

City of Barstow 2021-2029 Housing Element

Quick Guide to Revisions Made in Response to HCD Comments on Previous Submittal

	March 16, 2022 HCD Comments	City Revisions / Responses
1a	<p>Extremely Low-Income Households: The element was generally not revised to address this requirement and must still analyze the housing needs of projected and existing extremely low income households. Please see HCD’s prior review for additional data and information on this issue.</p>	<p>The City updated the housing needs for extremely low-income (ELI) households throughout element. Updates include:</p> <ul style="list-style-type: none"> - Appendix B, p. B-23, Analysis of overpayment, overcrowding, and future need - Housing Plan, p. 19, Adding quantified extremely low income objectives for 2021-2029
1b	<p>Housing Conditions: The element now reports data on the housing units in need of rehabilitation in addition to identifying the age of the housing stock. However, it must still estimate the number of units in need of rehabilitation and in need of replacement. For example, the analysis could include information from a recent windshield survey, estimates from code enforcement, or information from other local organizations.</p>	<p>The City expanded discussion of housing conditions and substandard housing throughout the element. Updates include:</p> <ul style="list-style-type: none"> - Housing Plan, 19, adding quantified objectives for housing rehabilitation for 2021-2029 - Appendix B, p. B-11 adding estimates of housing condition and substandard housing - Appendix D, p. D-54, adding information on substandard housing - Appendix D, p. D-68–73, adding contributing factors and programs to address housing conditions
2a	<p>Sites Inventory: The element must identify and analyze sites for fostering inclusive communities and Affirmatively Furthering Fair Housing. The element discusses identified sites for lower-income households but should also discuss the number of units for all income groups, evaluate the magnitude of the impact, describe any isolation of the sites that address the RHNA and address whether sites improve/ exacerbate each fair housing issue.</p>	<p>The City updated Appendix E, Sites Analysis and Inventory to revise sites, methodology, and fair housing implications. Updates include:</p> <ul style="list-style-type: none"> - Appendix E, p. E-2 to E-3, adding planned and entitled projects credited toward the RHNA - Appendix E, p. E-4 to E-7, revising methodology for site inventory to address the RHNA - Appendix E, p. E-8 to E-10, revising sites to include only vacant sites and mapping their locations - Appendix E, p. E-11 to E-14, addressing the fair housing implication of sites re: segregation, integration, isolation, and access to opportunity
2b - 2c	<p>Local Data and Knowledge, and Other Relevant Factors: The element should incorporate local data and knowledge of the city into the AFFH section. To meet this requirement, the element should provide local data not captured in regional, state, or federal data. The element must include other relevant factors that contribute to fair housing issues in the city. The element can analyze historical land use and investment practices or other information and demographic trends.</p>	<p>The City updated Appendix D to include local data and knowledge and how it influences housing in Barstow. Updates include:</p> <ul style="list-style-type: none"> - Appendix D, p. D-65 adding the results of a housing survey issued after the housing element was adopted to clarify key issues - Appendix D, p. D-66-67, adding a discussion of contemporary issues, including addressing disparities in opportunity, resulting from the City’s past decisions on growth and development.

