



COUNTY OF PLACER
Community Development Resource Agency

PLANNING

Michael J. Johnson, AICP
Agency Director

MEMORANDUM

TO: Honorable Board of Supervisors

FROM: Michael J. Johnson, Director
Planning Department, Community Development Resource Agency

DATE: May 12, 2009

SUBJECT: Placer County Housing Element Update Adoption

ACTION REQUESTED

The Planning Department is requesting that the Board of Supervisors adopt the Negative Declaration prepared for this project and adopt the resolution amending Section 2, Housing, of the Placer County General Plan to approve the 2008 Placer County Housing Element Update.

BACKGROUND

As required by California Government Code Article 10.6, commencing with Section 65583, staff has prepared a Draft Housing Element Update for consideration by the Board of Supervisors. The Draft Housing Element was prepared by a collaboration of County departments and Mintier Harnish, a planning consultant, with input by the public through a number of workshops and public hearings. The Housing Element provides goals, policies, and implementation programs for the planning and development of housing throughout unincorporated Placer County.

Every jurisdiction in California must adopt a General Plan, and every General Plan must contain a Housing Element. While jurisdictions review and revise all elements of their General Plan periodically to ensure that the documents remain up to date, California law is much more specific in regard to the schedule for updating the Housing Element, requiring an update at least every eight years. The current Housing Element planning period runs from 2006 through 2013.

FISCAL IMPACT

Approval of the Housing Element Update will have a positive fiscal impact on the County. The County will be eligible to apply for various state and federal grants and programs once the California Housing and Community Development Department (HCD) certifies this Housing Element Update. For example, the June 2008 \$3.3 million infill infrastructure award to the Redevelopment Agency for the Kings Beach Scattered Sites initiative required a Housing Element deemed in compliance by HCD. The County and Agency will be ineligible to apply for the next round of funding in that program, without a Housing Element deemed in compliance and adopted by the Board. It is anticipated that applications for the next round of funding will be required to be submitted by December 2009.

BACKGROUND/STATE HOUSING ELEMENT LAW

The Housing Element is one of the elements of the County's General Plan and it provides goals, policies and implementation programs for the planning and development of housing throughout unincorporated Placer County. State housing element law, enacted in 1969, mandates that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community.

State law requires that Housing Elements be updated every five years. The Housing Element is the only General Plan element that has a mandatory update requirement. To address this requirement, Placer County initiated the update process in July 2007, hiring Mintier Harnish (formerly Mintier & Associates), a planning consulting firm, to assist County staff with this State-mandate. The Housing Element consists of two documents, a Housing Element Background Report that contains all of the data on the status of housing in Placer County and the Housing Element policy document which contains the goals, policies and programs.

1. Housing Element Requirements

As set forth in Section 65583 (Housing Element Content) of the California Government Code, the law is also specific in terms of the issues that the Housing Element must address, including:

1. An evaluation of the results from housing programs implemented during the previous review period; (i.e., with the County's current Housing Element);
2. An assessment of the County's existing and projected housing needs based on housing, land use, population, demographic and employment trends;
3. An analysis of housing opportunities within the County, including an inventory of suitable sites and the County's capacity to meet regional fair-share goals;
4. An analysis of constraints to providing housing and mitigating opportunities for those constraints; and,
5. A set of goals, policies, resources, and programs for the preservation, improvement and development of housing.

Failure to secure a certified Housing Element from HCD can result in the loss of funding for housing and redevelopment related projects and potential legal challenges. The ramifications of a legal challenge range from court mandated actions to a moratorium on development until the County meets State Housing Element requirements.

2. Accommodating the State Housing Allocation

One of the most important aspects of the Housing Element Update is to identify sufficient sites at appropriate densities for affordable housing to demonstrate that the County can satisfy its Regional Housing Need Allocation (RHNA). The intent of the RHNA is to ensure that each jurisdiction provides its "fair share" of affordable housing in the region. Each jurisdiction must have adequate sites with appropriate zoning to accommodate a variety of housing types suitable for households with a range of income levels and housing needs.

The allocations are intended to be used by jurisdictions when updating their housing elements as the basis for assuring that adequate sites and zoning are available to accommodate at least the number of units allocated. Placer County must describe in its Housing Element how it will provide zoning for these units within the planning period of 2006-2013.

The Resource Inventory section of the Housing Element identifies vacant land that is suitable and available within unincorporated Placer County for higher-density residential development. It compares this inventory to the County's RHNA-assigned need for new housing. Land deemed suitable for residential development in the analysis includes:

- Vacant sites zoned for residential use;
- Vacant sites zoned for nonresidential use that allows residential development;

- Residentially zoned sites that are capable of being developed at a higher density; and
- Sites zoned for nonresidential use that can be redeveloped for, and as necessary, rezoned for residential use.

Demonstrating that the County has sufficient land zoned to support mixed use or higher density housing is essential for certification of the Housing Element by the California Department of Housing and Community Development (HCD).

Placer County is classified as a "suburban jurisdiction" and the density standard is defined as "sites allowing at least 20 units per acre." This is a new designation for Placer County. In the past the County was able to demonstrate affordability at 15 units to the acre. HCD is required to accept sites that meet this density standard as appropriate for accommodating Placer County's share of the regional housing need for lower-income households.

As part of this Housing Element update, the County performed a parcel-specific residential site analysis by conducting windshield surveys, performing a Geographic Information System (GIS) analysis, a review of staff's knowledge of individual sites, and examination of the zoning maps.

Sites with a land use designation/zoning district combination with a maximum allowable density of up to 21 units per acre were inventoried as available for very-low and low income residential development.

In total, the County's residentially-designated land has capacity for 3,512 very low-, 286 low-, and 1,124 moderate-income units. The County's non-residentially-designated land has capacity for 2,728 very low-income units. This includes capacity within adopted Specific Plans (e.g., Placer Vineyards).

The Housing-Element Background Report also provides an inventory of the residential projects built or planned since the start of the Housing Element planning period (January 1, 2006) that have an affordable housing component. As shown in the table below, there are a total of 841 planned and built affordable units: 26 very low-income units, 498 low-income units, and 317 moderate-income units.

AFFORDABLE RESIDENTIAL HOLDING CAPACITY COMPARED TO RHNA BY INCOME				
Unincorporated Placer County				
January 1, 2006 to June 30, 2013				
	Very Low	Low	Moderate	TOTAL AFFORDABLE
RHNA	1,538	1,178	1,231	3,947
Affordable Residential Holding Capacity	6,266	1,176	1,456	8,898
Built and Planned Projects with an Affordability Component	26	498	317	841
Residential Holding Capacity on Vacant Land w/ Residential Designations	3,512	286	1,124	4,922
Residential Holding Capacity on Vacant Land w/ Non-Residential Designations	2,728	0	0	2,728
Residential Holding Capacity on Vacant Land in Tahoe Basin	0	392	15	407

Source: Placer County, TRPA, Muttler Harnish

Total affordable: 8,898 (RHNA: 3,947)

According to the analysis summarized in Table 46 of the Housing Element (same as above table), Placer County has capacity of more than twice the RHNA to accommodate the need for affordable housing.

3. Policies and Programs

State housing law mandates that local governments must adopt land use plans and regulatory systems which provide opportunities for, and do not unduly constrain, housing development for the private market to adequately address housing needs and demand.

In creating housing policy, the County has tried to strike a balance between protecting the existing housing stock, and allowing for the development and production of new housing for all income groups while protecting the quality of life within the County.

Many of the policies and programs contained in the 2006-2013 Housing Element update have been carried forward from the previous element. Other programs have been modified to comply with new State laws or changed local conditions. After public and stakeholder input, several new programs have been proposed for implementation during the planning period to assist with the maintenance, improvement, and development of housing.

The Zoning Ordinance, land use policies, permitting practices, and building codes may contain provisions that could pose constraints to the development of affordable and special needs housing. During workshops, the public and stakeholders were asked to identify governmental and nongovernmental constraints and assist with formulating new Housing Element policy and programs.

Programs have been formulated to assist in the reduction of development costs. Fees and land costs impact housing affordability. Regulatory requirements have also been identified as an impediment to creation of affordable housing. Therefore, the Housing Element recommends the following programs:

- Analyze and modify County regulations and standards that may be impeding production of affordable housing. (Program A-2)
- Determine whether or not fees collected by the County are appropriate and fair, the County shall complete nexus studies analyzing fees on residential and non-residential projects. (Program A-8)
- Reduce landscaping and/or open space requirements by 25 percent for affordable projects located within one-half mile of a public park. (Program B-3)
- Waive environmental review staff time charges on voluntary affordable units (based on percentage of affordable units in project), and consider waiving application processing fees completely for projects where all units are affordable by covenant (non-mitigation fees only) to reduce costs. (Program B-5)
- Continue discussions regarding the creation of a Housing Land Trust in Placer County as a way to lower land costs. (Program B-13)

County procedures and approval processes are sometimes considered to be an obstacle to building affordable and/or special needs housing. In scheduled workshops, the public also identified a need for a County housing facilitator to assist projects through the approval process. Two programs have been proposed in the draft Housing Element intended to streamline approvals:

- Evaluate increasing as-right occupancy in residential care homes from six to eight or fewer residents. Occupancy would likely be based on number of bedrooms and tied to lot size and access. (Program F-1)
- Designate a County 'Housing Point-Person' and create affordable housing working group of County staff and departments to assure Housing Element implementation. (Programs J-1 and J-2)

Secondary units built as-of-right can help increase housing supply. The following program is included in the draft Housing Element:

- **Modify Zoning Ordinance** to ease rules for secondary units. (Program B-12)

To further facilitate development of affordable housing and to encourage innovative design and residential infill development, the County is proposing new zoning districts, flexible development standards, and other incentives. The following programs have been proposed:

- Create new 'mixed-use' zoning district, design guidelines and incentives to provide an affordable housing component. (Program A-4)
- Create new 'infill development' zoning district and design guidelines providing flexibility in lot sizes, building height, setbacks/site planning, parking requirements, etc. to encourage higher-density and affordable housing. (Program A-5)
- Require an affordable housing component for any General Plan or Community Plan amendment that provides an intensification of land use. (Policy B-15)

There is a scarcity of sites appropriate and zoned for medium and high-density residential development, particularly multi-family (MF) parcels. Many of the MF properties have been developed as lower-density, single-family homes. Based upon a review of "best practices" policies from other jurisdictions, the following program is proposed:

- Adopt a zoning text amendment setting a density minimum on multi-family parcels, i.e. 80 percent of base density. There are detached products that may also be able to achieve multi-family densities. (Program A-7)

4. Public Outreach

This 2006-2013 Housing Element update was initiated in July 2007. In recognition of the different housing problems facing Tahoe Basin area residents and residents of western Placer County, kick-off workshops were held in Kings Beach as well as Auburn in early November of 2007.

County staff and consultants distributed announcements of the community/stakeholder workshops to a mailing list of various stakeholders including local residents, housing developers, social service providers, neighborhood associations, and the business community. Furthermore, the County publicized the workshops in local newspapers and on the County website.

The Draft Housing Element Background Report was released for public review and comment in March 2008. Follow-up workshops in Auburn and Tahoe were held in April. Issues raised at the workshops have been summarized in the Introduction Section of the Draft Housing Element.

In mid-May, the Policy Document public review draft was released. Public workshops were scheduled for June 5 and 10 to receive public input and to foster a discussion on the housing issues and policies for the County.

5. California Department of Housing and Community Development Review

The State Department of Housing and Community Development (HCD) is required by State law to review draft housing elements and report their findings to the locality.

The draft Housing Element Background Report was prepared and released for review in March 2008, with the Program and Policy Document released in May 2008. Following public workshops before the Planning Commission and Board of Supervisors, the County submitted the original 2006-2013 Draft Housing Element in August 2008 to HCD for review.

HCD completed their initial 60-day review on October 10, 2008 and responded with a formal comment letter describing the revisions needed to comply with State Housing Element law.

The County submitted a written response to HCD's comments on December 22, 2008. Based upon informal discussions with HCD after their preliminary review of the County's responses and proposed changes to the draft Housing Element, the County revised the response letter that was sent in December. HCD's official response to the revised December submission was issued on February 19, 2009. Through additional discussions and submissions to HCD, Staff revised programs and policies pursuant to the State's additional comments. All of the revisions to the Draft Housing Element Update were made to ensure compliance with State law.

On March 12, 2009, HCD provided a conditional approval letter to the County stating the revised Draft Housing Element Update is in substantial compliance with State law- a copy of which is attached. HCD will certify the update if the Board of Supervisors adopts the same without substantial changes.

6. Housing Element Revisions

Several revisions have been made to the Draft Housing Element in response to the comments provided by HCD in the letters dated October 10, 2008 and February 19, 2009 (see Attachments B and D). Additional discussion, clarifications, and analysis have been added in several areas. The additional analysis has resulted in the revision of various programs and policies and the addition of two new programs based upon HCD's recommendations.

Revisions made to the draft document respond to the State's comments but do not substantively alter the element. The revisions do provide additional information and clarification as necessary to ensure compliance with State law. Other minor revisions were made to the format of the document. The following discussion reviews the key issues raised by the State.

A. Progress in Meeting the Housing Needs Allocation. The Housing Element must document the affordability of units credited as affordable to lower-income households constructed or approved since January 1, 2006, and the status of pending projects with an approximate total of 724 units.

Response. County staff compiled an inventory of all residential projects with an affordable and/or multi-family housing component that have been constructed, are under construction, or are planned within the current Housing Element Planning Period.

Table A-1 was revised to add information on the type of affordability covenants for each project and its status.

B. Inventory of Vacant Sites within Specific Plans. The Housing Element describes available residential capacity in approved Specific Plans for over 16,000 housing units, including 1,278 units affordable to lower-income households. To insure that these units are available to accommodate the County's share of the regional housing need, the State required a description of phasing or other timing requirements that impact the units being built during the planning period.

Response. Due to the current economic conditions and depressed new-home construction market, it is unlikely that construction will start on any homes in these projects in the near-term, but it is possible that construction could begin before the end of the planning period. However, the land is available and properly zoned for the affordable housing units required as a condition of their approval.

In the original Draft Housing Element submitted to HCD (August 2008), the number of planned affordable housing units in each Specific Plan were applied towards the RHNA obligation. However, during the HCD review process, County staff and the Consultants changed the strategy for inventorying the capacity for affordable housing within Specific Plans. Rather than counting the number of planned affordable housing units in each Specific Plan, which are oftentimes required after a substantial portion of the planned market-rate units have been built, the high-density parcels in each plan that are available for high-density/affordable housing were inventoried. This analysis showed additional capacity for affordable housing on the high-density sites than previously counted. The land is available and properly zoned for the affordable housing units required as a condition of their approval, and could be developed within the time frame of the Housing Element.

- C. Realistic Capacity.** Residential capacity projections for vacant residentially-zoned sites are based on 85 percent of allowed density. The State requested an analysis of projects recently built or under construction to show that 85 percent maximum buildout was realistic.

Response. The County provided five examples of recent projects that have been approved at densities close to the existing maximum densities for higher-density land use designations including the Orchard at Penryn, Colonial Village, the Pardee Court subdivision and Terracina Oaks. Each project has been approved at densities at or above the 85 percent level.

- D. Processing and Permitting Procedures.** Many of the sites identified in the inventory to accommodate the allocation of lower-income housing are located in the C2 and CPD zones which require a Conditional Use Permit for multifamily development. The State identified the CUP process as a potential constraint and required additional information on how the CUP process could potentially impact project approval, certainty, timing, and cost.

Response. The County proposed a new program to remove the requirement to obtain a CUP for certain multi-family developments in the C1 and C2 zone districts:

Program B-15 MULTI-FAMILY HOUSING ON COMMERCIAL SITES

To facilitate the construction of high-density housing on commercially-zoned sites, the County shall consider amending the zoning ordinance provisions for multi-family housing use. These revisions may include amending the zoning ordinance to allow multi-family dwellings; 20 or fewer units/acre as a permitted use by right in the C1 and C2 zone districts.

- E. Completion Dates.** To address the requirements of Government Code Section 65583(C) (1-6), all programs where specific actions are required, were revised to include specific completion dates.

Response. In response, the County has changed the fiscal year ranges in the draft Housing Element to a specific month and year in the revised document.

- F. Zoning for Single-Room Occupancy Units.** State law requires each jurisdiction to provide appropriate zoning that explicitly allows Single-Room Occupancy units with development standards that encourage and facilitate development. A Single-Room Occupancy Unit is a room individually leased or rented within a dwelling that does not contain its own kitchen facilities.

Response. Placer County's Zoning Ordinance does not explicitly address single-room occupancy units. Therefore, the following program was added to ensure that the County complies with State law:

Program G-4 SINGLE ROOM OCCUPANCY (SRO) UNITS

The County shall amend the Zoning Code to define Single Room Occupancy (SRO) units and explicitly allow SROs as a residential use in certain zones. These zones could include Multi-Family Residential (RM), Highway Service (HW), and Resort (RES) zoning districts.

- G. Addressing the Needs of Extremely Low-Income Households.** HCD suggested changes to several programs to include language to specifically address the housing needs of extremely low-income households.

Response. Three policies were modified and one new program was included to address the needs of extremely low-income households. The underlined text was added to the following programs:

Program B-6 REDEVELOPMENT SET-ASIDE FUNDS

Consistent with State law, twenty percent of the tax increment funds accruing to the Redevelopment Agency shall be directed to affordable housing. If successful in receiving funding from the Local Housing Trust Fund matching program, the County shall encourage the Redevelopment Agency to work with affordable housing developers to utilize a portion of set-aside funds for development of housing affordable to extremely low-income households.

Program B-9 STATE AND FEDERAL FUNDS

The County shall apply for State and Federal monies for direct support of low-income housing construction and rehabilitation. The Redevelopment Agency and Health and Human Services shall continue to assess potential funding sources, such as, but not limited to, the Community Development Block Grant (CDBG), and HOME. The County shall also seek State and Federal funding specifically targeted for the development of housing affordable to extremely low-income households, such as the Local-Housing-Trust Fund program and Proposition 1-G funds. The County shall promote the benefits of this program to the development community by posting information on its web page and creating a handout to be distributed with land development applications.

Program B-5 FEE WAIVERS

The County shall adopt a resolution waiving 100 percent of the application processing fees for developments in which 5 percent of units are affordable to extremely low-income households, 10 percent of the units are affordable to very low-income households, 20 percent of the units are affordable to low-income households, or 30 percent of the units are affordable to moderate-income households. Additionally, the County shall evaluate waiving environmental review staff time charges for projects containing affordable housing units. To be eligible for fee waiver, the units shall be affordable by affordability covenant. The waiving or reduction of service mitigation fees may also be considered when an alternative funding source is identified to pay these fees. The County may use either redevelopment set-aside funds or the Housing Trust Fund to subsidize the service and mitigation fees for affordable housing developments. The County shall promote the benefits of this program to the development community by posting information on its web page and creating a handout to be distributed with land development applications.

