

City of: Laguna Beach

Adopted Revisions Received: June 14, 2022

Addressing HCD Findings Letter Dated: March 30, 2022

For subsequent Drafts: The draft revisions were posted on the website for 7 days and a link was send to interested parties pursuant to AB 215.

N/A - informal

For Adopted Elements: A copy of the resolution was received

Y – see attached

For Adopted Elements: If more than 50% of the lower-income RHNA was on non-vacant sites, appropriate findings in the resolution was made

N – missing

For Adopted Elements: A copy of the E-sites inventory was received.

Y

HCD's Finding	Page #	Satisfied? (y/n)	Analyst's Evaluation
<u>Local Data and Knowledge:</u> The element did not address this requirement. The element should complement federal, state, and regional data with local data and knowledge where appropriate to capture emerging trends and issues, including utilizing knowledge from local and regional advocates and service providers.	C-1- C-7 C-85	~	
<u>Other Relevant Factors:</u> In response to HCD's prior review, the element now includes some additional information on historic zoning practices, but as mentioned in the prior review,	C-1- C-7	~	Some discussion on redlining and racialized exclusionary policies in OC, as well as voter initiatives. Historical zoning? Other exclusionary practices? Laguna Residents First voter initiative status? State and federal investments?

<p>additional information is required to address this finding. Examples of relevant factors that contribute to certain fair housing conditions include information on past and current state and federal investments, the impact of regulations or voter initiatives on perpetuating exclusionary zoning practices, coordination with affordable housing developers, inclusionary policies, and existing demographic trends and patterns resulting from greenlining or redlining practices.</p>			<p>Inclusionary practices – what outreach targeted toward this effort?</p>
<p><u>Sites Inventory:</u> In response to HCD's prior review, the element now includes some revisions on page C-63 that address the relationship between each of the fair housing issues (e.g., integration and segregation, disparities in access to opportunity, and disproportionate housing needs) relative to the sites inventory. In addition, the element provides a general description of location and concentration of sites across tracts for the fair housing issues identified. However, the analysis should address how sites by income group are distributed throughout the census tracts and evaluate any isolation of identified sites by income group, including impact on protected characteristics and whether sites will promote inclusion and foster equitable planning practices within the City.</p>	<p>C-7- C-84 C-151; 208</p>	<p>N</p>	<p>Analyze sites by income group by location. Send Alameda City example</p>
<p><u>Contributing Factors to Fair Housing Issues:</u> In response to HCD's prior</p>	<p>Begins 234</p>	<p>~</p>	<p>Prioritize factors.</p>

<p>review, the element now includes some revisions to contributing factors. However, these factors do not appear to be directly correlated to the affirmatively furthering fair housing (AFFH) analysis. For example, many of these factors are limited to the lack of outreach. Other examples to consider include community opposition to affordable housing, housing discrimination, land use and zoning laws, lack of regional cooperation, location and type or lack of affordable housing and lack of public or private investment in areas of opportunity or affordable housing choices. The analysis should result in strategic approaches to inform and connect goals and actions to mitigate contributing factors to affordable housing. As an additional example, the element should identify and assess the characteristics of the City as a predominantly higher resourced community, in relation to equal opportunity and access to resources as a contributing factor, and formulate appropriate policies and programs to address this finding.</p>	C-85		
<p><u>Programs, Actions, Metrics, and Milestones:</u> The element did not address this requirement. The element must add and revise programs based on a complete analysis. Please see HCD's prior review for additional information.</p>	113	N	<p>Needs more targeted AFFH actions as relates to areas of opportunity in DSP Phase II and Laguna Canyon Specific Plan, housing mobility, transit and transit infrastructure improvements.</p> <p>Must have significant actions to facilitate new affordable opportunities throughout the City.</p>
<p><u>Housing Mobility:</u> The element did not address this requirement. Please</p>	106	N	<p>Target housing mobility and new opportunity programs and tie to Program 5.2-4 (Downtown</p>

<p>see HCD's prior review for additional information.</p>			<p>Specific Plan Phase 2). Set a quantified and measurable goal as part of this program action: ex. "The City will prioritize affordable housing projects in the DSP, with a goal of XX AH units by XXXX." Also, what does environmental analysis have to do with the DSP Phase 2 incentives? How related to the action described in a.? Additional program support can include close TA by designated staff for AH RFPs. City hired a point of contact person to implement HE programs.</p> <p>Send Pasadena sample</p>
<p><u>Suitability of Nonvacant Sites:</u> In response to HCD's prior review, the adopted element now specifies that the City is working with the project applicant to rezone the 0.35-acre parking lot in the R-2 zone that is adjacent to 340 St. Ann's Drive. However, the element does not include a specific commitment and timeframe of completion to facilitate zoning of this site. In addition, the element should include the adjacent property in the sites inventory.</p>	<p>76 84-85 96</p>	<p>No/?</p>	<p>To discuss feasibility issue with project proponent Program lacks specific action to facilitate zoning</p>
<p><u>Program 5.2-6 (Special Needs Housing):</u> The element adds additional information to the Program, indicating the City will create a zone to permit emergency shelters in the same area that the existing Friendship Shelter is located by the end of 2022. For your information, as noted in HCD's prior review, the City does not have a zone to permit emergency shelters without discretionary action and HCD cannot</p>	<p>45; 107</p>	<p>N</p>	<p>Amendment is in process as of Spring 2022. Completion date not reflected but CL discussed with City and expected in late August 2022. Making note to City to reflect in HE draft.</p> <p>No compliance until completed</p>

find the element in compliance until the appropriate zoning is available.			
<u>Electronic Site Inventory</u> : As noted in the prior review, pursuant to Government Code section 65583.3, subdivision (b), the City must utilize standards, forms, and definitions adopted by HCD when preparing the sites inventory and submit an electronic version of the sites inventory. While the City has submitted an electronic version of the sites inventory, if changes occur, any future re-adopted versions of the element must also submit the electronic version of the sites inventory.	N/A	Y – Continue	Continue
The revised element now includes additional revisions to Program 5.2-7(d) (Affordable Housing Partnerships), but these actions do not result in specific commitments and thus do not otherwise address this finding. Please see HCD’s prior review for additional information. HCD will also send a sample under separate cover.	109	N	Adds a min. of 2x presentations to Health and Human Services Committee, but not significant actions. Technical assistance to developers? Priority to process AH RFPs?