

Attn: Martha Spencer  
Humboldt County Planning Department  
Community Development Services  
3015 H Street  
Eureka, CA 95501

February 12, 2009

Dear Planning Commission and Staff,

Thank you for the opportunity to comment on the most recent draft of the 2009 Humboldt County Housing Element.

The “Background” section of the element lays out in stark detail the degree to which we as a community have failed to meet the housing needs of hardworking low-income people in the County. Even with the overall number of new units exceeding the Regional Housing Need for the last cycle, the County fell 61% short of the “very low income” housing need, and 22% below the “low income” housing need. The failure to produce appropriate housing for such a large segment of our population should alert us to the need to take action in this cycle to fix the problem. With each housing cycle that fails to provide adequate affordable housing, available appropriate locations for siting such housing shrinks, making the possibility of meeting these requirements even further out of reach.

### **Mixed Housing Types Potentially Ineffective**

The suite of proposals in Alternative B including the “Mixed-Housing Types”, policy H-P3, while potentially helpful, most likely will be ineffective in eliminating the County’s substantial shortfall in housing production affordable to low and very low income buyers.

- What guarantees that multifamily housing units will be built within the next five years, especially if they are limited to subdivisions of 50 or more parcels?
- What guarantees that new multifamily housing units will be affordable to low and very low income buyers?

Because Humboldt County is coastal with a relatively mild climate, plentiful water, working private resource lands and publicly accessible National Forest lands, it is a desirable place to live and developers will be able to sell “mixed-housing types” at prices affordable to moderate and above moderate income buyers only. A mixed-housing type requirement may have potential to create higher density walkable neighborhoods, but it does not solve the problem of the huge shortfall in low and very low income housing.

Rather than require mixed housing types in only the largest subdivisions (50 to 100 parcels or more), the County should look to more effective strategies like Arcata’s requirement of mixed affordability in major subdivisions (5 parcels or more). Allowing mixed housing in more subdivisions could offer developers one of many tools to meet the affordability requirements.

The County should look to the success Arcata has had in nearly meeting its housing needs for all income categories. Full-fledged inclusionary zoning is the primary tool that enabled Arcata to achieve this despite higher land prices. Inclusionary zoning not only requires affordable housing unit construction; it also promotes economically-integrated neighborhoods, resulting in less disparity between public school districts. The County should draft a similar policy, maximizing assistance on affordable units, but giving developers the freedom to choose which housing types to use, so long as a mix of affordability is achieved.

### **Solutions to Inclusionary Zoning (IZ) Challenges**

There are various models for accommodating the affordable units required under inclusionary zoning. We hope the commission will investigate thoroughly and give full consideration to this option for insuring enough affordable housing for all income levels.

The first challenge is funding. There are many options that can minimize the burden of this subsidy to moderate income homebuyers. A Housing Trust Fund could be built up to leverage state and federal grants to support the development of the affordable units in major subdivisions. This Housing Trust Fund could in turn be supported by a McMansion Fee, that is, a fee on square footage above 2500 square feet per new residential unit. Jobs-linkage fees are another potential funding source, i.e. fees on development of businesses that provide mostly less than living wage jobs. These, and in lieu fees from developers who would prefer not to provide affordable units on major subdivisions, would support the Housing Trust Fund that leverages additional grants.

Administration is another addressable challenge. In Arcata, this is covered by the Humboldt Bay Housing Development Corporation. The city purchases the parcels dedicated for low-income housing at market rate and passes them off to HBHDC which builds the affordable housing, screens the applicants and insures the affordability covenants are adhered to. The developer doesn't need to do anything but sell the parcels to the Community Land Trust managed by the HBHDC.

### **Housing Opportunity Zones and Incentives**

Housing Opportunity Zones need to be more clearly defined. We are told they will occur in the Urban Development Areas, which we strongly support. This needs to be explicit. Incentivizing residential development outside Urban Development Areas would increase the urban footprint, increase transportation costs as people need to travel further to work, school, and services, and would encourage inappropriate conversion of resource lands. We suggest eliminating the term Housing Opportunity Zone and simply describing these incentives that apply to the Urban Development Areas

We support many of the incentives to reduce housing costs, particularly reduced minimum parcel sizes to provide opportunity for less expensive housing, and modified parking standards. The high cost of parking needs to be unbundled from housing costs. There are many other opportunities to modernize parking policy by taking advantage of shared parking in mixed-use areas, and managing parking demand, not just supply as is done now. We will comment specifically on this topic in the Urban Lands component of the Land Use Element.

We have concerns with two incentives. First, caution must be applied when modifying solar shading requirements to allow for higher densities. It is vital that development take maximum advantage of solar access for the given density being developed. We need to work hard to ensure that our region has made itself resilient to fluctuating energy prices, and to keep energy costs low.

The second concern is the proposed weakening of parkland dedication requirements. Parkland is particularly important in developed areas, since residents have less space on their own land for healthy outdoor recreation. According to the Health Impact Assessment, presence of parks is associated with increased physical activity, reduced stress, bolstered social cohesion, and people just feeling healthier. So if anything, parkland dedication requirements should be strengthened, not weakened. Dedication of community gardens should also be addressed in Urban Development Areas to provide residents of higher density areas with access to plots to grow their own food.

### **Second Units**

We support making development of second units easier within urban development areas. This creates infill opportunities, potential low income second units, and a potential revenue stream to support a home buyer's purchase. Second units should not, however, be viewed as a panacea to our low income housing shortfalls. These can become boutique rentals unaffordable to low income buyers.

### **Conclusion**

We believe that focusing on the Urban Development Areas with an approach that mixes relaxation of antiquated rules such as parking requirements with the application of a comprehensive inclusionary zoning ordinance will enable the County to meet the housing needs and bolster quality of life for all income groups. Our suggested choices and edits to the decision-making guide for the Housing Element follow.

Sincerely



Chris Rall – Policy Director  
Healthy Humboldt Coalition




CC:  
Humboldt County Board of Supervisors

# Plan Alternatives Comparison Chart

## Chapter 8 Housing Element

Plan Alternative				Chapter 8 Housing Element	Remarks/Implementation	Vote R,M,D
				<b>8.4 Goals</b>		
A	B	C		<b>H-G1. Housing Production and Supply.</b> Sufficient housing production on an annual basis for all income levels in accordance with the County's projected fair share housing needs allocation; <u>and maintenance of sufficient housing supply for all income levels.</u>		<b>M</b>
<b>Comments:</b>						
			D	<b>Goal 1.1</b> To provide for the projected future housing needs of the community.		<b>D</b>
<b>Comments:</b>						
			D	<b>Goal 2.1</b> To provide for adequate sites for all types of housing throughout the county.		<b>D</b>
<b>Comments:</b>						
A	B			<b>H-G2. Workforce Housing.</b> An adequate supply of rental and homeownership opportunities affordable to wage earners within close proximity to local businesses, <u>schools, community services and health services.</u>	No emphasis on housing location in Alt. C.	<b>M</b>
<b>Comments:</b>						
			D	<b>Goal 1.2</b> To play a lead role in meeting the future housing needs of lower income households.		<b>D</b>
<b>Comments:</b>						


Plan Alternative				Chapter 8 Housing Element	Remarks/ Implementation	Vote R,M,D
A	B	C		<b>H-G3. Housing Needs of Special Populations.</b> Sufficient and affordable housing opportunities for seniors, disabled persons, homeless, nomadic, single-parent households, farm workers, and large families.		<u>R</u>
<b>Comments:</b>						
A	B	C		<b>H-G4. Emergency Shelters and Transitional Housing.</b> Sufficient emergency shelter capacity and transitional housing opportunities to meet local demands.		<u>R</u>
<b>Comments:</b>						
A	B	C		<b>H-G5. Residential Land Inventory.</b> An inventory of land, suitable for development within a five-year period, which provides adequate capacity to meet projected regional housing needs for all income levels.		<u>R</u>
<b>Comments:</b>						
A	B	C		<b>H-G6. Safe Housing Accessible to All.</b> 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.		<u>R</u>
<b>Comments:</b>						
			D	<b>Goal 4.1</b> To conserve existing housing through maintenance and rehabilitation		<u>D</u>
<b>Comments:</b>						
	B	C		<b>H-G7. Minimize Governmental Constraints.</b> Regulatory policies, practices and costs that promote the creation of affordable housing, <u>protect safety, health and the environment</u> , and reflect the goals and priorities of this Plan.		<u>M</u>
<b>Comments:</b> <u>There are some governmental constraints (such as off-street parking requirements, and restrictions against mixed housing types) that work against health, safety and environmental protection. These governmental constraints should be minimized, and regulation should be focused on exactly what matters, housing affordability for all income levels, and protection of health and the environment.</u>						



Plan Alternative				Chapter 8 Housing Element	Remarks/ Implementation	Vote R,M,D
			D	<b>Goal 3.1</b> To assist in the construction of market rate housing by reducing government constraints whenever possible		<u>D</u>
<b>Comments:</b>						
A	B			<b>H-G8. Constructing Low-Cost, Resource-Conserving Housing.</b> Regulatory allowances and incentives for techniques and programs that reduce housing costs and minimize the environmental impacts of housing development.	No emphasis on reducing environmental effects in Alt. C.	<u>R</u>
<b>Comments:</b>						
			D	<b>Goal 5.1</b> To utilize techniques and programs which will reduce costs of new residential construction.		<u>D</u>
<b>Comments:</b>						
			D	<b>Goal 5.2</b> To encourage resource-conserving site utilization and dwelling unit construction techniques.		<u>D</u>
<b>Comments:</b>						
				<b>8.4 Policies</b>		
A	B			<b>H-P1. Promote Infill, Reuse and Redevelopment.</b> The County shall prioritize infill, re-use and redevelopment of vacant and under-developed land within Urban Development Areas as a strategy to create affordable housing, provide an economic stimulus and re-vitalize community investment.	Leg, QJ, H-S7, H-S8, H-IM1   	<u>R</u>
<b>Comments:</b>						

Plan Alternative				Chapter 8 Housing Element	Remarks/ Implementation	Vote R,M,D
A	B			<b>H-P2. <del>Housing Opportunity Zones</del>Infill Incentives.</b> The County shall adopt policies, standards and programs to stimulate residential and infrastructure development within <del>Board-adopted Housing Opportunity Zones</del> Urban Development Areas.	Leg, QJ, <del>H-S7</del> H-S8, H-IM1	<b>M</b>
<b>Comments:</b>						
	B			<b>H-P3. Requirements for a Mixture of Housing Sizes and Types.</b> 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.	QJ, H-S5, H-IM3	<b>D</b>
<b>Comments:</b> <u>This policy does not address affordability. The policy should directly address the need rather than require something that instead should be an optional tool to achieve a required affordability mix.</u>						
A				<b>H-P3. Requirements for a Mixture of Housing <del>Sizes and Types</del>Affordabilities.</b> The County shall <u>allow a variety of housing types and sizes, and</u> require long-term affordability restrictions and covenants on housing for <del>specified</del> major subdivisions to ensure the availability of housing for very low and low income categories. The County <del>shall</del> <u>may</u> allow payment in lieu of meeting these requirements under specified circumstances.	Requires <del>developer</del> subsidy of rents or purchase price	<b>M</b>
<b>Comments:</b> <u>This policy would succeed in creating an adequate supply of affordable housing in mixed income neighborhoods. Allowing mixture of housing types and sizes gives the developer a tool to help reach that affordability mark. We propose subsidizing the affordable units through a Housing Trust Fund generated from a McMansion fee and in lieu fees as well as subsequent matching funds from state and federal grants. This would make it possible to minimize or eliminate subsidies from buyers or renters of moderate income housing.</u>						
			D	<b>Policy 1.1a</b> The County shall maintain an adequate supply of residentially zoned land to develop an affordable mix of housing in urban areas and accommodate projected housing needs.		<b>D</b>
<b>Comments:</b>						