The County is also proposing to include a new policy regarding extremely low-income housing:

New Policy: The County currently requires 10 percent of residential units in specific plans be affordable (4 percent very-low, 4 percent low, 2 percent

moderate). On a case-by-case basis, the County shall consider allowing developers that provide extremely low-income units to reduce the required percentage of other affordable units.

PLANNING COMMISSION RECOMMENDATION

On March 26, 2009, a public workshop was conducted by the Planning Commission. No public comments were received. On April 9, 2009, after conduction of a public hearing, during which no member of the public testified or submitted written comments, the Planning Commission unanimously adopted a motion to recommend the Board of Supervisors adopt the Draft Housing Element Update.

RECOMMENDATION

The Planning Department recommends that the Board of Supervisors take the following actions:

1. Adopt the Negative Declaration prepared for the Housing Element Update based on the following findings:
 - A. The negative declaration has been prepared as required by and in accordance with the California Environmental Quality Act;
 - B. There is no substantial evidence in the record as a whole that the adoption of the updated Housing Element will have a significant effect on the environment; and,
 - C. The negative declaration as adopted reflects the independent judgment and analysis of Placer County, which has exercised overall control and direction of its preparation.

2. Adopt the attached resolution, amending Section 2, Housing, of the Placer County General Plan adopted by the Board of Supervisors on May 20, 2003 to approve the Placer County Housing Element Update.

Respectfully submitted,



MICHAEL J. JOHNSON, AICP
Community Development / Resource Agency Director

Attached to this report for the Board's information/consideration are:

ATTACHMENTS:

- Attachment A: HCD Comment Letter, October 10, 2008
- Attachment B: Response to HCD Comments, December 23, 2008/February 17, 2009
- Attachment C: HCD Comment Letter, February 19, 2009
- Attachment D: Response to HCD Comments, February 26, 2009/March 5, 2009
- Attachment E: HCD Compliance Letter, March 12, 2009
- Attachment F: Negative Declaration and comment letter
- Attachment G: Resolution to Adopt the Housing Element

OTHER DOCUMENTS (AVAILABLE FOR REVIEW WITH THE CLERK OF THE BOARD):

Housing Element Background Report and Policy Document, HCD Review Draft

cc: Bob Martino – Chief Building Official

Gina Langford – Environmental Coordinator
Holly Heinzen – County Executive Office
Joanne Auerbach – Redevelopment Agency
Jill Pahl – Environmental Health Services
Karin Schwab – County Counsel
Loren Clark – Deputy Planning Director
Paul Thompson – Deputy Planning Director
Rich Colwell – County Executive's Office/Redevelopment
Richard Eiri – Engineering and Surveying Division
Housing Element Distribution List
All MAC's

STATE OF CALIFORNIA BUSINESS, TRANSPORTATION AND HOUSING AGENCY
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
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October 10, 2008

Mr. Michael Johnson
Planning Director
County of Placer
3097 County Center Dr., Ste 140
Auburn, CA 95603

Dear Mr. Johnson:

RE: Review of the County of Placer's Draft Housing Element

Thank you for submitting Placer County's draft housing element received for review on August 13, 2008. The Department is required to review draft housing elements and report the findings to the locality pursuant to Government Code Section 65585(b). A meeting on October 7, 2008 with Messrs. Loren Clark, Assistant Director, Christopher Schmidt, Senior Planner, Ms. Ann Baker, Principal Planner, and Mr. Rik Keller and Ms. Chesley Norton, with Mintier Hamish, the County's Consultants, facilitated the review.

The Department commends the County's successful implementation of many of the programs in the previous planning period, including the development of the Children's Emergency Shelter and Health Center; the institution of the one-stop permit counter which has facilitated a streamlined permitting process and the commitment to establish minimum density standards in the Multifamily Residential (RM) zoning district. The draft element addresses many statutory requirements; however, revisions will be necessary to comply with State housing element law (Article 10.6 of the Government Code). In particular, the element must include a more detailed analysis of identified sites and potential governmental constraints such as permit procedures. The enclosed Appendix describes these and other revisions needed to comply with State housing element law.

If you have any questions or would like assistance, please contact Melinda Coy, of our staff, at (916) 445-5307. We would be happy to arrange a meeting in either Auburn or Sacramento to provide any assistance needed to facilitate your efforts to bring the element into compliance.

Sincerely,

Cathy E. Creswell
Deputy Director

Enclosure

ATTACHMENT A

11

APPENDIX PLACER COUNTY

The following changes would bring Placer's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on the Department's website at www.hcd.ca.gov/hpd. Refer to the Division of Housing Policy Development and the section pertaining to State Housing Planning. Among other resources, the Housing Element section contains the Department's latest technical assistance tool *Building Blocks for Effective Housing Elements (Building Blocks)* available at www.hcd.ca.gov/hpd/housing_element2/index.php, the Government Code addressing State housing element law and other resources.

A. Housing Needs, Resources, and Constraints

1. *Include an inventory of land suitable for residential development, including vacant sites and sites having the potential for redevelopment, and an analysis of the relationship of zoning and public facilities and services to these sites (Section 65583(a)(3)). The inventory of land suitable for residential development shall be used to identify sites that can be developed for housing within the planning period (Section 65583.2).*

The County has a Regional Housing Need (RHNA) of 6,229 housing units, of which 2,716 units are for lower-income households. The element relies on approved developments, vacant sites, and sites within commercial zones that allow residential development, to address this need. To demonstrate the adequacy of these sites and strategies to accommodate the County's share of the RHNA, the element must include an analysis, as follows:

Progress in Meeting the Regional Housing Need Allocation: Table A-1 lists a number of projects that have been built, under construction, approved, or are pending entitlements. However, the element must document the affordability of the 1,585 units credited as affordable to lower-income households constructed or approved since January 1, 2006, and the status of 724 units pending approval. Specifically, the element must demonstrate affordability of units credited to the lower-income need based on actual sales prices, rents, or information on financing or other mechanisms establishing affordability. For projects pending approval, the element should provide information regarding the projected affordability and describe the anticipated timing and types of entitlements needed for approval.

The element describes available residential capacity in approved specific plans for over 16,022 units, including 1,278 units affordable to lower-income households. To utilize this capacity to accommodate the County's share of the regional housing need, the element must include a description of phasing or other timing requirements that impact the units being built in the planning period. For example, of the 16,022 units, how many units are projected to be developed in the planning period? This analysis should particularly address timing requirements for housing anticipated to be affordable to lower-income households. In addition, the Bickford

Ranch Specific Plan development agreement allows 50 percent of the affordable units to be accommodated through other mechanisms such as in-lieu fees, land dedication, or constructed off site. In order to credit these 90 units, the element must demonstrate these units will be constructed within the planning period.

Suitability of Non-Vacant Sites: The sites inventory contains several parcels which would require some demolition (page 188). If utilizing non-vacant sites to accommodate the regional housing need, the element must include a description of existing uses, analyze the extent to which existing uses may impede additional residential development and describe, relative to identified sites, development trends, market conditions and regulatory incentives and standards to facilitate redevelopment or reuse. This analysis could utilize interest from property owners, applications in the planning stage or recent redevelopment activity and describe recent characteristics and circumstances leading to redevelopment, such as discontinuing uses, which could be compared to the identified sites to demonstrate their suitability in the planning period.

Realistic Capacity: The inventory indicates realistic residential capacity projections are based on 85 percent of allowed density. The element must describe the methodology for establishing the capacity estimates of sites. The analysis must adjust the calculation to account for land-use controls and site improvements, including height limits. The element could also describe the typical density yield of those projects recently built or under construction.

In addition, the analysis should specifically describe the methodology for determining the residential capacity on commercial sites that allow residential development. This is particularly important since all of these identified sites can be wholly developed for non-residential uses. For example, Table A-2 notes two of the commercial parcels have non-residential uses in the "pre-development" stage. The analysis should specifically account in the calculation of capacity any current proposal and account for the potential for other uses other than residential being built and describe any existing or proposed regulatory incentives and standards to facilitate housing development in the commercial zones.

Zoning to Encourage and Facilitate Housing for Lower-income Households: Should the County need to rely on sites allowing less than 20 dwelling units per acre to accommodate a portion of the RHNA for lower-income households, the element must demonstrate the adequacy of the zone including the base density, without density bonus, to encourage and facilitate the development of housing based on factors such as market demand, financial feasibility and development experience within zones or identify additional sites at appropriate densities.

Environmental Constraints: While the element notes identified sites accounted for slope and flood zones, it should include a general analysis of the full range of known environmental constraints, such as conservation easements, wetlands, and oak tree preserves, which could impede development in the planning period.

2. *Analyze potential and actual governmental constraints upon the maintenance, improvement, and development of housing for all income levels, including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures. The analysis shall also demonstrate local efforts to remove governmental constraints that hinder the locality from meeting its share of the regional housing need in accordance with Section 65584 (Section 65583(a)(5)).*

Land-Use Controls: While the element describes Placer County's zoning and development standards for typical residential zones (Table 64), it must describe and analyze the development standards for residential development within commercial and mixed-use zones.

Processing and Permit Procedures: As the element describes typical approval requirements for residential development, it should also describe the typical process and timeframes for approval of both single-family and multifamily residential projects. In addition, many of the sites identified in the inventory to accommodate the RHNA for housing for lower-income households are located in the C2 and CPD zones which require a CUP for multifamily development. The element must identify typical findings of approval for the CUP and analyze the process for the potential impact on approval certainty, timing, and cost. The County may need to include a program to mitigate or remove this process requirement especially as it relates to the identified potential for residential development.

3. *Analyze existing assisted housing developments that are eligible to change to non-low-income housing uses during the next 10 years due to termination of subsidy contracts, mortgage prepayment, or expiration of use restrictions (Sections 65583(a)(8) through 65583(a)(9)(D)).*

While the previous housing element identified the Foresthill Apartments as at-risk for conversion, these units were removed from the at-risk list. According to the US Department of Agriculture this project is eligible to convert in 2016 which is within the 10-year period required by housing element law. The element must include an analysis of the potential risk of conversion including a cost estimate of replacing the at-risk units. This analysis will facilitate development of a program to address the critical nature of preserving at-risk units.

B. Housing Programs

1. *Include a program which sets forth a five-year schedule of actions the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the housing element through the administration of land-use and development controls, provision of regulatory concessions and incentives, and the utilization of appropriate federal and State financing and subsidy programs when available. The program shall include an identification of the agencies and officials responsible for the implementation of the various actions (Section 65583(c)).*

-4-

To address the requirements of Government Code Section 65583(c)(1-5), all programs where specific actions are required, must be revised to include specific completion dates. In addition, Programs B-9 (State and Federal Funds) and Program C-2 (Employee Housing) should be revised to include a specific commitment to seek funding and formalize procedures, respectively.

2. *Identify adequate sites which will be made available through appropriate zoning and development standards and with public services and facilities needed to facilitate and encourage the development of a variety of types of housing for all income levels, including rental housing, factory-built housing, mobilehomes, and emergency shelters and transitional housing. Where the inventory of sites, pursuant to paragraph (3) of subdivision (a), does not identify adequate sites to accommodate the need for groups of all household income levels pursuant to Section 65584, the program shall provide for sufficient sites with zoning that permits owner-occupied and rental multifamily residential use by right, including density and development standards that could accommodate and facilitate the feasibility of housing for very low- and low-income households (Section 65583(c)(1)).*

As noted in finding A1, the element does not include a complete site analysis and therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the County may need to add or strengthen programs to address a shortfall of sites or zoning available to encourage a variety of housing types. At a minimum, the element should be revised as follows:

As referenced (page 87), the County must comply with recent statutory changes pursuant to Chapter 633, Statutes of 2007 (SB 2), requiring, among other things, the identification of at least one zone(s) where emergency shelters are permitted without a conditional use permit (CUP) or other discretionary action within one year of the beginning of the planning period. While the element states Placer County will amend the zoning code to designate emergency shelters in the RM zone with a zoning clearance, it must demonstrate that the RM zone provides sufficient opportunities to accommodate the identified need in the planning period, and should consider opportunities available in suitable locations near services and facilities. In addition, the element must demonstrate that proposed permit processing, development, and management standards encourage and facilitate the development of, or conversion to, emergency shelters. To assist in addressing this statutory requirement, refer to the Department's SB 2 memo at http://www.hcd.ca.gov/hcd/sb2_memo050708.pdf

In addition, the element states that the Placer County zoning ordinance does not explicitly address single-room occupancy (SRO) units (page 96). Therefore, the element must include implementation actions to provide appropriate zoning that explicitly allows SROs with development standards that encourage and facilitate development.

3. *Provide information on the redevelopment agency's role in the County's effort to encourage the development of a variety of housing types for all income levels (Section 65583(c)).*

The element estimates the County will accrue approximately \$11,225,572 in low- and moderate-income set aside funds through 2012 (page 98). The County should describe the proposed uses of these funds relative to the programs described in the element. For your information, Community Redevelopment Law (Health and Safety Code Section 33334.4) requires agencies, over each 10-year period of the implementation plan, to ensure housing assistance is proportionately provided to very low- and low-income households (based on the proportion each group represents of the community's total housing need for lower- and moderate-income persons) and also to persons under the age of 65 years (based on the proportion this population group represents of the total population reported from the current census). In addition, 33413(b)(4) requires a redevelopment implementation plan to be consistent with a community's housing element. The integration of applicable information from the redevelopment agency's current housing implementation plan into the housing element will assist in the development of an effective housing element.

4. *The housing element shall contain programs which "assist in the development of adequate housing to meet the needs of extremely low-, low- and moderate-income households (Section 65583(c)(2)).*

While the element includes some programs to assist the development of very low-, low-, and moderate-income households, programs should be expanded or added pursuant to Chapter 891, Statutes of 2006 (AB 2634), to specifically assist in the development of a variety of housing types to meet the housing needs of extremely low-income households. Given the importance of the Program A-4 (Mixed-use development) in addressing Placer County's housing need, the County should consider modifying the program to include additional incentives to facilitate the development of residential such as by-right processing of multifamily units and financial incentives for developments which provide housing affordable to lower-income households.

5. *The housing element shall contain programs which "address, and where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing" (Section 65583(c)(3)).*

As noted in finding A2, the element requires a more detailed analysis of potential governmental constraints. Depending upon the results of that analysis, the County may need to strengthen or add programs and address and remove or mitigate any identified constraints.

RESPONSES TO HCD COMMENTS PLACER COUNTY DRAFT HOUSING ELEMEN

DECEMBER 23, 2008
REVISED FEBRUARY 17, 2009

The following report summarizes Placer County's responses to the California Department of Housing and Community Development's (HCD) review letter of October 10, 2008 concerning Placer County's Draft Housing Element dated August 12, 2008. The report includes verbatim excerpts from HCD's review letter and both narrative responses and proposed changes to the text (in ~~strikeout~~ and underline) of the HCD Review Draft Background Report and Policy Document of the Housing Element.

HCD Comment A.1

The County has a Regional Housing Need (RHNA) of 6,229 housing units, of which 2,716 units are for lower-income households. The element relies on approved developments, vacant sites, and sites within commercial zones that allow residential development, to address this need. To demonstrate the adequacy of these sites and strategies to accommodate the County's share of the RHNA, the element must include an analysis, as follows:

HCD Comment A.1a

~~Progress in Meeting the Regional Housing Need Allocation.~~ Table A.1 lists the number of projects that have been built, under construction, approved, or are pending entitlements. However, the element must document the affordability of the 1,585 units credited as affordable to lower-income households constructed or approved since January 1, 2006, and the status of 724 units pending approval. Specifically, the element must demonstrate affordability of units credited to the lower-income need based on actual sales prices, rents, or information on financing or other mechanisms establishing affordability. For projects pending approval, the element should provide information regarding the projected affordability and describe the anticipated timing and types of entitlements needed for approval.

Response: Table A.1 will be revised to add information for many of the listed projects, including affordability covenants and project status. The new table (with changes tracked from the previous version) is in the Appendix of this document. There were also several minor revisions made to Table A-2. The new table (with changes tracked from the previous version) is in the Appendix of this document. The following text from page 79 of the Background Report will be revised:

Inventory of Built and Planned Projects with an Affordable Housing Component

Since the Housing Element planning period runs from January 1, 2006, to June 30, 2013, the County's Regional Housing Needs Allocation (RHNA) can be reduced by the number of new units built or approved since January 1, 2006.

County staff compiled an inventory of all residential projects with an affordable and/or multi-family housing component that have been constructed, are under construction, or are planned within the current Housing Element planning period as follows (residential projects without an affordable housing component are not shown in the inventory):

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- Units built since the start of the current Housing Element planning period (January 1, 2006),
- Units currently (as of January 1, 2008) under construction; or
- Units currently (as of January 1, 2008) "planned" (whether approved or in the planning process) and scheduled to be built by the end of the current Housing Element planning period (June 30, 2013)

Table A-1 (in Appendix A) shows the inventory of built and planned projects by location within the Placer County unincorporated area. The effective inventory date is January 1, 2008, and the project status as of that date is used for inventory purposes. For each project the table shows the Assessor's Parcel Number(s) (APN), Placer County General Plan land use designation, zoning district, size, number of units, number of affordable units (by very low-, low-, and moderate-income categories), description of affordable units, project status, and additional notes. The following assumptions were used to determine income categories of units:

- Actual affordable categories when known;
- Default assumption of low-income units when not specified/not yet known;
- Employee/workforce housing as low-income;
- Mobile homes as low-income; and
- Market-rate multi-family units without income restrictions as moderate-income.

For many of the approved/proposed projects, there is no information available regarding pricing and/or affordability restrictions. Oftentimes the details on the affordable or workforce housing obligations for projects are negotiated after project approval. The County has made several assumptions for these projects to determine projected affordability levels. In 2003 Bay Area Economics completed a survey of seasonal workers in the nearby Town of Truckee. According to the survey, resort workers earned an average weekly wage of \$306 in 2003, which is equal to \$353 in 2008 when adjusted for inflation. These wages would qualify the average resort worker as very low-income. Based on the findings in this survey and other knowledge of the local seasonal workforce, employee/workforce housing is categorized as low-income in the inventory of projects. For projects with an affordable housing obligation, the County is assuming that a deed restriction will be required, which is consistent with the existing affordable housing units in Placer County. The other assumptions in the table regarding the number and type of required affordable units for approved projects are based on County policy and requirements imposed on existing projects.

