

HCD Findings on Draft City of Sonoma 6th Cycle Housing Element

Finding	Interpretation	How the Comment Was Addressed	P. #
A. Housing Needs Resources and Constraints			
<i>1. Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2...shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)</i>			
<p><u>Fair Housing Enforcement and Outreach Capacity:</u> The element should include findings, lawsuits, enforcement actions, settlements, or judgments related to fair housing or civil rights.</p>	<ul style="list-style-type: none"> • Add information regarding findings, fair housing and civil rights lawsuits, enforcement actions, settlements, or judgements. 	<p>Additional information has been added to the Fair Housing Enforcement and Outreach Capacity discussion.</p>	<p>HBR-115</p>
<p><u>Disparities in Access to Opportunity:</u> The housing element must identify and analyze significant disparities in access to opportunity. A complete analysis should include the locally and regional disparities of economic, education, environmental, and transportation opportunities through local, federal, and/or state data. The element should be revised as follows:</p> <ul style="list-style-type: none"> • For economic the element includes some information on economic scores from the California Fair Task Force; however, it should also describe any disparities in access to jobs by protected groups, address where protected groups live and how that affects their ability to obtain a job; and evaluate employment trends by protected groups. Trends should then be compared to the region. • For education the element includes some information on student enrollment and the ethnic/racial make-up; however, the element should also describe any differences amongst schools within the City and whether access to more proficient schools has any patterns across protected characteristics (e.g., race and ethnicity, familial status, persons with disabilities); analyze the proximity of proficient and less proficient schools to areas of segregation and racial and ethnic concentrated areas of poverty; and evaluate the presence or lack of policies, practices, and investment to promote access to more proficient schools or that contribute to a disparity in access to opportunity. • While the element includes environmental scores within the City for environment, the element should also describe any disparities in access to environmentally healthy neighborhoods by protected class groups and discuss policies, practices and 	<ul style="list-style-type: none"> • Economic: <ul style="list-style-type: none"> - Describe disparities in access to jobs by protected groups, address where protected groups live, and how that affects their ability to obtain a job, and evaluate employment trends by protected groups and provide a regional comparison of trends. • Education: <ul style="list-style-type: none"> - Describe differences amongst school and whether access to proficient schools has patterns across protected characteristics. - Address policies, practices, and investment (or lack of) to promote access to more proficient schools and contribute to disparity in access to opportunity. • Environmental: <ul style="list-style-type: none"> - Describe disparities in access to environmentally healthy neighborhoods by protected class groups and discuss policies, practices, and investments that impact access to environmentally healthy neighborhoods. • Transportation <ul style="list-style-type: none"> - Compare concentrations of protected groups with access to transportation options and assess any 	<p>Economic</p> <ul style="list-style-type: none"> • Updated to address economic scores in the City versus region and comparison of scores within the City. • Where protected groups live is discussed in the Integration/ Segregation section of the AFFH analysis and the discussion was updated to reference this and the ability of protected groups to obtain a job. • Added Table 70A addressing City versus County employment trends for protected classes, where data is available. <p>Educational</p> <ul style="list-style-type: none"> • Information regarding educational opportunity scores was discussed at a regional level. • Proficiency scores of schools serving the City were discussed, along with analysis of access to higher scoring schools by protected classes. • SVUSD’s equity policy was reviewed and discussed as it relates to policies, practices, and investment to promote access to more 	<p>HBR-140 to HBR-145</p>

