



COUNTY OF SISKIYOU

COMMUNITY DEVELOPMENT DEPARTMENT
Building ♦ Environmental Health ♦ Planning
806 South Main Street · Yreka, California 96097
Phone: (530) 841-2100 · Fax: (530) 841-4076
<https://www.co.siskiyou.ca.us/community-development>

RICHARD J. DEAN
DIRECTOR

AARON STUTZ, MD
PUBLIC HEALTH OFFICER

June 12, 2023

State Department of Housing and Community Development
C/O Land Use and Planning Unit
2020 W. El Camino Ave, Suite 500
Sacramento, CA 95833

Subject: Revised Draft Siskiyou County Housing Element

Attached is the *revised draft* Siskiyou County Housing Element update for the period 2022-2030. This is an update to the draft Siskiyou County Housing Element that incorporates revisions in response to comments provided by HCD in their review letter dated March 21, 2023. On pages 2-5 of this letter, we have provided a table which summarizes HCD's comments, and the County's responses including where to find amended language within the document to address each comment.

Pursuant to AB 215, the revised draft version was available for public comment from June 1 to June 7, 2023, and the County posted the revised draft version on the County's Housing Element webpage and emailed a link to all individuals and organizations that have previously requested notices relating to the Siskiyou County Housing Element. One comment was received during the public comment period. The commenter asked for information on County housing assistance programs and advised of the need to build staffing capacity in order to respond to recent wildfires.

Please direct HCD comments on this revised draft Housing Element to both of the parties noted below:

Attention: Hailey Lang
County of Siskiyou
Deputy Director of Planning
hlang@co.siskiyou.ca.us
(530) 842-8203

James Coles, Principal
Housing Tools
jcoles@housing-tools.com
(916) 692-8544

Sincerely,

Hailey Lang,
Deputy Director of Planning

HCD Comment on March 21, 2023, Letter	County Response and Where Addressed in Revised Draft (dated June 1, 2023)
<p>A.1. (pg. 1) <u>Fair Housing Enforcement and Capacity</u>: The housing element must include a summary of fair housing enforcement and outreach capacity. The analysis must address how the County complies with state and federal fair housing laws, including regulations, lawsuits, and related enforcement actions. For more information, see HCD's affirmatively furthering fair housing (AFFH) Guidance Memo (starting on p. 28) at https://www.hcd.ca.gov/planning-and-community-development/affirmatively-furthering-fair-housing.</p>	<p>See Ch. 4, pg. 65 for added explanation of enforcement, and Programs 6.1.1 and 6.1.2.</p>
<p>A.1. (pg. 2) <u>Racial/Ethnic Areas of Concentration of Poverty (R/ECAP)</u>: The element identifies areas of high segregation and poverty (p. 93) and as a result, it should specifically analyze these areas to better formulate appropriate policies and programs. The analysis should address trends, neighborhood conditions, comparisons to other neighborhoods or areas and effectiveness or absence of past strategies related to equitable quality of life. The element must add or modify programs based on the outcomes of this analysis.</p>	<p>See pg. 102, which includes references to Programs that address findings.</p>
<p>A.1. (pg. 2) <u>Disproportionate Housing Needs including Displacement</u>: The element should analyze the disproportionate housing needs of persons experiencing homelessness and risk of displacement. For persons experiencing homelessness, the element should discuss patterns or areas of higher incidence of homelessness and access to services and transportation. For Displacement risk, the element should address disinvestment, investment and disaster driven displacement and add or modify programs as appropriate. For more information, please see HCD's AFFH Guidance Memo (starting on p. 40).</p>	<p>See description of analysis in Ch. 4, pgs. 136-139.</p>
<p>A.1. (pg. 2) <u>Goals, Actions, Metrics, and Milestones</u>: As noted above, the element must include a complete assessment of fair housing. Based on the outcomes of that analysis, the element must add or modify goals and actions. Goals and actions must significantly overcome contributing factors to fair housing issues and must include specific commitment, discrete timelines, geographic targeting and metrics or numerical targets. Programs, as appropriate, must address enhancing housing mobility, increasing housing</p>	<p>See revisions to Programs under Goal 6 in Ch. 3.</p>