Plan Alternative				Chapter 8 Housing Element	Remarks/ Implementation	Vote R,M,D
A	B	C		<b>H-P4. Residential Units in Commercial Zones.</b> Residential units shall be principally permitted when consistent with adopted performance standards in specified commercial zones.	Min, HS-8	<b>R</b>
<b>Comments:</b>						
A	B	C		<b>H-P5. Minimum Development Requirement Based on Mid-point Density.</b> 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.	QJ, H-S2, H-S3	<b>R</b>
<b>Comments:</b>						
			D	<b>Policy 1.1b.</b> 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.		<b>D</b>
<b>Comments:</b>						
			D	<b>Policy 1.1d.</b> Support residential project proposals that are appropriately designed, and meet required density ranges in order to promote the construction of affordable housing.		<b>D</b>
<b>Comments:</b>						
			D	<b>Policy 1.1e.</b> Promote the buildout of vacant residential properties in urban areas through infill, reuse and redevelopment activities.		<b>D</b>
A	B	C		<b>H-P6. Protecting Multifamily Uses in the Affordable Multifamily Land Inventory.</b> Sites identified in the residential land inventory as being suitable for meeting extremely low, very low and low multifamily uses shall be protected by ordinance standards or zoning overlay from non-multifamily use development.	QJ, H-IM4, H- IM17	<b>R</b>
<b>Comments:</b> <u>While we recognize that one acre-or-larger parcels is a criterion that HCD likes to see, we have concerns over attempting to meet the vast majority of low and very low housing needs in a manner that results in segregation and ghettoization of low income groups. Furthermore, this approach still fails to require that any of the multifamily units developed on these sites be affordable, therefore, it is likely to be inadequate in providing enough low and very low income housing. So, we support the policy, but urge the Commission to consider how to ensure that affordable housing needs are met given these concerns. Implementing inclusionary zoning would be one way to do so.</u>						



Plan Alternative				Chapter 8 Housing Element	Remarks/ Implementation	Vote R,M,D
			D	<b>Policy 1.2a.</b> The land inventory shall be monitored annually to maintain a development potential of at least 1,000 multifamily units with public services available.		<u>D</u>
<b>Comments:</b>						
A	B	C		<b>H-P7. Encourage Second Units.</b> The County shall stimulate the construction of second units by relaxing second-unit development standards in order to provide low-cost housing and to make more efficient use of existing infrastructure.	QJ, H-S8, H-S9, H-IM1, H-IM2	<u>R</u>
<b>Comments:</b>						
A	B	C		<b>H-P8. Retain Legal Non-Conforming Housing.</b> The County shall support the retention of legal non-conforming housing through modifications to the land use and building codes.	QJ, H-IM10	<u>R</u>
<b>Comments:</b>						
A	B	C		<b>H-P9. Flexibly Apply Development Standards to Low Income Housing.</b> The County shall support the flexible application of development standards through a streamlined permit process for housing for lower income affordability categories and special needs populations.	QJ, H-IM22	<u>R</u>
<b>Comments:</b>						
			D	<b>Policy 1.2e.</b> The County shall support the flexible application of development ordinances to encourage residential projects that produce housing affordable to lower income households.		<u>D</u>
<b>Comments:</b>						
A	B	C		<b>H-P10. Contributions to Infrastructure and Service Development.</b> 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 <u>20-50</u> years may be eligible for subsidies to pay for applicable infrastructure and public service costs.	Leg, QJ, Min 	<u>M</u>
<b>Comments:</b> <u>Incentivizing long term covenants helps ensure a supply of affordable housing into the future.</u>						

Plan Alternative				Chapter 8 Housing Element	Remarks/ Implementation	Vote R,M,D
			D	<b>Policy 1.1g.</b> The General Plan Update shall include actionable plans for infrastructure financing and construction.		<b>D</b>
<b>Comments:</b>						
A	B			<b>H-P11. Residential Development in Proximity to Transportation and Work.</b> <del>Locate The County shall plan and support</del> residential development, <del>particularly development affordable to those earning less than median income,</del> near transportation corridors, transit stops, employment centers and public services.	Leg, QJ, HS-8, HS-19, HS-20, H-IM1  	<b>M</b>
<b>Comments:</b> <u>While a greater share of a low income household's income is devoted to transportation expenses, this ghettoization approach is the wrong one in remaking our communities less automobile dependent. Burdening higher income households with greater transportation expenses means more vehicles and fuel imported to Humboldt and more dollars flowing out, resulting in negative impacts on our overall economy even if the impacts on higher income households is proportionally smaller.</u>						
			D	<b>Policy 1.1c.</b> Support development proposals that seek to locate new market rate multi-family uses at strategic locations within transportation corridors and at transit stops, or at other strategically located reuse and underdeveloped sites.		<b>D</b>
<b>Comments:</b>						
			D	<b>Policy 1.1f.</b> Initiate appropriate plan and zone amendments which allow increased residential densities in areas where community health and safety will not be compromised.		<b>D</b>
<b>Comments:</b>						
A	B			<b>H-P12. Preservation of Mobile Home Parks and Long-Term Occupancy Recreational Vehicle Parks.</b> The County shall support continuation of existing mobile home and long term occupancy recreational vehicle parks <u>as an important source of affordable housing through actions such as legislative changes, zoning consistency determinations, analysis of legal-non-conforming status or through</u> Plan amendments or zone reclassifications.	Leg, QJ, Min	<b>R</b>
<b>Comments:</b>						

Plan Alternative				Chapter 8 Housing Element	Remarks/ Implementation	Vote R,M,D
			D	<b>Policy 2.1a.</b> The County shall acknowledge and make adequate provision for the County's nomadic households in vehicular dwellings as they are a significant and complex socio-economic component of the county population that eludes census data.		<b>D</b>
<b>Comments:</b>						
A	B	C		<b>H-P13. Single Room Occupancy Units.</b> The County shall support the conversion and use of motels, hotels and detached bedrooms for single room occupancy units.	Leg, QJ, Min, Prog, H-S15, H-IM2, H-IM11	<b>R</b>
<b>Comments:</b>						
	B	C		<b>H-P14. Emergency Shelters, Supportive and Transitional Housing.</b> Emergency shelters, supportive and transitional housing shall be allowed as principally permitted uses in specified zones.	Min, H-S12, H-S13, H-IM17	<b>R</b>
<b>Comments:</b>						
A				<b>H-P14. Emergency Shelters, Supportive and Transitional Housing.</b> Emergency shelters, supportive and transitional housing shall be allowed as principally permitted uses <del>on specified parcels</del> within specified zones.	Limits extent	<b>D</b>
<b>Comments:</b> <u>We need to allow service providers as much flexibility as possible in providing services to those in need. Specifying the parcels introduces the NIMBY problem and is inconsistent with the spirit of SB-8 and possible with the letter of the law.</u>						
			D	<b>Policy 2.1b.</b> The County shall identify sites for permanent homeless shelters and transitional housing.		<b>D</b>
<b>Comments:</b>						
A	B			<b>H-P15. Use of Surplus County-owned Property.</b> The County shall consider using surplus County-owned property for development or financing of housing for low income and special need populations.	Prog, H-IM9	<b>R</b>
<b>Comments:</b>						

Plan Alternative				Chapter 8 Housing Element	Remarks/ Implementation	Vote R,M,D
A	B			<b>H-P16. Siting of Multifamily Housing Developments.</b> The County shall Plan and 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.	Leg, QJ, Min, H-P11  	<b>R</b>
<b>Comments:</b>						
A	B	C		<b>H-P17. Insufficient Multifamily Housing Land Inventory.</b> The County has determined there are an insufficient number of suitable sites adequate to accommodate the RHNA Plan allocation for extremely low, very low and low income categories in the unincorporated area. Therefore, before May 31, 2010, the County shall create an inventory of sites suitable for multifamily housing which can accommodate a minimum of 100% of the County's fair share regional housing need for extremely low, very low and low income households.	Leg, H-S6, H-S19, H-S20, H-IM3, H-IM9, H-IM17, H-IM18	<b>R</b>
<b>Comments:</b>						
A	B	C		<b>H-P18. Maintenance of an Adequate Supply of Residential Land.</b> Once the residential land inventory is adopted, the County shall maintain an adequate supply of residentially zoned land to accommodate projected housing needs for all income categories and special needs populations throughout the Housing Element planning period.	Leg, QJ, Prog, H-17, H-S18,	<b>R</b>
<b>Comments:</b>						
			D	<b>Program 1.3 in the Statement of Resolve of the 2004 Housing Element</b> To complete and maintain a land use inventory for all residentially zoned areas.		<b>D</b>
<b>Comments:</b>						
A	B			<b>H-P19. Housing Rehabilitation in Economically Distressed Communities.</b> The County shall work to improve housing conditions in communities with high proportions of substandard housing as indicated through housing condition surveys.	Prog, H-IM7, H-IM19	<b>R</b>
<b>Comments:</b>						

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A	B			<b>H-P20. Enforcement of Tenant's Rights.</b> The County shall support the enforcement of state and federal tenant rights.	Iss, Prog, H-IM20	<b>R</b>
<b>Comments:</b>						
A	B			<b>H-P21. Prevention of Housing Discrimination.</b> The County shall support the enforcement of state and federal fair housing and anti-discrimination laws.	Iss, Prog, H-IM20	<b>R</b>
<b>Comments:</b>						
A	B	C		<b>H-P22. Elderly and Handicapped Housing and Support Services.</b> The County shall promote and encourage a range of housing and support services for elderly and handicapped persons that allow a wide spectrum of choices from fully independent to fully assisted living.	Leg, QJ, Min, H-IM2, H-IM7	<b>R</b>
<b>Comments:</b>						
			D	<b>Policy 2.1d.</b> The County shall exempt the construction of ramps for disabled persons from zoning setback provisions where it is the only feasible design and provides a "reasonable accommodation" consistent with the Americans With Disabilities Act.		<b>R</b>
<b>Comments:</b> <u>This is a good policy that makes sure it is reasonably easy to make housing accessible to disabled persons. It should be retained if there is no replacement policy which specifically allows this.</u>						
			D	<b>Policy 2.1e.</b> The County shall encourage removal of architectural barriers to housing access for persons with disabilities by providing fast-tracking reasonable accommodation requests for relief from development standards consistent with the Americans With Disabilities Act, and using rehabilitation funds and program income from closed-out CDBG grants to assist qualifying residents in- removal of architectural barriers.		<b>R</b>
<b>Comments:</b> <u>See above comment.</u>						

Plan Alternative				Chapter 8 Housing Element	Remarks/ Implementation	Vote R,M,D
	B	C		<b>H-P23. Residential Subdivision Approvals within <del>Housing Opportunity Zones</del> <u>Urban Development Areas</u>.</b> Residential subdivisions within Housing Opportunity Zones shall be approved unless the County makes specified findings for denial.	QJ, H-S8, H-IM1	<u>D</u>
<b>Comments:</b> <u>We cannot support this until we know what the “specified findings for denial” are. This could be a major abdication of a community’s right to direct its own future.</u>						
A	B	C		<b>H-P24. Residential Subdivision Permit Process within <del>Housing Opportunity Zones</del> <u>Urban Development Areas</u>.</b> The County shall maintain an efficient, streamlined and predictable permitting process designed for residential subdivisions located within Housing Opportunity Zones.	Prog, H-S8, H-IM1, H-IM7	<u>M</u>
<b>Comments:</b> <u>Making HOZs coincident with Urban Development Areas has the added benefit of eliminanting the need for the confusing term Housing Opportuntiy Zones.</u>						
			D	<b>Policy 3.1a.</b> The County shall reduce uncertainty, risk, and delay in the planning, environmental, and permitting process through a commitment to targeted timelines.		<u>D</u>
<b>Comments:</b>						
			D	<b>Policy 3.1b.</b> 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.		<u>D</u>
A	B	C		<b>H-P25. Fee Deferrals and Subsidies.</b> 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 <del>20</del> <u>50</u> years.	QJ, Min, Prog, H-IM2, H-IM7	<u>M</u>
<b>Comments:</b> <u>We need to ensure affordable hosuing stays so long enough into the future to have an impact on the affordability of our overall housing supply, not just new housing.</u>						