Market rate attached housing (including apartments, duplexes, half-plexes, townhomes, and condos) outside of the Tahoe Basin are assumed to be moderate-income based on the rental/sales prices of existing units of this type. This assumption applies to the Premier Granite Bay subdivision, Pardec Court subdivision, Orchard at Penryn subdivision, and Morgan Place subdivision projects.

As shown in the table, there have been two projects with an affordable residential component constructed since January 1, 2006: Atwood Village and Sawmill Heights. The other projects shown in the table are at various stages in the approval process.

Based on the revisions to Table A-1 and A-2, the following is the updated Table 46. All text referring to these tables will be updated as appropriate.

TABLE 46 AFFORDABLE RESIDENTIAL HOLDING CAPACITY COMPARED TO RHNA BY INCOME Unincorporated Placer County January 1, 2006 to June 30, 2013				
	Very Low	Low	Moderate	TOTAL AFFORDABLE
RHNA	1,538	1,178	1,231	3,947
Affordable Residential Holding Capacity	3,243	2,170	670	6,083
	6,266	1,176	1,390	8,832
Built and Planned Projects with an Affordability Component (see Table A-1)	725	1,583	575	2,883
	26	498	317	841
Residential Holding Capacity on Vacant Land w/ Residential Designations (see Table A-2)	348	496	80	624
	3,512	286	1,073	4,871
Residential Holding Capacity on Vacant Land w/ Non-Residential Designations (see Table A-2)	2,140	0	0	2,140
	2,728			2,728
Residential Holding Capacity on Vacant Land in Tahoe Basin (see Table A-3)	0	392	15	407

Source: Placer County, TRPA, Munier & Associates

HCD-Comment-A-1b

The element describes available residential capacity in approved specific plans for over 16,022 units, including 1,278 units affordable to lower-income households. To utilize this capacity to accommodate the County's share of the regional housing need, the element must include a description of phasing or other timing requirements that impact the units being built in the planning period. For example, of the 16,022 units, how many units are projected to be developed in the planning period? This analysis should particularly address timing requirements for housing anticipated to be affordable to lower-income households. In addition, the Bickford Ranch Specific Plan development agreement allows 50 percent of the affordable units to be accommodated through other mechanisms such as in-lieu fees, land dedication, or constructed off site. In order to credit these 90 units, the element must demonstrate these units will be constructed within the planning period.

Response: The following text will be added to the Residential Sites Inventory Section, starting on page 77 of the Background Report:

Inventory of Vacant Sites Within Specific Plans

As described on page 143, Placer County has used the Sacramento Area Council of Government's (SACOG) Affordable Housing Compact as guidance for its affordable housing requirements. While the SACOG compact provides for voluntary production standards, the County has mandated a minimum of 10 percent of all units built within Specific Plan areas be made available to very low-, low-, and moderate-income households. The 10 percent goal is guided by the following rules:

- At least 4 percent of all new housing construction will be affordable to very low-income families.

- At least 4 percent of all new housing construction will be affordable to low-income families.
- Up to 2 percent of the 10 percent goal could be met by housing affordable to moderate-income families.

The Bickford Ranch, Placer Vineyards and Regional University Specific Plans have been approved by the Placer County Board of Supervisors with affordable housing requirements. More than 1,900 affordable housing units have been entitled. Due to the current economic conditions and depressed new-home construction market, it is unlikely that construction will start on any homes in these projects in the near-term, but it is possible that construction could begin before the end of the planning period. The land is available and properly zoned for the affordable housing units required as a condition of their approval, however. The Riolo Vineyards Specific Plan is not yet approved, but was reviewed by the Planning Commission on December 18, 2008 and recommended for adoption. The Board of Supervisors will review the plan in March 2009. The project would generate an additional 60 affordable housing units.

While the specific plans will provide affordable units through specific affordable housing agreements, not all of the locations of the affordable units are known making it difficult to project realistic development capacity within the time frame of the Housing Element. However, all of the specific plans include areas designated as high-density housing, some with allowed densities of up to 25 units per acre. The following describes the realistic capacity for medium and high-density housing as well as the affordability requirements. For the purpose of inventorving residential development capacity, the analysis focuses on the capacity on higher-density sites.

Bickford Ranch Specific Plan

The County approved the Bickford Ranch Specific Plan on December 18, 2001. The plan includes 17.3 acres of land designated Village Residential (VR) with an expected 172 units. This land use designation is intended to provide for high-density attached residential units that could include apartments, condominiums, or townhomes. Of the 172 units planned under this designation, 106 are expected to be built as senior, affordable units (parcel R-7C). The other units are expected to be townhomes, and will likely be affordable moderate-income households based on the expected density of 9.9 units/acre.

Pursuant to the terms of the executed Development Agreement, the developer of Bickford Ranch is required to develop or cause to be developed 180 below-market rate housing units, affordable to lower income households earning not more than 80 percent of the Placer County median income. The developer is required to construct up to 106, and no less than 90, of the units on site. The Development Agreement requires the developer to provide 'gap financing' needed to provide the balance of the below market rate units not constructed on site. Units may be developed as an affordable age-restricted multi-family project. Upon creation of the parcel designated "Village Residential," the landowner is required to record a notice of restriction on the parcel restricting the development and use of the property to affordable housing.

Table A-1 will be modified to reflect the requirements that 90 affordable units are required to be developed on site. The table shows the following required affordable units: 90 low income. The following is a description of the requirements for the affordable units in the Specific Plan:

The affordable housing will be constructed in a staged process as specified in the Development Agreement:

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- Prior to approval of the final subdivision map creating the 900th residential lot, the landowner must obtain approval of the applicable development entitlement for the construction of a senior affordable multi-family project on the Village Residential site, or submit a complete application to the County or show proof of submission of a complete application to a city within the County for an off-site affordable housing project.
- Prior to County approval of the final subdivision map creating the 1,300th residential lot, the landowner shall have commenced construction of either the on-site or off-site affordable housing project.
- Prior to County approval of the final subdivision map creating the 1,500th residential lot, the landowner shall have commenced construction of the affordable housing units that constitute the remaining obligation pursuant to the Development Agreement.

Figure XX (numbering TBD) shows the land use summary and phasing for Bickford Ranch. The plan claims that all residential development could occur within six to eight years from start to finish. The plan calls for residential development to generally occur from Sierra College Boulevard to the east. The parcel planned for senior affordable housing (see parcel R-7C of Figure XX) is located along the main arterial, Bickford Ranch Road, and within the area planned to be constructed during Phase I. Therefore, it is realistic to assume that the 106 units planned for affordable senior housing could be constructed within the timeframe of the Housing Element. Since the developer is only required to build 90 units on-site, this Housing Element inventories the R-7C parcel as having realistic capacity for 90 units.

Regional University Specific Plan

The County Board of Supervisors approved the Regional University Specific Plan on November 4, 2008. The plan includes 44.3 acres of High Density Residential (HDR) land (16-25 units/acre), 139.9 acres of Medium Density Residential (MDR) land (8-15.9 units/acre), and 10 acres of Commercial Mixed Use (CMU) land. Based on HCD's "default density standard" the sites designated as HDR have a capacity for 931 very low-income residential units. The MDR sites have a capacity for 1,508 moderate-income units.

However, the plan calls for phasing. University Boulevard will be constructed in two phases. Phase I, which includes 59.1 acres of MDR and 16.4 acres of HDR, could realistically be completed during the timeframe of the Housing Element. These HDR and MDR sites have a realistic capacity for 295 very low-income units and 650 moderate-income units.

Figure XX (numbering TBD) shows the land use summary of the Regional University Specific Plan. As shown in the figure, the HDR, MDR, and CMU designated sites are all located along the main arterial, University Boulevard. However, only the eastern part of University Boulevard is expected to be constructed during Phase I. Therefore, this Housing Element only inventories capacity on the sites included in Phase I of the plan.

The development agreement requires the following affordable units: 126 very low-income, 127 low-income, and 65 moderate-income. The higher-density sites have a greater capacity for affordable units than are required in the affordable housing agreement for the specific plan. The following is a description of the requirements for each level of affordable units in the Specific Plan:

Four percent very-low income. The developer has one of three options: A \$5.04 million lump sum payment amount; \$50,000 per required very-low income affordable unit based upon development milestones within the community; or a per-unit building permit fee equal to \$2,500 per residential unit and adjusted annually based upon a construction cost index. The developer is obligated to construct 126 units of housing for very-low income households according to the "Campus Master Plan."

Low-income units. A deed restriction will be recorded on Parcel 15 within the community to accommodate 127 units of low-income affordable housing. There is no obligation to build, but the applicant must also execute and record an irrevocable offer to dedicate the site to the County within 15 years.

Moderate-income units. Sixty-three moderate affordable units are required and may be provided as affordable for-sale units within Parcels 5, 18 and 24, but may be transferred. Prior to the approval of each final residential lot subdivision map within these parcels, the parties shall enter into an Affordable Purchase or Rental Housing agreement for the residential units affordable to low-income households. Affordable units are deed restricted for a period of 30 years.

Placer Vineyards Specific Plan

The Planning Commission approved the Placer Vineyards Specific Plan on July 16, 2007. The plan includes 205 acres of High Density Residential (HDR) land (7-21 units/acre) and 50.5 acres of Commercial Mixed Use (CMU) land (14-22 units/acre). Based on HCD's "default density standard" the sites designated as HDR have a realistic capacity for 2,881 very low-income residential development. The CMU sites have a realistic capacity for 636 very low-income units (see Table A-2).

The plan calls for Placer Vineyards "to invest and construct a Core Backbone Infrastructure in one phase and initial public service facilities that will allow all the major project developments in the Plan Area to proceed in a logical fashion." Core Backbone Infrastructure includes initial roadway improvements to the following roads: Base Line Road, Watt Avenue, West Dyer Lane, 16th Street, and 18th Street. The initial water, wastewater, and dry utilities infrastructure will support development along these initial roadway improvements.

The realistic capacity for higher-density sites is based on the assumption that all of the higher-density and mixed-use sites within the Placer Vineyards Specific Plan are located along the Core Backbone of roadways, will be some of the first areas to have access to infrastructure, and could therefore be developed within the time frame of the Housing Element. Figure XX (numbering TBD) shows the land use summary of the Regional University Specific Plan. As shown in the figure, the majority of HDR and CMU designated sites (except sites 1 and 2) are located along Base Line Road, Watt Avenue, West Dyer Lane, and 16th Street.

The development agreement requires at least the following affordable units within the Placer Vineyards Specific Plan: 549 very low-income, 549 low-income, and 274 moderate-income. The following is a description of the requirements for each level of affordable units in the Specific Plan:

The Development Agreement states that the "affordable units shall be developed generally concurrently and in proportion with development of the market rate units within the balance of the Property." The agreement requires the developer to complete the design and obtain all required approvals for the development of the affordable units prior to the issuance of the first building permit after building permits

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for 50 percent of the total number of single family residential units approved for the project have been issued. The developer must complete construction of the affordable units prior to the issuance of the first building permit after building permits for 75 percent of the total number of single family residential units approved for the project have been issued. Units may be either purchase or rental affordable units or a mixture of both and may be located anywhere on the property and must be maintained as affordable units for a period of 30 years.

Riolo Vineyards Specific Plan

The Planning Commission approved the Riolo Vineyards Specific Plan on December 18, 2008. The plan includes 3.2 acres of High Density Residential (HDR) land (10-23 units/acre) and 36.5 acres of Medium Density Residential (MDR) land (5-10 units/acre). Based on HCD's "default density standard" the sites designated as HDR have a realistic capacity for 60 very low-income residential development. The MDR sites have a realistic capacity for 277 moderate-income units (see Table A-2).

The realistic capacity assumption is based on the location of the HDR- and MDR-designated sites. The 3.2-acre HDR site is located at the corners of two major roads: Watt Avenue and PFE Road. The 36.5 acres of MDR-designated sites is located along PFE Road to the east of the HDR site (see Figure XX numbering TBD).

The higher-density sites have less capacity for affordable units than are required in the affordable housing agreements for the specific plan. The following are the affordable units required by the development agreement: 37 very low-income, 37 low-income, and 19 moderate-income, and a total of 93 units as the Specific Plan builds out. The following is a description of the requirements for each level of affordable units in the Specific Plan:

The developer is required to provide 10 percent of the total residential units within its property as affordable housing (2% moderate, 4% low, 4% very low income). A Specific Plan designation of High Density Residential (HD) will be applied to APN 23-200-056, a parcel located in the southwest corner of the Specific Plan area that will be available for and utilized to provide for development of affordable housing.

The developer is required to use its best efforts to construct or cause to be constructed, prior to the issuance of the 400th building permit on the property, a minimum of 54 affordable housing units on the HD parcel by working with a developer which specializes in the development of affordable housing projects.

The developer is required to record a deed restriction on the HD parcel prior to the issuance of the approval for recordation of the first final small lot map within the Property. The deed restriction shall limit the use of the HD parcel to the provision of affordable housing only. A per-unit building permit fee, initially equal to \$1,800 per residential unit, will be paid upon issuance of each building permit for residential units within the property.

HCD Comment A.1c

Suitability of Non-Vacant Sites. The sites inventory contains several parcels which would require some demolition (page 188). If utilizing non-vacant sites to accommodate the regional housing need, the element must include a description of existing uses, analyze the extent to which existing uses may

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impede additional residential development and describe, relative to identified sites, development trends, market conditions and regulatory incentives and standards to facilitate redevelopment or reuse. This analysis could utilize interest from property owners, applications in the planning stage or recent redevelopment activity and describe recent characteristics and circumstances leading to redevelopment, such as discontinuing uses, which could be compared to the identified sites to demonstrate their suitability in the planning period.

Response: The following text will be added to page 80 of the Background Report.

Inventory of Vacant Sites Available for Higher-Density Residential Development

In accordance with the requirements of Government Code Section 65583.2 described above, an assessment was conducted of the vacant land suitable for higher-density housing within unincorporated Placer County. The data was compiled by County staff and mapped using a Geographic Information System (GIS). Only vacant land allowing for higher-density residential development was included in the inventory. A complete inventory of all vacant residential land within unincorporated Placer County was not conducted. The inventory includes some vacant sites that were in the discussion or pre-application stages in the Placer County development project approval process as of the effective date of the inventory (January 1, 2008), but were not included in the inventory of built and planned projects.

The following criteria were used to map vacant residential sites allowing for higher-density residential development:

- **Location:** all parcels within unincorporated Placer County, but excluding Specific Plan areas and the Tahoe Basin. The inventory also does not include projects within the unincorporated Spheres of Influence (SOIs) of cities which have been given jurisdiction for the purposes of the RHNA/Housing Element, such as Placer Ranch (Roseville). Specific Plan areas within County jurisdiction are accounted for as planned projects in Table A-1 (in Appendix A) and vacant sites in the Tahoe Basin are accounted for in Table A-3.
- **Vacancy:** vacant parcels were initially selected based on the County Assessor's use codes in the parcel database. Vacancy status was verified through aerial photographs and/or field observation. Since the Assessor's use codes are not completely accurate for all parcels, the vacant parcel list was supplemented with additional entries from County staff. The effective date of the vacancy status for each site is January 1, 2008. The sites inventory contains a few parcels that have existing uses which would require some demolition. The Hallmark Gardens parcels listed in Table A-2 (APNs 054-143-001, -005, -009, and 054-171-008) are commercially-zoned (Highway Service) properties. The property owner did have a project in the pre-development stage but later withdrew the application. The two-phased project proposed a three-story, 182 unit senior independent living center along with a 100 unit hotel/conference center. Though a new project has not been proposed for the site, it is assumed that the owner is open to redeveloping the property to a higher density use with a residential component. There are no significant barriers to such redevelopment. Since the site is in a Redevelopment Area, fifteen percent of any units constructed would be required to remain affordable for 55 years.

HCD Comment A.1d

Realistic Capacity: The inventory indicates realistic residential capacity projections are based on 85 percent of allowed density. The element must describe the methodology for establishing the capacity estimates of sites. The analysis must adjust the calculation to account for land-use controls and site improvements, including height limits. The element could also describe the typical density yield of those projects recently built or under construction.

In addition, the analysis should specifically describe the methodology for determining the residential capacity on commercial sites that allow residential development. This is particularly important since all of these identified sites can be wholly developed for non-residential uses. For example, Table A-2 notes two of the commercial parcels have non-residential uses in the "pre-development" stage. The analysis should specifically account in the calculation of capacity any current proposal and account for the potential for other uses other than residential being built and describe any existing or proposed regulatory incentives and standards to facilitate housing development in the commercial zones.

Response: The following analysis, which will be added to the text on page 82 of the Background Report, demonstrates that the assumptions of 85 percent of maximum buildout capacity for parcels with residential land use designation and zoning, and 75 percent of maximum buildout capacity for parcels with a non-residential land use designation and zoning, are realistic development capacity assumptions.

- **Inventoried affordable units by category.** While the maximum allowed residential density was used to determine the income categories of the inventoried sites, the inventory uses the following assumptions about realistic unit buildout capacity for the sites.
 - 85 percent of maximum buildout capacity for parcels with residential land use designation and zoning. For example, a vacant site that allows a 20 unit per acre maximum density without a density bonus is inventoried with a development capacity of 17 units per acre (85 percent of 20 units per acre). [Note: since the site could be developed at up to 27 units per acre with a 35 percent density bonus, the inventoried density of 17 units per acre is only 63 percent of the maximum allowed density for affordable units].
 - 75 percent of maximum buildout capacity for parcels with a non-residential land use designation and zoning. For example, a vacant site that allows a 20 unit per acre maximum density without a density bonus is inventoried with a development capacity of 15 units per acre (75 percent of 20 units per acre). [Note: since the site could be developed at up to 27 units per acre with a density bonus, the inventoried density of 15 units per acre is only 56 percent of the maximum allowed density for affordable units].
 - For certain sites, based on specifically identified constraints, the inventoried percent of maximum buildout capacity has been reduced beyond the default assumption described above. The buildout assumption is stated in the notes for each site.
 - A number of the vacant sites in the table are inventoried as having no development potential for lower-income higher-density housing (they still might have some residential development potential). The reasons for each site are provided in the "notes" column and range from infrastructure limitations in a certain locations to other constraints such as steep slopes.

