

Planning Commission Staff Report

Meeting Date: August 17, 2021
Item 3: Draft 2021-2029 Housing Element
File: General Plan Amendment (GPA) 20-01
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*"Placerville, a Unique
 Historical Past Forging into
 a Golden Future"*

Request: Consider the Draft 2021-2029 Housing Element Update (GPA20-01) and Addendum to the 2013-2021 Housing Element Negative Declaration (EA13-01) for the 2021-2029 Housing Element, then make recommendation to the Placerville City Council.

Background: A Housing Element is one of seven mandatory elements (per state law) of the City of Placerville General Plan. The purpose of a Housing Element is to identify and analyze existing and projected housing needs in an effort to preserve, improve and develop housing for all economic segments of the community in accordance with State Housing Element law, Article 10.6 of the Government Code. A Housing Element is the only general plan element for which State certification is required. The certification is done by the State Department of Housing and Community Development (HCD) after adoption by the City.

A Housing Element is also the only element with a regulated update cycle. The City of Placerville is on an 8-year update cycle through its compliance actions with State Housing Element law during the previous update cycle, the 5th Cycle (2013-2021). The City is a jurisdiction included within the Sacramento Area Council of Governments (SACOG) region. The deadline for jurisdictions within the SACOG region to adopt updates to their Housing Element for the 6th Cycle of 2021-2029 in order to remain in the 8-year housing element planning cycle is within 120 calendar days after May 15, 2021. Cities on an 8-year update cycle that do not adopt an updated Housing Element on that schedule are required to complete a Housing Element update every four years. In order to comply with state law and retain an 8-year update cycle, the Placerville City Council must adopt the subject Housing Element by September 12, 2021. After adoption, the Housing Element will be sent to HCD for certification. A certified Housing Element may allow the City to be eligible for future state funding in areas of community development.

The current update of the Housing Element began in February 2020 during the global COVID-19 pandemic. Since that time, the City has developed and implemented two community questionnaires focused on housing policies and fair housing, conducted meetings with housing advocates, developers, and local service providers to solicit input regarding housing resources and housing related issues.

Due to recent changes to Housing Element Law under AB 686 in 2018, beginning on January 1, 2019, all housing elements must include a program that promotes and affirms fair housing opportunities throughout the community for all persons regardless of race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, marital status,

national origin, ancestry, familial status, source of income, disability, veteran or military status, or genetic information protected by the California Fair Employment and Housing Act. In addition, all housing elements due on or after January 1, 2021 must include an assessment of fair housing consistent with the core elements of the analysis required by the federal Affirmative Furthering Fair Housing (AFFH) Final Rule of July 16, 2015. To comply with the requirements under AB 868, the City utilized non-competitive planning grant funding administrated by SACOG for the consultant services expertise of BAE Urban Economics to prepare a fair housing assessment and related housing program for the 2021-2029 Housing Element Update.

Administrative Draft 2021-2029 Housing Element Update was submitted to HCD on May 14, 2021 for their review. On July 15, 2021, the City received a letter from HCD dated July 13, 2021 indicating that changes are necessary to bring Placerville's Housing Element into compliance with Article 10.6 of the Government Code. HCD's review letter further emphasized that public participation in the development, adoption and implementation of the housing element is essential and that the City must continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available while considering and incorporating comments where appropriate. Staff made this administrative Draft 2021-2029 Housing Element and the July 13, 2021 HCD review letter available to the public to solicit public comments during the month of July and August on the City of Placerville website at the following link:

<https://www.cityofplacerville.org/HousingElementUpdate-6thCycle2021-2029>

Public notice was published in the Mountain Democrat, posted on the website created for the Housing Element update, and posted on the City's Facebook social media platform account. Public comment due date was August 10, 2021. No public comments were received as of the preparation of staff's report on the administrative Draft 2021.

Since receiving the HCD review letter staff and BAE Urban Economics has made draft edits to the administrative draft to address HCD comments. These edits are displayed using underline and strikethrough in response to HCD's review comments to produce the proposed Draft 2021-2029 Housing Element Update (Housing Element Update) for Planning Commission consideration.

Staff has prepared an Addendum to the 2013-2021 Housing Element Negative Declaration (EA13-01) for the draft Housing Element Update. The underlined and strikethrough Housing Element Update, along with the prepared Addendum were made available to the public at the webpage provided above and the webpage dedicated to Planning Commission meetings (<https://www.cityofplacerville.org/pc-meetings>) on August 12, 2021 to coincide with the release of the meeting agenda and packet for the August 17, 2021 public hearing.

Planning Commission Authority: The proposed Housing Element Update (GPA20-01) would amend the City's General Plan. State Planning and Zoning Law Section 65354, requires the Planning Commission to make a written recommendation on the adoption or amendment of a general plan. A recommendation for approval must be made by the affirmative vote of not less than a majority of the total membership of the commission. The Planning Commission must send its recommendation to the legislative body. The legislative body for the City is the Placerville City Council.