Plan Alternative				Chapter 8 Housing Element	Remarks/ Implementation	Vote R,M,D
			D	<b>Policy 3.1c.</b> Minimize increases to application processing fees which adversely impact housing affordability.		<b>D</b>
<b>Comments:</b>						
A	B	C		<b>H-P26. Fast Track Application Review.</b> Projects which construct or rehabilitate at least 25% low income, 10% very low income, or 5% extremely low income residential units shall be fast-tracked through the Planning and Building Divisions of Community Development Services, Environmental Health Division of Public Health, and the Land Use Division of the Department of Public Works.	QJ, Min, Prog, H-IM2, H-IM7	<b>R</b>
<b>Comments:</b>						
A	B	C		<b>H-P27. Deferral of Minor Subdivision Improvements.</b> The County shall allow applicants to defer improvements for minor subdivisions until the time of building permit issuance for the development of housing affordable to low, very low or extremely low income households <u>as long as there are no impacts to health and safety. Public Works shall specify allowable deferrals on a project by project basis.</u>	QJ, Min, Prog, H-IM2, H-IM7	<b>M</b>
<b>Comments:</b> <u>This is already permitted under the law, so specifying additional review is unnecessary and counterproductive to the purpose of the policy.</u>						
A	B	C		<b>H-P28. Support Innovative Construction and Design Methods.</b> The County shall support the use of innovative construction and design methods that make more efficient use of land, <u>water, energy</u> and building materials, including water conserving waste disposal systems, energy systems, dwelling designs, and uses of recycled materials for building.	Leg, QJ, Min, Prog, H-IM22, H-IM26	<b>M</b>
<b>Comments:</b> <u>The policy, by only mentioning "energy systems," leaves out approaches to making buildings more energy efficient through insulation, passive solar heating. Likewise, there are ways to conserve water other than in waste disposal systems, using rain catchment system, low-flow appliances, etc.</u>						
A	B	C		<b>H-P29. Encourage New and Experimental Techniques.</b> The County shall encourage and be receptive to new and experimental construction techniques to facilitate optimum utilization of residential sites identified in the residential land inventory.	QJ, Min, H-IM8, H-IM22, H-IM26	<b>R</b>
<b>Comments:</b>						

Plan Alternative			Chapter 8 Housing Element	Remarks/ Implementation	Vote R,M,D
	B	C	<b>H-P30. Support Alternative Owner Builder Program.</b> The County shall support alternative owner-built/ owner-occupied housing to promote low cost housing and improved permit compliance in rural lands outside of Urban Development Areas.	Min, H-IM26	<b>R</b>
<b>Comments:</b> <u>While this will do little to create housing for low and very low income groups, it would be useful as part of an overall strategy to bring commonplace illegal rural development into legal compliance.</u>					
		D	<b>Policy 1.2b.</b> The County shall encourage affordable housing projects and housing for special populations which integrate well with the surrounding neighborhood.		<b>D</b>
<b>Comments:</b>					
		D	<b>Policy 1.2c.</b> The County shall pursue funding for first-time home buyer programs.		
<b>Comments:</b>					
		D	<b>Policy 1.2d.</b> The County shall pursue funding for HOME Tenant Based Rental Assistance (TBRA).		
<b>Comments:</b>					
		D	<b>Policy 2.1c.</b> The County shall continue to participate in the community-wide effort to operate the Multiple Assistance Center (MAC) in Eureka, as the MAC has promise in developing into an important transitional component in the delivery of existing and anticipated levels of County homeless services.		
<b>Comments:</b>					
		D	<b>Policy 2.1d</b> The County shall exempt the construction of ramps for disabled persons from zoning setback provisions where it is the only feasible design and provides a "reasonable accommodation" consistent with the Americans With Disabilities Act.		<b>R</b>
<b>Comments:</b> <u>See previous comments on this policy.</u>					



Plan Alternative	Chapter 8 Housing Element			Remarks/ Implementation	Vote R,M,D
	D	<b>Policy 2.1e</b> The County shall encourage removal of architectural barriers to housing access for persons with disabilities by providing fast-tracking reasonable accommodation requests for relief from development standards consistent with the Americans With Disabilities Act, and using rehabilitation funds and program income from closed-out CDBG grants to assist qualifying residents in. removal of architectural barriers.		R	
<b>Comments:</b> <a href="#">See previous comments on this policy.</a>					
	D	<b>Policy 3.1a.</b> The County shall reduce uncertainty, risk, and delay in the planning, environmental, and permitting process through a commitment to targeted timelines.			
<b>Comments:</b>					
	D	<b>Policy 3.1b.</b> 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.			
<b>Comments:</b>					
	D	<b>Policy 3.1c.</b> Minimize increases to application processing fees which adversely impact housing affordability.			
<b>Comments:</b>					
	D	<b>Policy 4.1a.</b> Utilize federal, state and local funding programs offering low interest loans, or grants, for the rehabilitation of rental properties.			
<b>Comments:</b>					
	D	<b>Policy 4.1b.</b> Provide low interest rate and deferred loans for the rehabilitation of substandard homes owned and occupied by lower income households.			
<b>Comments:</b>					

Plan Alternative				Chapter 8 Housing Element	Remarks/ Implementation	Vote R,M,D
				<b>8.5 Standards</b>		
	B	C		<b>H-S1. Housing Program Implementation.</b> The County shall implement a Housing Program consistent with this Plan to facilitate the permitting and construction by the year 2014 of: <ol style="list-style-type: none"> <li>1) 1,372 single family units</li> <li>2) 128 multi-family units</li> <li>3) <del>117 Alternative Owner Builder (AOB) units</del></li> <li>4) 169 second units</li> </ol>		<u>D</u>
<b>Comments:</b> <u>While we support AOB codes as part of a strategy to bring a greater portion of rural development into legal compliance, and to offer rural residents a more affordable way to build and develop their homes, AOB units are not likely to be affordable to low and very low income groups where the county has fallen short, are not part of the infill development goal, and therefore should not be part of the housing objectives.</u>						
A				<b>H-S1. Housing Program Implementation.</b> The County shall implement a Housing Program consistent with this Plan to facilitate the permitting and construction by the year 2014 of: <ol style="list-style-type: none"> <li>1) <del>1,389 single family units</del> <u>870 Above Moderate Income Units</u></li> <li>2) <del>228 multi family units</del> <u>502 Moderate Income Units</u></li> <li>3) <del>169 second units</del> <u>426 Low income Units</u></li> <li>4) <u>276 Very Low Income Units</u></li> <li>5) <u>385 Extremely Low Income Units</u></li> </ol>	Eliminates standard for rural housing and increases multi-family units	<u>M</u>
<b>Comments:</b> <u>Objectives should be based on affordability, not on housing type. When the final RHNA numbers for the County are available from HCAOG, they should be inserted here. Multifamily housing does not guarantee affordability.</u>						
A	B	C		<b>H-S2. Requirement to Develop the Minimum Number of Residential Units on a Parcel.</b> Parcels shall be developed at a residential density equal to or greater than the calculated minimum density unless the County makes findings supported by substantial evidence according to Government Code Section <del>65583 (b) (c)</del> <u>65589.5 (d)</u> .		<u>R</u>
<b>Comments:</b>						

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Plan Alternative			Chapter 8 Housing Element	Remarks/ Implementation	Vote R,M,D
A	B	C	<b>H-S3. Calculation of the Minimum Number of Residential Units on a Parcel.</b> The minimum number of required residential units on an individual parcel shall be calculated by multiplying the applicable mid-point 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.		<b>R</b>
<b>Comments:</b>					
A	B	C	<b>H-S4. Calculation of the Maximum Number of Residential Units on a Parcel.</b> 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.		<b>R</b>
<b>Comments:</b>					
	B		<b>H-S5. Requirements for a Mixture of Housing <del>Sizes and Types</del>Affordabilities.</b> The County shall require a mix of housing <del>types and sizes</del> affordabilities in <del>specified</del> major subdivisions in general proportion to the ratio of housing needs for designated income levels in the Regional Housing Needs Allocation Plan.		<b>M</b>
<b>Comments:</b> <u>Adequate housing affordable to each income group is the goal, and this standard should be consistent with that.</u>					
A	B		<b>H-S6. Consistent Density for the Residential Multifamily Plan Designation.</b> The County shall establish a uniform maximum density of 30 units per acre for all Residential Multi-family (RM) Plan designated parcels in the County.		<b>R</b>
<b>Comments:</b> <u>Our concerns that the county was setting an arbitrary cap on density at 30 units per acre were somewhat alleviated by the proposed ordinance for a density bonus that would allow substantial density increases above this level.</u>					
A	B		<b>H-S7. Infrastructure Development.</b> Infrastructure projects which reduce physical capacity constraints to residential land located within Housing Opportunity Zones shall be given priority for funding and development.		<b>R</b>
<b>Comments:</b>					

Plan Alternative		Chapter 8 Housing Element	Remarks/ Implementation	Vote R,M,D
A	B	<p><b>H-S8. Incentives for Residential Development within <del>Housing Opportunity Zones</del> <u>Urban Development Areas</u>.</b> Residential development within <del>designated Housing Opportunity Zones</del> <u>Urban Development Areas</u> shall be provided with one or more of the following incentives as detailed in the land use ordinance:</p> <ol style="list-style-type: none"> <li>1) Deferral of improvements for minor subdivisions</li> <li>2) Deferral of subdivision fees until issuance of building permits</li> <li>3) Accommodations for residential units in commercial zones</li> <li>4) Modified parking standards</li> <li>5) Reduced building setback requirements</li> <li>6) Eligible for fast-track and streamlined permit process</li> <li>7) Increased density bonuses and allowances</li> <li>8) Modified development standards for second units</li> <li>9) Allowance for lot-splits for qualified second units</li> <li>10) Reduced minimum parcel sizes</li> <li>11) Reduced lot coverage standards</li> <li>12) Modified Solar Shading Ordinance requirements</li> <li><del>13) Reduce Parkland Dedication requirements for existing structures</del></li> <li><del>14) 13) _____</del> Prioritized infrastructure development</li> </ol>		<b>M</b>
<p><b>Comments:</b> <u>Parks have a substantial impact on health of those served by them and are especially important in the Urban Development Areas where residents have more limited recreational opportunities on private land.</u></p>				

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Plan Alternative			Chapter 8 Housing Element	Remarks/ Implementation	Vote R,M,D
A	B		<p><b>H-S9. Incentives for Affordable and Special Needs Housing.</b> Residential development affordable to persons or families of low, very low or extremely low income or meeting the housing needs of identified special populations shall be provided with one or more of the following incentives as detailed in the land use ordinance:</p> <ol style="list-style-type: none"> <li>1) Deferral or subsidy of permit and review fees</li> <li>2) Deferral of subdivision improvements</li> <li>3) Deferral of subdivision fees until issuance of building permits</li> <li>4) Deferral or subsidy of development impact fees</li> <li>5) Eligible for fast-track and streamlined permit process</li> <li>6) Modified parking standards</li> <li>7) Increased density bonuses and allowances</li> <li>8) Reduced lot coverage standards</li> <li>9) Modified Solar Shading Ordinance requirements</li> <li>10) Special Permit process for waiver of development standards</li> <li>11) Prioritized infrastructure development and service delivery</li> </ol>		R
<b>Comments:</b>					
A	B	C	<p><b>H-S10. Retain Legal Non-Conforming Housing.</b> General Plan density standards shall be waived for existing legal non-conforming housing in new subdivisions.</p>		
<b>Comments:</b>					
A	B	C	<p><b>H-S11. Supportive and Transitional Housing.</b> The County shall principally permit supportive and transitional housing in <u>the following zoning designations:</u></p> <ol style="list-style-type: none"> <li>1) <del>the</del> R-4 Apartment Professional</li> <li>2) <del>r</del> R-3 Residential Multiple Family</li> <li>3) <del>and</del> RM Residential Medium Density Zones,</li> <li>4) <u>Commercial zones in which residential units are principally permitted.</u></li> </ol>		M
<b>Comments:</b> <u>If residential development is principally permitted in commercial zones within Housing Opportunity Zones, it makes sense for supportive and transitional housing to also be principally permitted in these zones, which are often close to services, transportation corridors and jobs.</u>					