The County evaluated the implementation of its current multi-family development standards and on-site improvement requirements and determined that the imposition of the setback requirements, building height requirements, parking requirements, and open space requirements listed in Section III.A (Potential Governmental Constraints) allow maximum densities to be achieved. This is further demonstrated by projects that have been approved and constructed at densities at or above the 85 percent level. For example the following are recent projects that have been approved or built at densities close to the existing maximum densities for higher-density land use designations:

- The Orchard at Penryn project is currently under construction. It consists of 150 condominium units on a 15.1-acre site with RM-DL10 PD=10 zoning. The density of 9.93 units per acre is close to the maximum allowed 10 units per acre.
- The Colonial Village project was built as a 56-unit apartment complex on a 5.93-acre site with RM-DL10 zoning. The density of 9.4 units per acre is 94 percent of the maximum allowed 10 units per acre.
- The Pardee Court Subdivision project was approved for 35 for-sale townhomes on a 3.57-acre site with CPD-Dc 10 zoning. The density of 9.8 units per acre is close to the maximum allowed 10 units per acre.
- Auburn Court was built as a 60-unit apartment complex on a 3.7-acre site with RM-DL15-DC zoning. The density of 16.2 units per acre is over the maximum allowed 15 units per acre.
- Terracing Oaks was built as a 56-unit apartment complex on a 3.1-acre site with RM-DL15-DC zoning. The density of 18 units per-acre is over the maximum allowed 15 units per acre.

Much of the County's vacant, commercially-zoned land available for residential development (see Table A-2) is in the Auburn area. A Fiscal Impact Analysis for the Auburn/Bowman Community Plan by Hausrath Economics Group in 1999, found an over-supply of non-residential land in the Community Plan area. Hausrath found that the Plan area is "generally well supplied with land designated for commercial and industrial uses: a 77 year supply of retail land, a 27 year supply of office land."

The residential sites inventory (see Table A-2) lists several commercial sites throughout the county. While residential uses are allowed on all of the commercially-designated sites listed in the inventory, the County recognizes that not all of the sites in the table are suitable for residential uses. These sites, while identified in the table, are not inventoried as having capacity for high-density housing. The notes section identifies the reasons for the decision to not inventory the sites, such as "likely will be developed for commercial use; not inventoried as affordable residential." The sites that are counted as having capacity are those that are most suitable for residential development. The majority of these suitable sites are in the Auburn/Bowman Community Plan area, which, as previously stated, has an oversupply of commercially-designated land and therefore increased capacity for residential uses on commercial land. As described previously, an assumption of 75 percent of maximum buildout capacity has been made for these parcels unless noted otherwise in the table.

HCD Comment A.1e

Zoning to Encourage and Facilitate Housing for Lower-income Households: Should the County need to rely on sites allowing less than 20 dwelling units per acre to accommodate a portion of the RHNA for

lower-income households, the element must demonstrate the adequacy of the zone including the base density, without density bonus, to encourage and facilitate the development of housing based on factors such as market demand, financial feasibility and development experience within zones or identify additional sites at appropriate densities.

Response: As shown in the revised Table 46 listed under the response to Comment A 1a above, the County does not need to rely on sites allowing less than 20 dwelling units per acre to accommodate a portion of the RHNA for lower-income households.

The text on page 81 of the HCD Review Draft Background Report will be modified as follows

- **Relation of density to income categories.** The following assumptions were used to determine the inventoried income categories according to the maximum allowed density for each site:
 - Sites with a land use designation/zoning district combination with a maximum allowable density of at least 20 units per acre were inventoried as available for very low-income residential development in accordance with the "default density standard" set forth in Government Code Section 65583.2(c)(3).
 - ~~Sites with a land use designation/zoning district combination with a maximum allowable density ranging from 15 to 19 units per acre were inventoried as available for low-income residential development. All of the sites in this category allow for a maximum development density of 15 units per acre without a density bonus. As discussed under Section III(A)(10) (Density Bonus) of this document and in accordance with State law, if the sites were developed with affordable housing, the developers would be entitled to a density bonus of up to 35 percent which would change the maximum allowed density to 20-25 units per acre. This density meets the requirements of the "default density standard" set forth in Government Code Section 65583.2(c)(3).~~
 - Sites with a land use designation/zoning district combination that allow multi-family housing ~~and~~ with a maximum allowable density less than ~~19~~ 15 units per acre are inventoried as available for moderate-income residential development. Based on existing developments in Placer County, these densities are adequate to provide for the provision of moderate-income housing.

HCD Comment A.1f

Environmental Constraints: While the element notes identified sites accounted for slope and flood zones, it should include a general analysis of the full range of known environmental constraints, such as conservation easements, wetlands, and oak tree preserves, which could impede development in the planning period.

Response: Government Code Section 65583.2(b) requires "A general description of any environmental constraints to the development of housing within the jurisdiction, the documentation for which has been made available to the jurisdiction. This information need not be identified on a site-specific basis."

As described on page 81 of the Background Report "All parcels (or portions of parcels) that met the criteria above were reviewed by County staff to confirm vacancy status, ownership, adequacy of public utilities and services, possible environmental constraints such as flood zones and steep slopes, and other

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possible constraints to development feasibility.” Slopes and flood zones were not the only possible environmental constraints that were analyzed, these were simply used in the text as an example. The following text will be added to page 81 of the Background Report to clarify:

All parcels (or portions of parcels) that met the criteria above were reviewed by County staff to confirm vacancy status, ownership, adequacy of public utilities and services, possible environmental constraints such as flood zones and steep slopes, and other possible constraints to development feasibility. The site inventory accounts for all known environmental constraints on the sites. Any environmental constraints for particular sites are noted and accounted for in the inventory tables. For example the following are some of the identified environmental constraints in Table A-2: “unlikely to be developed at high density; steep slope,” and “because of steep slope: assume development at 50% of max. capacity.”

HCD Comment A.2a

Land Use Controls: While the element describes Placer County's zoning and development standards for typical residential zones (Table 54), it must describe and analyze the development standards for residential development within commercial and mixed-use zones.

Response: The following text will be added to Table 54 and the discussion of development standards on page 117.

The setback requirements for residential uses in residential and commercial zones, as specified in the Placer County Zoning Ordinance, are shown below in Table 54. The Zoning Ordinance states that residential dwellings proposed in any commercial zones shall provide side and rear setbacks as required in the Multi-Family Residential districts, except when the dwelling is located within a commercial building. The setbacks, maximum coverage, and height requirements are similar to other communities throughout the state and are not considered a constraint to the development of affordable housing.

TABLE 54 SETBACK, LOT COVERAGE, AND HEIGHT REQUIREMENTS IN RESIDENTIAL AND COMMERCIAL ZONES Placer County					
Zone Designation	Front Setback	Side Setback	Rear Setback	Maximum Coverage	Maximum Height
Residential Zones					
Single-Family Residential	20 ft.	15 ft. total, 5 ft. min.-one story; 7 1/2 ft. min.-two stories or more	10 ft. min.-one story; 20 ft. min.-two stories or more	40% max.-one story; 35% max. two or more stories	30 ft.
Multi-Family Residential	20 ft.	15 ft. total, 5 ft. min.-one story; 7 1/2 ft. min.-two stories or more	10 ft. min.-one story; 20 ft. min.-two stories or more	40% max.-one story; 35% max. two or more stories	36 ft.
Residential-Forest	50 ft.	30 ft.	30 ft.	20%	36 ft.
Residential-Farm	50 ft.	30 ft.	30 ft.	25%	36 ft.
Commercial Zones¹					
Neighborhood	10 ft.	15 ft. total, 5 ft. min.-	10 ft. min.-one	40%	30 ft.

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<u>Commercial</u>		<u>one story; 7 1/2 ft. min.-two stories or more</u>	<u>story; 20 ft. min.-two stories or more</u>		
<u>General Commercial</u>	<u>10 ft.</u>	<u>15 ft. total, 5 ft. min.-one story; 7 1/2 ft. min.-two stories or more</u>	<u>10 ft. min.-one story; 20 ft. min.-two stories or more</u>	<u>40%</u>	<u>50 ft.</u>
<u>Commercial Planned Development</u>	<u>n/a²</u>	<u>15 ft. total, 5 ft. min.-one story; 7 1/2 ft. min.-two stories or more</u>	<u>10 ft. min.-one story; 20 ft. min.-two stories or more</u>	<u>50%</u>	<u>50 ft.</u>
<u>Highway Services</u>	<u>25 ft.</u>	<u>15 ft. total, 5 ft. min.-one story; 7 1/2 ft. min.-two stories or more</u>	<u>10 ft. min.-one story; 20 ft. min.-two stories or more</u>	<u>40%</u>	<u>35 ft.</u>

Source: Placer County Zoning Ordinance 2007

The side and rear setback described in the table apply to stand-alone residential projects in commercial zones. A 5-foot side and rear setback applies to buildings in most commercial zones that contain a mix of residential and commercial uses. The exception is in the Highway Services district where a 10-foot rear setback is required.

2 As required by CUP or MUP. The CUP setbacks are determined by the use permit except for senior housing projects, which are specified to have a front setback of 20' and the sides and rear are a 10' minimum.

HCD Comment A.2b

Processing and permit Procedures: As the element describes typical approval requirements for residential development, it should also describe the typical process and timeframes for approval of both single-family and multifamily residential projects. In addition, many of the sites identified in the inventory to accommodate the RHNA for housing for lower-income households are located in the C2 and CPD zones which require a CUP for multifamily development. The element must identify typical findings of approval for the CUP and analyze the process for the potential impact on approval certainty, timing, and cost. The County may need to include a program, to mitigate or remove this process requirement especially as it related to the identified potential for residential development

Response:

The County proposes to add a new program to the Housing Element to address multi-family development in C1 and C2 zone districts:

Program B-15 MULTI-FAMILY HOUSING ON COMMERCIAL SITES

To facilitate the construction of high-density housing on commercially-zoned sites, the County shall consider amending the zoning ordinance provisions for multi-family housing use. These revisions may include amending the zoning ordinance to allow multi-family dwellings, 20 or fewer units/acre as a permitted use by right in the C1 and C2 zone districts and require a Conditional Use Permit in the C1 and zone districts for multi-family projects of 20 units/acre or more.

Responsible Agency/Department: Planning Department

Timeframe: December 2009

Funding: General Fund

In addition, the following underlined text will be added to the discussion of processing and permit procedures on page 121:

Similar to other jurisdictions, the County has a number of procedures it requires developers to follow for processing development entitlements and building permits. Although the permit approval process must conform to the Permit Streamlining Act (Government Code Section 65920 *(et seq)*), housing proposed in the County is subject to one or more of the following review processes: environmental review, zoning, subdivision review, specific plan development and review, use permit control, design review, and building permit approval.

The County employs a Zoning Administrator to serve as a hearing officer who is assigned the authority and original jurisdiction to investigate, consider, and approve or deny Administrative Review Permits, Minor Use Permits, and Variances. The usual turn-around for a Zoning Administrator decision is five weeks after the receipt of a complete application and CEQA obligations completed.

Residential development projects requiring environmental review and a discretionary planning approval (Conditional Use Permit) that are on flat ground with available sewer, water, and electricity would take an average six to eight months to process through the Placer County Planning Department; more complicated sites typically take more time. Longer processing times may result from site constraints (wetlands, vernal pools, steep slopes, paleontology or archaeology finds), inadequate application materials, and/or review and comment by numerous other agencies.

Placer County now requires pre-development meetings with applicants of larger projects prior to submission of formal applications to better define the information needed to review a project. Pre-development meetings have helped to shorten the review process and allows for better communication between applicants and County departments.

As required by the California Environmental Quality Act (CEQA), the County's permit processing procedures include an assessment of the potential environmental impacts of the proposed project. The environmental review process helps protect the public from significant environmental degradation and locating inappropriate developments sites. It also gives the public an opportunity to comment on project impacts. However, if a project requires an Environmental Impact Report (EIR), additional processing, cost, and time is required. EIRs may take nine months or longer to complete depending on its complexity. The Placer County Environmental Review Ordinance provides an exemption for residential construction totaling no more than four dwelling units and for no more than six dwelling units in urbanized areas. Projects consisting of seven or more units may not have an environmental exemption.

CEQA compliance is the first step in the review of a project, prior to scheduling any permit or application before a hearing body. If, after completing the Initial Study, County staff determine that the proposal will have no significant adverse impact upon the environment, the applicant will be notified that a Negative Declaration (or Mitigated Negative Declaration) will be prepared by the County. If staff determine that the project may have a significant impact, an EIR is required. An EIR is an in-depth analysis of the potentially significant environmental impacts of a project. Once it has been determined that the EIR is acceptable, the EIR is distributed for public review. After either the Negative Declaration or EIR has been

completed, the applicant may file the tentative map or Subsequent Entitlement Application, and a public hearing will be set to consider the CEQA document and any other entitlements.

Residential project which are permitted as a "matter of right" and do not need discretionary approval include: single family residences, secondary dwellings, and multi-family project comprising 20 or less units within the Residential Multi-Family zone district. The processing time for these permits which are primarily tied to the Building Plan Check process typically ranges from one to four weeks.

Some projects require discretionary review (minor use permit or conditional use permit). As previously shown in Table 53, multi-family projects in the Residential multifamily (RM) zone district with more than 20 units, and all multi-family projects in the Neighborhood Commercial (C1) district require a minor use permit which is reviewed by the Planning Department staff and Zoning Administrator and discussed at a public hearing.

Residential projects require a conditional use permit in the General Commercial (C2) district. Since the majority of higher density single family and multi family developments require the approval of a conditional use permit, either as required by the base zoning district or as a requirement of the Planned Development ordinance, special findings need to be made by the County. The findings for conditional use permits that are used by the County for project approval include the following:

1. A comparison of the benefits or adverse impacts of the proposal versus traditional lot-and-block development of the property, and a conclusion that the Planned Development proposal is or is not the superior method of development for the site in question.
2. A summary of the benefits or adverse impacts to the community as a result of density increases realized by the project by using this process, and a conclusion regarding the appropriateness of any increased density in the project based upon specific features of the Planned Development proposal.
3. The physical design of the proposal and the manner in which the design does or does not make adequate provision for public services, control over vehicular traffic and the amenities of light and air and recreation and visual enjoyment.
4. The site for the proposed development is physically suitable for the type and proposed density of development.
5. The proposed use is consistent with the character of the immediate neighborhood and will not be contrary to its orderly development.

The County expedites permit processing for development projects containing a low-income residential component through its Permit-Streamlining Program, and prioritizes low-income and senior housing projects in the development review process.

Conclusions

Processing and permit procedures do not constitute a development constraint in Placer County. The County's Permit-Streamlining Program places priority on affordable and senior housing projects, expediting the process.

Placer County proposes to add a new program to the Housing Element to address multi-family development in C1 and C2 zone districts (Program B-15: Multi-Family Housing on Commercial Sites). Amendments such as those outlined in the new Program B-15 would allow multi-family residential housing with 20 or fewer units per acre "by right" in C1 and C2 zones, while higher densities in the same zones will be considered with a Minor or Conditional Use Permit.

HCD Comment A.3

While the previous housing element identified the Foresthill Apartments as at-risk for conversion, these units were removed from the at-risk list. According to the US Department of Agriculture this project is eligible to convert in 2016 which is within the 10-year period required by housing element law. The element must include an analysis of the potential risk of conversion including a cost estimate of replacing the at-risk units. This analysis will facilitate development of a program to address the critical nature of preserving at-risk units.

Response: The following text changes will be made to the discussion on Pages 107-109 of the Background Report.

There are numerous assisted housing projects in Placer County, including four projects in the unincorporated area of North Auburn: Snow Cap View Apartments, Auburn Court Apartments, Colonial Village, and Terracina Oaks. Snow Cap View Apartments is an 80-unit apartment complex serving low-, median-, and moderate-income tenants in North Auburn. In 2002, the Placer County Redevelopment Agency provided funds to extend the affordability for residents, but as of October 2007, it remains on the at-risk list. Auburn Courts, a 60-unit apartment complex in North Auburn, also received funds from the Redevelopment Agency in 2001 to provide affordable housing to very low and low-income households. Foresthill Apartments was previously at risk, but has been removed from the at-risk list. Table 50 lists all assisted housing projects in Placer County.

Property	Units	Bedrooms	Target Population	Subsidy	Expiration
Snowcap View Apartments 3540 Snowcap View Circle (N Auburn)	80	1, 2, and 3	Low-, median-, and moderate-income	Section 515	4/12/2022
Auburn Court Apartments 12199 Gateway Court (N Auburn)	60	2, 3, and 4	Very low- and low-income	Tax credits	2/14/2056
Sawmill Heights Northstar Village	12	Studio, 2, and 4	Low	Housing Trust Fund (HTF)	2026/TBD
Terracina Oaks 12200 Gateway Court (N Auburn)	56	2 and 3	Very low and low	HCD	2021
Colonial Village 2205 Colonial Village (N Auburn)	56	2 and 3	Very low and low	Tax credits	2045

Foresthill Apartments 3771 Gold Street	34 (29 affordable units)	1, 2, and 3	Family	Section 515	Unknown 2016
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Source: "Multifamily Affordable Housing in Placer County," 2007, and "Housing in Placer County," ASOC Housing Team, 2007.

4. Preserving At-Risk Units

State law requires that housing elements include an inventory of all publicly assisted multi-family rental housing projects within the local jurisdiction that are at risk of conversion to uses other than low-income residential during the current planning period (January 1, 2006, through June 30, 2013) and the subsequent five years (July 1, 2013, through June 30, 2018).

California Government Code Section 65863.10 requires that owners of federally-assisted properties must provide notice of intent to convert their properties to market rate twelve months and six months prior to the expiration of their contract, opt-outs, or prepayment. Owners must provide notices of intent to public agencies, including HCD, the local redevelopment agency, and the local public housing authority, and to all impacted tenant households. The six-month notice must include specific information on the owner's plans, timetables, and reasons for termination. Under Government Code Section 65863.11, owners of federally-assisted projects must provide a Notice of Opportunity to Submit an Offer to Purchase to Qualified Entities, non-profit or for-profit organizations that agree to preserve the long-term affordability if they should acquire at-risk projects, at least one year before the sale or expiration of use restrictions. Qualified Entities have first right of refusal for acquiring at-risk units.

According to County staff, preserving existing affordable housing costs roughly half the cost of creating new units and has therefore been a County priority. As of September 2007, the Placer County Redevelopment Agency had not received any notices of intent to convert within the coming year. Snowcap View Apartments, a Section 515 property with 80 units in North Auburn, had provided HCD with notice of intent to convert in 2005. Through CDBG loans, the County Redevelopment Agency provided a rehabilitation loan to the owners to extend the covenant for 15 years. The affordability covenant on Foresthill Apartments, a Section 515 property with 34 units in the Foresthill community, was previously at risk, but has been removed from the list of expiring properties is scheduled to expire in 2016, making it at risk of conversion to market rate during the five years following the housing element planning period.