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<p>investments that impact access to environmentally healthy neighborhoods.</p> <ul style="list-style-type: none"> For transportation opportunities, the analysis should, compare concentrations of protected groups with access to transportation options and assess any disproportionate transportation needs for members of protected classes. 	<p>disproportionate transportation needs for members of protected classes</p>	<p>proficient schools or to address disparities in access to opportunity.</p> <p>Environmental</p> <ul style="list-style-type: none"> Revised to compare regional conditions. Discussion of environmental scores and correspondence to concentrations of protected classes is added. Discussion of policies and programs addressing environmental issues added. Discussed disparities in access to environmentally healthy neighborhoods. <p>Transportation</p> <ul style="list-style-type: none"> Access to transportation options, such as transit and safe routes to schools, for protected classes is added along with discussion of disparate access to transportation options. Transit scores for the City and region are discussed. Discussion of transportation-oriented programs is provided, along with a discussion of disparate access by protected classes. 	
<p><u>Integration and Segregation:</u> The element includes data on integration and segregation at the local and regional level for race and familial status; however, it does not include sufficient regional information to adequately compare income and disability to the City. The element must include additional information related to income and disability on a regional level.</p>	<ul style="list-style-type: none"> Revise income discussion to compare City to regional conditions Revise disability discussion to compare City to regional conditions 	<ul style="list-style-type: none"> The household income discussion has been updated to compare Sonoma to regional conditions. Updated the disability discussion to provide a comparison of income levels to the region and to discuss income group isolation in the City versus the Bay Area. 	<p>HBR-125 to HBR-126</p>

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<p><u>Disproportionate Housing Needs, Including Displacement:</u> The element does not include sufficient regional information to adequately compare cost burden, substandard housing and displacement to the City. The element must include additional information related cost burden, substandard housing and displacement on a regional level. In addition, for homeless the element should examine disproportionate impacts on protected characteristics (e.g., race, disability) and patterns of need, including access to transportation and services.</p>	<ul style="list-style-type: none"> • Provide regional information and comparison related to cost burden, substandard housing, and displacement. • For homeless, examine disproportionate impacts on protected characteristics (e.g., race, disability) and patterns of need, including access to transportation and services. 	<ul style="list-style-type: none"> • Updated discussion to provide regional comparisons of cost burden, substandard housing, and displacement. • Information on the City’s homeless population is not available at the local level, but protected characteristics of the homeless are examined on the Countywide basis to the extent information is available. A discussion of access to transportation and services has been added. 	<p>HBR-152 to HBR-158</p>
<p><u>Site Inventory and AFFH:</u> The element must include an analysis demonstrating whether sites identified to meet the regional housing needs allocation (RHNA) improves or exacerbates conditions. HCD recognizes that the majority of the City is considered low resourced and therefore, while the sites are distributed throughout the City, sites to accommodate the lower-income are all located within these areas. While the element states that by promoting new development opportunities in low opportunity areas, the City intends to improve the conditions of these census tracts by providing a boarder range of goods and services, bring new residential development closer to transit and jobs, and support community revitalization, it must substantiate this claim with evidence. For example, the analysis could describe the disparities in access to opportunities for these sites and how the City is addressing these disparities. The element must have commensurate programs with place-based strategies for community revitalization and new opportunities in higher opportunity areas to result in an equitable quality of life and (AFFH) throughout the City.</p>	<ul style="list-style-type: none"> • Address how the City will improve conditions of Census Tracts. 	<p>Table 1: Program 22 Fair Housing Program Action Items in the Housing Plan has been revised to include additional actions under the fair housing issue Place-Based Strategies for Community Preservation and Revitalization that are intended to improve the conditions in low resource census tracts.</p>	<p>HBR-157 Housing Plan Prog 22</p>
<p><u>Contributing Factors to Fair Housing Issues:</u> The element lists contributing factors on Table 71, such as “Lack of Access to Opportunity, including areas with Low Racial/Ethnic Diversity and Higher Incomes”; however, it is unclear the relationship between</p>	<ul style="list-style-type: none"> • Demonstrate relationship between contributing factors to fair housing issues and corresponding meaningful actions. 	<p>Table 71 in the Housing Element Background Report identifies the fair housing issues facing the City and the contributing factors to the issues. This</p>	<p>See previous revisions to</p>

