

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

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January 18, 2024

John Kunkel, Interim City Manager  
City of Huron  
36311 S. Lassen Ave,  
Huron, CA 93234

Dear John Kunkel,

**RE: Review of the City of Huron's 6<sup>th</sup> Cycle (2023-2031) Draft Housing Element**

Thank you for submitting the City of Huron's (City) draft housing element received for review on October 20, 2023 along with revisions received on January 4, 2024. The revisions were made available to the public for seven days prior to review by the California Department of Housing and Community Development (HCD). The review was facilitated by a meeting on December 20, 2023. In addition, HCD considered public comments from David Kellogg, pursuant to Government Code section 65585, subdivision (c). Pursuant to Government Code section 65585, HCD is reporting the results of its review.

The draft element, including revisions, addresses many statutory requirements; however, revisions will be necessary to substantially comply with State Housing Element Law (Gov. Code, § 65580 et seq), as follows:

1. *Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2...shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)*

*Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics...(Gov. Code, § 65583, subd. (c)(5).)*

**Concentrated Areas of Poverty:** The element includes information relative to areas of High Segregation and Poverty but should evaluate the characteristics of these areas, changes over time, comparisons to other neighborhoods in terms of equitable quality of life and consider other relevant factors, such as public participation, past policies, practices, and investments and demographic trends.

Disproportionate Housing Needs, Including Displacement Risk: The element includes some general information on persons experiencing homelessness but should also evaluate that information. Specifically, the element should examine patterns of need or areas with higher concentrations of persons experiencing homelessness, including access to transportation and services. The element should utilize local data and knowledge such as service providers and code enforcement officials to assist this analysis.

Contributing Factors: Based on the outcomes of a complete analysis, the element should re-assess and prioritize the contributing factors to fair housing issues.

Programs: As noted above, the element requires a complete affirmatively furthering fair housing (AFFH) analysis. Depending upon the results of that analysis, the City may need to revise or add programs. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have specific commitment, milestones, geographic targeting and metrics or numerical targets and, as appropriate, address housing mobility enhancement (housing choices and affordability across geographies), new housing choices and affordability in higher opportunity or income areas (throughout the City), place-based strategies for community preservation and revitalization, and displacement protection.

In addition, to promote and AFFH programs should be revised, as follows:

- *Program 3 (Homeless/Unhoused Needs)*: This Program should add geographic targeting.
- *Program 11 (Encourage and Facilitate Accessory Units)*: This Program should increase the metric or numeric target for the planning period.
- *Program 22 (Housing Rehabilitation Program)*: This Program should increase the quantifiable metric.
- *Program 24 (Homebuyer Assistance Program)*: This Program should add geographic targeting and quantifiable metrics.
- *Program 26 (Housing Choice Vouchers)*: This Program should add geographically targeted metrics and refine geographic targeting to planning area (e.g., southeastern neighborhoods).
- *Program 28 (Improve Access to Resources)*: This Program must add discrete timing, geographic targeting, and quantifiable metrics. Additionally, the Program must expand place-based actions with specific commitment, timing, geographic targeting and metrics or numeric targets

toward outcomes. Examples of place-based strategies including targeting the City's capital improvement program toward a broad range of activities, applying for funding toward community revitalization, community amenities, parks, community facilities, recreation facilities, active transportation,

2. *Include an analysis of population and employment trends and documentation of projections and a quantification of the locality's existing and projected needs for all income levels, including extremely low-income households. (Gov. Code, § 65583, subd. (a)(1).)*

*Include an analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition. (Gov. Code, § 65583, subd. (a)(2).)*

*Analyze any special housing needs such as elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. (Gov. Code, § 65583, subd. (a)(7).)*

Housing Needs and Special Needs Assessment: The element has now added analysis regarding housing needs, including special needs households. However, the element should also address the magnitude of the gap between housing needs and resources and then add or modify programs in response to the magnitude of the gap. For example, the element generally discusses the housing needs of extremely low-income (ELI) households and some resources and programs intended toward those housing needs but should also discuss the gap and magnitude of unmet needs between housing needs and resources and programs. This analysis should at least address overpayment, overcrowding, ELI households, and special needs households.

3. *The Housing Element shall contain programs which assist in the development of adequate housing to meet the needs of extremely low-, very low-, low- and moderate-income households. (Gov. Code, § 65583, subd. (c)(2).)*

Program 8 (Support Funding for Farmworker Housing): While the Program has been revised to identify development opportunities at least twice during the planning period, the Program must add actions to address existing conditions for farmworkers. For example, the program could clarify targeting in other rehabilitation programs along with increased metrics for farmworkers.

4. *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities... (Gov. Code, § 65583, subd. (c)(3).)*

Program 16 (Zoning Code Amendments): The Program should be revised to facilitate permanent supportive housing and group homes for seven or more persons, as follows:

- *Permanent Supportive Housing*: The Program should clarify that zoning will be amended to permit permanent supportive housing without discretionary action in compliance with Government Code section 65651.
  - *Group Homes for Seven or More Persons*: The Program commits to subject licensed group homes for seven or more persons to a conditional use permit. However, regardless of licensing, the Program should commit to allow group homes for seven or more persons in all zones allowing residential uses and permitted similar to other residential uses of the same type in the same zone.
5. *Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the Housing Element, and the element shall describe this effort. (Gov. Code, § 65583, subd.(c)(9).)*

While the element provides an overview of public comments recently received, it must also describe how prior comments are incorporated into the housing element. In addition, the discussion of public participation should not be limited to comments received on the City's housing element and should incorporate comments received on the Multi-Jurisdictional Housing Element. Further, Self Help Enterprises has provided helpful comments to other Cities in the region that have meaningful application County-wide. HCD encourages the City to consider these comments and will send the comments under separate cover.

Finally, public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. During the housing element revision process, the City must continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available while considering and incorporating comments where appropriate. Please be aware, any revisions to the element must be posted on the local government's website and to email a link to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD.

The element will meet the statutory requirements of State Housing Element Law once it has been revised, adopted, submitted and reviewed by HCD to comply with the above requirements pursuant to Government Code section 65585.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government does not adopt a compliant housing element within 120 days of the

statutory deadline (December 31, 2023), then any rezoning to make prior identified sites available or accommodate the regional housing needs allocation (RHNA) shall be completed no later than one year from the statutory deadline pursuant to Government Code sections 65583, subdivision (c) and 65583.2, subdivision (c). Otherwise, the local government's housing element will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i). Please be aware, if the City does not adopt a compliant housing element within one year from the statutory deadline, the element cannot be found in substantial compliance until these rezones are completed.

For your information, pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD. Please see HCD's housing element webpage at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements> for a copy of the form and instructions. The City can reach out to HCD at [sitesinventory@hcd.ca.gov](mailto:sitesinventory@hcd.ca.gov) for technical assistance.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant, the Affordable Housing and Sustainable Communities program, and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: <https://www.opr.ca.gov/planning/general-plan/guidelines.html>.

HCD appreciates the cooperation of the City throughout the housing element review. We are committed to assisting the City of Huron in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Melissa Vasquez of our staff, at [Melissa.Vasquez@hcd.ca.gov](mailto:Melissa.Vasquez@hcd.ca.gov).

Sincerely,



Paul McDougall  
Senior Program Manager