<p>opportunity in higher opportunity or relatively higher income areas, expanding place-based strategies for community revitalization and mitigating displacement risk.</p>	
<p><u>A.2. (pgs. 2-3) Zoning for a Variety of Housing Types (Emergency Shelters):</u> The element identifies the Highway Commercial (C-H) Zone to permit emergency shelters without discretionary action and notes 258 acres of land. However, the element must:</p> <p>Analyze the suitability and capacity in the C-H zone to meet the need for emergency shelters. For example, the element should identify the number of parcels, typical parcel sizes, available acreage, whether sites are underutilized, and any potential for reusing existing buildings for emergency shelters.</p> <ul style="list-style-type: none"> • Discuss proximity to transit and services and any known hazardous conditions unfit for human habitation. • Identify and evaluate any special development standards as potential constraints on the development of emergency shelters • Add or modify programs as appropriate based on the outcomes of a complete analysis. 	<p>Addressed in Ch. 6, Land Use Controls Section, Zoning for a Variety of Housing Types on pgs. 219-220.</p>
<p><u>A.3. Processing and Permit Procedures (pg. 3):</u> While the element includes information about processing steps and various permit types, it should also describe the procedures for a typical single family and multifamily development. The analysis should address the approval body, the number of public hearing if any, approval findings and any other relevant information. The analysis should address impacts on housing cost, supply, timing and approval certainty.</p> <p>In addition, the element should address public comments on this draft submittal and discuss compliance with the Permit Streamlining Act and intersections with CEQA and timing requirements, including streamlining determinations and add or modify programs as appropriate.</p>	<p>See Permitting Process for Typical Single-Family and Multi-Family Residential Development Section on pgs. 223-224. Also see Conditional Use Permits Section on pgs. 227-228.</p>
<p><u>A.3. Housing for Persons with Disabilities (pg. 4):</u> While the element includes a program to establish a reasonable accommodation procedure, it should</p>	<p>Addressed on pgs. 216-217, 220 and Program 1.4.11.</p>

<p>also analyze any definitions of family utilized in zoning and land and potential constraints on group homes for seven or more persons. For the definition of family, the element should specifically describe the definition and evaluate impacts on the number of persons and unrelated persons. For group homes for seven or more persons, the element should analyze the lack of zones that allow residential uses and permit procedures such as conditional use permits as constraints on this housing type.</p>	
<p><u>A.3. Approval Time (pg. 4)</u>: The element must include analysis of the length of time between receiving approval for a housing development and submittal of an application for building permits. The analysis must address any hindrance on the development of housing and include programs as appropriate.</p>	<p>Addressed on pg. 230.</p>
<p>A.3. Programs (pg. 4): As noted above, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the County may need to revise or add programs to address and remove or mitigate any identified constraints.</p>	<p>See modifications to Programs as described above.</p>
<p>A.4. (pg. 4): The element includes some general quantification; however, it should analyze households with special housing needs. The analysis should include, but is not limited to, factors such as trends, household income, tenure, housing types, zoning, and available resources. Specifically, the element should address elderly households by tenure, characteristics of farmworker needs (e.g., income, housing types, zoning, available resources) and large households by tenure for five or more persons instead of 4 or more persons. Based on the outcomes of this analysis, the element should add or modify programs.</p>	<p>See data on senior householders by tenure on pg.166 and Figure 33.3. See data on large households by tenure for five or more persons on pg. 170 and Figure 33.6.</p>
<p>A.5. (pgs. 4-5): To have a beneficial impact in the planning period, programs must have specific commitment and discrete timing (e.g., at least annually or by 2025), as follows:</p> <ul style="list-style-type: none"> • <i>Program 2.1.2 (Infrastructure Investment)</i>: The Program should clarify how the County will work with service districts and how often steps will be taken. • <i>Program 2.2.2 (Infrastructure Improvement)</i>: The Program should clarify how the County will encourage special districts and nonprofit organizations to apply for funding. • <i>Program 4.2.1 (Extremely Low-income</i> 	<p>See revisions to address these comments in the Ch. 3 Housing Program.</p>

<p><i>Households</i>): The Program should commit to how often (e.g., at least annually) the County will prioritize funding and waive fees. The Program could also commit to proactively reach out to affordable developers at least bi-annually.</p> <ul style="list-style-type: none"> • <i>Program 4.2.2 (Farmworker Housing)</i>: The Program should include actions beyond completing a study and commit to steps that lead to housing outcomes such as at least bi-annually reaching out to developers and identifying sites, applying for funding and granting incentives beyond State Density Bonus Law. • <i>Program 6.3.1 (Workforce Housing)</i>: The Program should include actions beyond an annual workshop and ensuring land use plans support workforce housing. Actions should lead to housing outcomes such as identifying sites, applying for funding and setting numerical objectives for the planning period. 	
<p>6. (pg. 5): The element includes quantified objectives by income group for new construction and rehabilitation but does not provide quantified objectives for conservation. For your information, conservation objectives are not limited to at-risk preservation and may include a variety of activities that promote stability in housing. Examples of programs that may be used for conservation objectives include Programs 5.1.1 (Weatherization), 6.1.1 (Fair Housing Enforcement and Outreach), 6.2.1 (Section 8 Voucher) and 6.3.3 (Accessibility Improvements).</p>	<p>See preservation objectives in Figure 2 on pg. 50.</p>