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<p>those contributing factors and their corresponding meaningful actions address those factors. For example, it is not clear how contributing factors such as low educational opportunity scores and low environmental opportunity scores were addressed by any of the meaningful action programs that were included in the Table. The element should reevaluate actions provided to ensure strategic approaches to mitigate contributing factors to lack of fair housing choice and address AFFH.</p>		<p>is based on the analysis provided in the previous sections. Table 71 then connects the contributing factors to the meaningful actions under the Housing Plan (i.e. the housing programs) that will mitigate the contributing factors. Table 71 was updated to address school district issues impacting access to educational opportunities. Furthermore, Program 22 provides a matrix of fair housing program action items that neatly summarizes how the programs in the Housing Plan address the fair housing issues and contributing factors with specific commitments, timeframes, geographic targeting, and metrics and has been updated to include additional measures to address access to opportunity.</p>	<p>Background Report for AFFH issues. HBR-163 Housing Plan Program 22</p>
<p><i>2. An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)</i></p>			
<p><u>Approved/Pending Sites:</u> The housing element relies on approved/pending projects to accommodate the City's regional housing need for lower-income households. The element should describe the status of the project, including any necessary approvals or steps prior to development, development agreements, conditions, or requirements such as phasing or timing requirements that impact development in the planning period, and the affordability of the project's units based on anticipated rents, sales prices or other mechanisms (e.g., financing, affordability restrictions) ensuring their affordability.</p> <p>In addition, the element states on page HBR-9 that there are no known site-specific environmental constraints that would substantially impact development on the identified Housing</p>	<ul style="list-style-type: none"> For approved/pending projects, describe the status of the project, including any necessary approvals or steps prior to development, development agreements, conditions, or requirements such as phasing or timing requirements that impact development in the planning period, and the affordability of the project's units based on anticipated rents, sales prices or other mechanisms (e.g., financing, affordability restrictions) ensuring their affordability. Address the status of the Montaldo Apartments project, including whether an 	<ul style="list-style-type: none"> Pending and approved projects have been updated to: <ul style="list-style-type: none"> Identify the remaining steps in the entitlement/approval process and anticipated timing, including any phasing, conditions, or other requirements that would impact developing during the planning period. Identify the basis for the affordability assumptions of each project. Address whether an EIR is anticipated to be required for the 	<p>HBR-104 to HBR-106</p>

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<p>Opportunity sites; however, HCD received public comments regarding the Montaldo Apartments project which is included as a pending project in the sites inventory that a full new EIR is required to develop this housing opportunity site because the City considers there to be a CEQA issue not “addressed... in the prior General Plan EIR.” The element should clarify the status of this project and clarify whether there are any known environmental issues that would render the project infeasible.</p>	<p>EIR is being required and whether any known environmental issues would render the project infeasible.</p>	<p>Montaldo Apartments and whether there are any known environmental issues that would render the project infeasible.</p>	
<p><u>Realistic Capacity:</u> While the element provides assumptions of realistic capacity of 85 percent for residential zoning districts and 75 percent for commercial and mixed- use districts that allow residential development, it must also provide support for these assumptions. For example, the element should demonstrate what specific trends, factors, and other evidence led to the assumptions. The estimate of the number of units for each site must be adjusted as necessary, based on the land use controls and site improvements, typical densities of existing or approved residential developments at a similar affordability level in the City, and on the current or planned availability and accessibility of sufficient water, sewer, and dry utilities. The element includes several projects on Table 60; however, it is unclear if those projects represent a trend for all developments at similar affordability levels in the City.</p>	<ul style="list-style-type: none"> • The element must provide support for the realistic capacity assumptions of 85% for residential zoning districts and 75% for commercial and mixed-use districts that allow residential development, including trends, factors, and other evidence that led to these assumptions. Elements must be adjusted for typical densities of existing or approved residential developments at a similar affordability level and on the current or planned availability and accessibility of sufficient water, sewer, and dry utilities. • It is unclear if the projects in Table 60 represent a trend for all developments at similar affordability levels in the City. 	<ul style="list-style-type: none"> • The discussion of approved and built densities has been updated to reflect the average densities of projects on sites zoned for residential and on sites zoned for commercial and mixed use, and to discuss densities relative to income levels for sites. The Background Report has been revised to clarify that built densities in the City average higher than the assumptions used, so no reduction in unit counts is necessary. • The Background Report has been updated to clarify that all sites have or are planned to have sufficient water, sewer, and dry utilities, so no adjustments are needed to reflect availability of infrastructure and utilities during the planning period. • The discussion of projects provided in Table 60 has been updated to identify that these are representative of typical projects in the City and the project types, zoning, and densities anticipated for the 6th Cycle. 	<p>HBR-91 to HBR-95 Table 60 HBR-101</p>

