

MEMORANDUM

DATE March 9, 2022

TO Roy Ramsland, Deputy Director, City of La Habra

FROM Mark Hoffman, Associate Principal, PlaceWorks

SUBJECT Summary of HCD Letter responses

Below is a summary of responses and revisions made to the draft 2021-2029 Housing Element in response to HCD's letter dated November 1, 2021.

A. Review and Revisions

The element must provide an evaluation of the effectiveness of goals, policies, and related actions in meeting the housing needs of special needs populations.

City Response:

- » Clarified progress made in implementing the housing element (HE p. 5-5, Table 5-2)
- » Evaluated the effectiveness of goals, policies, and programs for addressing the housing needs of special needs population. See HE, p. 5-3)

B. Housing Needs, Resources, and Constraints

1. The element includes a section for Affirmatively Furthering Fair Housing; however, additional information and programs are needed to address fair housing analysis requirements, as follows:

City Response:

- » Enforcement and Outreach. Clarified FHF's role in testing for fair housing (HE, p 3-57), and included Table HE-3.11 (page 3-58) discussing City's compliance with fair housing.
- » Integration and segregation. Augmented race/ethnic concentrations (HE, pp. 3-54/3-35), disabled persons (HE, pp.3-36/3-37), and families with children (HE, pp. 3-35/3-36).
- » Racial/Ethnic Concentrated Areas of Poverty/Affluence. Augmented discussion of topic to specifically address North Hills and Westridge neighborhoods (HE, p. 3-41)
- » Disproportionate Need. Augmented discussion of substandard housing (p. 3-40), overcrowding (p. 3-42), homelessness (p. 3-44), and displacement risk (p. 3-45)
- » Access to Opportunity. Augmented analysis of employment (pp. 3-48/3-49), education (pp. 3-50/3-51), environmental factors (pp. 3-52/3-53), and transportation (p. 3-55)
- » Contributing Factors. Expanded and revised contributing factors to match findings from additional analyses (HE, pp. 3-59 and 3-60)
- » Goals, Policies, Metrics, and Milestones. Required changes will be addressed in the subsequent HCD review following state review of the augmented fair housing analysis.

2. Analysis of population, employment trends, existing and projected needs for all income levels. The Element must contain selected information to address state law:

City Response:

- » Revised (un)employment figures (HE, p. 2-6)

3. Analysis of household characteristics among others. The Element must contain selected information to address state law:

City Response:

- » Revised analysis of overpaying by tenure, including lower income households (HE, p. 2-8)

4. Compliance with RHNA. To demonstrate the adequacy of these sites and strategies to accommodate the City's RHNA, the element must include the following.

City Response:

- » RHNA Progress. Clarified Table HE-4.2 (pp. 4-3) with expected rents of new housing projects based on actual quoted prices/rents and similar market comparisons
- » Sites Inventory. Clarified vacant and underutilized status and descriptions of all parcels included toward meeting the RHNA (HE, pp. 4-12/13)
- » Realistic Capacity. Augmented discussion of capacity and suitability of sites to demonstrate feasibility of development assumptions (HE, p. 4-17)
- » Suitability of Nonvacant sites. Included discussion of each approved project to demonstrate how recycling of sites is feasible. (HE, pp. 4-4 through 4-6)
- » Accessory Dwellings. Clarified RHNA credits from ADUs based on annual progress reports and rent surveys conducted by the City (HE, pp. 4-8/4-9)
- » Infrastructure Availability. Augmented infrastructure adequacy discussion HE, p. 4-18)

5. Sites with Zoning for a Variety of Housing

The Housing Element must include a complete analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing.

City Response:

- » Emergency shelters. Clarified how shelters are permitted, demonstrated occupancy capacity of the ES Overlay to accommodate unmet need, and amended program to comply with statutory requirements (see HE, pp. 3-14, 3015, 3-16 and Program D3)
- » Transitional / supportive housing. Clarified how such facilities are permitted, discussed spacing and other operational requirements, and amended program to address required changes to comply with statutory requirements (HE, p. 3-14 and Program D3).
- » Housing for Farmworkers. Analyzed the prevalence of farmworkers in the community, the municipal codes regarding farmworker/employee housing, and included program to comply with statutory requirements (HE, p. 3-12 and Program B8)
- » Accessory Dwelling Units. Analyzed existing zoning for permitting accessory dwellings and amended program to comply with statutory requirements (HE, p. 3-12 and Program B4). Also clarified ADU credits by revising annual reports to HCD for 2019-2021.