Foresthill Apartments currently (2008) provides 34 units, 29 of which are affordable—residents pay 30 percent of adjusted income. The amount of the subsidy is based on debt servicing and operating cost for the project. The County contacted the property manager, but was unable to get a response. However, if Foresthill Apartments were able to retain its rental subsidies through Rural Development, the estimated cost of continuing to subsidize the 29 assisted is \$236 per unit per month based on the difference between the 2007 HUD FMR rate of \$992 and the \$756 for a 2-bedroom unit that a very low-income household can afford to pay. Over a 30-year period, the estimated cost of subsidizing 29 units is \$2.67 million.

Table ## (numbering to be established) shows the estimated costs of constructing new units to replace the 29 units at Foresthill Apartments if the at-risk project were to convert to market rate housing. Assuming that the 29 units were to be replaced, the total replacement cost would be approximately \$5.37 million (\$185,000 per unit). This estimate is based on the total development costs identified in this Housing

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Element Background Report (see Section B, Non-Governmental Constraints). It would require additional funding sources to replace these affordable units.

TABLE ## NEW CONSTRUCTION/REPLACEMENT COSTS		
Fee/Cost Type	Total Project Cost	Cost Per Unit
Land Acquisition (NOTE: would need about 1.4 acres site (21 units/acre) at \$350,000/acre)	\$490,000	\$17,000
Construction (\$150/sq. ft. x 800 sq. ft./unit x 29 units)	\$3,500,000	\$120,000
Typical Residential Development Fees (See Table 60)	\$800,000	\$28,000
Financing/Other Soft Costs	\$580,000	\$20,000
Total Estimated Cost	\$5,370,000	\$185,000

Source: Minter Harnish

Table ## (numbering to be established) shows the estimated costs of acquiring and rehabilitating an at-risk affordable housing project. It would require approximately \$145,000 per unit to acquire and rehabilitate the 29 affordable units at Foresthill Apartments. Rehabilitation would cost an estimated \$40,000 less per unit than replacement.

TABLE ## REHABILITATION COSTS		
Fee/Cost Type	Total Project Cost	Cost Per Unit
Acquisition	\$3,500,000	\$120,000
Rehabilitation	\$500,000	\$17,000
Financing/Other	\$290,000	\$10,000
Total Estimated Cost Per Unit	\$4,290,000	\$145,000

Source: Minter Harnish

In 2003, the Placer County Redevelopment Agency contacted the property managers of Foresthill Apartments, who indicated that the owners were not interested in rehabilitation loans and would likely extend the affordability on their own. Through Programs E-1, E-2, and E-3, the County will monitor the status of this project and contact owners concerning their plans to continue in or opt out of the subsidy programs. If necessary, the County will identify potential buyers of the at-risk project, such as those listed as qualified entities. The County will also identify possible sources of County funding, including housing set-aside funds, to supplement primary state and federal sources.

HCD Comment B.1

To address the requirements of Government Code Section 65583(C)(1-6), all programs where specific actions are required, must be revised to include specific completion dates. In addition, Programs B-9 (State and Federal Funds) and Program C-2 (Employee Housing) should be revised to include a specific commitment to seek funding and formalize procedures, respectively.

Response: The specificity of completion dates listed for the implementation programs meets the requirements of State law. There is no requirement to be more specific than the timeframes that the

County has proposed for completion of the programs. However, to address the comment, the County has changed the fiscal year range to a specific month and year for the following programs shown below.

Program B-9 will be modified as shown below to provide a more specific commitment to seek funding

The employee housing requirement policy (Policy C-2) has been implemented on projects in the Sierra Nevada and Lake Tahoe areas, but a specific employee housing program has not been adopted by the Board of Supervisors. A draft ordinance is complete but final adoption was on hold pending the outcome of the affordable housing program under consideration for the West county. Both programs were to be considered concurrently to have affordable housing requirements for projects in all portions of the county.

The Stakeholder Group, comprised of representatives from the Building Industry Association, affordable housing advocates, and representatives of real estate and landowner interests along with County staff from several departments, first met in June 2005. The group has been actively working towards the development of an affordable housing program to present to the Board of Supervisors. One of the most important issues to all parties continues to be the certainty and timeliness of delivering affordable housing units.

There has been general agreement with the inclusion of the 4-4-2 (four percent very-low, four percent low, 2 percent moderate) standard as one way of providing affordable housing opportunities, it was the consensus of the Stakeholders Group that a 'menu of options' should be provided to increase flexibility and creativity in the delivery of affordable housing units. The intent of the menu of options was to recognize the diversity of the County and various project conditions (i.e., building type, economic status, location), thereby allowing project applicants to fine-tune a proposal that might fit their specific needs, while at the same time furthering the County's affordable housing efforts.

While the Stakeholders Group has identified some challenges to implementing an affordable housing program, none of the challenges are viewed as being insurmountable. The Stakeholders Group will continue meeting after Housing Element adoption to craft an affordable housing program for Board of Supervisors consideration.

Program A-2 DEVELOPMENT STANDARDS

The County shall amend land use regulations and development standards (e.g., Department of Public Works and Fire Department regulations) where feasible to remove unnecessary impediments to and reduce the cost of the production of housing.

Responsible Agency/Department: Planning Department, Department of Public Works

Timeframe: ~~FY 2008/2009~~ December 2011

Funding: General Fund

Program A-4 MIXED-USE DEVELOPMENT

The County shall create a mixed-use zoning overlay district and prepare related design guidelines. The County shall also adopt incentives for residential development that is part of a mixed-use project, including but not limited to relaxed development standards, reduced parking requirements, and expedited development review procedures.

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Responsible Agency/Department: Planning Department
Timeframe: ~~FY 2008/2009~~ July 2010
Funding: General Fund
Quantified Objective: 425 units in mixed-use projects (352 affordable units)

Program A-5 INFILL DEVELOPMENT

The County shall create an infill development overlay district and prepare related guidelines that allow flexibility in lot sizes, building height, setbacks, site planning, parking requirements, and other development standards to encourage high-density and affordable housing in proximity to transit services.

Responsible Agency/Department: Planning Department
Timeframe: ~~FY 2009/2010~~ July 2010
Funding: General Fund

Program A-6 INFILL PROJECTS

To facilitate development of infill projects, the County shall adopt an Infill Incentive Ordinance to assist developers in addressing barriers to infill development. Incentives could include, but are not limited to, modifications of development standards, such as reduced parking, increased building height, reduced street width, and relaxed setback requirements to accommodate smaller or odd-shaped parcels; waivers or deferrals of certain development fees, helping to decrease or defer the costs of development; or direct grants from the County.

Responsible Agency/Department: Planning Department
Timeframe: ~~FY 2009/2010~~ July 2010
Funding: General Fund
Quantified Objective: 160 units (110 affordable units)

Program A-8 FEES

The County shall conduct a nexus study to analyze impact fees and planning-related fees associated with residential and non-residential development. The County shall determine whether or not the fees collected in the county are appropriate and fair. In conducting the study, the County shall compare Placer County's fee structure with fees collected in other nearby jurisdictions.

Responsible Agency/Department: Planning Department
Timeframe: ~~FY 2008/2009~~ June 2009
Funding: General Fund

Program B-3 FLEXIBLE DEVELOPMENT STANDARDS

The County shall amend engineering standards and the subdivision and zoning ordinances to allow flexibility in certain development standards as incentives for

affordable housing developments. The County shall ensure that adjusting development standards for affordable housing does not result in lower quality housing or higher replacement or maintenance costs in the future. The County shall consider site and potential occupancy characteristics when amending development standards. The specific standards which shall be evaluated include, but are not limited to, the following:

- Reduction in the area of paved surfaces through the use of angled parking and one-way circulation;
- Reduction in street widths;
- Reduction in turning radius on cul-de-sacs;
- Reduction in pavement thickness when it can be demonstrated that soils and geotechnical conditions can permit a lesser thickness, subject to fire department approval;
- Limiting the requirement for sidewalks to one side of the street and reducing the width requirement;
- Reduction in the number of landscaped islands required in parking areas;
- Reduction in the open space/recreational area requirements by 25 percent for high-density, affordable residential developments when the project is located within ¼ mile of public open space areas that may include schools, parks, passive recreation areas, etc;
- Increased flexibility in evaluating a project's architectural conformity to the Placer County Design Guidelines Manual. Increase in the allowable height of buildings for affordable housing developments;
- Increase in the allowable lot coverage for affordable housing developments; and
- Consideration of cluster development particularly where either more open space is achieved or existing requirements increase costs or reduce density.

Responsible Agency/Department: Planning Department

Timeframe: ~~FY 2008/2009~~ December 2011

Funding: General Fund

Program B-5 FEE WAIVERS

The County shall adopt a resolution waiving 100 percent of the application processing fees for developments in which 10 percent of the units are affordable to very low-income households, 20 percent of the units are affordable to low-income households, or 30 percent of the units are affordable to moderate-income households. Additionally, the County shall evaluate waiving environmental review staff time charges for projects containing affordable housing units. To be eligible for fee waiver, the units shall be affordable by affordability covenant. The waiving or reduction of service mitigation fees may also be considered when an alternative funding source is identified to pay these fees.

The County may use either redevelopment set-aside funds or the Housing Trust Fund to subsidize the service and mitigation fees for affordable housing developments. The County shall promote the benefits of this program to the development community by posting information on its web page and creating a handout to be distributed with land development applications.

Responsible Agency/Department: County Executive Office, Planning Department, Building Department, Public Works, Parks and Grounds Division, and Health and Human Services (HHS)

Timeframe: ~~FY 2008/2009~~ December 2009: Promotional material will be prepared and utilized within six months after adoption of the Housing Element

Funding: General Fund, Redevelopment set-asides, Housing Trust Fund

Program B-9 STATE AND FEDERAL FUNDS

The County shall investigate and, where deemed eligible, apply for State and Federal monies for direct support of low-income housing construction and rehabilitation. The Redevelopment Agency and Health and Human Services shall continue to assess potential funding sources, such as, but not limited to, the Community Development Block Grant (CDBG), and HOME. The County shall promote the benefits of this program to the development community by posting information on its web page and creating a handout to be distributed with land development applications.

Responsible Agency/Department: Redevelopment Agency, Health and Human Services/Adult System of Care

Timeframe: Ongoing, depending on funding programs; promotional material will be prepared and utilized within six months after adoption of the Housing Element

Funding: General Fund, Technical Assistance Grants

Quantified Objective: 100 units

Program B-12 SECOND UNITS

The County shall amend the zoning ordinance to allow accessory apartments, such as detached units over garages, by right within all residential zones to provide another source of affordable housing. The amendments will ensure that the County's Zoning Ordinance is consistent with State law requirements for second units. Additionally, the County shall consider streamlining the approval process for secondary units, as well as allowing second units on smaller parcels than what is currently allowed.

Responsible Agency/Department: Planning Department

Timeframe: ~~FY 2008/2009~~ December 2009

Funding: General Fund

Quantified Objective: 250 units

Program B-14 PUBLICIZE FORECLOSURE ASSISTANCE PROGRAMS

The County shall publicize information on the County website about existing toll-free foreclosure assistance hotlines, foreclosure counseling, foreclosure prevention programs, and other resources available for residents facing possible foreclosures.

Responsible Agency/Department: Health and Human Services Department

Timeframe: ~~FY 2008-2009~~ June 2009

Funding: General Fund

Program C-2 EMPLOYEE HOUSING PROGRAM

The County shall initiate a review of Policy C-2 to consider specific issues including: the appropriateness of the application of the same requirement to both small (i.e. under 2 acres in project area) commercial/professional office projects, the financial feasibility of requiring 50 percent of the housing demand and the impact of the requirement on attracting new commercial projects.

The review shall also consider formalizing procedures for calculating employee housing obligations and assess the need to require the submittal of a housing mitigation plan by project applicants. If such a submittal is required, the following methods of providing housing shall be considered: a) Construction of housing on site; b) Construction of housing off site; c) Dedication of land for housing; and d) Payment of an in-lieu fee.

Responsible Agency/Department: Planning Department

Timeframe: ~~FY 2008-2009~~ December 2012

Funding: General Fund

HCD Comment B.2a

As noted in finding A1, the element does not include a complete site analysis and therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the County may need to add or strengthen programs to address a shortfall of sites or zoning available to encourage a variety of housing types. At a minimum, the element should be revised as follows:

As referenced (page 87), the County must comply with recent statutory changes pursuant to Chapter 633, Statutes of 2007 (SB 2), requiring, among other things, the identification of at least one zone(s) where emergency shelters are permitted without a conditional use permit (CUP) or other discretionary action within one year of the beginning of the planning period. While the element states Placer County will amend the zoning code to designate emergency shelters in the RM zone with a zoning clearance, it must demonstrate that the RM zone provides sufficient opportunities to accommodate the identified need in the planning period, and should consider opportunities available in suitable locations near services and facilities. In addition, the element must demonstrate that proposed permit processing, development, and management standards to encourage and facilitate the development of, or conversion to, emergency shelters. To assist in addressing this statutory requirement, refer to the Department's SB 2 memo at http://www.hcd.ca.gov/hpd/sb2_memo050708.pdf

Response: The following text will be added to the discussion of emergency shelters on pages 88-89.

As described previously, the County allows emergency shelters under its provisions for "residential care homes." Residential care homes with six or fewer clients are permitted with a Zoning Clearance (C) in all

residential districts, the Motel (MT) district, the Resort (RES) district, and the Farm (F) district. Residential care homes with seven or more clients are permitted with a Minor Use Permit (MUP) in the Residential Multi-Family (RM) district, the Residential Agricultural (RA) district, the Motel (MT) district, and the Farm (F) district.

The County has included a program to amend the zoning ordinance to include emergency shelters "by right" (with zoning clearance) in the Residential Multi-family (RM) zones. The vacant sites inventory identifies approximately 180 acres of vacant RM-zoned land. Most RM-zoned land is located near services, such as transit. The program specifies that the County will ensure that the development standards, which will be established at a later date, do not pose a constraint on the development of emergency shelters.

HCD Comment B.2b

In addition, the element states that the Placer County zoning ordinance does not explicitly address single-room occupancy (SRO) units (page 95). Therefore, the element must include implementation actions to provide appropriate zoning that explicitly allows SROs with development standards that encourage and facilitate development.

Response: HCD Building Blocks state that, "The element could include a program action that commits the local government to amending their zoning and building codes, and permitting procedures to facilitate and encourage new SRO construction." The Housing Element Background Report states that SROs are allowed in all of the zoning districts where multifamily housing is allowed. Placer County has not identified a pressing need for SROs, and while the proportion of extremely low-income residents in the county is smaller than the state average, the County has several programs to address the needs of this population group (e.g., Program B-6 Program B-9, Program D-12). The City will add the following program:

Program X-X SINGLE ROOM OCCUPANCY (SRO) UNITS

The City shall amend the Zoning Code to define Single Room Occupancy (SRO) units and explicitly allow SROs as a residential use in certain zones.

Responsible Agency/Department: Planning Department

Timeframe: July 2010

Funding: General Fund

HCD Comment B.3

The element estimates the County will accrue approximately \$11,225,572 in low- and moderate-income set aside funds through 2012 (page 98). The County should describe the proposed uses of these funds relative to the programs described in the element. For your information, Community Redevelopment Law (Health and Safety Code Section 33334.4) requires agencies, over each 10-year period of the implementation plan, to ensure housing assistance is proportionately provided to very low- and low-income households (based on the proportion each group represents of the community's total housing need for lower- and moderate-income persons) and also to persons under the age of 65 years (based on the proportion this population group represents of the total population reported from the current census). In addition, 33413(b)(4) requires a redevelopment implementation plan to be consistent with a community's housing element. The integration of applicable information from the redevelopment agency's

December 23, 2008

Revised February 17, 2009

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current housing implementation plan into the housing element will assist in the development of an effective housing element.

Response: The following text will be added to the discussion of housing set-aside funds on pages 98-99 of the Background Report.

Placer County Redevelopment Agency

The Placer County Redevelopment Agency was created in 1996. The County has three redevelopment project areas: the North Tahoe Redevelopment Project, the North Auburn Redevelopment Project, and the Sunset Industrial Redevelopment Project. The Sunset Industrial Project Area does not include residential land uses. According to State Community Redevelopment Law (Health and Safety Code Section 33000 *(et seq)*), one of the primary purposes of redevelopment is to increase and improve the community's supply of low and moderate-income housing.

Tax Increment Financing

A portion of the increased property tax revenue (tax increment) resulting from new private investment in the redevelopment project areas is directed to the redevelopment agency rather than the County, or independent districts. Redevelopment agencies must apply tax increment funds to public improvements and affordable housing development within the project area, or in some circumstances, outside the project area.

Tax increment financing in the redevelopment areas has generated several million dollars for the "housing set-aside fund." State law requires 20 percent of redevelopment tax revenues be set aside to increase, improve, and preserve the supply of affordable housing. The annual growth of the tax increment in these areas averaged 27 percent between 2001 and 2006. During this period, the North Auburn Project Area generated \$785,000 for the Housing Set-Aside Fund, and is projected to generate an additional \$1,561,000 from 2007 to 2012. The Sunset Industrial Park Project Area generated \$1,038,572 for affordable housing from tax increment financing from 2001 to 2006, and is projected to generate an additional \$2,366,000 from 2007 to 2012. North Lake Tahoe, the largest of the redevelopment projects, is projected to generate \$5,475,000 from 2006 to 2011 in tax increment financing for the housing set-aside fund.

Housing set-aside funds are used for a number of ongoing Redevelopment Agency programs. Set-aside funds are used to preserve the existing stock of affordable housing through the County Housing Rehabilitation Program which supports Housing Element Policy D-1 (rehabilitation loans to low-income households), Policy E-1 (preserve at-risk dwelling units), and Program E-3 (Preservation of At-Risk Properties). Set-aside funds are also used for the First-Time Homebuyer Program which supports Policy B-7 (facilitate expanded affordable housing opportunities).

The Multi-Family Rental New Construction Program utilizes set-aside funding. The focus of this program is in the Tahoe area to address the need for additional affordable employee housing. It supports Policy A-1 (maintain an adequate supply of appropriately-zoned land) by purchasing infill housing sites, Policy E-1 (preserve at risk units) by redeveloping existing affordable multi-family housing, and Program B-2 (Assisting Affordable Housing Developers).