Draft 2013-2021 Housing Element Update: The City of Placerville General Plan is comprised of two components, the *Policy Document* and the *Background Report*. The Housing Element Update when adopted will amend Part II – Section II. *Housing*, of the Policy Document, and Chapter II – *Housing*, of the General Plan Background Report.

The Housing Element Update covers the City's housing policies, goals, objective and implementation programs for the eight-year planning period 2021 through 2029. The update reflects new and existing Housing Element law, analysis of available data from the US Census, the State Department of Finance, other sources where indicated, and the data packet prepared by SACOG for the City.

A copy of the Housing Element Update is provided as Attachment A to this report. Amended text in response to HCD review is shown as underlined for new text, with strikethrough denoting text that was removed.

Discussed within the Housing Element document as required by State law are:

- Population growth and employment trend
- Household characteristics
- Housing costs
- Inventory of available residentially zoned land
- Governmental and non-governmental constraints to housing production
- Special housing needs (persons with disabilities, homeless, female heads of households, seniors and extremely low-income households)
- Energy conservation measures
- Existing affordable housing developments
- Fair Housing
- Review and evaluation of the previous Housing Element (2013 – 2021)

Housing Needs Allocation and Existing Available Inventory

The City's share of the region's housing need is determined by SACOG through the Regional Housing Needs Plan, adopted March 19, 2020. The plan contains the Regional Housing Needs Allocation (RHNA), which specifies the share of the regional housing need allocated to each city and county by income level.

The RHNA is divided into four income categories established by HCD. Pursuant to state housing element law, a jurisdiction must demonstrate in its housing element that it has adequate

residential sites at appropriate densities and development standards to accommodate its RHNA. In January 2007, AB 2634 took effect, which requires housing elements to include an analysis of extremely low-income needs and address those needs in proposed programs. According to Government Code Section 65583(a)(1), the City may “presume that 50 percent of the very low-income households qualify as extremely low-income households.” For this reason, the number of very low-income units provided in the RHNA number has been split equally between these two income categories.

As shown in Table 1, the City’s RHNA allocation for 2021 through 2029 is 259 housing units, and is distributed as follows:

- ❖ Very Low Income (<50 percent AMI): 56
- ❖ Low Income (51 to 80 percent AMI): 34
- ❖ Moderate Income (81 to 120 percent AMI): 50
- ❖ Above Moderate Income (>120 percent AMI): 259

Table 1. City Of Placerville Regional Housing Needs Allocation (RHNA) 2021–2029

Income Category	RHNA Allocation	
	Number of Dwelling Units	Percent
Very Low (50% AMI or less)	56	21.62%
Low (51% to 80% AMI)	34	13.13%
Moderate (81%-120% AMI)	50	19.31%
Above Moderate (>120% AMI)	119	45.94%
Total	259	100.00%

AMI = El Dorado County Area Median Income

Source: Sacramento Area Council Governments, Regional Housing Needs Plan. (March 2020)

RHNA comparison of the 2021-2029 planning period to the 2013-2021 planning period is as follows:

Total RHNA Units: 30.4% decrease in total number of dwelling units from 372 to 259.

Very Low Income Units: Decreased from 78 to 56 units.

Low Income Units: Decreased from 55 to 34 units.

Moderate Income Units: Decreased from 69 to 50 units.

Above Moderate Income Units: Decreased from 170 to 119 units.

Housing Strategy

The City will meet its housing goals, policies and its housing needs that were identified in the Housing Element Update through implementation of the Implementation Programs provided within Section II. Housing, of the Policy Document beginning on page 5. Many of the 2013-2021 planning period Housing Element programs adopted in 2014 were updated and modified then

renumbered for the Housing Element Update. They are applicable to and relevant in helping the City meet its General Plan goals and policies of having land inventory to meet its share of future regional housing needs; to facilitate the development of housing for special needs households and lower and moderate-income households; to preserve existing housing stock; conserve existing affordable housing opportunities; and promote energy conservation. Others were fully implemented during the 5th Cycle and were eliminated. New housing programs were added that address housing needs and due to changes in state housing law.

The following are lists of the Implementation Programs that have been continued and renumbered as indicated and those new for this Housing Element Update. See the Policy Document for a complete program description.