5. Analysis of Governmental and NonGovernmental Constraints

The Housing Element must include a complete analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels.

City Response:

- » Land Use Controls. Included an analysis of ability to achieve maximum densities, cumulative impact of maximum heights and stories (HE, p. 3-20), clarified private versus public yard (HE, p. 3-20), and analyzed garage requirements (HE, p. 3-21).
- » Corridor Mixed use. Analyzed corridor multifamily housing limited to 20% of the acreage of the block in which it is located and requirements for minimum 1-acre lots (HE, p. 3-20) and included program to remove above constraints (Program B5).
- » Fees and Exactions. Recalculated fees and exactions based on updated records, and analyzed impacts (HE, pp. 3-3/3-4) as potential constraint.
- » Zoning and Fees Transparency. Included web reference for where data on zoning, development regulations, and fees can be found (HE, p. 3-3).
- » SB 35 Streamlined Ministerial Approval Process. Included Program B2 to remove constraint.
- » Codes and Enforcement. Clarified process and complaint-driven focus (HE, p. 3-24).
- » Permit Procedures. Clarified processing and permit procedures including timeline for single-family and multiple-family projects, including permit type and level (HE, p. 3-29).
- » Design Review. Included greater detail on design review and decision-making criteria for approvals. Included program to comply with state law (HE, p. 3-30 and Program B6).
- » Housing for Persons with disabilities. Analyzed current codes and included program to comply with state law (HE, p. 3-17 and Program D2)

6. Analysis of NonGovernmental Constraints

The Housing Element must include analysis of potential and actual nongovernmental constraints on the maintenance, improvement, or development of housing for all income levels.

City Response:

- » Analyzed request to build at lower densities than anticipated and length of time between receiving approval for a housing project and submittal for building permit (HE, p. 3-7).

7. Analysis of Special Needs

City Response:

- » Included analysis of special housing needs, specifically quantify development disabilities by age and employment status and analyze housing needs (HE, pp. 2-23/2-24)

8. Analysis of Assisted Developments

The Housing Element must analyze existing assisted housing developments that are eligible to change to non-low-income housing uses and preservation options.

City Response:

- » At-Risk Analysis. Describe financial resources to assist at risk units and list qualified entities with the capacity to acquire and manage units. (HE, p. 3-7).

C. Housing Programs

To address the program requirements of Government Code section 65583, subdivision (c)(1-6), and to facilitate implementation, programs should include: (1) a description of the City's specific role in implementation; (2) definitive implementation timelines; (3) objectives, quantified where appropriate; and (4) identification of responsible agencies and officials.

City Response:

- » Revised Program A3: Land Use/Community Preservation
- » Revised Program B1: Adequate Housing
- » Revised Program B2: Priority Processing
- » Revised Program B3: Affordable Housing Ordinance
- » Revised Program B4: Accessory Dwelling Unit
- » New Program B7: Water and Sewer Priority Policy
- » Revised Program C1: Collaborative Partnerships
- » Revised Program C2: Inclusionary Housing
- » Revised Program C3: Mobilehome Preservation
- » Revised Program C5: Housing Choice Voucher
- » Revised Program D1: Senior Housing
- » Revised Program D2: Housing for People with Disabilities
- » Revised Program D3: Homeless Services
- » New Program C8: Replacement Housing
- » New Program C7: Extremely Low-Income Households
- » Revised Program C4: Preservation of At-Risk Housing

D. Quantified Objectives

- » Included quantified objectives for preservation, rehabilitation ,and production by income level (HE, p. 5-38)

E. Public Participation

- » Included specifically how public participation shaped new and revised goals, policies, and programs (HE, p. 5-13)