Set-aside funds are used to support the County's Mixed-Use Development Program which helps identify sites and provides loans for the development of mixed-use projects. The Mixed-Use Program supports Housing Element Program B-2 (Assisting Affordable Housing Developers) and Program B-13 (Land Banking).

The Housing Rehabilitation Program also utilizes set-aside funds. The program supports Housing Element Policy D-1 (provide rehabilitation loans to low-income households) and Policy D-4 (abatement of unsafe housing conditions).

On November 5, 2007, Placer County released a Request for Proposals for \$2 million of Redevelopment Housing Set-Aside Bond Funds for the western portion of Placer County. At this time, the County has not yet received any proposals for the funds.

In 2007, the Redevelopment Agency signed an agreement with Domus Development for \$1,136,500 to assist with redevelopment of up to eight scattered residential sites in Kings Beach for approximately 100 affordable housing units. In February 2008, the Redevelopment Agency Board approved the use of \$3.9 million for the purchase of three parcels in the Domus proposal, and approved an option agreement with Domus for development of the three parcels.

This project was also submitted and subsequently accepted, as one of the five Community Enhancement Program (CEP) Proposals for the Tahoe Regional Planning Agency's (TRPA) Pathway 2007 Plan. Through the CEP, TRPA invited developers to submit proposals for innovative, infill development projects that focused on the revitalization of downtown areas and were oriented around different modes of transit. The focus of the CEP is to encourage revitalization projects in downtown and recreation areas that demonstrate substantial environmental, as well as social and economic benefits. Developers whose projects are selected for the program receive incentives including Commercial Floor Area (CFA), Tourist Accommodation Bonus Units (TABU), and Multi-residential Bonus Units (MRBU). Incentives may also involve easing density limitations and building heights.

It is expected that these projects, in turn, will be catalysts for revitalization of Basin community centers, transit nodes and neighborhood centers. Since Community Enhancement Projects are intended to provide clear public benefit, many of the projects are proposing to provide affordable housing units.

Several proposed projects, including those discussed above, are expected to use set-aside funding during the Housing Element timeframe:

- Highlands Village- \$1 million towards low income senior units (Program B-2, Assisting Affordable Housing Developers)
- Domus CEP Projects- \$3.9 million for property acquisition (Program B-2, Assisting Affordable Housing Developers)
- Ridgeview Villas Site Acquisition/Development- Redevelopment-owned site available for affordable housing development- potential set-aside funding to assist with construction (Program A-1, Land Supply and B-13, Land Banking)

In addition, the Redevelopment Agency will likely assist with the Vista Village workforce housing project once the EIR/EIR is certified.

December 23, 2008

Revised February 17, 2009

HCD Comment B.4

While the element includes some programs to assist the development of very low-, low-, and moderate-income households, programs should be expanded or added pursuant to Chapter 891, Statutes of 2006 (AB 2634), to specifically assist in the development of a variety of housing types to meet the housing needs of extremely low-income households. Given the importance of the Program A-4 (Mixed-use development) in addressing Placer County's housing need, the County should consider modifying the program to include additional incentives to facilitate the development of residential such as by-right processing of multifamily units and financial incentives for developments which provide housing affordable to lower-income households

Response: As written, Program A-4 (Mixed-Use Development) shows a commitment by the County to create a variety of incentives for residential development in mixed-use projects. The County will need to study the most appropriate incentives prior to creating the mixed-use zoning overlay district; however, the County cannot commit to specific processing procedures or incentives at this time. For that reason, the County has provided three examples of incentives and stated that these incentives are "not limited to" those listed in the program.

In terms of housing for extremely low-income households, the County has included three programs with quantified objectives for extremely low-income households: Program B-6 (Redevelopment Set-Aside Funds), Program B-9 (State and Federal Funds), and Program D-2 (Housing Choice Vouchers). Together these programs have a quantified objective of 150 extremely low-income housing units. County staff and the Consultants carefully selected the programs that they believed would be most appropriate for meeting the needs of extremely low-income households based on the fact that housing for households earning 30 percent or less of the area median income requires significant public financing.

HCD Comment B.5

As noted in finding A2, the element requires a more detailed analysis of potential governmental constraints. Depending upon the results of that analysis, the County may need to strengthen or add programs and address and remove or mitigate any identified constraints.

Response: Based on the results of the expanded analysis of governmental constraints (addressed in the responses to Comments A 2a and A 2b above), the County has not identified any additional program needs.

STATE OF CALIFORNIA BUSINESS, TRANSPORTATION AND HOUSING AGENCY

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT

DIVISION OF HOUSING POLICY DEVELOPMENT

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 Sacramento, CA 94252-2053
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February 19, 2009

Mr. Michael Johnson
 Planning Director
 County of Placer
 3097 County Center Dr., Ste 140
 Auburn, CA 95603

Dear Mr. Johnson:

RE: Review of the County of Placer's Revised Draft Housing Element

Thank you for submitting Placer County's revised draft housing element received for review on December 23, 2008 with additional revisions received on February 17, 2009. The Department is required to review draft housing elements and report the findings to the locality pursuant to Government Code Section 65585(b). A telephone meeting with Mr. Christopher Schmidt, Senior Planner, and Ms. Ann Baker, Principal Planner, of your staff, and Mr. Rik Koller and Ms. Chesley Norton, with Mintier Harnish, the County's Consultants, facilitated the review.

The revised draft element addresses most of the statutory requirements described in the Department's October 10, 2008 review. However, the following revisions are necessary to comply with State housing element law (Article 10.6 of the Government Code):

1. *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, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (Section 65583(c)(1))*

The revised element includes a program to explicitly allow Single Room Occupancy Units (SRO) as a residential use in "certain zones", (page 24). The program should clarify which zones the County is considering to allow SRO projects.

2. *The housing element shall contain programs which "assist in the development of adequate housing to meet the needs of extremely low-, low- and moderate-income households (Section 65583(c)(2)).*

The element did not address this requirement.

- a) The response letter indicates Program B-6, Program B-9, and Program D-2 are sufficient to assist in the development of housing to meet the needs of extremely low-income households (ELI). However, neither these programs nor the element specifically indicate how these programs are adequate or address the unique

ATTACHMENT C
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Mr. Michael Johnson
Page 2

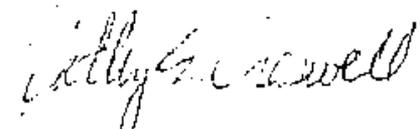
housing needs of extremely low-income households. To address this requirement, the element could revise programs B-6 and B-9 to prioritize use of a portion of the identified funding to be for the development of housing affordable to ELI households; and/or, include programs offering financial incentives or regulatory concessions to encourage the development of housing types, such as SROs, which address the needs of this Income group. In addition, the County could consider a program to encourage development of housing affordable to ELI households by providing financial or regulatory incentives to developers who agree to include a portion of their units affordable to ELI households.

- b) Given the increased reliance on commercial and mixed-use sites to accommodate housing affordable to low-income households, the element continues to require programmatic actions to facilitate housing development within these zones. For example, the element could modify Program A-4 (Mixed-Use Development) or include additional programs to specify how the County will promote the availability of these sites, target specific financial incentives, and offer expedite the permit processing procedures and other regulatory incentives for stand alone residential development as well as mixed-use developments.

Finally, the revised inventory demonstrates sufficient capacity to accommodate the County's remaining regional housing need allocation (RHNA) of 2,417 units affordable to lower-income households. For your information the determination of adequate sites only considered sites less than 20 acres in size, and sites without environmental or infrastructure limitations. In addition, the determination did not consider the 225 units of employee housing as the element was not revised to demonstrate the affordability of the units. Without relying on these sites to accommodate the RHNA for lower-income households, the inventory demonstrates the capacity for 1,239 units on high density residential sites and 1,916 units on mixed-use or commercial sites allowing residential development.

Once the element has been revised to adequately address these requirements, the element will be in compliance with State housing element law. The Department appreciates the cooperation and assistance provided by Mr. Keller and Ms. Norton throughout the course of the review and would be happy to provide any assistance needed to facilitate your efforts to bring the element into compliance. If you have any questions or would like assistance in revising the element, please contact Melinda Coy, of our staff, at (916) 445-5307.

Sincerely,



Cathy E. Creswell
Deputy Director

RESPONSES TO HCD COMMENTS PLACER COUNTY DRAFT HOUSING ELEMENT

FEBRUARY 26, 2009
(REVISED MARCH 5, 2009)

The following report summarizes Placer County's responses to the California Department of Housing and Community Development's (HCD) review letter of February 19, 2009 concerning Placer County's letter of December 22, 2008 written in response to HCD comments received on October 10, 2008. It includes verbatim excerpts from HCD's review letter and both narrative responses and proposed changes to the text (in underline) of the HCD Review Draft Background Report and Policy Document of the Housing Element. The highlighted addition was added on March 5, 2009.

HCD Comment 1

The revised element includes a program to explicitly allow Single Room Occupancy Units (SRO) as a residential use in "certain zones", (page 24) The program should clarify which zones the County is considering to allow SRO projects.

Response: The following program (numbering TBD) will be revised to include references to specific zones where the County will consider allowing SRO projects

Program X-X SINGLE ROOM OCCUPANCY (SRO) UNITS

The County shall amend the Zoning Code to define Single Room Occupancy (SRO) units and explicitly allow SROs as a residential use in certain zones. These zones could include the Multi-Family Residential (RM), Highway Service (HS), and Resort (RES) zoning districts.

Responsible Agency/Department: Planning Department

Timeframe: July 2009

Funding: General Fund

HCD Comment 2.A

The response letter indicates Program B-6, Program B-9, and Program D-2 are sufficient to assist in the development of housing to meet the needs of extremely low-income households (ELI). However, neither these programs nor the element specifically indicate how these programs are adequate to address the unique housing needs of extremely low-income households. To address this requirement, the element could revise programs B-6 and B-9 to prioritize use of a portion of the identified funding to be for the development of housing affordable to ELI households; and/or, include programs offering financial incentives or regulatory concessions to encourage the development of housing types, such as SROs, which address the needs of this income group. In addition, the County could consider a program to encourage development of housing affordable to ELI households by providing financial or regulatory incentives to developers who agree to include a portion of their units affordable to ELI households

Response: The underlined text will be added to the following programs to specifically address the housing needs of extremely low-income households and a new policy will be added to include consideration of extremely low-income units to meet affordability requirements in specific plans

Program B-6 REDEVELOPMENT SET-ASIDE FUNDS

Consistent with State law, twenty percent of the tax increment funds accruing to the Redevelopment Agency shall be directed to affordable housing. If successful in receiving funding from the Local Housing Trust Fund matching program, the County shall encourage the Redevelopment Agency to work with affordable housing developers to utilize a portion of set-aside funds for development of housing affordable to extremely low-income households.

Responsible Agency/Department: Redevelopment Agency

Timeframe: Ongoing

Funding: Tax increment

Quantified Objective: 425 units

Program B-9 STATE AND FEDERAL FUNDS

The County shall apply for State and Federal monies for direct support of low-income housing construction and rehabilitation. The Redevelopment Agency and Health and Human Services shall continue to assess potential funding sources, such as, but not limited to, the Community Development Block Grant (CDBG), and HOME. The County shall also seek State and Federal funding specifically targeted for the development of housing affordable to extremely low-income households, such as the Local Housing Trust Fund program and Proposition 1-C funds. The County shall promote the benefits of this program to the development community by posting information on its web page and creating a handout to be distributed with land development applications.

Responsible Agency/Department: Redevelopment Agency, Health and Human Services/Adult System of Care

Timeframe: Ongoing, depending on funding programs; promotional material will be prepared and utilized within six months of adoption of the Housing Element

Funding: General Fund, Technical Assistance Grants

Quantified Objective: 100 units

Program B-5 FEE WAIVERS

The County shall adopt a resolution waiving 100 percent of the application processing fees for developments in which 5 percent of units are affordable to extremely low-income households, 10 percent of the units are affordable to very low-income households, 20 percent of the units are affordable to low-income households, or 30 percent of the units are affordable to moderate-income households. Additionally, the County shall evaluate waiving environmental review staff time charges for projects containing affordable housing units. To be eligible for fee waiver, the units shall be affordable by affordability covenant. The waiving or reduction of service mitigation fees may also be considered when an alternative funding source is identified to pay these fees. The County may use either redevelopment set-aside funds or the Housing Trust Fund to subsidize the service and mitigation fees for affordable housing developments. The County shall promote the

benefits of this program to the development community by posting information on its web page and creating a handout to be distributed with land development applications.

Responsible Agency/Department: County Executive Office, Planning Department, Building Department, Public Works, Parks and Grounds Division, and Health and Human Services (HHS)

Timeframe: FY 2008/2009; promotional materials will be prepared and utilized within six months after adoption of the Housing Element

Funding: General Fund, Redevelopment set-asides, Housing Trust Fund

New Policy The County currently requires 10 percent of residential units in specific plans be affordable (4 percent very-low, 4 percent low, 2 percent moderate). On a case-by-case basis, the County shall consider allowing developers that provide extremely low-income units to reduce the required percentage of other affordable units.

HCD Comment 2.B

Given the increased reliance on commercial and mixed-use sites to accommodate housing affordable to low-income households, the element continues to require programmatic actions to facilitate housing development within these zones. For example, the element could modify Program A-4 (Mixed-Use Development) or include additional programs to specify how the County will promote the availability of these sites, target specific financial incentives, and offer expedite the permit processing procedures and other regulatory incentives for stand-alone residential development as well as mixed-use developments.

Response: The underlined text will be added to Program A-4.

Program A-4 **MIXED-USE DEVELOPMENT AND RESIDENTIAL DEVELOPMENT IN COMMERCIAL ZONES**

The County shall create a mixed-use zoning overlay district and prepare related design guidelines. The County shall also adopt incentives for residential development that is part of a mixed-use project or high density, stand-alone residential projects in commercial zones, including but not limited to relaxed development standards, reduced parking requirements, and expedited development review procedures. Additionally, the County shall maintain an inventory of potential sites for mixed-use and residential development in commercial zones and promote the inventory and incentives to the development community and property owners. The County shall produce promotional materials such as brochures and fliers, website postings, and/or electronic mailings.

Responsible Agency/Department: Planning Department

Timeframe: July 2010

Funding: General Fund

Quantified Objective: 425 units in mixed-use projects (352 affordable units)

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

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**Received**

MAR 12 2009

CDRA - Admi

March 12 2009

Mr. Michael Johnson
Planning Director
County of Placer
3097 County Center Drive, Suite 140
Auburn, CA 95603

Dear Mr. Johnson:

RE: Review of the County of Placer's Revised Draft Housing Element

Thank you for submitting Placer County's revised draft housing element received for review on February 19, 2009 along with revisions on March 4, 2009. The Department is required to review draft housing elements and report the findings to the locality pursuant to Government Code Section 65585(b).

The revised draft element addresses the statutory requirements described in the Department's February 19, 2009 review. For example, the element now includes programs to assist in the development of housing affordable to extremely low-income households (ELI) and encourage development within mixed-use and commercial zones. These programs promote the availability of high density sites within commercial corridors, facilitate the development of single-room occupancy units, and provide funding resources and fee deferrals to encourage developments that include units affordable to ELI households. As a result, the revised draft element will comply with State housing element law (Article 10.6 of the Government Code) when adopted and submitted to the Department, pursuant to Government Code Section 65585(g).

The Department appreciates the County's efforts to address its housing and community development needs and looks forward to receiving Placer County's adopted housing element. If you have any additional questions, please contact Melinda Coy, of our staff, at (916) 445-5307.

Sincerely,

A handwritten signature in cursive script that reads "Cathy E. Creswell".

Cathy E. Creswell
Deputy Director

ATTACHMENT E

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NEGATIVE DECLARATION

In accordance with Placer County ordinances regarding implementation of the California Environmental Quality Act, Placer County has conducted an Initial Study to determine whether the following project may have a significant adverse effect on the environment, and on the basis of that study hereby finds:

- The proposed project will not have a significant adverse effect on the environment; therefore, it does not require the preparation of an Environmental Impact Report and this **Negative Declaration** has been prepared.
- Although the proposed project could have a significant adverse effect on the environment, there will not be a significant adverse effect in this case because the project has incorporated specific provisions to reduce impacts to a less than significant level and/or the mitigation measures described herein have been added to the project. A **Mitigated Negative Declaration** has thus been prepared.

The environmental documents, which constitute the Initial Study and provide the basis and reasons for this determination are attached and/or referenced herein and are hereby made a part of this document.

PROJECT INFORMATION

Title: Placer County Housing Element Update	Plus# PGPA T20080279
Description: The 2008 Housing Element represents a modification to existing policies and implementation programs in the 2003 Housing Element. It proposes to preserve the most successful programs from the last Element to meet the housing needs of the county's residents.	
Location: Placer County	
Project Owner/Applicant: Planning Department, Community Development Resource Agency	
County Contact Person: Christopher Schmidt	530-745-3076

PUBLIC NOTICE

The comment period for this document closes on **November 17, 2008**. A copy of the Negative Declaration is available for public review at the Community Development Resource Agency public counter, the Applegate, Auburn, Colfax, Foresthill, Granite Bay, Kings Beach, Lincoln, Rocklin, Roseville, Tahoe City, and Truckee Library. Additional information may be obtained by contacting the Community Development Resource Agency, Environmental Coordination Services, at (530) 745-3132 between the hours of 8:00 am and 5:00 pm at 3091 County Center Drive, Auburn, CA 95603.

If you wish to appeal the appropriateness or adequacy of this document, address your written comments to our finding that the project will not have a significant adverse effect on the environment: (1) identify the environmental effect(s), why they would occur, and why they would be significant, and (2) suggest any mitigation measures which you believe would eliminate or reduce the effect to an acceptable level. Regarding item (1) above, explain the basis for your comments and submit any supporting data or references. Refer to Section 18.32 of the Placer County Code for important information regarding the timely filing of appeals.

Recorder's Certification



COUNTY OF PLACER
Community Development Resource Agency

**ENVIRONMENTAL
COORDINATION
SERVICES**

John Marin, Agency Director

Gina Langford, Coordinator

3091 County Center Drive, Suite 190 • Auburn • California 95603 • 530-745-3132 • fax 530-745-3003 • www.placer.ca.gov/planning

INITIAL STUDY & CHECKLIST

This Initial Study has been prepared to identify and assess the anticipated environmental impacts of the following described project application. The document may rely on previous environmental documents (see Section C) and site-specific studies (see Section I) prepared to address in detail the effects or impacts associated with the project.

This document has been prepared to satisfy the California Environmental Quality Act (CEQA) (Public Resources Code, Section 21000 et seq.) and the State CEQA Guidelines (14 CCR 15000 et seq.) CEQA requires that all state and local government agencies consider the environmental consequences of projects over which they have discretionary authority before acting on those projects.