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		<ul style="list-style-type: none"> The Realistic Capacity discussion has been updated in Chapter 4 to reference the City’s evidence supporting the realistic capacity assumptions. 	
<p><u>Sites Identified in Prior Planning Periods:</u> While the sites inventory in Appendix A indicate if vacant and nonvacant sites were identified in the 5th cycle planning period, the element must also indicate which vacant sites were identified in the 4th cycle planning period. Sites identified in prior planning periods shall not be deemed adequate to accommodate the housing needs for lower-income households unless a program, meeting statutory requirements, requires rezoning within three years of the beginning of the planning period to allow residential use by-right for housing developments in which at least 20 percent of the units are affordable to lower-income households (Gov. Code, § 65583.2, subd. (c)). The element must clarify if vacant sites were used to accommodate the housing need for lower-income households in the 4th cycle planning period and include or modify programs as appropriate.</p>	<ul style="list-style-type: none"> Sites inventory must identify vacant sites identified in the 4th Cycle planning period. Sites identified in prior planning periods must meet statutory requirements. 	<ul style="list-style-type: none"> Appendix A has been updated to identify vacant and underutilized sites identified in the 4th Cycle. Program 20 has been added to the Housing Plan to address rezoning pursuant to Government Code Section 65583.2(i). 	Appx A Prog 20
<p><u>Infrastructure:</u> While the element describes water and sewer infrastructure, it must also demonstrate sufficient existing or planned dry utilities supply capacity, including the availability and access to distribution facilities to accommodate the city’s regional housing need for the planning period (Gov. Code, § 65583.2, subd. (b)).</p>	<ul style="list-style-type: none"> Demonstrate sufficient existing or planned dry utilities supply capacity, including the availability and access to distribution facilities to accommodate the city’s regional housing need for the planning period. 	<ul style="list-style-type: none"> A discussion of dry utilities has been added to the Background Report, including demonstration of adequate capacity for service providers to accommodate the City’s regional housing need for the planning period. 	HBR-98
<p><u>Zoning for a Variety of Housing Types:</u> The element must demonstrate zoning to encourage and facilitate a variety of housing types, as follows:</p> <ul style="list-style-type: none"> Emergency Shelter: The element states emergency shelters are permitted by-right in the Public Facilities zoning district; however, emergency shelters with 16 or more beds require a use permit. The element must analyze the use permit process as a potential constraint on housing supply and affordability. The analysis should identify findings of approval for the use permit and their potential 	<ul style="list-style-type: none"> Address the requirement that emergency shelters with 16 or more beds require a use permit, including analyzing the use permit process as a potential constraint on housing supply and affordability. Address findings of approval for the use permit and their potential impact on development approval certainty, timing, and cost. Either must demonstrate this 	<ul style="list-style-type: none"> The Emergency Shelters analysis has been updated to address the use permit requirement. Program 15 in the Housing Plan has been revised to remove constraints to emergency shelters, including addressing use permit findings and allowing emergency shelters up to 30 beds without a use permit. 	HBR-66 HBR-64 Housing Plan Program 15

