regional Housing Needs Allocation Plan.~~

* **Goal 5.1** To utilize techniques and programs which will reduce costs of new residential construction.

† **Policy 1.1e** Promote the buildout of vacant residential properties in urban areas through infill, reuse and redevelopment activities.

‡ **Policy 1.1b** Promote the development of various types of housing opportunities, by ensuring an adequate supply of residentially zoned sites at low, moderate and high densities for new housing construction.

§ **Policy 1.1d** Support residential project proposals that are appropriately designed, and meet required density ranges in order to promote the construction of affordable housing.

~~**H-IM3. Requirements for a Mixture of Housing Sizes and Types.** The County shall require a variety of housing types and sizes in specified major residential subdivisions, including provisions for payment in lieu by ordinance.~~

H-P5 creates a mandatory density requirement “unless specific findings are made.” My support of this policy would be contingent upon exactly what these undefined specific findings are. These specific findings are not outlined in any policy, standard, or implementation measure, and so I propose the policy be deleted.

~~**H-P5. Minimum Development Requirement Based on Mid-point Density.** Residential parcels shall be developed equal to or greater than the mid-point density of the parcel based on the applicable Plan designation and zoning standards unless specific findings are made.~~

By denying all other forms of development on parcels suitable for lower income multifamily uses, **H-P6** will actually discourage considerable multifamily residential production. There are many compatible uses such as a shop with multifamily units above it. Furthermore, that protection should not be binding, so “shall” has been replaced with “should”. I also added the “income” I’m sure was intended by staff.

~~**H-P6. Protecting Multifamily Uses in the Affordable Multifamily Land Inventory.** Sites identified in the residential land inventory as being suitable for meeting extremely low, very low and low income multifamily uses shall should be protected from incompatible uses by ordinance standards or zoning overlay from non-multi-family use development.~~

I do not support the County making a determination as to what market-rate housing’s “fair share” of infrastructure and public service costs is. I do not support affordable housing that has discriminatory long-term affordability restrictions. I most certainly do not support subsidies for such discriminatory restrictions. I recommend the deletion of **H-P10**.

~~**H-P10. Contributions to Infrastructure and Service Development.** Market-rate housing shall pay its fair share of infrastructure and public service costs. Housing that has long-term affordability covenants and restrictions that require units to be available to, and occupied by, persons or families of low, very low or extremely low income at affordable housing costs for at least 20 years may be eligible for subsidies to pay for applicable infrastructure and public service costs.~~

Affordable housing should not be limited to being located in urban or suburban areas, which is precisely what is proposed by limiting it near transportation corridors, employment centers, and public services. Affordable housing should be developed where it is most affordable to be developed and where the demand is located. As for transit stops, transit should be following demand, not the other way around. I recommend the deletion of **H-P11**.

~~**H-P11. Residential Development in Proximity to Transportation and Work.** Locate residential development, particularly development affordable to those earning less than median income, near transportation corridors, transit stops, employment centers and public services.~~

While I support the gist of **H-P13**, I do not believe it wise for the County to bind itself into supporting such projects with the use of “shall” instead of “should”.

H-P13. Single Room Occupancy Units. The County ~~shall~~should support the conversion and use of motels, hotels and detached bedrooms for single room occupancy units.

In **H-P16**, the County should not be planning such proposals, nor should they be bound into supporting such proposals by the use of the word “shall” instead of “should”.

H-P16. Siting of Multifamily Housing Developments. The County ~~shall~~Plan and should support development proposals that locate multi-family uses along major transportation corridors, near transit stops, public services, recreation areas, neighborhood commercial centers and work opportunities.

The County’s permitting process should be efficient, streamlined, and predictable for all development, not just for those subdivisions the County sees fit to grant such a privilege. I propose striking the specificity of Housing Opportunity Zones from **H-P24**.

H-P24. Residential Subdivision Permit Process ~~within Housing Opportunity Zones.~~ The County shall maintain an efficient, streamlined and predictable permitting process designed for residential subdivisions ~~located within Housing Opportunity Zones.~~

I do not support affordable housing that has discriminatory long-term affordability restrictions. I most certainly do not support subsidies for such discriminatory restrictions. I recommend the deletion of **H-P25**.

H-P25. Fee Deferrals and Subsidies. ~~If requested, the County shall defer until occupancy fees for building permits, discretionary land use permits, and review fees charged by the Department of Environmental Health and Public Works for housing that has long-term affordability covenants and restrictions that require units to be available to, and occupied by, persons or families of low income at affordable housing costs for at least 20 years. The County shall subsidize such fees so there is no cost to the applicant for residential units that have long-term affordability covenants and restrictions that require units to be available to, and occupied by, persons or families of very low or extremely low income at affordable housing costs for at least 20 years.~~

I disagree with the calculation of the minimum number of residential units on a parcel proposed by **H-S3**. The minimum should be found by multiplying the applicable minimum, not mid-point, by the developable area. Furthermore, the net developable area should take into account value of resources available on the parcel.

H-S3. Calculation of the Minimum Number of Residential Units on a Parcel. The minimum number of required residential units on an individual parcel shall be calculated by multiplying the applicable ~~mid-point~~minimum Plan density by the net developable area determined during application processing. The net developable area shall be the total parcel area minus areas that cannot be physically developed due to hazards or environmental constraints and areas that would lose resource production value.

H-S4 should take into account the desire not to develop an area due to its resource production values.

H-S4. Calculation of the Maximum Number of Residential Units on a Parcel. The maximum number of residential units on an individual parcel shall be calculated by multiplying the highest density allowed in the applicable Plan designation by the total parcel area. Additional units may be allowed based on applicable density waivers or density bonuses. Allowable residential units may be clustered in developable areas of the parcel to avoid physical, environmental or infrastructure constraints or to retain resource production value.

I do not support the County engaging in a bait and switch with regard to the residential land inventory. **H-S18** appears to give the County an option of presenting one land inventory to the public process, only to replace it with another inventory after the majority of public comment has been received. I do not support this type of opaque process being substituted for a fair and open public process. I recommend its deletion to remove such an option.

~~**H-S18. Re-submittal of Residential Land Inventory to Housing and Community Development.** If changes during the Housing Element planning period result in a residential land inventory that is inadequate to meet regional housing needs, the County shall identify within 180 days of the known deficiency additional adequate and available sites, formally adopt an amended residential land inventory and re-submit the amended inventory to Housing and Community Development for a state law consistency review.~~

I do not support redevelopment agencies within the County. Assessing impact fees on any developers will be counterproductive to the provision of affordable housing, and is similarly not supported.

H-IM6. Housing Trust Fund. The County shall establish a Housing Trust Fund to support the development of housing affordable to low, very low, and extremely low income households. The County shall seek funding to provide an initial funding level of \$500,000. Sources of initial and long-term funding may include:

- State and Federal Grants
- Local Financial Institutions
- Local Jurisdictions
- ~~Redevelopment Agencies~~
- ~~Affordable Housing Developer Impact Fees~~
- Sale of Surplus County Property
- Economic Development Division Set-aside
- County General Fund