The Initial Study is a public document used by the decision-making lead agency to determine whether a project may have a significant effect on the environment. If the lead agency finds substantial evidence that any aspect of the project, either individually or cumulatively, may have a significant effect on the environment, regardless of whether the overall effect of the project is adverse or beneficial, the lead agency is required to prepare an EIR, use a previously-prepared EIR and supplement that EIR, or prepare a Subsequent EIR to analyze the project at hand. If the agency finds no substantial evidence that the project or any of its aspects may cause a significant effect on the environment, a Negative Declaration shall be prepared. If in the course of analysis, the agency recognizes that the project may have a significant impact on the environment, but that by incorporating specific mitigation measures the impact will be reduced to a less than significant effect, a Mitigated Negative Declaration shall be prepared.

A. BACKGROUND:

Project Title: Placer County Housing Element Update	Plus# PGPA T20080279
Entitlements: General Plan Amendment	
Site Area: n/a	APN: n/a
Location: Unincorporated Placer County	

Project Description:

The project is a comprehensive update of the Housing Element that was adopted by Placer County in 2003. State Housing Element Law (Government Code Section 65580 (et seq.)) mandates that local governments must adequately plan to meet the existing and projected housing needs of all economic segments of the community. The Element served a seven-and-a-half year planning period from January 1, 2000 to June 30, 2007. The seven-and-a-half year planning period is for January 1, 2006 to June 30, 2013. Upon its adoption, the 2008 Housing Element will become part of the Placer County General Plan, which was last comprehensively updated in August 1994.

On August 5, 2008 the Placer County Board of Supervisors approved the 2008 Draft Housing Element for review by the California Department of Housing and Community Development (HCD). The County submitted the Draft Housing Element to HCD on August 13, 2008, and HCD has 60 days to review the draft and submit comments to the County. The County will then address HCD comments and approve a final Housing Element for certification by the State. This entire process is anticipated to be completed by January 2009.

"Projected Housing Needs" for Placer County during this housing element period were determined through the regional housing needs allocation process. California law requires HCD to project the statewide housing need and allocate the statewide need amongst the various regions in California. The Sacramento Area Council of Governments (SACOG) allocated the region's "fair share" housing need among the jurisdictions within its boundaries, including Placer County, pursuant to State guidelines. In February 2008, SACOG assigned 6,229 housing units to Placer County for the period from January 1, 2006, through June 30, 2013. Of the 6,229 housing units, 3,947 units are to be affordable to moderate-income households and below, including 1,538 very low-income

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units, 1,178 low-income units, and 1,231 moderate-income units. The allocation is equivalent to a yearly need of 830 housing units for the seven-and-a-half year time period.

After accounting for new affordable housing units that were constructed, planned, or approved between January 1, 2006 through January 1, 2008 (2,884 units), Placer County has a remaining need of 1,063 affordable housing units for the 2006-2013 planning period. To demonstrate that the County has sufficient land capacity to accommodate this remaining need, the County conducted an inventory of vacant sites allowing higher-density residential development. A complete inventory of all vacant residential land within unincorporated Placer County was not conducted. The vacant land inventory demonstrated that Placer County has a total residential capacity (6,053) in excess of its RHNA for affordable units (3,947). Additionally, Placer County has sufficient capacity for above moderate-income (market rate) housing to meet its RHNA numbers. Therefore, the County will not need to rezone any additional sites to accommodate its RHNA.

The 2008 Housing Element represents a modification to existing policies and implementation programs in the 2003 Housing Element. The 2008 Housing Element preserves the most successful programs from the last Element and proposes new programs to meet the housing needs of the county's residents. Some of the more significant changes in the 2008 Housing Element Update include an expanded focus on infill and transit-oriented housing, increased incentives for the development of affordable housing, and more attention paid to workforce housing needs in the Tahoe Basin portion of the county.

There are several programs in the Housing Element Update that encourage higher-density, mixed-use, and transit-oriented development that could result in increased height, reduced parking, and increased residential densities beyond those anticipated in the Placer County Code of Ordinances. However, the Housing Element is strictly a policy document. Specific housing projects and/or General Plan amendments will require project-specific environmental review.

Based on the State the California Environmental Quality Act (CEQA) Guidelines and professional judgment, the proposed project would result in a significant impact on housing if it would:

1. Create a demand for additional housing without providing for accompanying housing development; or
2. Result in the displacement of substantial amounts of existing affordable housing.

The 2008 Housing Element will not displace substantial amounts of existing housing and will not substantially alter the location or extent of designated residential land uses. As a result, adequate area is available to provide for anticipated housing demand.

No specific housing projects are approved as part of Housing Element adoption. In fact, the Housing Element, in itself, would not directly result in changes to the physical environment (environmental effects). After Housing Element adoption, the County will evaluate specific housing development proposals based on their compliance with the General Plan, relevant Community Plans, Zoning Ordinance, and other ordinances. Additional environmental review of potential environmental effects in compliance with the California Environmental Quality Act may be required prior to development of any specific housing units. Compliance with the programs and policies of the Housing Element, alone, does not ensure project approval.

Project Site:

County-wide; all designations allowing residential development.

B. ENVIRONMENTAL SETTING:

Placer County is a geographically diverse county. While the western portion of the County contains suburbs of the Sacramento Region, the eastern portion lies within the Lake Tahoe Region. Placer County is one of the fastest growing counties in the state. Between 2000 and 2007, the County's population grew from 248,399 to 324,495. The proposed Housing Element update encompasses all of the land within the unincorporated areas of the county.

C. PREVIOUS ENVIRONMENTAL DOCUMENT:

The County has determined that an Initial Study shall be prepared in order to determine whether the potential exists for unmitigatable impacts resulting from the proposed project. Relevant analysis from the County-wide General Plan and Community Plan Certified EIRs, and other project-specific studies and reports that have been generated to date, were used as the database for the Initial Study. The decision to prepare the Initial Study utilizing the analysis contained in the General Plan and Specific Plan Certified EIRs, and project-specific analysis summarized herein, is sustained by Sections 15168 and 15183 of the CEQA Guidelines.

Section 15168 relating to Program EIRs indicates that where subsequent activities involve site-specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity, to determine whether the environmental effects of the operation were covered in the earlier Program EIR. A Program EIR is intended to provide the basis in an Initial Study for determining whether the later activity may have any significant effects. It will also be incorporated by reference to address regional influences, secondary effects, cumulative impacts, broad alternatives, and other factors that apply to the program as a whole.

The following documents serve as Program-level EIRs from which incorporation by reference will occur:

- ➔ Placer County General Plan EIR

Section 15183 states that "projects which are consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified shall not require additional environmental review, except as may be necessary to examine whether there are project-specific significant effects which are peculiar to the project or site." Thus, if an impact is not peculiar to the project or site, and it has been addressed as a significant effect in the prior EIR, or will be substantially mitigated by the imposition of uniformly applied development policies or standards, then additional environmental documentation need not be prepared for the project solely on the basis of that impact.

The above stated documents are available for review Monday through Friday, 8am to 5pm, at the Placer County Community Development Resource Agency, 3091 County Center Drive, Auburn, CA 95603. For Tahoe projects, the document will also be available in our Tahoe Division Office, 565 West Lake Blvd., Tahoe City, CA 96145.

D. EVALUATION OF ENVIRONMENTAL IMPACTS:

The Initial Study checklist recommended by the State of California Environmental Quality Act (CEQA) Guidelines is used to determine potential impacts of the proposed project on the physical environment. The checklist provides a list of questions concerning a comprehensive array of environmental issue areas potentially affected by the project (see CEQA Guidelines, Appendix G). Explanations to answers are provided in a discussion for each section of questions as follows:

- a) A brief explanation is required for all answers including "No Impact" answers.
- b) "Less Than Significant Impact" applies where the project's impacts are insubstantial and do not require any mitigation to reduce impacts.
- c) "Less Than Significant with Mitigation Measures" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The County, as lead agency, must describe the mitigation measures, and briefly explain how they reduce the effect to a less-than-significant level (mitigation measures from earlier analyses may be cross-referenced).
- d) "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- e) All answers must take account of the entire action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts [CEQA Guidelines, Section 15063(a)(1)].
- f) Earlier analyses may be used where, pursuant to the tiering, Program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or Negative Declaration [CEQA Guidelines, Section 15063(c)(3)(D)]. A brief discussion should be attached addressing the following:
 - ➔ **Earlier analyses used** – Identify earlier analyses and state where they are available for review.
 - ➔ **Impacts adequately addressed** – Identify which effects from the above checklist were within the scope of, and adequately analyzed in, an earlier document pursuant to applicable legal standards. Also, state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - ➔ **Mitigation measures** – For effects that are checked as "Less Than Significant with Mitigation Measures," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- g) References to information sources for potential impacts (i.e. General Plans/Community Plans, zoning ordinances) should be incorporated into the checklist. Reference to a previously-prepared or outside document should include a reference to the pages or chapters where the statement is substantiated. A source list should be attached and other sources used, or individuals contacted, should be cited in the discussion.

I. AESTHETICS – Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. Have a substantial adverse effect on a scenic vista? (PLN)				X
2. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within a state scenic highway? (PLN)				X
3. Substantially degrade the existing visual character or quality of the site and its surroundings? (PLN)				X
4. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area? (PLN)				X

Discussion- All Items:

The Housing Element Update identifies an assigned growth need of 6,229 housing units for development through June 30, 2013. Without identifying the location and type of residential development, it is not possible to anticipate how development of new housing units will potentially impact the existing visual character of unincorporated areas of the county. To ensure that significant impacts to aesthetic resources do not occur, future development of residential uses will be in accordance with applicable County standards and guidelines, as well as the requirements mandated during the environmental review of individual projects.

II. AGRICULTURAL RESOURCE – Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? (PLN)				X
2. Conflict with General Plan or other policies regarding land use buffers for agricultural operations? (PLN)				X
3. Conflict with existing zoning for agricultural use, or a Williamson Act contract? (PLN)				X
4. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland (including livestock grazing) to non-agricultural use? (PLN)				X

Discussion- All Items:

Adopting the updated Housing Element will not by itself convert Prime Farmland, Unique Farmland, or conflict with existing zoning for agricultural use or a Williamson Act contract. A land inventory analysis undertaken in Section II of the Housing Element showed the County has sufficient properly zoned land capacity to accommodate the Regional Housing Needs Allocation.

III. AIR QUALITY – Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. Conflict with or obstruct implementation of the applicable air quality plan? (APCD)				X
2. Violate any air quality standard or contribute substantially to an existing or projected air quality violation? (APCD)				X
3. Result in a cumulatively considerable net increase of any criteria for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? (APCD)				X
4. Expose sensitive receptors to substantial pollutant concentrations? (APCD)				X
5. Create objectionable odors affecting a substantial number of people? (APCD)				X

Discussion- All Items:

The proposed updated Housing Element analyzes adopted land use policies and serves as a policy guide for meeting existing and future housing needs of the unincorporated areas of Placer County. The proposed Housing Element does not revise, replace or attempt to supersede existing standards and procedures to ensure compliance with County codes and policies. Individual future residential projects will be subject to supplemental environmental review as required by State law and County policy. The project will not conflict with existing Community Plan land use designations as there are no changes in zoning required to adopt the Housing Element update.

IV. BIOLOGICAL RESOURCES – Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by the California Department of Fish & Game or U.S. Fish & Wildlife Service? (PLN)				X
2. Substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number of restrict the range of an endangered, rare, or threatened species? (PLN)				X
3. Have a substantial adverse effect on the environment by converting oak woodlands? (PLN)				X
4. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations or by the California Department of Fish & Game or U.S. Fish & Wildlife Service? (PLN)				X
5. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? (PLN)				X

6. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? (PLN)				X
7. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (PLN)				X
8. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? (PLN)				X

Discussion- All Items:

The proposed Housing Element and associated implementation programs will not affect biological resources. Potential biological impacts associated with construction of 6,229 housing units would vary on a project-by-project basis. Each development project would be subject to separate environment review at the time a specific development proposal is made, and project-specific biological constraints (e.g., presence of rare/endangered species, locally designated species or habitats) would be further assessed at that time in accordance with the California Environmental Quality Act (CEQA).

V. CULTURAL RESOURCES – Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. Substantially cause adverse change in the significance of a historical resource as defined in CEQA Guidelines, Section 15064.5? (PLN)				X
2. Substantially cause adverse change in the significance of a unique archaeological resource pursuant to CEQA Guidelines, Section 15064.5? (PLN)				X
3. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? (PLN)				X
4. Have the potential to cause a physical change, which would affect unique ethnic cultural values? (PLN)				X
5. Restrict existing religious or sacred uses within the potential impact area? (PLN)				X
6. Disturb any human remains, including those interred outside of formal cemeteries? (PLN)				X

Discussion- All Items:

The Housing Element update identifies an assigned growth need of 6,229 housing units for development through 2013. Without specific data on the location and type of new residential development, it is not possible to determine potential impacts to cultural (historic and archeological) resources. The proposed updated Housing Element does not involve revisions to the development standards that would impact cultural or historical resources.

Review of new residential development(s) will permit an analysis of how such development may potentially conflict with cultural resources. Adherence to applicable County, State, and Federal standards and guidelines related to the protection/preservation of cultural resources, as well as the requirements mandated during the environmental review of individual projects will reduce potential impacts related to cultural resources to a less than significant level.

VI. GEOLOGY & SOILS – Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. Expose people or structures to unstable earth conditions or changes in geologic substructures? (ESD)				X
2. Result in significant disruptions, displacements, compaction or overcrowding of the soil? (ESD)				X
3. Result in substantial change in topography or ground surface relief features? (ESD)				X
4. Result in the destruction, covering or modification of any unique geologic or physical features? (ESD)				X
5. Result in any significant increase in wind or water erosion of soils, either on or off the site? (ESD)				X
6. Result in changes in deposition or erosion or changes in siltation which may modify the channel of a river, stream, or lake? (ESD)				X
7. Result in exposure of people or property to geologic and geomorphological (i.e. Avalanches) hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards? (ESD)				X
8. Be located on a geological unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse? (ESD)				X
9. Be located on expansive soils, as defined in Section 1802.3.2 of the California Building Code (2007), creating substantial risks to life or property? (ESD)				X

Discussion- All Items:

Adopting the updated Housing Element will not by itself affect geologic and soil conditions. Potential geologic impacts associated with the construction of new housing units would vary on a project-by-project basis. Each development project would be subject to separate environmental review at the time a specific development proposal is made, and project-specific geologic constraints (e.g., potential for fault rupture, ground shaking, ground failure, subsidence, expansive soils, etc.) would be evaluated at that time.

VII. HAZARDS & HAZARDOUS MATERIALS – Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. Create a significant hazard to the public or the environment through the routine handling, transport, use, or disposal of hazardous or acutely hazardous materials? (EHS)				X
2. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? (EHS)				X
3. Emit hazardous emissions, substances, or waste within one-quarter mile of an existing or proposed school? (APCD)				X

Initial Study & Checklist continued

4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? (EHS)				X
5. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? (PLN)				X
6. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing in the project area? (PLN)				X
7. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? (PLN)				X
8. Create any health hazard or potential health hazard? (EHS)				X
9. Expose people to existing sources of potential health hazards? (EHS)				X

Discussion- All Items:

The updated Housing Element will not create concerns regarding hazards or hazardous materials. Future development in the county will be subject to hazardous materials regulations and would be required to meet fire safe guidelines. Project-specific health hazards will be evaluated at the time a specific development proposal is made.

VIII. HYDROLOGY & WATER QUALITY – Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. Violate any potable water quality standards? (EHS)				X
2. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lessening of local groundwater supplies (i.e. the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? (EHS)				X
3. Substantially alter the existing drainage pattern of the site or area? (ESD)				X
4. Increase the rate or amount of surface runoff? (ESD)				X
5. Create or contribute runoff water which would include substantial additional sources of polluted water? (ESD)				X
6. Otherwise substantially degrade surface water quality?(ESD)				X
7. Otherwise substantially degrade ground water quality? (EHS)				X
8. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard boundary or Flood Insurance Rate Map or other flood hazard delineation map? (ESD)				X

Initial Study & Checklist continued

9. Place within a 100-year flood hazard area improvements which would impede or redirect flood flows? (ESD)				X
10. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? (ESD)				X
11. Alter the direction or rate of flow of groundwater? (EHS)				X
12. Impact the watershed of important surface water resources, including but not limited to Lake Tahoe, Folsom Lake, Hell Hole Reservoir, Rock Creek Reservoir, Sugar Pine Reservoir, French Meadows Reservoir, Combie Lake, and Rollins Lake? (EHS, ESD)				X

Discussion- All items:

All future development will be subject to site-specific environmental studies as determined appropriate by the County and will comply with all applicable County policies related to hydrology and water quality. Each development project would be subject to separate environmental review at the time a specific development proposal is made, and project-specific hydrologic impacts (e.g. changes in drainage patterns, increased surface runoff, flood hazards, water quality degradation, etc.) would be evaluated at that time.

IX. LAND USE & PLANNING – Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. Physically divide an established community? (PLN)				X
2. Conflict with General Plan/Community Plan/Specific Plan designations or zoning, or Plan policies adopted for the purpose of avoiding or mitigating an environmental effect? (EHS, ESD, PLN)				X
3. Conflict with any applicable habitat conservation plan or natural community conservation plan or other County policies, plans, or regulations adopted for purposes of avoiding or mitigating environmental effects? (PLN)				X
4. Result in the development of incompatible uses and/or the creation of land use conflicts? (PLN)				X
5. Affect agricultural and timber resources or operations (i.e. impacts to soils or farmlands and timber harvest plans, or impacts from incompatible land uses)? (PLN)				X
6. Disrupt or divide the physical arrangement of an established community (including a low-income or minority community)? (PLN)				X
7. Result in a substantial alteration of the present or planned land use of an area? (PLN)				X
8. Cause economic or social changes that would result in significant adverse physical changes to the environment such as urban decay or deterioration? (PLN)				X

Discussion- All Items:

The proposed project is to adopt the 2006-2013 Housing Element update, which provides policies and programs to address housing requirements in the unincorporated areas of Placer County. Adoption of the Housing Element does not grant entitlements for any projects. As a part of the County General Plan, the Housing Element complies with the adopted General Plan and will not change residential land use designations outlined in the Land Use Element.