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<p>impact on development approval certainty, timing, and cost. The element must demonstrate this process is not a constraint or it must include a program to address and remove or mitigate the use permit requirement.</p> <ul style="list-style-type: none"> Employee Housing: The element should clarify if there are any zones that allow agriculture uses. If there are zones that allow agriculture uses, then the City must comply with California Health and Safety Code Section 17021.6. Section 17021.6 requires employee housing consisting of no more than 12 units or 36 beds to be permitted in the same manner as other agricultural uses in the same zone. 	<p>process is not a constraint or include a program to address and remove or mitigate the use permit requirement.</p> <ul style="list-style-type: none"> Clarify if there are any zones that allow agriculture uses. If there are zones that allow agriculture uses, then the City must comply with California Health and Safety Code Section 17021.6. Section 17021.6 requiring employee housing consisting of no more than 12 units or 36 beds to be permitted in the same manner as other agricultural uses in the same zone. 	<ul style="list-style-type: none"> The Agricultural (Farmworker) and Employee Housing discussion has been updated to identify districts that allow agricultural uses and to identify how the Development Code permits agricultural employee and employee housing. Program 15 in the Housing Plan has been updated to ensure employee housing, including agricultural housing, is permitted in compliance with State law. 	
<p><i>3. An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures... (Gov. Code, § 65583, subd. (a)(5).)</i></p>			
<p><u>Land-Use Controls:</u> The element must analyze the height requirement (p. 58) of only allowing two stories in zones that allow multifamily for its impact as a potential constraint on housing, including the ability to achieve maximum densities and cost and supply of housing. Should the analysis determine the height requirement is a constraint on residential development, it must include a program to address or remove any identified constraints.</p>	<ul style="list-style-type: none"> Analyze the height requirement of only allowing two stories in zones that allow multifamily and address whether the requirement is a potential constraint on housing, including the ability to achieve maximum densities and the cost and supply of housing. Should the analysis determine the height requirement is a constraint on residential development, it must include a program to address or remove any identified constraints. 	<ul style="list-style-type: none"> The height analysis has been updated to address the two-story limit as a potential constraint. Program 15 in the Housing Plan has been updated to address the constraint associated with the two-story height limit. 	<p>HBR-59 Housing Plan Prog 15</p>
<p><u>Codes and Enforcement:</u> The element states the City enforces the 2019 California Building Code (CBC) for existing units, new construction, and residential rehabilitation; however, it should also discuss the type (e.g., compliant based) and degree of enforcement.</p>	<ul style="list-style-type: none"> Discuss the type and degree of code enforcement. 	<p>The analysis on Building Codes and Enforcement has been updated to reflect the approach to code enforcement.</p>	<p>HBR-74</p>
<p><u>On/Off-Site Improvements:</u> The element must identify subdivision level improvement requirements (e.g., curbing requirements, circulation improvements, minimum street widths) and analyze</p>	<ul style="list-style-type: none"> Identify subdivision improvement requirements and analyze their impact as 	<p>The analysis has been updated to address subdivision improvement requirements and to address whether</p>	<p>HBR-95</p>

