

City/County: City of Lompoc

HCD Question/Concerns Resulting from Review

Page Number(s)	HCD Question/Concern by Topic	Jurisdiction's Response	Date / Page Number of Revision or Phone Call	Accepted?	HCD Perspective on Response
PUBLIC PARTICIPATION					
2-15-2-25	What efforts were made to achieve public participation of all economic segments of the community in the development of the element? What organizations that represent lower income were contacted?				
REVIEW AND REVISE					
2-34-2-37	The element includes a general discussion of the progress toward implementation from the previous element, but must describe how the goals, policies and programs of the updated element incorporate what has been learned from the results of the previous element.				
GEN	The element must include analysis of the cumulative impact of the previous housing element's programs to address the housing needs of special needs populations.				
HOUSING NEEDS (Population/employment/Household Characteristics/Housing Stock)					
GEN	The element must quantify housing units by type (S.F, MF, MH, etc.).				
HOUSING NEEDS (Special Needs)					
2-61	The element includes data on the number of households with householder age 65+ but should include the total number of elderly individuals.				
GEN	The element should provide an overview of available resources for special housing needs groups.				

AFFH (Summary of Fair Housing Issues/enforcement/outreach/integration/segregation/RECAPs/A to O/displacement)

A-8-A-11	<p>The element indicates that the city received a high number of fair housing complaints, particularly related to disability, but should include additional analysis of this data, if possible, to determine if any differences in geographies exist within the city. The analysis could also evaluate results from any fair housing testing or local knowledge from the fair housing service provider to obtain insight into local trends of fair housing complaints.</p>				
GEN	<p>The analysis must address compliance with existing fair housing laws.</p>				
A-74	<p>The element includes some discussion of local trends of homelessness but should include additional analysis to identify potential areas of higher need (i.e., encampments, etc.) and include program(s) as appropriate. The element should also provide meaningful analysis from homeless data, including disproportionate impacts on protected characteristics (e.g., race, family, disability), patterns of need and access to opportunities, including services, and transportation.</p>				
A-94	<p><u>Contributing factors:</u> The element should prioritize contributing factors.</p>				
<p>HOUSING NEEDS (Energy Conservation/At-Risk Housing)</p>					
2-59	<p>The element indicates that the City has 31 affordable units with expiring affordability restrictions within the next eight years but must also include an assessment of conversion risk.</p>				
2-60-2-61	<p>The element includes a brief discussion of the cost of new affordable housing but must analyze the cost for replacing versus preserving the identified at-risk units.</p>				
GEN	<p>The element must identify qualified entities and funding sources to assist with</p>				

	maintaining the affordability of the identified at-risk units.				
HOUSING NEEDS (RHNA/Progress)					
2-102– 2-105	The element must demonstrate the availability of pipeline projects in the planning period, including and any known barriers to development. Element should also include the mechanism holding the units affordable for each individual project.				
ADEQUATE SITES (Inventory/E-Sites)					
2-107	ADUs: How many ADU permitted in 2022? In line with assumptions for the planning period? The element should add or modify programs to monitor permitted ADUs and affordability every other year and take appropriate action such as adjusting assumptions or rezoning within a specified time period (e.g., 6 months).				
2-112– 2-122	Inventory must indicate which sites were used in previously adopted housing element(s).				
2-124	Status of rezoning Site 32 to MU? Program needed?				
GEN	Do non-vacant sites include any residential units, either existing or demolished, that are/were occupied by, or subject to affordability agreements for lower income households within 5 years preceding the beginning of the planning period? If so, replacement program needed.				
ADEQUATE SITES (Analysis, incl. Sites AFFH)					
2-108– 2-109	Realistic capacity: The element describes how the calculation accounts for typical densities of existing and approved projects, but must also address minimum density requirements, land use controls, site improvements, and access to current, or planned, water, sewer, and dry utilities.				
2-108, 2-112	Are 100% nonresidential projects permitted in the MU and OTC zones? What is the likelihood of a residential component?				

<p>2-109– 2-112</p>	<p>The element analyzes the jurisdiction's past experience converting existing residential and mixed-use uses to higher density residential development, development trends, and incentives that encourage development, but should also address current market demand for the existing uses and analysis of existing leases or other contracts that would perpetuate the existing uses or prevent additional residential development.</p>				
<p>2-113– 2-122</p>	<p><u>Non-vacant:</u> Non-vacant sites accommodate 50% or more of the lower-income need, therefore the housing element must demonstrate that the existing use is not an impediment to additional residential development in the planning period. This can be demonstrated by providing substantial evidence that the existing use is likely to be discontinued during the planning period.</p>				
<p>2-113– 2-122</p>	<p><u>Small Sites:</u> Do grouped sites in inventory (e.g., sites 35, 37, 39) indicate common ownership? Are they contiguous?</p> <p>Sites smaller than a half-acre in size are deemed inadequate to accommodate housing for lower-income households unless it is demonstrated, with sufficient evidence, that sites are suitable to accommodate housing for lower-income households. The analysis could describe the City's role or track record in facilitating past lot consolidation, common ownership, policies, or incentives offered or proposed to encourage and facilitate lot consolidation or other conditions rendering parcels suitable and ready-for-lot consolidation. Based on a complete analysis, the city should consider adding or revising programs to include incentives for facilitating development on small sites.</p>				

