

Responses to HCD Comments - City of San Joaquin HCD Comment Letter received on February 2, 2023

On February 2, 2024, the City of San Joaquin received a second comment letter from the California Department of Housing and Community Development (HCD) on the Revised HCD Review Draft Housing Element, which was resubmitted to HCD on December 4, 2023. As a result, the City reviewed these comments and revised the document. This version of the Housing Element shows all revisions done in track changes and in yellow highlights, with the latest revisions highlighted in teal. To help the reader track the revisions made, this attachment to the Housing Element outlines the comments from the February 2, 2024, letter with responses from the City describing how and where comments were addressed in the Revised HCD Review Draft Housing Element.

A. Housing Needs, Resources, and Constraints

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).)*

HCD Comment 1: Goals, Priorities, Actions, and Milestones: The element should expand place-based strategies toward community revitalization such as increasing community programs or rehabilitation efforts, including indoor air quality, energy efficiency or other environmental health initiatives. In addition, programs should be revised as follows:

- *Program 6 (Affordable Housing Incentives):* The Program should include geographic targeting such as throughout the City and consider actions to improve housing choices such as increasing R-2 capacity or reducing minimum lot sizes.
- *Program 28 (Improve Access to Resources):* The element should commit to applying for funding at least every other year and implement the capital improvement plan on at least an annual basis.

Response 1:

- Added citywide geographic targeting to a number of programs (e.g., Program 3, Program 5, Program 6, and Program 7), starting on page 1M-1-3.
- Revised Program 23, on page 1M-1-20, to address environmental health (Improve Access to Resources and Environmental Health). Added commitments to pursue grant funding (at least every other year) for environmental health initiatives (e.g., paving dirt roads and trails that would improve air quality) and public infrastructure improvements. Also

added commitments to annually implement the Capital Improvement Plan and to prioritize projects that improve environmental health such as installing new HVAC systems in community facilities.

- Corrected a typo in the Constraints analysis, on page 1M-4-5, to clarify that the City's minimum lot size for the R-1 and R-2 zones are 6,000 and 3,000 square feet, respectively.
- Revised Program 13 (Zoning Code Amendments) to include commitments to revise zero lot line standards in the R-2 zone to allow for a greater variety of housing types, to rezone approximately 5 acres to R-2 zoning, and to reduce the minimum lot size in the R-1 zone.

HCD Comment 2: Zoning for a Variety of Housing Types (Emergency Shelters):

Program 13 (Zoning Code Amendments) should commit to update the definition of emergency shelters in compliance with new requirements and clarify emergency shelters will be permitted without discretionary actions. In addition, the element should further evaluate the redevelopment potential of R-3 properties for emergency shelters, including proximity to services for persons experiencing homelessness. For example, the element could discuss any opportunities for re-purposing existing structures. replacement and then examine any patterns and trends to better formulate appropriate policies and programs such as targeted rehabilitation assistance.

Response 2:

- Added a commitment to adopt the updated State definition of emergency shelters and clarified in Program 13 (Zoning Code Amendments), on page 1M-1-12, that emergency shelters will be permitted without discretionary review.
- Updated the Emergency Shelters section, starting on page 1M-4-10, to note that the definition of emergency shelters was expanded by AB 2339. Also further evaluated the redevelopment potential of R-3 properties for emergency shelters.