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Plan Alternative			Chapter 8 Housing Element	Remarks/ Implementation	Vote R,M,D
	B	C	<p><b>H-S12. Emergency Shelters.</b> The County shall identify areas for <del>allow</del> principally permitted emergency shelters <del>within</del> <u>in</u> the following zoning designations:</p> <ol style="list-style-type: none"> <li>1) MB – Business Park Zone</li> <li>2) ML – Limited Industrial Zone</li> <li>3) C-2 – Community Commercial Zone</li> <li>4) C-3 – Industrial Commercial Zone</li> <li>5) CG – Commercial General Zone</li> <li>6) R-3 – Residential Multiple Family Zone</li> <li>7) R-4 – Apartment Professional Zone</li> <li>8) RM – Residential Medium Density Zone</li> </ol>	Shelters allowed throughout the applicable zone in an identified area.	<b>R</b>
<b>Comments:</b>					
A			<p><b>H-S12. Emergency Shelters.</b> The County shall use a zoning overlay to identify specific parcels or areas for principally permitted emergency shelters. Parcels shall have one of the following underlying zone designations:</p> <ol style="list-style-type: none"> <li>1) MB – Business Park Zone</li> <li>2) ML – Limited Industrial Zone</li> <li>3) C-2 – Community Commercial Zone</li> <li>4) C-3 – Industrial Commercial Zone</li> <li>5) CG – Commercial General Zone</li> <li>6) R-3 – Residential Multiple Family Zone</li> <li>7) R-4 – Apartment Professional Zone</li> <li>8) RM – Residential Medium Density Zone</li> </ol>	Shelters allowed on specific identified properties with these zoning designations. More discrete selection of sites.	<b>D</b>
<b>Comments:</b> <u>See our comments on H-P14</u>					
		D	<p><b>Program 2.1a.</b> The County shall develop a homeless shelter site inventory and identify the permit requirements for each potential site. Responsible Agency: Community Development Services.</p>		<b>D</b>
<b>Comments:</b>					

Plan Alternative			Chapter 8 Housing Element	Remarks/ Implementation	Vote R,M,D
A	B	C	<p><b>H-S13. Standards for Principally Permitted Emergency Shelters.</b> Emergency shelters allowed as principally permitted uses shall be required to meet ordinance standards developed by the County that address <del>all the following:</del><u>the health and safety of the shelter occupants, shelter staff and neighbors.</u></p> <ul style="list-style-type: none"> <li>1)Maximum number of beds</li> <li>2)Off-street parking based upon demonstrated need</li> <li>3)Size and location of on-site waiting and intake areas</li> <li>4)Provision of on-site management</li> <li>5)Proximity to other shelters</li> <li>6)Length of stay</li> <li>7)Lighting</li> <li>8)Security during hours when the shelter is open</li> </ul>		<u>M</u>
<p><b>Comments:</b> <u>The items on this list add a level specificity that will tie the hands of shelter providers in providing the most sensible and humane service to those in need of shelter. Development of Emergency Shelters should be consistent requirements for residential multi-family housing</u></p>					
A	B		<p><b>H-S14. Ten-Year Plan to END Homelessness.</b> The Board adopted Ten-Year Plan to End Homelessness <del>shall be used to</del> <u>will</u> guide the County's efforts to address the housing and service needs of the homeless, and at risk of homelessness populations.</p>		<u>R</u>
<p><b>Comments:</b></p>					
A	B	C	<p><b>H-S15. Single Room Occupancy Units.</b> The County shall allow single room occupancy units (SRO) under specified conditions in zones that allow transient habitation. Plan and zone density standards shall be waived for SRO units. Permit fees shall be subsidized for hotel and motel conversions to SRO units and for reviews of the legal non-conforming status or Plan amendments or zone reclassifications for motel and hotel conversions that have already occurred.</p>		<u>R</u>
<p><b>Comments:</b></p>					

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Plan Alternative			Chapter 8 Housing Element	Remarks/ Implementation	Vote R,M,D
A	B	C	<p><b>H-S16. Calculation of Development Potential for the Residential Land Inventory.</b> The County shall identify land suitable for residential <u>development</u> consistent with Government Code 65583.2. Projections of residential development potential on individual parcels shall be based on applicable Plan densities, zoning standards and net developable parcel area. Net developable area may be based on best-available mapping of hazards and environmental resources known to have the potential to restrict development. Residential development potential on individual parcels may also be limited by infrastructure constraints identified within the Residential Land Inventory by Urban Development Area. Actual development potential on individual parcels is determined at the time of project application. Deviations between actual development potential identified at the time of project application and projected development potential identified in the residential land inventory shall be tracked and reported to the Board of Supervisors in the General Plan Annual Progress Report (Government Code Section 65400).</p>		R
<b>Comments:</b>					
A	B		<p><b>H-S17. Publication and Maintenance of the Residential Land Inventory.</b> The County's residential land inventory, found consistent with state law according to Government Code Section 65583 (a) (3), shall be published to the internet to aid the identification of vacant and underdeveloped residential sites. Thereafter, during the Housing Element planning period, the County shall periodically update the GIS inventory for public information purposes to reflect development approvals, changes in estimated development potential of individual parcels or infrastructure constraints.</p>		R
<b>Comments:</b>					
A	B	C	<p><b>H-S18. Re-submittal of Residential Land Inventory to Housing and Community Development.</b> If changes during the Housing Element planning period result in an <u>Affordable Multifamily</u> residential land inventory that is inadequate to meet 100% of the regional housing needs, the County shall identify within 180 days of the known deficiency additional adequate and available sites, formally adopt <u>any necessary rezonings</u> and an amended residential land inventory and re-submit the amended inventory to Housing and Community Development for a state law consistency review.</p>		R
<b>Comments:</b>					



Plan Alternative			Chapter 8 Housing Element	Remarks/ Implementation	Vote R,M,D
A	B		<p><b>H-S19. Standards for Extremely Low, Very Low and Low Income Sites in the Residential Land Inventory.</b> At least 100 percent of the RHNA Plan allocations for extremely low, very low and low income housing units shall be accommodated on sites suitable and zoned for multifamily residential development. Multi-family sites shall be considered suitable if they contain one or more developable acres planned and zoned for at least 16 dwelling units per acre and can be provided with <u>public</u> water and sewer services within the planning period. No more than 100 units can be counted on any single parcel.</p>		<u>R</u>
<p><b>Comments:</b> <u>See our comments on H-P6</u></p>					
A	B		<p><b>H-S20. Surplus Sites for Extremely Low, Very Low and Low Income Sites in the Residential Land Inventory.</b> A surplus of at least 50 percent of the RHNA Plan allocations for extremely low, very low and low income housing units shall be included in the residential land inventory. Surplus sites may include parcels of any size or density, suitable for extremely low, very low, or low income housing including; second unit development, <del>Alternative Owner-Builder development</del>, duplexes, mobile homes, farm worker housing, single room occupancy units, emergency shelters, supportive housing or transitional housing.</p>		<u>M</u>
<p><b>Comments:</b> <u>As we stated before, we support AOB as part of a greater strategy to bring commonplace illegal rural development into compliance, but it is not a realistic strategy to meet low income housing needs.</u></p>					
A	B	C	<p><b>H-S21. Standards for Fast Tracking Projects.</b> Residential permit applications eligible for fast track processing shall be processed through the Planning and Building, Environmental Health and Public Works Land Use Divisions by dedicated staff on a priority basis ahead of non-fast track permit applications.</p>		<u>R</u>
<p><b>Comments:</b></p>					

Plan Alternative				Chapter 8 Housing Element	Remarks/ Implementation	Vote R,M,D
				<b>8.6 Implementation Measures</b>		
A	B			<b>H-IM1. <del>Housing Opportunity Zones</del>Urban Development Area Incentives.</b> The County shall adopt <del>Housing Opportunity Zones and</del> applicable residential and infrastructure development incentives and standards <u>for Urban Development Areas</u> by ordinance. Responsible Agency: CDS. Timeframe: By August 31, 2009.		<b>M</b>
<b>Comments:</b>						
A	B			<b>H-IM2. Incentives for Affordable and Special Needs Housing.</b> The County shall adopt residential and infrastructure development incentives and standards by ordinance to encourage housing affordable to persons or families of low, very low or extremely low income or meeting the housing needs of identified special populations. Responsible Agency: CDS. Timeframe: By August 31, 2009.		<b>R</b>
<b>Comments:</b>						
A	B			<b>H-IM3.1 Requirements for a Mixture of Housing <del>Sizes and Types</del>Affordabilities.</b> The County shall <u>develop an ordinance that</u> requires a <u>proportion of housing variety of housing types and sizes</u> in <del>specified</del> major residential subdivisions <u>be affordable to low and very low income households in a manner consistent with the County's Regional Housing Need Allocation</u> , including provisions for payment in lieu <u>and subsidy of affordable units through the Housing Trust Fund and additional grants by ordinance</u> . Responsible Agency: CDS. Timeframe: By August 31, 2009.		<b>M</b>
<b>Comments:</b>						
A			D	<b>Program 1.1a.</b> Create a redevelopment agency and establish redevelopment districts, and plans in those areas which set aside redeveloped land for residential development. Responsible Agency: Community Development Services.		
<b>Comments:</b>						
A	B			<b>H-IM4. Protecting Multifamily Uses in the Affordable Multifamily Land Inventory.</b> The County shall protect multi-family sites identified in the residential land inventory from non-multi-family use development by ordinance. Responsible Agency: CDS. Timeframe: By August 31, 2009.		<b>R</b>
<b>Comments:</b>						

Plan Alternative				Chapter 8 Housing Element	Remarks/ Implementation	Vote R,M,D
A	B			<b>H-IM5. Residential Density Bonus.</b> The County shall develop density bonus provisions within Housing Opportunity Zones, and maintain consistency with the density bonus provisions of state law, by ordinance. Responsible Agency: CDS. Timeframe: By August 31, 2009.		<b>R</b>
<b>Comments:</b>						
			D	<b>Program 1.2c.</b> Amend the density bonus ordinance pursuant to recent changes in State law to facilitate the construction of units affordable to lower income households. Responsible Agency: Community Development Services. Timeframe: By August 31, 2009.		
<b>Comments:</b>						
A	B			<b>H-IM6. Housing Trust Fund.</b> 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: <ul style="list-style-type: none"> <li>• State and Federal Grants</li> <li>• Local Financial Institutions</li> <li>• Local Jurisdictions</li> <li>• Redevelopment Agencies</li> <li>• <u>Affordable Housing Developer Impact Fees/Inclusionary Zoning In Lieu Fees</u></li> <li>• <u>McMansion Fee on squarefootage of new construction above 2500 sq ft per unit.</u></li> <li>• Sale of Surplus County Property</li> <li>• Economic Development Division Set-aside</li> <li>• County General Fund</li> </ul> Responsible Agency: CDS. Timeframe: By August 31, 2009.		<b>M</b>
<b>Comments:</b> <u>Developer Impact fees should be designed to minimize impacts on moderate income housing and incentivize affordable housing. The average American house is 2349 square feet, making 2500 sq ft a reasonable size above which new residential square footage can be assessed a fee with reasonable expectation that it will have little-to-no impact on moderate or low income families.</u>						