Continued Implementation Programs:

- Program 1. Available Land Inventory (*Modified and renumbered as Program A-1*)
- Program 2. Infill Development and Potential Re-Use Sites (*Modified and renumbered as Program A-2*)
- Program 5. Public Outreach (*Modified and renumbered as Program B-1*)
- Program 8. Transitional and Supportive Housing Zoning Amendments (*Modified and renumbered as Program B-2*)
- Program 9. Accommodate Housing for Persons with *Disabilities* (*Modified and renumbered as Program B-3*)
- Program 10. Housing for Developmentally Disabled Persons (*Modified and renumbered as Program B-5*)
- Program 11. Senior Housing (*Continued and renumbered as Program B-6*)
- Program 12. Workforce Housing (*Continued and renumbered as Program C-8*)
- Program 13. Density Bonus (*Continued and renumbered as Program C-1*)
- Program 14. Pursue State and Federal Funding (*Modified and renumbered as Program C-4*)
- Program 15. Permit and Development Impact Fees (*Continued and renumbered as Program C-5*)
- Program 16. Self-Help Housing (*Continued and renumbered as Program C-6*)
- Program 17. First Time Homebuyer Assistance (*Modified and renumbered as Program C-9*)
- Program 18. Statewide Community Infrastructure Program (SCIP) (*Continued and renumbered as Program C-7*)
- Program 20. Housing Rehabilitation (*Continued and renumbered as Program F-1*)
- Program 21. Housing Conditions Survey (*Continued and renumbered as Program F-2*)
- Program 22. Code Enforcement (*Continued and renumbered as Program F-3*)
- Program 23. Historic Preservation (*Continued and renumbered as Program F-4*)
- Program 24. Housing Choice Voucher Program (*Continued and renumbered as Program G-1*)
- Program 25. Preservation of “At-Risk” units (*Modified and renumbered as Program G-2*)
- Program 26. Mobilehome Parks (*Modified and renumbered as Program G-3*)
- Program 27. Weatherization & Energy Conservation (*Continued and renumbered as Program H-1*)
- Program 28. Energy Conservation for New Residential Development (*Continued and renumbered as Program H-2*)

New Housing Programs:

Program A-3: Complete Implementation of High-Density Development Land Inventory and Objective Design Standards;

Program A-4: No Net Loss;

Program A-5: Multi-Family Residential Zone Minimum Densities and Development Regulations;

Program B-4: Homeless Low Barrier Navigation Center Use;

Program B-7: Family Daycare Homes;

Program B-8: Residential Care Facilities;

Program B-9: Female-Headed, Large Families, Extremely Low-Income Households and Veterans Housing;

Program C-2: Accessory Dwelling Units (ADUs);

Program C-3: Prototype ADU Plans;

Program D-1: Create Resource Base Information and Materials on Fair Housing;

Program D-2: Community Outreach;

Program D-3: Landlord Education of Fair Housing;

Program E-1: Expand Public Transportation and Alternative Transportation Infrastructure;

Program F-5: Demolition Regulation, and

Program F-6: Public Safety

Environmental Review: The proposed Housing Element Update will replace the existing 2013-2021 Housing Element and serve as the City of Placerville's guiding policy document that meets future needs of housing for all the City's economic segments. An addendum to the City of Placerville 2013-2021 General Plan Housing Element Negative Declaration (ND), State Clearing-house Number 2013122012, was prepared to evaluate the environmental impact of the proposed update. This addendum demonstrates that the analysis contained in that ND adequately addresses the potential physical impacts associated with implementation of the proposed 2021-2029 Housing Element and that none of the conditions described in California Environmental Quality Act (CEQA) Guidelines Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred. Policies included in the Housing Element Update are designed to bring the City into compliance with state law, or to increase the availability of housing sites.

Attachment B contains the Addendum to 2013-2021 Housing Element Negative Declaration for the 2021-2029 Housing Element Update. Attachment C contains the 2013-2021 Housing Element Negative Declaration.

Recommendation: Staff recommends that the Planning Commission consider the proposed 2021-2029 Housing Element, conduct a public hearing to receive and consider public comment, then take the following action:

1. Make the following findings:
 - (A) The addendum to the City of Placerville 2013-2021 General Plan Housing Element Negative Declaration (ND) (State Clearinghouse Number 2013122012) prepared for the 2021-2029 Housing Element adequately addresses the potential physical impacts associated with implementation of the proposed 2021-2029 City of Placerville Housing Element;
 - (B) The 2021-2029 Housing Element has been prepared, consisting of General Plan Amendment (GPA) 20-01, containing goals, policies, programs, and quantified objectives to meet projected housing needs to comply with State housing element law (Article 10.6 of the California Government Code).
 - (C) Public comments received have been considered and incorporated in to the 2021-2029 Housing Element, where appropriate.
2. Forward a recommendation to the City Council to approve an Addendum to the 2013-2021 General Plan Housing Element Negative Declaration for the 2021-2029 Housing Element, and to adopt GPA20-01, adopting a Comprehensive Update of the Housing Element of the City of Placerville General Plan.

Attachments

- A. [Draft 2021-2029 Housing Element Update \(22,430KB\) \(Individual sections\)](#)
- B. [Addendum to the 2013-2021 Housing Element Negative Declaration \(EA13-01\) for the 2021-2029 Housing Element](#)
- C. [2013-2021 Housing Element Negative Declaration \(EA13-01\)](#)
- D. [Housing and Community Development Review Letter, July 13, 2021](#)

[Memo dated August 12, 2021: Public Comment received after August 10, 2021](#)