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<p>their impact as potential constraints on housing supply and affordability.</p>	<p>potential constraints on housing supply and affordability.</p>	<p>the requirements constrain housing supply and affordability.</p>	
<p><u>Growth Control:</u> The City must evaluate against SB 330 requirements and whether the growth cap is consistent with 66300 (b)(1)(D)(i) and (ii). Which prohibits establishing or implementing any provision that:</p> <ul style="list-style-type: none"> • Limits the number of land use approvals or permits necessary for the approval and construction of housing that will be issued or allocated within all or a portion of the affected county or affected city, as applicable. • Acts as a cap on the number of housing units that can be approved or constructed either annually or for some other time period. 	<ul style="list-style-type: none"> • 	<p>The discussion on Growth Controls/ Growth Management has been revised to further analyze consistency with SB 330. As well, Program 17 has been modified to commit the City to annually review the Growth Management Ordinance to ensure that it does not conflict with SB 330 or any other provisions of State law.</p>	<p>HBR-74 Prog 17</p>
<p><u>Processing and Permit Procedures:</u> The element includes Table 56 (Page HBR-78) that has estimated total processing procedures by type; however, the element should clarify if these are the typical total permit and entitlement process for a typical single-family unit, subdivision, and multifamily project. In addition, while the element describes the design review findings and process; it must analyze the finding, “the project responds appropriately to the context of adjacent development, as well as existing site conditions and environmental features,” as a potential constraint on housing supply and affordability. The element must demonstrate the finding is not a constraint and add or modify programs to address and remove or mitigate the constraint.</p>	<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> • As indicated on p. HBR-79, the processing procedures outlined in Table 56 are typical approval requirements for a single-family infill project, a subdivision, and a multifamily project, assuming that the land is zoned appropriately. • Under the discussion Site Design and Architectural Review (Design Review) Process, the subjective language contained in certain design review findings is identified and Program 15 has been revised to ensure that subjective language is removed or clarified. 	<p>HBR-79 HBR-83 Housing Plan Prog 15</p>
<p><u>SB 35 Streamlined Ministerial Approval Process:</u> It appears the City does not have a streamline, ministerial approval process for SB 35. While Program 15 is included to streamline ministerial review for eligible affordable housing projects, it is not clear if the City is committing to include a streamline, ministerial approval process. The element must describe the availability of written procedures for the SB 35 streamlined, ministerial approval process or include a program as appropriate.</p>	<ul style="list-style-type: none"> • 	<p>Program 15 has been revised to clearly commit the City to streamlined and ministerial review for eligible affordable housing projects as well as to preparing application materials and written procedures for eligible projects.</p>	<p>HBR-71 to HBR-72 Housing Plan Prog 15</p>

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<p><u>Inclusionary Housing</u>: While the element describes the framework of inclusionary requirements and available alternatives, it must also include the amount of in lieu fees instead of providing affordable units in a residential project of four or fewer units that a developer would pay if this option were chosen.</p>	<ul style="list-style-type: none"> • 	<p>The City is currently in the process of determining and establishing an in-lieu fee to be paid instead of providing affordable units in a residential project of four or fewer units. Nonetheless, Program 1 in the Housing Plan commits the City to adopting an in-lieu fee by December 2023. The in-lieu fee will be supported by a study to ensure the fee does not make residential projects economically infeasible.</p>	<p>HBR-68 Housing Plan Prog 1</p>
<p><u>Housing for Persons with Disabilities</u>: The element states the City provides reasonable accommodation for persons with disabilities; however, it should include the procedure and the review findings. In addition, the element should clarify if the City has a definition of family and include a program if necessary.</p>	<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> • The discussion on Persons with Disabilities (Reasonable Accommodation) has been revised to include the procedure for requesting such. The review findings are also described and do not include any subjective language. • The City’s Development Code does not define “family” or “household”, so there are no constraints regarding how households are treated (see p. HBR-70). 	<p>HBR-70</p>
<p><i>4. An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, the cost of construction, the requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Government Code section 65583.2, and the length of time between receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality’s share of the regional housing need in accordance with Government Code section 65584. The analysis shall also demonstrate local efforts to remove nongovernmental constraints that create a gap between the locality’s planning for the development of housing for all income levels and the construction of that housing. (Gov. Code, § 65583, subd. (a)(6).)</i></p>			
<p><u>Requests for Lesser Densities and Approval Times</u>: The element must include the length of time between receiving approval for housing development and submittal of application for building permits. The analysis must address any hinderances on housing development and programs should be added as appropriate.</p>	<ul style="list-style-type: none"> • Identify the length of time between project approvals and submittal of building permit applications. • Address any hinderances of housing development and add programs, if needed. 	<p>The Building Permit Timing discussion (p. HBR-91) has been updated to further describe the types of projects addressed in Table 60 and to identify the timing between project approvals and building permit applications. The</p>	<p>HBR-91 Table 60</p>