Plan Alternative				Chapter 8 Housing Element	Remarks/ Implementation	Vote R,M,D
A	B			<p><b>H-IM7. Pursue Funding for Housing Programs.</b> The County shall pursue funding for housing programs; including:</p> <ul style="list-style-type: none"> <li>• First-time Homebuyer Program</li> <li>• Home Investment Partnership Program (HOME)</li> <li>• State Community Development Block Grant (CDBG)</li> <li>• Multifamily Housing Program (MHP)</li> <li>• Joe Serna, Jr. Farmworker Housing Grant Program (JSJFWHG)</li> <li>• CalHome Program</li> <li>• Building Equity and Growth in Neighborhoods Program (BEGIN)</li> <li>• United States Department of Agriculture Housing Programs</li> <li>• California Housing Finance Authority Loans (CHFA)</li> <li>• Federal Low Income Housing Tax Credit (LIHTC)</li> </ul> <p>Responsible Agency: CDS. Timeframe: on-going.</p>		R
<b>Comments:</b>						
A				<p><b>H-IM7x. Pursue Redevelopment.</b> The County shall pursue the formation of a Redevelopment Agency and the designation of Redevelopment Areas to fund infrastructure and housing programs.</p> <p>Responsible Agency: CDS. Timeframe: By August 31, 2011.</p>		
<b>Comments:</b>						
A				<p><b>H-IM7x. Jobs/Housing Linkage Fee.</b> The County shall <del>pursue</del><u>consider</u> enacting a jobs/housing linkage fee program to fund infrastructure and housing programs. Responsible Agency: CDS. Timeframe: By August 31, 2011. Responsible Agency: CDS. Timeframe: By August 31, 2011.</p>		M
<b>Comments:</b>						
			D	<p><b>Program 1.1a.</b> Create a redevelopment agency and establish redevelopment districts, and plans in those areas which set aside redeveloped land for residential development. Responsible Agency: Community Development Services.</p>		
<b>Comments:</b>						

Plan Alternative				Chapter 8 Housing Element	Remarks/ Implementation	Vote R,M,D
			D	<b>Program 1.2a.</b> Use tax increment financing from redevelopment for affordable housing production and conservation countywide. Responsible Agency: Community Development Services.		
<b>Comments:</b>						
A	B			<b>H-IM8. Planned Development Ordinance Revisions.</b> The County shall modify the Planned Development Ordinance to <del>encourage</del> <u>require</u> a mix of housing <del>sizes and</del> affordability levels in residential developments. Responsible Agency: CDS. Timeframe: By August 31, 2009.		<b>M</b>
<b>Comments:</b> <u>See our comments on H-P3</u>						
A	B			<b>H-IM9. Use of Surplus County-owned Property.</b> The County shall evaluate the use of surplus County-owned property for development or financing of housing for low income and special need populations. Responsible Agency: CDS. Timeframe: By August 31, 2010.		<b>R</b>
<b>Comments:</b>						
			D	<b>Program 1.2b.</b> Inventory sites owned by the County that are presently not used or underutilized and research the potential for selling them to a non-profit housing developer or for-profit developer for the construction of new housing affordable to very low income persons. Responsible Agency: Community Development Services.		<b>D</b>
<b>Comments:</b>						
A	B	C		<b>H-IM10. Retain Legal Non-Conforming Housing.</b> The County shall waive General Plan density standards for legal non-conforming housing involved in new subdivisions by ordinance. Responsible Agency: CDS. Timeframe: By August 31, 2009.		<b>?</b>
<b>Comments:</b>						

Plan Alternative			Chapter 8 Housing Element	Remarks/ Implementation	Vote R,M,D
A	B	C	<b>H-IM11. Single Room Occupancy Units.</b> The County shall accommodate the use of hotels, motels and detached bedrooms for single room occupancy units by ordinance. Responsible Agency: CDS. Timeframe: By August 31, 2009.		<u>R</u>
<b>Comments:</b>					
A	B		<b>H-IM12. Identify Potential Special Occupancy Park Sites.</b> The County shall develop and maintain an inventory of suitable sites for use for managed low income special occupancy parks. Responsible Agency: CDS. Timeframe: on-going.		<u>R</u>
<b>Comments:</b>					
A	B		<b>H-IM13. Ten-Year Plan to End Homelessness.</b> The County shall staff and support the implementation measures outlined in the Ten-Year Plan to End Homelessness. Responsible Agency: HHS & CDS. Timeframe: on-going.		<u>R</u>
<b>Comments:</b>					
A	B		<b>H-IM14. Homeless Task Force.</b> The County shall support continuation of the Humboldt County Homeless Task Force, or its equivalent, in order to guide policy development and implementation of programs that address the needs of the homeless population. Responsible Agency: HHS & CDS. Timeframe: on-going.		<u>R</u>
<b>Comments:</b>					
A	B		<b>H-IM15. Funding for the Multiple Assistance Center.</b> <del>The County shall provide program service support to the Multiple Assistance Center based on program and cost efficiency outcomes. Responsible Agency: HHS. Timeframe: on-going.</del> <u>Within available resources of the Department of Health and Human Services and consistent with the mandates of the Department and the needs of its core service populations, the Department will consider entering into ANNUAL contract service arrangements with the Multiple Assistance Center. Continuation of service contracts will be based on fund availability, and program or cost efficiency outcomes. Responsible Agency: HHS. Timeframe: on-going via annual review.</u>		<u>R</u>
<b>Comments:</b>					

Plan Alternative				Chapter 8 Housing Element	Remarks/ Implementation	Vote R,M,D
			D	<b>Program 2.1c.</b> The County shall provide \$600,000 in program service support to the Multiple Assistance Center (\$200,000 per year over initial three year period), and shall consider similar commitments to the MAC after the initial three year period expires, based on program and cost efficiency outcomes. Responsible Agency: Dept. of Health and Human Services.		<u>D</u>
<b>Comments:</b>						
A	B	C		<b>H-IM16. Housing Accessibility for the Disabled.</b> The County shall support housing access for persons with disabilities by fast-tracking reasonable accommodation requests consistent with the Americans With Disabilities Act, and prioritizing housing rehabilitation funds to assist qualifying residents in removal of architectural barriers. Responsible Agency: CDS.		<u>R</u>
<b>Comments:</b>						
A	B			<b>H-IM17. Affordable Multifamily Housing Land Inventory.</b> The County shall create an inventory of lots suitable for affordable multifamily housing, including any necessary rezonings to R-3: Residential Multiple Family or RM: Residential Multifamily which can accommodate a minimum of 100% of the County's fair share regional housing need for extremely low, very low and low income households pursuant to Government Code Section 65583 (c) (1) (A). Responsible Agency: CDS. Timeframe: prior to May 31, 2010.		<u>R</u>
<b>Comments:</b>						
A	B			<b>H-IM18. Surplus Affordable Multifamily Housing Land Inventory.</b> The County shall add to the required inventory of multifamily lots sufficient additional sites to achieve a total affordable residential land inventory of 150% of the County's fair share regional housing need for extremely low, very low and low income households. Responsible Agency: CDS. Timeframe: prior to May 31, 2010.		<u>R</u>
<b>Comments:</b>						

Plan Alternative				Chapter 8 Housing Element	Remarks/ Implementation	Vote R,M,D
A	B			<b>H-IM19. Housing Rehabilitation in Distressed Communities.</b> The County shall periodically conduct housing condition surveys and prioritize housing rehabilitation funding and assistance to communities with high proportions of sub-standard housing. Responsible Agency: CDS. Timeframe: on-going.		<b>R</b>
<b>Comments:</b>						
A	B			<b>H-IM20. Post Information Regarding Fair Employment and Housing.</b> The County shall continue to support the enforcement program of the State Fair Employment and Housing Commission. Responsible Agency: HHS & CDS. Timeframe: on-going.		<b>R</b>
<b>Comments:</b>						
A	B			<b>H-IM21. Revised Length of Stay Limits for Recreational Vehicles.</b> Consistent with the visitor serving provisions of the Coastal Act and recent amendments to state law, the County shall eliminate any provision of County Code limiting the period a tenant may reside in a recreational vehicle within a Recreational Vehicle Park pursuant to California Recreational vehicle Code Occupancy Law, Civil Code Section 799.20. Responsible Agency: CDS. Timeframe: on-going.		<b>R</b>
<b>Comments:</b>						
			D	<b>Program 2.1b.</b> Identify adequate housing sites for the low-income nomadic population throughout the County in proportion to the specific local needs as part of the ongoing development of the Land Use Element of the General Plan. Responsible Agency: Community Development Services. Timeframe: Ongoing.		<b>D</b>
<b>Comments:</b>						
A	B	C		<b>H-IM22. Flexible Application of Development Standards.</b> The County shall adopt by ordinance provisions which allow exceptions and modifications to development standards for extremely low, very low and low income housing through a special permit process. Responsible Agency: CDS. Timeframe: August 31, 2009.		<b>R</b>
<b>Comments:</b>						



Plan Alternative				Chapter 8 Housing Element	Remarks/ Implementation	Vote R,M,D
A	B	C		<b>H-IM23. Reduce Parkland Dedication Requirements for Existing Structures.</b> The County shall modify the Parkland Dedication Fee Ordinance to subtract existing structures from parkland dedication fee requirements for those structures which pre-dated the original Quimby Act ordinance applicable to the property. Responsible Agency: CDS. Timeframe: By August 31, 2009.		<u>R</u>
<b>Comments:</b> <u>While we understand the rationale behind this, currently parkland dedication requirements and fees have not generated adequate funding or dedicated land to create enough parks in our communities. Given the substantial benefits of parks to public health and quality of life, the parkland dedication requirements need revisiting in the Land Use Element.</u>						
A	B			<b>H-IM24. Provide Second Unit House Plans.</b> The County shall maintain plan-checked second dwelling unit plans for public use. Responsible Agency: CDS. Timeframe: ongoing.		<u>R</u>
<b>Comments:</b>						
			D	<b>Program 3.1a.</b> The County shall apply for grant funding to hire designers to develop a set of five pre-approved low-cost housing plans kept on file so the Building Division may offer them to property owners seeking to streamline the permit approval process. Responsible Agency: Community Development Services.		<u>R</u>
<b>Comments:</b>						
A	B			<b>H-IM25. Internet Accessible Residential Land Inventory and Development Constraint Maps.</b> The County shall continue to provide internet access to a searchable GIS based inventory documenting residential development potential and hazard and environmental building constraints on a parcel-specific level. Responsible Agency: CDS. Timeframe: on-going.		<u>R</u>
<b>Comments:</b>						
			D	<b>Program 1.1.b</b> The Planning Division shall make available at the public information counter of Community Development Services a GIS computer that will enable developers to identify real-time mapped constraints to housing development. Responsible Agency: Community Development Services.		<u>D</u>
			D	<b>Program 1.1e</b> The Planning Division shall develop materials for the Department's website that clearly show the existing vacant and underdeveloped land inventory, including thematic maps, graphs, and tables documenting development potential and constraints on a parcel-specific level.		<u>D</u>

Plan Alternative				Chapter 8 Housing Element	Remarks/ Implementation	Vote R,M,D
<b>Comments:</b>						
			D	<b>Program 1.1f</b> The Planning Division shall establish a procedure for updating the land inventory on annual basis to incorporate the best available information.		D
<b>Comments:</b>						
A	B			<b>H-IM26. Alternative Owner Builder Program.</b> The County shall update standards for alternative owner-built/ owner-occupied housing to ensure consistency with environmental and resource protection policies of this Plan, health and safety requirements and to promote permit compliance in rural lands. Responsible Agency: CDS. Timeframe: By August 31, 2011.		R
<b>Comments:</b>						
A	B			<b>H-IM27. Encourage Efficiency Unit Construction.</b> The County shall consider adopting changes <del>to the Uniform Building Code</del> to allow construction of efficiency units as small as 150 square feet in size consistent with the requirements of state and local law.		M
<b>Comments:</b> <u>I don't think the County has the authority to change the uniform building code.</u>						
			D	<b>Program 1.1.c.</b> The Planning Division shall make available at the public information counter of Community Development Services a handout describing recent changes in State law that exempt affordable housing projects from "prevailing wage" requirements. Responsible Agency: Community Development Services.		
<b>Comments:</b>						
			D	<b>Program 1.1.d.</b> The Planning Division shall quantify in a replicable format the development potential for each alternative land use pattern evaluated in the Environmental Impact Report for the General Plan Update.		
<b>Comments:</b>						
			D	<b>Program 1.1g.</b> The Planning Division shall develop development timing procedures as part of the General Plan Update process that link updates of the Housing Element to infrastructure improvements and other development timing initiatives to ensure an adequate supply of housing to meet the County's future housing needs.		