2-116-2-121	Sites 46/64/68/79: Please describe anticipated development. Will existing SFR use continue or discontinue with anticipated redevelopment? Analysis should be coupled with AFFH displacement program.			
2-119	What is the size of site 69? Status of school district project?			
2-126-2-127	<u>Environmental Constraints:</u> Were other known constraints evaluated as well? Lot shape, easements, overlays, contamination?			
A-90-A-93	<u>Sites & AFFH:</u> Element includes discussion of sites in relation to identified fair housing issues but must also quantify and evaluate sites by area/location in relation to each indicator. HCD will send sample table.			
ADEQUATE SITES (Zoning for a Variety of Housing Types)				
2-71, 2-95	The element must address whether existing zoning and development standards pose a constraint on new SRO construction and add programs as appropriate to facilitate development of this housing type.			
2-86	<u>Housing for persons with Disabilities:</u> The element subjects residential care homes for six or more persons to a conditional use permit. The element must analyze the CUP permit process for its impacts on housing supply and choice and approval certainty and objectivity for housing for persons with disabilities and include programs as appropriate.			
2-86	<u>Reasonable Accommodation:</u> Element should evaluate the RA findings, comparing them to the model RA ordinance and make programmatic changes where appropriate.			
2-93	<u>Emergency Shelters:</u> The element should include new provisions from AB 2339. For more information, see HCD's AB 2339			

	<p>memorandum at https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/ab2339-notice.pdf.</p> <p>Accessory Dwelling Units: Ordinance will be evaluated by the ADU team, pursuant to GC 65852 (h).</p>						
FY1							
CONSTRAINTS ON HOUSING (Governmental)							
2-73	<u>Land-use controls:</u> Any minimum unit sizes or other standards not listed?						
2-73	<u>Land-use controls:</u> How often and how likely is development at maximum density (44 du/ac) in MU and OTC zones, given 3-story height limits? Element should provide a cumulative analysis of land use controls.						
2-74-2-75	<u>Land-use controls:</u> Parking for supportive housing, transitional housing, and residential group care homes should be for underlying use.						
2-74-2-75	<u>Land-use controls:</u> The element must describe and analyze the parking requirement for multifamily which requires 50% of parking spaces to be covered.						
2-71	<u>Land-use controls:</u> Single-family residential (SF) is permitted by-right in MU zone, which may pose a constraint on higher density development. The element should include a program to remove this constraint on housing supply and affordability.						
2-78-2-81	<u>Processing and permit procedures:</u> The element describes review findings and procedures for use permits (AUP, MUP, CUP), but should address impacts on housing cost, supply, timing, and approval certainty. For example, the element should analyze approval findings for impacts on approval certainty, the presence of processes or guidelines to promote certainty and add or modify programs as appropriate.						

2-81	<u>Design Review:</u> How is "appropriate relationship to surrounding development and land use" evaluated? Can it be objectively evaluated through Architectural Review Guidelines?					
2-81	<u>Codes/standards:</u> The element discusses building code standards but should also describe the city's approach to enforcement (i.e., degree, type of enforcement).					
2-82	<u>On/off site improvements:</u> The element must identify improvement requirements, such as minimum street widths (e.g., 40-foot minimum street width), and analyze their impact as potential constraints on housing supply and affordability.					
2-83	<u>Fees & exactions:</u> The element details required fees for development but must also include impact fees. In addition, the element must analyze all fees for their impact as potential constraints on housing supply and affordability. For example, the analysis could identify the total amount of fees and their proportion to the development costs for both single family and multifamily housing and analyze surrounding jurisdictions' total fees.					
CONSTRAINTS ON HOUSING (Non-Governmental)						
2-89	The element quantifies the average cost of construction in nearby Solvang but must also include quantification of construction costs in Lompoc.					
GEN	Any local efforts to address non-governmental constraints that create a gap in the ability to meet RHNA by income category?					
2-126	Available and accessible dry utilities infrastructure sufficient to support housing development?					
QUANTIFIED OBJECTIVES						

1-5-1-6	Reconcile quantified objectives for moderate & above moderate.				
PROGRAMS					
1-16	Program H-A.8 (Municipal Code Updates): Timing should be amended to implement by 2/15/2025 or include a statement of implementation in the interim.				
1-19, 1-20, 1-22	Programs H-A.13, H-A.15, and H-A.19 include descriptions such as "if needed" and "as necessary," and should be amended to specify the trigger for the actions to occur.				
1-21	Program H-A.17 (At-Risk Assisted Affordable Housing Units): Program should be modified to include noticing requirements within 3 years and 6 months of the affordability expiration dates, in addition to coordinating with qualified entities such as non-profit organizations and establish specific time parameters around such actions.				
GEN	Program needed for vacant/non-vacant sites for lower identified in multiple housing element(s). See Sites Inventory Guidebook p. 13 for sample program.				
GEN	Replacement program needed for non-vacant site occupied by lower-income household within the last 5 years?				
GEN	The element should include program(s) for displacement protections, including but not limited to first right of return, replacement requirements, just cause eviction, relocation ordinance etc. In addition, based on a complete AFFH analysis, the city may need to add or revise programs as appropriate to address identified needs (e.g., homeless supportive services). Programs must include specific commitments, discrete timelines for implementation throughout the planning				

	period (e.g., month, year), metrics and geographic targeting.					
FY1	Based on a complete analysis of governmental constraints, the element may need to add or amend programs to address any identified constraints (e.g., zoning for SROs, use permit requirements, site improvement requirements, fees)					
FY1	Based on a complete analysis of small sites, the city should consider revising program H-A.12 to include incentives or add additional actions to facilitate lot consolidation.					
OTHER						
FY1	> 50% nonvacant resolution					
FY1, 2-124	Rezone timing: Plan for rezoning Site 32 to MU to accommodate RHNA? Any other sites in need of rezone to accommodate RHNA or to add capacity?					
FY1	E-Sites: Required submittal with adopted housing element					
FY1	Consistency with General Plan/Land Use Element					
Comments	D. Kellogg- Discuss compliance with the Permit Streamlining Act and intersections with CEQA and timing requirements, including streamlining determinations and add or modify programs as appropriate.					