

HCD comments on DNC Final Draft

This document identifies informal comments made by HCD during the 60-day review period. The County's response is listed below each comment. Revisions are reflected in the Revised Public Hearing Draft Housing Element.

Comment: Emergency Shelters – emergency shelters need to be allowed by-right in at least one zone.

- The County has 11.5 acres zoned C4-ES that allow development of a shelter without a rezone or use permit, subject only to performance standards.
- We have updated the final paragraph under Emergency Shelters (page 89 in the track change version) as necessary.
- We have added a program action to program HE-Q committing the County to removing performance standards related to maximum number of beds and length of stay (by 2024)

Comment: Public Comment came in: CEQA process; evaluation needed related to the Permit Streamlining Act. Describe the process and if the County complies.

- We have added information to the background report related to the County's practices (page 110-111 of the track change version).
- We have added a new action to Program HE-Q that commits the County to "amend County Code Section 22.04 *Environmental Guidelines and Procedures* to specify who is responsible for making CEQA determinations and within the timeframes of PRC 21080.1 and PRC 21080.2; and determination of when the PSA is triggered per Government Code 65950(a)(5) the Permit Streamlining Act (PSA)."

Comment: AFFH - Programs: HE-J Add a geographic target.

- We have revised the program to target high resource areas "immediately north of Crescent City.")

Comment: HE-U add geographic target.

- We have updated the program to target Bertsch-Oceanview (moderate resource) and Klamath (low resource).

Comment: HE-BB: in addition to high resource areas, it will also need to target high and relatively high-income level areas.

- We have revised the program to target "...including tracts north of Crescent City and the community of Smith River"

Comment: HE-FF: Move up the timing from 3 years to 2 years. Increase the target for the outcome of improvements.

- We've moved the timing for identification up from 2024 to 2023. I've also added that funding should be pursued annually, with the goal of obtaining \$500k during the planning period.

Comment: Zoning for lower income households: table 40 lists 152 units for lower, but data shows 132. Check the math in this table.

- We have verified the calculation in Table 40. 143 very low- and 159 low-income units are included. Please review the table again.

Comment: Availability of infrastructure: Site 9, its unclear whether utilities are available for a portion of C during the planning period.

- We have revised the description for Site 9 for clarity.

Comment: Site 24: Is Public sewer available or not? This is conflicting in the draft.

- We have revised the description of site 24 for clarity.

Comment: HE-Q: Move up the timing to two years due to coastal zone constraints (it takes longer there). Move up timing.

- We have edited this to “...within two years of adoption...”

Comment: Constraints on housing for persons with disabilities: program should allow for group homes of seven or more in ALL residential zones. Add language to the program to ensure that they are allowed objectively with approval certainty. CUP findings must be objective.

- We have revised the program action related to residential care facilities in Program HE-A to “allow for residential care homes with seven or more residents by right in all zones allowing residential uses based on objective criteria to facilitate approval certainty by September 15, 2024”.

Comment: HE-A: Make sure that the program also confirms that the sites currently have proper density. If so, add that the zoning is already appropriate in the program language.

- We have added, “*All previously used lower income sites currently meet the density threshold for lower-income housing in Del Norte County (15 du/ac)*” to the program language related to *previously uses sites*.

Comment: Leave the language in the document related to a shortfall. We don’t need it, but it’s OK to leave it in there.

- No changes made.

Additional edits:

We have deleted references to sites 18 and 19, which were removed from consideration.

We updated the sites inventory table in the appendix.