Plan Alternative	Chapter 8 Housing Element			Remarks/ Implementation	Vote R,M,D
<b>Comments:</b>					
		D	<b>Program 1.1h</b> The Planning Division shall perform an internal consistency review as part of the annual general plan implementation report, required by State law. Timeframe: On-going.		
<b>Comments:</b>					
		D	<b>Program 1.2d</b> The County shall assist in the development of housing for very low -income households by reducing Planning Division fees by at least 50%, minimizing site improvement standards where consistent with public health, safety and welfare, and fast-tracking approval for up to six (6) housing projects per year that make at least 20% of the new units affordable to very low income households for 30 years or more.		
<b>Comments:</b>					
		D	<b>Program 1.2e</b> The County shall encourage the development of very low income housing by encouraging other public agencies to match the incentives offered by the Planning Division in Policy 1.2d.		
<b>Comments:</b>					
		D	<b>Program 1.2f</b> The County shall assess the feasibility of building multifamily housing at the maximum development potential allowed by the general plan on a random sample of ten vacant lots.		
<b>Comments:</b>					
		D	<b>Program 1.2g</b> Should the analysis in Program 1.2e demonstrate the required development standards preclude the ability to achieve the maximum density allowed by the general plan, new standards shall be included in the draft General Plan Update that enable development of		

Plan Alternative	Chapter 8 Housing Element			Remarks/ Implementation	Vote R,M,D			
	multifamily housing at the maximum development potential allowed by the General Plan.			<b>Comments:</b>				
	D <b>Program 1.2h.</b> The draft General Plan Update shall include policies and programs to encourage and facilitate multifamily housing development affordable to lower income households.			<b>Comments:</b>				
	D <b>Program 1.2i.</b> The County shall encourage development of housing for lower- and moderate-income households in the coastal zone by amending the zoning ordinance to provide ordinance requirements in the Coastal Zone, consistent with State law.			<b>Comments:</b>				
	D <b>Program 1.2j</b> The County will annually contact local developers and assist with development of housing affordable to lower income households including identification of sites, information on funding availability, support with funding applications, ensuring zoning facilitates development, conducting pre-application meetings and streamlining development applications. Funding Responsibility: CDBG, HOME, USDA, LIHTC, CHFA, Other HCD Funds, etc. Objective: Development and rehabilitation of 44 housing units affordable to lower income individuals and families.			<b>Comments:</b>				
	D <b>Program 2.1d.</b> Within budget constraints, the County shall facilitate implementation of the following measures to meet the housing needs of the County's homeless population: 1. Facilitate the cooperation between public and private agencies serving the homeless. 2. To insure that information/referral and other services are created for the homeless, facilitate the cooperation of public and private entities and the acquisition of funding for the development, siting and staffing of 24 hour shelter, support and self help centers in Eureka,							

Plan Alternative	Chapter 8 Housing Element	Remarks/ Implementation	Vote R,M,D
	<p>Garberville, and Arcata/McKinleyville. These centers would provide volunteer and peer support; scheduled professional services: e.g. information and referral, mental and public health services, social services, career development and job services, and access to showers, locker space, child care, mail receipt, tools, etc.</p> <p>3. Continue to have a representative and alternate from Southern Humboldt on the Task Force to lead in exploring the particular needs of the rural homeless and in reporting back to the Board of Supervisors with recommendations.</p> <p>4. Extend the mandate of the Humboldt County Homeless Task Force in order to provide information and contribute their diverse access to resources to the implementation of both the short-term and long-term recommendations.</p> <p>5. Locate and staff with full eligibility workers satellite Social Service centers with posted hours and days of operations in Southern Humboldt and the North East portion of the County. In this way, the requirement of centralized services will be reduced, thus reducing the influx of the homeless to Eureka, while preserving the needs of rural areas of Humboldt County.</p> <p>6. Apply for and administer planning and technical assistance grants to study the most effective way to provide transitional housing and support systems for homeless persons. Possible options are voucher campgrounds, women's supported housing developments, non-profit and tenant owned mobilehome parks, non-profit motel with support services, therapeutic care communities, residential/work programs, sweat equity development projects, and limited equity cooperatives. This study should assess the option to have transitional housing and homeless support systems that are small, and scattered into communities where people feel at home, combined with case management or other social service supervision. The study should also identify zoning and General Plan amendments necessary to allow these transitional housing and service programs to be developed. Finally, the study should identify sites appropriate for housing homeless persons</p> <p>7. Based on the above study, secure funding for the permitting, development, siting and staffing of secure transitional housing facilities appropriate to different populations of the homeless for overnight stays and where services of longer duration may be provided.</p> <p>8. Support existing programs for the homeless, and ensure that shelter services are provided in northern and southern Humboldt for winters.</p> <p>9. Develop the capacity to provide, locate, manage, and fund campgrounds/safe zones for homeless persons to stay in. Responsible Agency: Community Development Services, County</p>		

Plan Alternative	Chapter 8 Housing Element			Remarks/ Implementation	Vote R,M,D	
	Administrative Office, Department of Social Services.					
<b>Comments:</b>						
	D	<p><b>Program 2.1e</b> The County shall establish the following process in the zoning ordinance to provides "reasonable accommodation" consistent with the Americans With Disabilities Act:</p> <p>a. The party requesting the modification or exception from any zoning or land use standard or regulation shall provide the Director of Community Development Services a written request for "reasonable accommodation" pursuant to the federal Fair Housing Act (FHA) and/or State Fair Employment and Housing Act (FEHA). The request shall describe the nature of the disability, the impact of the existing regulation or standard that has necessitated the request, and other methods or actions considered by the party to provide necessary relief and why the measure or measures were not found to be feasible.</p> <p>b. Upon finding the request complete, and following consultation with any knowledgeable party or parties as determined appropriate, the Director shall process the request according to the procedures for Special Permits. If this determination of modification of exception is related to a discretionary land use project, the matter may be taken to the hearing officer ahead of the project as a whole, so as to expedite review and render a decision on which other permit findings may be dependant.</p> <p>c. In addition to the findings for approving Special Permits, approval of a request for reasonable accommodation shall include the findings, a) the request is the only feasible design and b) the request provides a "reasonable accommodation" consistent with the Americans With Disabilities Act.</p>				
<b>Comments:</b>						
	D	<p><b>Program 2.1f</b> The County shall amend the general plan and zoning ordinance to add transitional housing and emergency shelters to the list of allowed uses in the zoning ordinance.</p>				
<b>Comments:</b>						
	D	<p><b>Program 2.1g</b> The Planning Division shall disseminate information about fair housing rights and</p>				

Plan Alternative	Chapter 8 Housing Element			Remarks/ Implementation	Vote R,M,D	
	procedures for filing fair housing complaints to County government offices, public libraries, post offices, colleges and universities, shopping centers and Laundromats. The Planning Division shall also maintain the information at all County government office locations.					
<b>Comments:</b>						
	D	<b>Program 3.1b.</b> Establish and fund a position in the Planning Division specifically designed to assist persons with developing materials necessary for complete applications. Responsible Agency: Community Development Services.				
<b>Comments:</b>						
	D	<b>Program 5.2a.</b> Identify watersheds that have limited water availability in the General Plan Update and require cumulative impact analysis for proposed water withdrawals and encourage residential water conservation in these watersheds. Responsible Agency: Community Development Services.				
<b>Policies and programs in the Statement of Resolve of the 2004 Housing Element</b>						
	D	<p><b><u>1: Housing Supply</u></b></p> <p><b>1.1.</b> The County shall continue to implement the following programs to meet the housing needs of Humboldt County residents.</p> <p><b>Building permits</b> The objective of the County is to facilitate the construction of 1,408 additional single family units and 128 multifamily units by 2008.</p> <p><b>Alternative Owner Builder (AOB) program.</b> The objective of the County is to facilitate the construction of 117 units under this program in the next five years.</p> <p><b>Second Units.</b> The objective of the County is to facilitate the construction of 79 additional second units between 2003 and 2008.</p>				
<b>Comments:</b>						
	D	<b>1.1.</b> To incorporate quantitative and qualitative analyses of future Census data into this document at the earliest possible date, in order to assess the types, quantities and locations of housing that are needed for various sizes of families in various income groups.				

Plan Alternative	Chapter 8 Housing Element			Remarks/ Implementation	Vote R,M,D	
<b>Comments:</b>						
	D	1.2. To complete and maintain a comprehensive land use map.				
<b>Comments:</b>						
	D	1.3 To complete and maintain a land use inventory for all residentially zoned areas.				
<b>Comments:</b>						
	D	1.4 To encourage second units where there are adequate public services and where compatible with adjacent land uses, and allow them in resource lands where compatible with resource protection policies				
<b>Comments:</b>						
	D	1.5 To provide for more affordable new housing ownership opportunities for low and very low income households, including smaller scale housing units.				
<b>Comments:</b>						
	D	1.6 The County shall all within its power to facilitate the production of affordable housing, particularly for low and very low income residents, including actively pursuing all possible funds to maintain and create low-cost housing in diverse areas of the County, and assisting developers in using State and Federally-funded housing programs.				
<b>Comments:</b>						
	D	1.7. The County shall encourage new housing developments for very low, low and moderate income households.				
<b>Comments:</b>						
	D	1.8 The County shall encourage self-help housing programs.				
<b>Comments:</b>						
	D	1.9 The County shall encourage new multiple-unit housing developments to build a certain percentage of their units for sale or rent at below-market rates for very low, low and moderate income families by providing a density, or other incentive bonus.				
<b>Comments:</b>						
	D	1.10 The County recognizes and supports the rights of tenants to secure habitable housing.				
<b>Comments:</b>						
	D	1.11 The County shall encourage the inclusion of residential units for low and moderate income families in new developments within the coastal zone, where feasible, pursuant to Government Code Section 66590.				



Plan Alternative	Chapter 8 Housing Element				Remarks/ Implementation	Vote R,M,D
<b>Comments:</b>						
		D	1.12 The County shall encourage the replacement of housing occupied by low and/or moderate income families when converted or demolished within the coastal zone, where feasible, pursuant to Government Code Section 66950.			
<b>Comments:</b>						
		D	1.13. The County shall support all efforts to construct housing affordable to very low income persons.			
<b>Comments:</b>						
		D	1.14. The County encourages second units where there are adequate public services and where compatible with adjacent land uses, and allow them in resource lands where compatible with resource protection policies.			
<b>Comments:</b>						
		D	1.15. The County shall put an Article 34 Referendum on the ballot upon request of a government agency, or a citizens group willing to campaign for such a measure.			
<b>Comments:</b>						
		D	1.16. The County shall annually compete for CDBG funds as a means of developing local communities including improvements to and expansion of sewer and water lines and facilities for community planning areas and coastal communities.			
<b>Comments:</b>						
		D	1.17. The County shall maintain a current housing stock inventory in order to anticipate availability for an expanding population, and to set priorities for meeting the more critical housing shortages.			
<b>Comments:</b>						
		D	1.18. The County shall provide for density bonuses for developments containing at least 25% of the units for low or moderate income households or at least 10% of the units for lower-income households as provided in Government Code Section 65915.			
<b>Comments:</b>						
		D	1.19. Provide the staffing necessary to process building permits and subdivision applications in a timely fashion.			
<b>Comments:</b>						
		D	1.20. Adopt fees for service which support the cost of the permit and land use review processes.			