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2d	<p>Goals, Priorities, Metrics, and Milestones: The element must be revised to add or modify goals and actions based on the outcomes of a complete analysis. 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> <p>Actions must have metrics and milestones as appropriate and must address housing mobility enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for community preservation and revitalization and displacement protection.</p>	<p>The City revised Appendix D and the Housing Plan to include additional goals and actions to reflect the local priorities related to fair housing issues.</p> <p>Updates include:</p> <ul style="list-style-type: none"> - Appendix D, p. D-68-D-70, Set forth five new contributing factors based on revised work. - Appendix D, p. D-71-72, prepared a fair housing matrix documenting factors, issues, programs, geographical areas, metrics, and timetable. - Appendix D, p. D-73, included a map of some of the key improvements planned for the City - Housing Plan, p. 7, adding Program #5 to reduce disparities in economic development - Housing Plan, p. 14, adding Program #16 to address focused capital improvement planning - Housing Plan, p. 15, adding Program #19 to improve environmental and community health - Housing Plan, p. 16, adding Program #20 to explore temporary and permanent workforce housing
3a	<p>Processing and Permit Procedures: The element mentions a Site Plan Review where projects are reviewed to determine the type of approval (e.g., ministerial, staff review and Planning Commission review through public hearing). However, the element does still not fully address this requirement. While the element should also describe procedures for a typical single family and multifamily project. The analysis should address the approval body, number of public hearings, approval findings, and any other relevant information. The element should add or modify programs, as appropriate, based on the outcomes of a complete analysis to address constraints. Please see HCD’s prior review for information.</p>	<p>The City updated Appendix C to include information on local permitting practices, steps, and timelines.</p> <p>Updates include:</p> <ul style="list-style-type: none"> - Appendix D, p. C-18 and C-19, clarifying the project application review process, site plan review, design review, approval findings, and timeframes - Appendix D, p. C-19, clarifying the typical process and timeframe required for a single-family and multiple-family project including reviewing body - Housing Plan, p. 6, includes action item to create objective design standards in Program #4 - Housing Plan, p. 15, contains action to annually evaluate review process to ensure timeliness as stated in Program #17
3b	<p>Housing for Persons with Disabilities: The element now further describes why a conditional use permit (CUP) is required for group homes for seven or more persons but generally was not revised to evaluate the CUP as a constraint on housing for persons with disabilities. Further, the element must still address the exclusion of these uses from several residential zones. The element should</p>	<p>The City updated Appendix C to include information on local permitting practices, steps, and timelines.</p> <p>Updates include:</p> <ul style="list-style-type: none"> - Appendix C, p. C-7, clarifying the need to correctly define residential care facilities per state law. - Appendix C, p. C-7, clarifying the findings required for approving large residential care facilities

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	evaluate the impacts of these requirements and include programs to address identified constraints, such as amending zoning to allow these uses in all residential zones and replace or revise CUP procedures to permit group homes for seven or more persons with objectivity to facilitate approval certainty.	<ul style="list-style-type: none"> - Housing Plan, Program #12 (p. 11-12) commits the City to correctly define residential care facilities, and allow in all residential zones per state law. - Housing Plan, Program #12 (p. 11-12) commits to conditionally allow large facilities in all zones that allow housing but will evaluate and modify any findings that serves as a constraint to ensure objectivity and certainty in the approval process.
4	<p>Beneficial Impact: To have a beneficial impact in the planning period and address housing element goals, programs must be revised with discrete timelines and specific commitment. Specifically, Program 2 (Downtown Barstow) should commit to how often (e.g., at least annually and ongoing) the City will contact developers.</p>	<p>The City has updated the programs, specifically Downtown Barstow (Program #2) specific commitments and time frames to address this comment. Updates include:</p> <ul style="list-style-type: none"> - Housing Plan, Program #2, p. 5, committing to contact developers on an annual and ongoing basis - Revised other housing programs as needed
5	<p>Quantified Objectives: The element now provides a summary of quantified objectives for new construction; however, it must also provide quantified objectives for rehabilitation and conservation by income group, including ELI households.</p>	<p>The City has updated the Housing Plan to include these objectives. Updates include:</p> <ul style="list-style-type: none"> - Housing Plan, p.19, adding quantified objectives for rehab and conservation by income group, including ELI households. Reference included to Table D-5 for objectives for fair housing
6	<p>Diligent Effort at Outreach: While the element lists the programs that were added or modified following workshops, online surveys, and meetings (Appendix F), it still should summarize public comments, including future comments and describe how comments were considered and incorporated into the element. Further, moving forward, the City should employ additional methods for public outreach efforts in the future, particularly to include lower-income and special needs households and neighborhoods with higher concentrations of lower-income households.</p>	<p>Appendix F, Stakeholder Engagement, was significantly expanded to include additional public engagement efforts and show how the results are incorporated into the update. Examples of updates include:</p> <ul style="list-style-type: none"> - Comments raised at the October 2021 adoption hearing for the element, additional public outreach done after HCD’s last element review, and revisions made (beyond state law compliance) as a result of comments from the additional public outreach