X. MINERAL RESOURCES – Would the project result in:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. The loss of availability of a known mineral resource that would be of value to the region and the residents of the state? (PLN)				X
2. The loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? (PLN)				X

Discussion- All Items:

Adopting the Housing Element will not by itself substantially result in the loss of the availability of mineral resources, particularly petroleum resources. All future development proposals as a result of the updated housing element will be analyzed for specific project impacts to mineral resources.

XI. NOISE – Would the project result in:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. Exposure of persons to or generation of noise levels in excess of standards established in the local General Plan, Community Plan or noise ordinance, or applicable standards of other agencies? (PLN)				X
2. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? (PLN)				X
3. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? (PLN)				X
4. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? (PLN)				X
5. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? (PLN)				X

Discussion- All Items:

The updated Housing Element and its programs will not affect noise conditions. Based on the objectives of the proposed Housing Element, it is anticipated that 6,229 housing units would be developed. Potential noise impacts associated with construction and occupation of these new units would vary on a project-by-project basis. The County's existing Noise Ordinance (Article 9.36 of the County Code) would apply to proposed residential development and each development project would be subject to separate environmental review at the time a specific development proposal is made; project-specific noise impacts or constraints would be evaluated at that time.

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XII. POPULATION & HOUSING – Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. Induce substantial population growth in an area, either directly (i.e. by proposing new homes and businesses) or indirectly (i.e. through extension of roads or other infrastructure)? (PLN)				X
2. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? (PLN)				X

Discussion- All Items:

Adoption of the updated Housing Element will not by itself induce substantial population growth in unincorporated Placer County. As required by State law, the Housing Element is designed to address the housing needs forecasted for unincorporated Placer County for the 2006-2013 planning period. Without specific details regarding future developments, it is impossible to evaluate inducement of population growth. Through the County's environmental review process, future development projects would be evaluated for potential growth inducing impacts.

The project sets forth programs and policies to facilitate housing conservation and maintenance and therefore has the potential to improve the quality of the existing housing stock within the county. The Housing Element also contains programs and policies to address the County's future housing needs by encouraging housing that provides diversity in type and price. No aspect of the project involves the displacement of any number of people.

XIII. PUBLIC SERVICES – Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services?

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. Fire protection? (EHS, ESD, PLN)				X
2. Sheriff protection? (EHS, ESD, PLN)				X
3. Schools? (EHS, ESD, PLN)				X
4. Maintenance of public facilities, including roads? (EHS, ESD, PLN)				X
5. Other governmental services? (EHS, ESD, PLN)				X

Discussion- All Items:

The proposed Housing Element analyzes adopted land use policies and will not change residential land use designations within the Land Use Element of the Placer County General Plan and, therefore, would not cause an increase in demand for public services. All future development will be subject to site-specific environmental studies as determined appropriate by the County, and will comply with all applicable County policies and regulation related to public services.

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XIV. RECREATION – Would the project result in:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? (PLN)				X
2. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? (PLN)				X

Discussion- All Items:

The proposed Housing Element analyzes adopted land use policies and does not grant entitlements for any projects. It will not change residential land use designations in the Land Use Element of the Placer County General Plan and, therefore, would not cause an increase in demand for recreational facilities. All future development will be subject to site-specific environmental studies as determined appropriate by the County, and will comply with all applicable County policies and regulation related to recreational services.

XV. TRANSPORTATION & TRAFFIC – Would the project result in:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. An increase in traffic which may be substantial in relation to the existing and/or planned future year traffic load and capacity of the roadway system (i.e. result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)? (ESD)				X
2. Exceeding, either individually or cumulatively, a level of service standard established by the County General Plan and/or Community Plan for roads affected by project traffic? (ESD)				X
3. Increased impacts to vehicle safety due to roadway design features (i.e. sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (ESD)				X
4. Inadequate emergency access or access to nearby uses? (ESD)				X
5. Insufficient parking capacity on-site or off-site? (ESD, PLN)				X
6. Hazards or barriers for pedestrians or bicyclists? (ESD)				X
7. Conflicts with adopted policies supporting alternative transportation (i.e. bus turnouts, bicycle racks)? (ESD)				X
8. Change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? (ESD)				X

Discussion- All Items:

The proposed Housing Element and its programs will not directly affect transportation facilities or traffic conditions. However, the objectives of the updated Housing Element would be expected to generate 6,229 housing units from 2006 through 2013. The nature and extent of local traffic impacts would vary on a project-by-project basis. Project-

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specific traffic impacts (e.g., level of service operation, access problems, traffic or pedestrian safety hazards, etc.) would be evaluated when such proposed project plans are submitted to the County. Mitigation measures have been integrated into the General Plan in the form of goals, policies and implementation measures to ensure that local traffic impacts are mitigated to a less than significant level.

XVI. UTILITIES & SERVICE SYSTEMS – Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation Measures	Less Than Significant Impact	No Impact
1. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? (ESD)				X
2. Require or result in the construction of new water or wastewater delivery, collection or treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? (EHS, ESD)				X
3. Require or result in the construction of new on-site sewage systems? (EHS)				X
4. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? (ESD)				X
5. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? (EHS)				X
6. Require sewer service that may not be available by the area's waste water treatment provider? (EHS, ESD)				X
7. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs in compliance with all applicable laws? (EHS)				X

Discussion- All Items:

The proposed Housing Element's residential development programs will result in the development of 6,229 new/rehabilitated housing units in unincorporated Placer County. Development of these new units would increase the demands on existing utilities and services systems. However, most of this new development would occur in areas that are already developed, or adjacent to urbanized areas. It is impossible to accurately determine utility and service system requirements of future development without site locations and specific project details. Future utility and service system needs will be evaluated on an ongoing basis as each new development is proposed.

E. MANDATORY FINDINGS OF SIGNIFICANCE:

Environmental Issue	Yes	No
1. Does the project have the potential to degrade the quality of the environment, substantially impact biological resources, or eliminate important examples of the major periods of California history or prehistory?		X
2. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)		X

3. Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?		X
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Discussion- All Items:

The draft Housing Element is a policy document intended as a guide to decision-makers in meeting the County's housing objectives over the next five years. Accordingly, the draft Element does not authorize specific housing development projects for specific sites. Housing projects undertaken in the course of implementing the goals, policies, and programs identified in the Draft Housing Element will be subject to project-specific environmental review in accordance with Section 10562 et seq. of the CEQA Guidelines. Any indirect impacts associated with future housing construction have already been addressed in the Placer County General Plan EIR and various community plan EIRs.

F. OTHER RESPONSIBLE AND TRUSTEE AGENCIES whose approval is required:

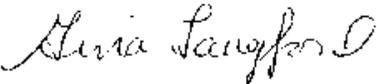
<input type="checkbox"/> California Department of Fish and Game	<input type="checkbox"/> Local Agency Formation Commission (LAFCO)
<input type="checkbox"/> California Department of Forestry	<input type="checkbox"/> National Marine Fisheries Service
<input type="checkbox"/> California Department of Health Services	<input type="checkbox"/> Tahoe Regional Planning Agency
<input type="checkbox"/> California Department of Toxic Substances	<input type="checkbox"/> U.S. Army Corp of Engineers
<input type="checkbox"/> California Department of Transportation	<input type="checkbox"/> U.S. Fish and Wildlife Service
<input type="checkbox"/> California Integrated Waste Management Board	<input type="checkbox"/>
<input type="checkbox"/> California Regional Water Quality Control Board	<input type="checkbox"/>

G. DETERMINATION – The Environmental Review Committee finds that:

Although the proposed project **COULD** have a significant effect on the environment, there **WILL NOT** be a significant effect in this case because the mitigation measures described herein have been added to the project. A **NEGATIVE DECLARATION** will be prepared.

H. ENVIRONMENTAL REVIEW COMMITTEE (Persons/Departments consulted):

- Planning Department, Christopher Schmidt, Chairperson
- Engineering and Surveying Department, Rick Eiri
- Engineering and Surveying Department, Wastewater, Janelle Fortner
- Department of Public Works, Transportation, Andrew Gaber
- Environmental Health Services, Grant Miller
- Air Pollution Control District, Yushuo Chang
- Flood Control Districts, Andrew Darrow
- Facility Services, Parks, Andy Fisher
- Placer County Fire/CDF, Bob Eicholtz/Brad Albertazzi

Signature  Date October 15, 2008
 Gina Langford, Environmental Coordinator

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I. SUPPORTING INFORMATION SOURCES:

The following public documents were utilized and site-specific studies prepared to evaluate in detail the effects or impacts associated with the project. This information is available for public review, Monday through Friday, 8am to 5pm, at the Placer County Community Development Resource Agency, Environmental Coordination Services, 3091 County Center Drive, Suite 190, Auburn, CA 95603. For Tahoe projects, the document will also be available in our Tahoe Division Office, 565 West Lake Blvd., Tahoe City, CA 96145.

County Documents	<input checked="" type="checkbox"/> Community Plan(s)	
	<input checked="" type="checkbox"/> Environmental Review Ordinance	
	<input checked="" type="checkbox"/> General Plan	
	<input type="checkbox"/> Grading Ordinance	
	<input type="checkbox"/> Land Development Manual	
	<input type="checkbox"/> Land Division Ordinance	
	<input type="checkbox"/> Stormwater Management Manual	
	<input type="checkbox"/> Tree Ordinance	
	<input checked="" type="checkbox"/> 2003 Housing Element, Draft 2008 Housing Element	
Trustee Agency Documents	<input type="checkbox"/> Department of Toxic Substances Control	
	<input type="checkbox"/>	
	<input type="checkbox"/>	
Site-Specific Studies	Planning Department	<input type="checkbox"/> Acoustical Analysis
		<input type="checkbox"/> Biological Study
		<input type="checkbox"/> Cultural Resources Pedestrian Survey
		<input type="checkbox"/> Cultural Resources Records Search
		<input type="checkbox"/> Lighting and Photometric Plan
		<input type="checkbox"/> Paleontological Survey
		<input type="checkbox"/> Tree Survey and Arborist Report
		<input type="checkbox"/> Visual Impact Analysis
		<input type="checkbox"/> Wetland Delineation
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
	Engineering & Surveying Department, Flood Control District	<input type="checkbox"/> Phasing Plan
		<input type="checkbox"/> Preliminary Grading Plan
		<input type="checkbox"/> Preliminary Geotechnical Report
		<input type="checkbox"/> Preliminary Drainage Report
		<input type="checkbox"/> Stormwater and Surface Water Quality BMP Plan
		<input type="checkbox"/> Traffic Study
		<input type="checkbox"/> Sewer Pipeline Capacity Analysis
		<input type="checkbox"/> Placer County Commercial/Industrial Waste Survey (where public sewer is available)
		<input type="checkbox"/> Sewer Master Plan
		<input type="checkbox"/> Utility Plan
		<input type="checkbox"/>
		<input type="checkbox"/>
	Environmental Health Services	<input type="checkbox"/> Groundwater Contamination Report
		<input type="checkbox"/> Hydro-Geological Study
		<input type="checkbox"/> Phase I Environmental Site Assessment

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Initial Study & Checklist continued

		<input type="checkbox"/> Soils Screening
		<input type="checkbox"/> Preliminary Endangerment Assessment
		<input type="checkbox"/>
		<input type="checkbox"/>
	Air Pollution Control District	<input type="checkbox"/> CALINE4 Carbon Monoxide Analysis
		<input type="checkbox"/> Construction Emission and Dust Control Plan
		<input type="checkbox"/> Geotechnical Report (for naturally occurring asbestos)
		<input type="checkbox"/> Health Risk Assessment
		<input type="checkbox"/> URBEMIS Model Output
		<input type="checkbox"/>
	Fire Department	<input type="checkbox"/> Emergency Response and/or Evacuation Plan
		<input type="checkbox"/> Traffic and Circulation Plan
		<input type="checkbox"/>
	Mosquito Abatement District	<input type="checkbox"/> Guidelines and Standards for Vector Prevention in Proposed Developments
		<input type="checkbox"/>

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DEPARTMENT OF TRANSPORTATION

DISTRICT 3
703 B STREET
P. O. BOX 911
MARYSVILLE, CA 95901-0911
PHONE (530) 741-5151
FAX (530) 741-5346
TTY (530) 741-4509



*Use your power.
Be energy efficient!*

November 12, 2008

Peg Rein
Placer County Planning Department
3091 County Center Drive
Auburn, CA 95603

Dear Ms. Rein:

Thank you for the opportunity to review and comment on the Placer County General Plan Housing Element Update (PGPA T20080279; SCH #2008102056; IGR #032008PLA0045). Our comments are as follows:

- Caltrans supports Placer County's Housing Element Policies that emphasize smart growth principles, including, the focus on infill and transit-oriented housing, affordable housing incentives, and the Tahoe Basin workforce housing needs.
- The County should protect adequate right-of-way for new and expanded transportation facilities (transit and roadway) where new housing developments are planned and adjacent to State Highway corridors or mass transit rail systems. Please refer to the Transportation Concept Reports prepared by Caltrans for Interstate 80, State Route (SR) 65, SR 193, SR 49, SR 174, SR 28, SR 89, and SR 267, as they describe the ultimate freeway and highway facilities within Placer County.

Please provide our office with copies of any further actions regarding General Plan Updates. If you have any questions regarding these comments, please do not hesitate to contact Cassandra Eaton, of my staff, at (530) 634-7612.

Sincerely,


NICHOLAS DEAL, Chief
Office of Transportation Planning -- East

c: Scott Morgan

Before the Board of Supervisors County of Placer, State of California

In the matter of: **A Resolution Amending the Placer** Resolution No.: _____
Placer County General Plan by
Adopting the 2008 Housing Element Update

The following Resolution was duly passed by the Board of Supervisors of the County of Placer at a regular meeting held May 12, 2009, by the following vote on roll call:

Ayes:

Noes:

Absent:

Signed and approved by me after its passage.

Attest:
Clerk of said Board

Chairman, Board of Supervisors

Ann Holman

F.C. Rockholm

WHEREAS: All jurisdictions are required to review their Housing Element of their General Plan as frequently as appropriate and update their Housing Element at regular intervals. For a local government within the regional jurisdiction of the Sacramento Area Council of Governments (SACOG), the date for the revision of its housing element was June 30, 2008. Placer County (County) submitted a draft Housing Element to the California Department of Housing and Community Development (HCD) in August 2008 and has been working diligently with HCD since that time to address their questions.

WHEREAS: On March 12, 2009, the County Planning Department received a letter from HCD stating the County's Housing Element Policy Document and the Housing Element Background Report, both dated February 27, 2009, copies of which are on file with the Clerk of the Board of Supervisors and which are incorporated herein by reference (2008 Housing Element Update) will comply with State housing element law when adopted and submitted to HCD pursuant to Government Code section 65585(g). Consequently if the Board of Supervisors adopts the 2008 Housing Element Update as reviewed by HCD, the County's Housing Element will be presumed valid pursuant to Government Code

Section 65589.3 after submittal to HCD.

WHEREAS: At its regular meeting of March 26, 2009, the County Planning Commission held a noticed public workshop to receive comments on the 2008 Housing Element Update. This public workshop was noticed in accordance with all legal requirements and was also distributed to a number of organizations, agencies and individuals concerned about housing issues in Placer County. Notice of this workshop was also posted on the Planning Department's web site. There was no opposition to the 2008 Housing Element Update at the hearing.

WHEREAS: Pursuant to and in compliance with Government Code Section 65354, at its regular meeting of April 9, 2009, the Planning Commission voted unanimously to forward a favorable recommendation to the Board of Supervisors to amend the County General Plan by adopting the 2008 Housing Element Update.

WHEREAS: Pursuant to and in compliance with Government Code Section 65355, at its regular meeting of May 12, 2009, the Board of Supervisors held a duly noticed public hearing to consider amending the County General Plan by adopting the 2008 Housing Element Update.

WHEREAS: No modifications have been made to the 2008 Housing Element Update that were not previously considered by the Planning Commission when the Commission forwarded its recommendation to the Board. Therefore, no referral back to the Planning Commission pursuant to Government Code Section 65356 is required.

WHEREAS: Pursuant to Government Code Section 65585, the guidelines adopted by the HCD were considered when preparing the 2008 Housing Element Update.

WHEREAS: Amending the County General Plan by adopting the 2008 Housing Element Update is in the public interest. Among other things, the 2008 Housing Element Update provides updated facts and figures regarding the production of housing and available housing programs in the County and addresses the topics required by changes in state law. The 2008 Housing Element Update makes adequate provisions for the existing and projected housing needs for all economic segments of the community. The 2008 Housing Element Update is in the public interest since it addresses regional housing needs.

WHEREAS: Amending the County General Plan by adopting the 2008 Housing Element Update would not create any internal General Plan inconsistencies or otherwise cause the General Plan to be deficient. The 2008 Housing Element Update will amend Section 2, Housing, of the Placer County General Plan as adopted by the Board of Supervisors on May 20, 2003, and replaces the 2003 Housing Element Update in its entirety.

WHEREAS: Amending the County General Plan by adopting the 2008 Housing Element Update would not create any inconsistencies with existing state or federal laws or regulations or with any existing County ordinances, regulations, plans or policies.

WHEREAS: In taking action on the Housing Element Update, the Board fully reviewed and considered the information in staff reports, oral and written testimony

received from members of the public and other public agencies, and additional information contained in reports, correspondence, studies, proceedings, and other matters of record included or referenced in the administrative record of these proceedings.

WHEREAS: An Initial Study was completed per the requirements of the California Environmental Quality Act (CEQA) and the County's CEQA Guidelines. The negative declaration has been prepared as required by law. Based upon the whole record, there is no substantial evidence that the project will have a significant effect on the environment. The Negative Declaration reflects the County's independent judgment and analysis, and the Negative Declaration is adopted.

WHEREAS: The administrative record for this action is located in the Office of the Clerk of the Board of Supervisors and in the County Planning Department office.

NOW, THEREFORE BE IT RESOLVED: The Board of Supervisors of Placer County finds all of the foregoing recitals to be true and correct and hereby amends the Placer County General Plan by adopting the 2008 Housing Element Update, consisting the Housing Element Policy Document and the Housing Element Background Report, both dated February 27, 2009, copies of which are on file with the Clerk of the Board of Supervisors and which are incorporated herein by reference, and hereby replaces and supersedes the 2003 Housing Element Update in its entirety with the 2008 Housing Element Update.

BE IT FURTHER RESOLVED: The Planning Director is directed to promptly submit the 2008 Housing Element as adopted by the Board to HCD pursuant to Government Code section 65585(g).

BE IT FURTHER RESOLVED: The Planning Department is directed to file a Notice of Determination with the County Clerk within five (5) working days in accordance with Public Resources Code section 21152(a) and CEQA Guidelines section 15094.