Plan Alternative	Chapter 8 Housing Element				Remarks/ Implementation	Vote R,M,D
<b>Comments:</b>						
		D	1.21. The County shall encourage and support development by non-profit housing sponsors to maintain and develop housing affordable to low and very low income persons.			
<b>Comments:</b>						
		D	1.22. The County encourages future development based on energy efficient travel patterns and the location of existing services.			
<b>Comments:</b>						
		D	1.23. The County shall rezone lands designated for residential development under the General Plan to optimum development potential as soon as public sewer and water services become available. Until funding for expansion of public sewer and water facilities in the underdeveloped areas designated for urban development and urban expansion are obtained, the County will maintain zoning densities that reflect State and local health policies for individual wells and/or sewage disposal systems.			
<b>Comments:</b>						
		D	1.24. The County shall provide for development of single mobilehomes and mobilehome parks in residential zones throughout the community in accordance with the requirements of Government Code Sections 65852.3 and 65852.7 and consistent with General Plan/Community Plan residential land use densities.			
<b>Comments:</b>						
		D	1.25. The County should encourage the Planned Unit Development, Condominium, Limited Equity Cooperative, and Stock Cooperative housing as four methods to achieving more affordable housing.			
<b>Comments:</b>						
		D	1.26. The County shall discourage encroachment of residential subdivisions upon agricultural and other natural resource lands. Subdivisions of resource lands shall be allowed only where the resulting uses will not adversely affect the resource use of the site.			
<b>Comments:</b>						
		D	1.27. The County shall encourage the preservation of natural features of terrain and vegetation in new subdivisions in residential zones by clustering development, providing common open areas, smaller, more appropriate roads, and other compatible land use innovations in the development of new residential areas.			
<b>Comments:</b>						

Plan Alternative	Chapter 8 Housing Element			Remarks/ Implementation	Vote R,M,D	
	D	<b>2: Housing Needs of Special Populations</b>				
		2.1. The County shall support the elimination of housing discrimination.				
<b>Comments:</b>						
	D	2.2. The County shall actively assist the Humboldt County Housing Authority and non-profit corporations to develop and implement programs to assist very low, low and moderate income households, minorities, families with children, elderly, handicapped, and homeless persons to secure housing.				
<b>Comments:</b>						
	D	2.3. The County shall promote housing and support services for elderly and handicapped persons which encourage an independent lifestyle.				
<b>Comments:</b>						
	D	2.4. Community Plans, in the course of formulation or revision should henceforth designate adequate sites to accommodate the proportionate nomadic housing site needs for each community.				
<b>Comments:</b>						
	D	2.5. The County shall continue to distribute and post information on the enforcement program of the State Fair Employment and Housing Commission.				
<b>Comments:</b>						
	D	2.6. Support and coordinate the development of affordable housing for low income citizens, including multifamily, single family, and single room occupancy (SRO) units.				
<b>Comments:</b>						
	D	2.7. Support and encourage the development of transitional housing and homeless shelters.				
<b>Comments:</b>						
	D	2.8. To utilize federal, state and local funding programs for tenant-based rental assistance for the homeless and near-homeless persons, in securing and maintaining stable housing.				
<b>Comments:</b>						
	D	<b>3: Regulatory Constraints</b>				
		3.1. The County shall devise mutually acceptable means to meld the efforts of citizens and government to address the problems common to us all.				
<b>Comments:</b>						

Plan Alternative	Chapter 8 Housing Element			Remarks/ Implementation	Vote R,M,D	
	D	3.2. The County shall carefully complete an up-to-date, internally consistent, responsive General Plan and Zoning Ordinance that address the current needs and problems of the County citizenry, and which set forth a compatible vision for the future.				
<b>Comments:</b>						
	D	3.3. The County shall reduce, or limit increases, in application processing fees which adversely impact housing affordability.				
<b>Comments:</b>						
	D	3.4. The County shall foster greater responsiveness to public needs.				
<b>Comments:</b>						
	D	3.5. The County shall give the Planning and Building Divisions responsibility for formulating, implementing, and evaluating strategies to solve local housing problems.				
<b>Comments:</b>						
	D	3.6. The County shall encourage and be receptive to new and experimental techniques to facilitate optimum utilization of available sites.				
<b>Comments:</b>						
	D	3.7. Where consistent with State law, the Building Division shall encourage citizens to make partial repair of their dwellings without being required to rehabilitate beyond their economic means.				
<b>Comments:</b>						
	D	3.8. The County shall support tax programs which encourage citizens to maintain and repair their homes.				
<b>Comments:</b>						
	D	3.9. The County shall support the combination of private and public money to provide opportunities for financing not otherwise available to low and moderate income persons.				
<b>Comments:</b>						
	D	3.10. The County shall apply sensible and flexible housing standards to allow low-cost rehabilitation and repairs consistent with health and safety requirements.				
<b>Comments:</b>						
	D	3.11. The County shall endorse programs whereby students gain practical home construction, repair and weatherization techniques by repairing existing housing stock in the community.				
<b>Comments:</b>						

Plan Alternative	Chapter 8 Housing Element			Remarks/ Implementation	Vote R,M,D
		D	3.12. The County shall encourage experimentation with new concepts in housing construction, designs, styles and ownership patterns.		
<b>Comments:</b>					
		D	3.13. The County shall mitigate regulatory problems and amend the housing codes to reflect acceptable alternative methods.		
<b>Comments:</b>					
		D	3.14. The County shall support alternative owner-built/ owner-occupied housing which does not infringe upon public health and safety.		
<b>Comments:</b>					
		D	3.15. The County shall promote helpful attitudes by regulatory agencies in order to encourage voluntary compliance with the regulatory process.		
<b>Comments:</b>					
		D	3.16. The County shall promote flexibility in parking requirements for housing developments, especially for seniors and in areas with public transportation.		
<b>Comments:</b>					
		D	3.17. The County shall provide the opportunity to consider the temporary placement and use of a second dwelling unit in excess of densities permitted in this General Plan in cases where specified findings can be made that there is legitimate hardship.		
<b>Comments:</b>					
		D	3.18. The County shall encourage the development of presently under-utilized residential parcels served by public sewer and water for optimum development potential under the zoning ordinance.		
<b>Comments:</b>					
		D	3.19. County departments shall thoroughly review building and development codes and ordinances with an eye to eliminating requirements not necessary to the protection of public health, safety and welfare.		
<b>Comments:</b>					
		D	3.20. Once a final building, sanitation or subdivision permit is issued, it shall not be retroactively denied, unless the permit was issued on the basis of false information of a substantial nature or significant information is obtained subsequent to the issuance of the permit.		
<b>Comments:</b>					
		D	3.21. During the subdivision or building permit process, an applicant may choose any one of the		

Plan Alternative	Chapter 8 Housing Element			Remarks/ Implementation	Vote R,M,D
			agencies that he or she feels creates the greatest obstacle to approval and receive a do-pass or a rejection from that agency before proceeding (this includes public hearings).		
<b>Comments:</b>					
	D		3.22. When requested by applicants, permitting agencies shall make appointments for on-site inspections. If agency representatives cannot keep appointments, they should make reasonable efforts to inform the person who made the appointment.		
<b>Comments:</b>					
	D		3.23. All ministerial permit denials shall include in writing specific statutes applicable. If possible, discretionary permit denials should include, in writing, specific statutes, regulations and policies applicable.		
<b>Comments:</b>					
	D		3.24. During building inspections, all noncompliance items must be listed and all subsequent inspections shall be limited to new work and verification of corrections of prior noted deficiencies.		
<b>Comments:</b>					
	D		3.25. Regulatory changes that cumulatively enhance the ability of Humboldt County's citizens to build and repair their own homes for their own use in a manner suited to their needs and desires shall continue to be encouraged. (Board of Supervisors Resolution # 79-122 adopted September 11, 1979).		
<b>Comments:</b>					
	D		3.26. Building permit requirements for owner-built housing should be minimized consistent with the reasonable protection of health and safety.		
<b>Comments:</b>					
	D		3.27. The County shall maintain ordinances which allow the Building Inspection Division to approve building permits for residences and accessory structures in rural areas that are constructed to meet standards less restrictive than the Uniform Building Code (UBC).		
<b>Comments:</b>					
	D		3.28. If revisions to any of the Alternative Owner-Builder Ordinances are warranted, a formal Regulations Committee shall be officially constituted pursuant to the Board of Supervisors Policy on Committees and Commissions to perform ordinance review and revision tasks as outlined in an approved work program.		
<b>Comments:</b>					

Plan Alternative	Chapter 8 Housing Element			Remarks/ Implementation	Vote R,M,D	
	D	3.29. The Building Inspection Division and the Health Department shall provide inspections of homes to determine whether the structure complies with minimum health and safety requirements.				
<b>Comments:</b>						
	D	3.30. The Building Division and Health Department shall publicize the availability of a voluntary building condition inspection to be conducted for a fee commensurate with the service rendered.				
<b>Comments:</b>						
	D	3.31. Information on the availability of the inspection service should focus on communities containing a significant number of dwellings in need of repair.				
<b>Comments:</b>						
	D	3.32. The inspections service shall be strictly non-punitive, and shall be publicized as such.				
<b>Comments:</b>						
	D	3.33. To identify regulatory and tax constraints that effectively discourage rehabilitation and maintenance, and act to mitigate them.				
	D	3.34. The County shall review and streamline the permit application process on an ongoing basis, in all departments involved, in order to shorten the time required to process all permits, and to provide adequate information to prospective builders and developers.				
<b>Comments:</b>						
	D	3.35. The County shall encourage private developers, builders and financial institutions to work with public agencies and non-profit agencies in formulating strategies to solve local housing problems.				
<b>Comments:</b>						
	D	<b><u>4: Conservation of Existing Housing</u></b> 4.1. The County shall encourage the rehabilitation, rather than condemnation, of deteriorated housing.				
<b>Comments:</b>						
	D	4.2. The County, recognizing the need of tenants for energy-efficient housing, shall encourage the weatherization of rental units.				
<b>Comments:</b>						

Plan Alternative	Chapter 8 Housing Element			Remarks/ Implementation	Vote R,M,D	
	D	4.3. Incentives to rehabilitate, weatherize and maintain existing housing stock.				
<b>Comments:</b>						
	D	4.4. The County shall encourage and support programs that preserve and/or restore the unique character of older residences and neighborhoods.				
<b>Comments:</b>						
	D	4.5. The County shall encourage relocation, rather than destruction, of sound older housing threatened by development.				
<b>Comments:</b>						
	D	4.6. Public funds for the rehabilitation of low-income rental housing shall ensure that these rehabilitated units remain part of the low-income housing stock.				
<b>Comments:</b>						
	D	4.7. The County may allow legal, non-conforming single family and multifamily structures to be retained in new residential subdivisions even where the retention of these structures means that the general plan density for the parcel is exceeded. However, the creation of any parcels without an existing dwelling must be consistent with planned densities. The County shall require the repair of building, plumbing, mechanical and electrical hazardous conditions that exist in such non-conforming structures to meet acceptable health and safety codes.				
<b>Comments:</b>						
	D	<b>5: Reduce Housing Construction and Improvement Costs</b>  5.1. The County shall consider house solar orientation and energy effective landscaping during the review process.				
<b>Comments:</b>						
	D	5.2. The County shall encourage the use of alternative energy sources such as solar and wind power, with consideration for solar and wind rights in residential developments.				
<b>Comments:</b>						
	D	5.3. The County shall provide maximum opportunities for owner/builders to economize by doing what they can for themselves and to finish non-structural, non-mechanical work at their own pace.				
<b>Comments:</b>						
	D	5.4. The County shall encourage the use of low-cost, energy efficient, low-consumptive housing designs, materials and construction methods that reduce costs.				



