

Attachment 2

HCD 6th Housing Element Comments and Responses City of Colton October 2021

HCD Comment (Letter of 9/20/2021)	Housing Element Page No.	Response/Revision
A. Review and Revision	Appendix C	Appendix C has been revised to provide additional information regarding which programs will be continued, revised, or deleted, as well as evaluation of the effectiveness of goals, policies, and related actions in meeting the housing needs of special needs populations.
B.1 Affirmatively Furthering Fair Housing	25-26 51-58	The analysis of fair housing has been expanded to include contributing factors to impediments to fair housing, and Program 14 has been revised to include actions to address those contributing factors to fair housing issues.
B.2 Housing characteristics	40	The element has been revised to quantify and analyze the number of overpaying households by tenure (i.e., renter and owner).
B.3 Inventory of land suitable for residential development	19-20	<u>Sites Identified in the Previous Planning Period</u> . Tables H-38 and H-39 have been revised to identify sites identified in prior housing element planning periods. In addition, Program 9 has been revised to allow residential use by-right for housing developments in which at least 20 percent of the units are affordable to lower-income households on any vacant site identified in two or more consecutive planning periods or nonvacant sites identified in a prior planning period.
	Appendix D	<u>Realistic Capacity</u> . Appendix D has been revised to provide additional analysis of the City's methodology for calculating realistic capacity for sites listed in the sites inventory.
	19-20 Appendix D	<u>Small sites</u> . All of the sites identified as suitable for lower-income housing (Tables H-39 and H-39) are larger than ½ acre, and Program 9 has been revised to include a reference to the requirements of Government Code Sec. 65583.2(h), which addresses minimum parcel size.
	22-23	<u>Zoning for Lower-Income Households</u> . Program 11 has been revised to include an increase in the allowable density in the R-3 zone from 22 to 30 units/acre.

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	Appendix D	<u>Suitability of non-vacant sites</u> . The element has been revised to include additional analysis of nonvacant sites to accommodate the regional housing need for lower-income households including the methodology used to determine the additional development potential of these sites within the planning period.
	Appendix D	<u>Accessory Dwelling Units</u> : The sites inventory has been revised to reduce the projected number of ADUs to 11/year based on the average number of ADU permits during 2018-2020.
	24	<u>Priority Water and Sewer</u> : Program 13 has been revised to include notification to water and sewer service providers regarding priority water and sewer service to developments with units affordable to lower-income households. (Gov. Code, § 65589.7.)
	83	<u>Infrastructure</u> : Water and wastewater service are discussed in the Constraints analysis. The element has been revised to analysis of dry utilities.
	82	<u>Environmental Constraints</u> : The element has been revised to include additional analysis of the Very High Fire Severity Zone as a potential constraint to housing development.
	69-71 23	<u>Emergency Shelters</u> : The element includes a complete analysis of available sites for emergency shelters. Program 12 has been revised to address parking requirement standards per AB 139, which requires that the zone for emergency shelter allows for sufficient parking for the staff of the emergency shelter.
B.4 Governmental Constraints	65 22-23	<u>Land Use Controls</u> . The element has been revised to provide additional analysis of the maximum height limit of 2.5 stories, minimum unit size requirements, and the two enclosed parking space standard for multifamily developments. In addition, Program 11 has been revised to address these issues.
	74-75	<u>Fees and exactions</u> . The element has been revised to provide additional analysis of impact fees including the total amount of fees and their proportion to the development costs for both single family and multifamily housing.
	76-77 24	<u>Local Processing and Permit Procedures</u> : The element includes typical processing time for single family and multifamily developments (Table H-32). The analysis of the design review process has been expanded to include

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		required findings. In addition, Program 13 has been revised to include an SB 35 streamlined ministerial approval process.
	24	<u>Zoning, Development Standards and Fees</u> . Consistent with new transparency laws, Program 13 has been revised to include posting zoning and development standards on the City website.
	69	<u>Constraints on Housing for Persons with Disabilities</u> : The element has been revised to provide additional analysis of regulations for residential care facilities serving seven or more persons.
B.5 Non-Governmental Constraints	76, 79	<u>Developed Densities and Permit Times</u> : The element has been revised to include additional analysis of requests to develop housing at densities below those anticipated, and the length of time between receiving approval for a housing development and submittal of an application for building permits.
B.6 Special housing needs	44-50	The element has been revised to provide additional analysis of special housing needs and the City's programs to address those needs.
C.1 Housing Programs	14-22	<p>The following programs have been revised to provide additional information for implementation:</p> <ul style="list-style-type: none"> • Program 1 (Master Plans to Accommodate Diverse Housing Types): Specific actions the City will implement to achieve program objectives. • Program 2 (Appropriate Development Standards): Specific actions and timelines to implement this this program. • Program 7 (Density Bonus): As stated in this program, the City's density bonus ordinance complies with State Density Bonus Law • Program 8 (Mixed Use Development): Specific timeframes for when the City will seek partnerships. • Program 12 (Zoning Regulations and Initiatives for Extremely Low-Income (ELI) and Special Needs Housing): Specific timeframes for the amendment to the development code.
C.2 Actions that will be taken to make sites available during the planning period with appropriate zoning and development standards	19-20	<p>Program 9 (Provision of Adequate Sites) has been revised to include an action to increase density the R3/R4 zone to allow for a maximum of 25 units as well as the following:</p> <ul style="list-style-type: none"> - permit owner-occupied and rental multifamily uses by-right for developments in which 20 percent or more of the units are affordable to lower-income households. By-right means local government review must not

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		require a CUP, planned unit development permit, or other discretionary review or approval; - accommodate a minimum of 16 units per site; - require a minimum density of 20 units per acre; and - at least 50 percent of the lower-income need must be accommodated on sites designated for residential use only or on sites zoned for mixed uses that accommodate all of the very low and low-income housing need, if those sites allow 100 percent residential use, and require residential use occupy 50 percent of the total floor area of a mixed-use project.
C.3 Programs to assist in the development of adequate housing to meet the needs of extremely low-, very low-, low- and moderate-income households.	21-22	Program 10 has been revised to include additional actions the City will take to assist in the development of adequate housing to meet the needs of extremely low-, very low-, low- and moderate-income households.
C.4 Remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing		This comment is addressed above.
C.5 Affirmatively furthering fair housing.	25-26 51-58	The analysis of fair housing has been expanded to include contributing factors to impediments to fair housing, and Program 14 has been revised to include actions to address those contributing factors to fair housing issues.
D. Public Participation	Appendix E	The description of the public participation process has been expanded to demonstrate diligent efforts were made to involve all economic segments of the community in the development of the Housing Element, as well as a summary of how comments were incorporated into the element.
E. Consistency with the General Plan	19-20	As part of the Housing Element update, other elements of the General Plan (particularly the Land Use Element) were reviewed and Program 9 will include any Land Use Element amendments necessary to maintain consistency with the Housing Element and zoning regulations.