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		Building Permit Timing and Approved and Built Densities discussions have also been updated to address whether building permit timing or approval densities hinder housing development. No hinderances on housing development are apparent; no programs are necessary to address this topic.	
B. Housing Programs			
<p><i>1. Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city’s or county’s share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobile homes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (Gov. Code, § 65583, subd. (c)(1).)</i></p>			
<p>As noted in Finding A2, the element does not include a complete site analysis; therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types.</p>	<ul style="list-style-type: none"> • Add or revise programs if necessary to address a shortfall of sites or zoning to encourage a variety of housing types. 	<p>Please refer to responses under Finding A2 for Approved/Pending Sites, Realistic Capacity, etc. A complete site analysis has been performed. No rezoning is needed; however, changes were made to the Housing Plan to further encourage a variety of housing types and increase opportunities.</p>	
<p><i>2. Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of January 18, 2022 housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)</i></p>			
<p>As noted in Findings A3 and A4, the element requires a complete analysis of potential governmental and non-governmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.</p>	<ul style="list-style-type: none"> • Add or revise programs if necessary to address governmental constraints. 	<p>Please refer to responses under Finding A3 for Land Use Controls, Processing and Permit Procedures, etc. A complete analysis of governmental and nongovernmental constraints has been performed. For any constraints identified, a corresponding program in</p>	

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		the Housing Plan is included to address the constraint.	
<p><i>3. Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, City of Sonoma’s 6th Cycle (2023-2031) Draft Housing Element Page 7 January 24, 2023 marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)</i></p>			
<p>As noted in Finding A1, the element must include a complete analysis of AFFH. Based on the outcomes of that analysis, the element must add or modify programs. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends.</p>	<ul style="list-style-type: none"> 	<p>Revisions to the AFFH chapter were made as discussed above under Finding A1 to complete the analysis of fair housing, including revisions to Program 22: Affirmatively Further Fair Housing.</p>	<p>HBR – Chapter 5 Housing Plan Prog 22</p>
<p>C. Public Participation</p>			
<p><i>Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the Housing Element, and the element shall describe this effort. (Gov. Code, § 65583, subd.(c)(9).)</i></p>			
<p>Please note HCD received public comments that the City did not consider all comments from the public in the revision that was sent to HCD. The City must proactively make future revisions available to the public, including any commenters, prior to submitting any revisions to HCD and diligently consider and address comments, including revising the document where appropriate. HCD’s future review will consider the extent to which the revised element documents how the City solicited, considered, and addressed public comments in the element. The City’s consideration of public comments must not be limited by HCD’s findings in this review letter.</p>	<ul style="list-style-type: none"> Address the extent to which the revised element documents how the City solicited, considered, and addressed public comments in the element. 	<p>Multiple letters from one individual were overlooked in the preparation of Appendix E. Appendix E has been updated to address those comments.</p>	<p>Appendix E</p>
<p>D. Consistency with General Plan</p>			
<p><i>The Housing Element shall describe the means by which consistency will be achieved with other general plan elements and community goals. (Gov. Code, § 65583, subd. (c)(7).)</i></p>			
<p>The housing element affects a locality’s policies for growth and residential land uses. The goals, policies and objectives of an updated housing element may conflict with those of the land-use, circulation, open space elements as well as zoning and redevelopment plans. The general plan is required to be “internally consistent.” As part of the housing element update, the City should</p>	<ul style="list-style-type: none"> As part of the Housing Element Update, review the General Plan to ensure internal consistency is maintained. 	<p>Chapter 7 of the Housing Element Background Report has been amended and addresses internal consistency between the elements of the General Plan, including the Housing Element. The chapter also discusses how the</p>	<p>HBR-178</p>

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Finding	Interpretation	How the Comment Was Addressed	P. #
review the general plan to ensure internal consistency is maintained. In addition, the City should consider an internal consistency review as part of its annual general plan implementation report required under Government Code section 65400.		City's other plans and policies, including its Municipal Code, Development Code, and Specific Plans must all remain consistent with the Housing Element.	