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<b>Comments:</b>					
		D	5.5. The County shall support the use of innovative construction and design methods that make more efficient use of land and building materials including water- conserving waste disposal systems, energy systems, dwelling designs, and uses of recycled materials for building.		
<b>Comments:</b>					
		D	5.6. The County shall encourage the use of financial leveraging of public and private funding to construct owner-occupied and rental housing.		
<b>Comments:</b>					
		D	<p><b>6: Public Involvement and Education</b></p> <p>6.1. The Planning Commission shall maintain clear, consistent and fair procedures for operation and relationships with the public, the Board of Supervisors, ad-hoc committees, and local, State and Federal agencies.</p>		
<b>Comments:</b>					
		D	6.2. Planning Commission procedures shall be kept in a format and language that is clear and readily available to the public.		
		D	6.3. The County shall encourage the formation of citizen organizations to provide input on specific matters in a format consistent with the adopted policies and procedures.		
<b>Comments:</b>					
		D	6.4. The Planning Department shall provide notification of meetings adequate to insure public participation consistent with the goals of this program.		
<b>Comments:</b>					
		D	6.5 The meetings of the Planning Commission, whenever practical, shall be held in the geographic areas under consideration, or where the meetings of the Commission concern countywide issues as addressed in the Framework Plan, such meetings shall be held in the regional centers most representative of the issues to be addressed.		
<b>Comments:</b>					
		D	6.6. The Planning Commission shall encourage public participation in the land use decision-making process.		
<b>Comments:</b>					
		D	6.7. The County shall provide centralized public access to all relevant documents and information regarding housing activities.		

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<b>Comments:</b>					
		D	6.8. The County shall promote standardization of housing and zoning terminology throughout government and the housing industry.		
<b>Comments:</b>					
			<b>Policies and programs in the Idea Bank of the 2004 Housing Element</b>		
		D	1.1. Utilize appropriate surplus Federal, State and County land within Humboldt County for lower income housing development.		
<b>Comments:</b>					
		D	1.2. Develop and maintain a contingency plan to provide adequate emergency shelter to house refugees of catastrophic earthquakes, fire, flood, inclement weather or other crises.		
<b>Comments:</b>					
		D	1.3. Actively lobby the State and Federal government to reinstate funding for self-help programs.		
<b>Comments:</b>					
		D	1.4. Develop replacement housing provisions for the coastal zone in accordance with the requirements of Government Code Section 65590. Until these provisions are formally adopted, the County may require low and moderate income and replacement housing on a case-by-case basis only when feasible on the same site.		
<b>Comments:</b>					
		D	1.5. Explore various financing methods, such as creating tax increment districts, establishing land trusts and leveraging private money with public money for housing construction and rehabilitation.		
<b>Comments:</b>					
		D	1.6 Partner with the Builders Exchange, carpenter's union, Northern California Home Builders and Realtors to develop a series of informational workshops on permitting, safety, public financing and legal issues.		
<b>Comments:</b>					
		D	1.7. Research the potential for community land trusts to assist development of housing affordable to lower income households.		
<b>Comments:</b>					
		D	<b>SECTION 2: Housing Needs of Special Populations</b>		

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			2.1. Encourage the California Department of Transportation to conduct a recreational/nomadic housing travel study of Humboldt County and the North Coast area.		
<b>Comments:</b>					
		D	2.2. Explore the feasibility of utilizing public or private campgrounds for use as temporary or transitional shelters during off-seasons.		
<b>Comments:</b>					
		D	2.3. Develop and maintain an inventory of suitable sites for use for managed low income special occupancy parks in every planning area of the County.		
<b>Comments:</b>					
		D	2.4 Provide for the development of affordable, managed low-income special occupancy parks throughout the County.		
<b>Comments:</b>					
		D	2.5 Promote legislation on the local, State and Federal levels to assist with lower income housing development		
<b>Comments:</b>					
		D	2.6. Promote legislation aimed at securing State funding for the General Relief Program and at equalizing payment levels of General Relief throughout the State.		
		D	2.8. Encourage the establishment of a family recovery program.		
<b>Comments:</b>					
		D	2.9. Encourage the creation of an eviction prevention program and a revolving loan fund for rental assistance.		
<b>Comments:</b>					
		D	2.10. Encourage the development of job training/employment development programs.		
<b>Comments:</b>					
		D	2.11. Promote job training for the homeless, including remedial education, where needed. Coordinate with the Greater Avenues for Independence (GAIN) Program. Work with community programs versed in ways of enhancing one's sense of self, and other rehabilitation programs to minimize the need for sanctioning of GR, AFDC, and Food Stamp recipients and maximize chances of breaking the cycle of poverty. Other responsible agencies include Mental Health, the Department of Social Services, the Employment Development Department. The non-profit organization Redwood Community Action Agency will likely also play a role with this program .		

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<b>Comments:</b>						
			D	2.12. Develop a family recovery program that addresses the nexus of issues of domestic violence, alcohol and there drug abuse, sexual molestation and homelessness to help homeless persons to develop life-sustaining skills. Include a healthy parenting program that would subsequently bring the family back together so as to maximize the possibility of keeping families intact.		
<b>Comments:</b>						
			D	2.14. Designate permanent sites as emergency shelter sites which are geographically distributed throughout the County.		
<b>Comments:</b>						
			D	2.15. Decentralize support services for those in need of shelter to avoid burdening the County seat of Eureka with disproportionate numbers of homeless persons.		
<b>Comments:</b>						
			D	2.16. Information on, self-help housing, rehabilitation of inadequate housing, and low interest loans could be distributed by the County to all non-profits and other agencies acting as homeless prevention advocates.		
			D	2.17. Coordinate between the various agencies and non-profit groups directly involved with serving the needs of the homeless population activities aimed at alleviating hardships endured by homeless persons.		
<b>Comments:</b>						
			D	2.18. Encourage the development of community and conservation land trusts that develop housing for lower income households.		
<b>Comments:</b>						
			D	2.19. Investigate the need for an ordinance prohibiting age discrimination in housing.		
<b>Comments:</b>						
			D	2.20. Help educate the community regarding who the homeless are and how we can best assist them through the use of the media, a County Newsletter and by targeting various communities for special outreach.		
<b>Comments:</b>						
			D	2.21. Develop a community educational program and a consensual process to assist in enlisting the cooperation of the general public and especially neighbors of the centers, in creating programs that will assist the homeless.		

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<b>Comments:</b>						
		D	<p><b>2.22.</b> Develop an eviction prevention and intervention program which would identify and assist low income people in danger of losing their homes. Work with community agencies serving this population and with the Real Estate Board and providing institutions to make a viable program possible. Other responsible agencies include Mental Health, the Human Rights Commission, and RCAA.</p>			
<b>Comments:</b>						
		D	<p><b>SECTION 3: Regulatory Constraints</b></p> <p><b>3.1.</b> Support the flexibility of development standards, or flexibility within the adopted development ordinances, to accommodate residential projects that produce housing affordable to lower income households.</p>			
<b>Comments:</b>						
		D	<p><b>3.2.</b> Support legislation which reduces regulatory barriers to housing production, provides tax incentives and public subsidies for housing, and increases funding available for local infrastructure and services.</p>			
		D	<p><b>3.3.</b> Provide the library with a number of simplified and functional house plans approved by the County to encourage the construction of low and moderate cost housing.</p>			
<b>Comments:</b>						
		D	<p><b>3.4.</b> Challenge, consistent with health and safety, State and Federal mandates which inhibit local ability to provide for affordable housing (e.g., increased building regulation standards).</p>			
<b>Comments:</b>						
		D	<p><b>3.5.</b> Contract with a consultant well-versed in systems analysis to complete a thorough analysis of the building permit and subdivision process.</p>			
<b>Comments:</b>						
		D	<p><b>3.6.</b> The County could institute a comprehensive one-step pre inspection for all concerned departments involved in processing permits.</p>			
<b>Comments:</b>						
		D	<p><b>3.7.</b> Prepare a comprehensive development handbook which explains the permit and subdivision process.</p>			
<b>Comments:</b>						
		D	<p><b>3.8.</b> Annually review the permit process to identify measures to minimize time delays, to</p>			

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			maximize administrative efficiency, and foster greater cooperation and understanding between the permitting agencies and the public.		
<b>Comments:</b>					
		D	3.9. Annually implement measures according to the findings made above.		
<b>Comments:</b>					
		D	3.10. The building permit appeals process could be clearly noticed upon the building permit. (not a separate handout)		
<b>Comments:</b>					
		D	3.11. The County Health Department could initiate a study of the efficiency of alternating leachfield system designs when grant funding or other means of conducting a study are available. The Health Department shall actively pursue the necessary funding for this study.		
<b>Comments:</b>					
		D	3.12. A committee could be formed which includes representatives from the Health Department, California Department of Forestry and Fire Protection (CDF), the Regional Water Quality Control Board, engineers and contractors to make recommendations to the Board of Supervisors on how to best change the soils testing criteria. This Committee should provide ample opportunity for public input.		
<b>Comments:</b>					
		D	3.13. If the committee decides that changes are necessary, the Health Department should seek approval from the Regional Water Quality Control Board to modify its criteria for accepting wet weather soils tests to better link the testing period to actual soil conditions in different parts of the County. Unless a more accurate measurement can be found, the testing criteria should be based on rainfall data collected at CDF stations dispersed throughout the County.		
<b>Comments:</b>					
		D	3.14. Support legislation which reduces regulatory barriers to housing production, provides tax incentives and public subsidies for housing, and increases funding available for local infrastructure and services.		
<b>Comments:</b>					
		D	3.15. Develop materials that address the difficulty in navigating the application and approval process of the Community Development Services, Department of Environmental Health and Public Works.		
		D	<b>SECTION 4: Conservation of Existing Housing</b>		

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			4.1. Utilize federal, state and local funding programs offering low interest loans, or grants, for the rehabilitation of rental properties.		
<b>Comments:</b>					
		D	4.2. Provide low interest rate and deferred loans for the rehabilitation of substandard homes owned and occupied by lower income households.		
<b>Comments:</b>					
		D	4.3. Develop housing replacement requirements for people displaced by rehabilitation, condemnation or condominium conversions.		
<b>Comments:</b>					
		D	4.4. Support the preservation of existing, and encourage the construction of new low-cost rental units.		
<b>Comments:</b>					
		D	4.5. Study and pursue legislation that might remove any tax disincentive to maintenance or rehabilitation of the County's housing stock.		
<b>Comments:</b>					
		D	4.6. Any pending legislation related to property tax relief for residential rehabilitation efforts could be analyzed by the County Assessor and reported to the Board of Supervisors. The Assessor could include in their analysis of pending legislation reiteration of relevant County housing policy, and an analysis of the potential impact of such legislation on rehabilitation efforts within the County.		
<b>Comments:</b>					
		D	4.7. Limit the amount and rate of rental conversions to condominium ownership. Such an ordinance should ensure that a minimum number of rental units proportional to the need be maintained.		
<b>Comments:</b>					
		D	4.8 Develop dialog and expertise sharing between the historic preservation community and persons seeking to restore the existing housing stock.		
<b>Comments:</b>					
		D	<b><u>SECTION 5: Reduce Housing Construction and Improvement Costs</u></b> 5.1. Establish a solar rights ordinance to protect structures built to use solar energy from being		

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			shaded. (This matter should be referred this matter to the Energy Advisory Committee for review and recommendation.)		
<b>Comments:</b>					
		D	5.2. Develop guidelines to encourage home builders to use products that are locally produced, certified sustainable forest products or recycled building products.		
<b>Comments:</b>					
		D	5.3. Develop recommendations for revising the County's Alternative Owner Builder regulations to further streamline the building permit process.		
<b>Comments:</b>					
		D	<p><b><u>SECTION 6: Public Involvement and Education</u></b></p> <p>6.1. Provide for the education of the public to motivate them to participate in the planning process.</p>		
<b>Comments:</b>					
		D	6.2. The education of the public should be provided prior to public hearings on the plan proposals in adequate time to insure informed participation.		
		D	<p>6.3. The education of the public shall be provided through, but not limited to :</p> <ul style="list-style-type: none"> <li>- Citizens Handbook</li> <li>- Print and electronic media</li> <li>- Public meetings</li> </ul>		
<b>Comments:</b>					
		D	6.4. The Board of Supervisors should appoint a Housing Education Advisory Committee to investigate the means by which broader public education on housing may be achieved in Humboldt County.		
<b>Comments:</b>					
		D	6.5. Ask the Human Rights Commission to review landlord/tenant relations and make recommendations to the Board of Supervisors.		