

HCD Findings Letter: Revisions Matrix

Section of Findings Letter	Subsection	Subject	HCD Findings	HCD Revisions Made	Pg.	Notes
A	1	Outreach & Enforcement	Discuss findings, lawsuits, and settlements concerning fair housing violations	None found.	8-13	Chapter notes that the County has not had any findings, lawsuits, and settlements concerning fair housing violations during the last planning period.
			Include legal matters that could impact fair housing such as land use related measures	Added narrative on water litigation and effects on housing. Pg. 8-14 - 18	8-14 - 8-18	
			Discuss compliance with state and federal laws such as Government Code section 8879.50	Added list of state and fed laws County complies with. Pg. 8-19-22	8-19 - 8-22	
		Local and Regional Patterns and Trends	Address patterns and trends of socio-economic characteristics addressed in AFFH maps. Should include comparison of different communities and region as a whole.	Added narrative orienting reader to region, regional subareas. Added narrative describing trends in subregions (subregion breakdown approved by Paul 1/23). Throughout Appendix B.	Throughout App. 8	
		Disproportionate Housing Needs, Including Displacement Risk	Persons Experiencing Homelessness: Address what parts of the County have the most persons experiencing homelessness, what transportation, services, and programs exist in those areas, and what programs may address gaps in resources and strategies.	Added a "Homelessness in the Unincorporated County" section outlining existing and future efforts to assist homeless community. Pg. 8-169-179	8-169 - 8-179	
			Housing Conditions: Analyze those housing conditions and whether there are any patterns within the communities to better geographically target programs and resources. For example, the element could discuss the degree of rehabilitation needs and compare different areas of the County	Expanded analysis to include housing condition survey by subregion area, age of structure, rehabilitation investments, and overcrowding maps. Starting pg. 8-179-195	8-179 - 8-195	
			Displacement Risk: Examine conditions that may lead to higher displacement risk, and add or modify programs as needed based on this info	Added discussion on displacement risk and conditions, including analysis of rental rates. 8-195-203	8-195 - 8-203	
		Identified Sites and AFFH	Analyze the impact of planned units within each of the communities and of the County level. Address # of units by income group and location, and isolation of the RHNA by income group and discuss how the sites improve fair housing conditions. Address the distribution of units within each of the communities by income group.	Added the Sites Inventory Distribution and Sites Strategy narratives, along with tables detailing the breakdown by AFFH characteristics for each community and the impacts of the distribution. Throughout App. B.	Throughout App. 8	
		Local Data and Knowledge and Other Relevant Factors	Utilize local data and knowledge to better support maps and patterns examined. Examples include local and regional advocates, public comments (CRLA), services providers, etc. (More examples provided in this section of the letter).	Used sample questions and integrated answers into appropriate section throughout App. B.	Throughout App. 8	
		Contributing Factors to Fair Housing	Assess and prioritize contributing factors to fair housing issues that unique to UMC and add/modify programs based on this info.	Revised after analysis complete.	Pg. 8-231 - Pg. 8-235	
A	2	Progress in Meeting the RHNA	Demonstrate affordability and availability of units that are pending, approved, or permitted in pipeline/built since June 30 2023. For availability, the element should discuss remaining units in the planning period, including accounting for the chances of expired or unused entitlements in the planning period.	Sites Inventory - Added updates on progress of entitled/proposed projects. Pg. 46-50	pg. 7-46 - Pg. 7-50	
		Realistic Capacity	For non-residential zones that are not part of the rezoning to address a shortfall of capacity for the lower-income RHNA, the element should clearly describe any zones that allow 100 percent non-residential uses and account for the likelihood of 100 percent non-residential uses in the calculation of residential capacity.	Sites Inventory - All opportunity sites are being rezoned, to all sites are being rezoned to HDR-20 and will not allow 100% non-residential. Only residential development is expected. Pg. 24 and Pg. 108	pg. 7-24, Pg. 7-108	
		Infrastructure	HE should describe or list the existing and planned water and sewer capacity in each of districts or community areas relative to planned residential capacity, as well as the existing and planned accessibility of infrastructure to identified sites. Add/modify programs based on this info.	Added narrative and table showing water context.	Pg. 7-52 - Pg. 7-57	
		Environmental Constraints	Describe any other known environmental or other conditions that could impact housing development on identified sites in the planning period, including anticipated agricultural preservation, coastal zone compatibility, easements, unit caps or other constraints in community plans or other conditions affecting the availability of identified sites.	Expanded narrative on Env Constraints to include 1) Table showing possible constraints per CPA (Pg. 7-61), 2) table showing env. constraints per site (pg. 7-219), 3) expanded narrative on sites in coastal zone and coastal commission comments on them (pg. 7-64); 4) areas with unit caps and how County dealing with it (pg. 7-65). Sites Profiles also highlight water management agency, if site in coastal zone, if site in area with unit cap.	pg. 7-60 - 7-67; 7-219; and throughout sites profiles	
		Large Sites	The element should either justify utilizing a higher affordability component or rescold affordability assumptions on identified sites similar to recent trends (e.g., 20 percent or less). For larger sites (greater than 20 acres), the element could discuss the opportunity for parceling of appropriate sizes and how higher affordability will be facilitated. Based on the outcomes of this analysis, the element should add or modify programs to establish incentives to promote parceling of appropriate sizes and affordability to lower-income households.	Sites Inventory - Incorporated Narrative sent to HCD Jan 2025. Section 7.5.3.1.1 pg. 79 - pg. 86.	Pg. 7-79 - 7-86	
		Suitability of Nonvacant Sites	The element must include an analysis demonstrating the potential for additional development on nonvacant sites.	Sites Inventory - added a Suitability of Non-Vacant site section describing zoning, regions, and interest trends. Incorporated Narrative sent to HCD Jan 2025. Section 7.9.1 pg. 124 - 191	Pg. 7-124 - Pg. 7-191	
		Publicly-Owned Sites	Analyze status, necessary steps, any known barriers to development in the planning period, development schedule, including anticipated completion dates and add or modify programs based on the analysis.	Added schedule for large sites; Section 7.1.6, Pg. 7-222 - Pg. 7-224	Pg. 7-222 - Pg. 7-224	
		Electronic Sites Inventory	For County, submit an electronic sites inventory with adopted housing element (Use HCD forms/standards).	Noted, County will submit electronic copy with adopted HE.	N/A	
		Zoning for Emergency Shelters	Clarify that emergency shelters are permitted without discretionary action and analyze whether the definition of emergency shelters complies with recent changes to state law. Demonstrate sufficient capacity to accommodate the need for emergency shelters and analyze development standards as potential constraints on emergency shelters. Add or modify programs as needed based on this info.	Constraints - Clarified that ES are permitted w/o discretionary actions in HDR and MU zones (pg. 161). Current zoning and development standards do not provide sufficient capacity for emergency shelters. An action has been added to Program H.4.G (Zoning Ordinances and General Plan Efficiencies for Housing) to address this constraint. Pg. 161-163	Pg. 3-161 - Pg. 3-163	
		Zoning for Transitional and Supportive Housing	Update references to transitional and supportive housing to reflect the fact that transitional housing and supportive housing are permitted as a residential use and only subject to those restrictions that apply to other residential dwellings of the same type in the same zone. These uses should be permitted as described above in all zones allowing residential uses in coastal and inland areas. Add or modify programs as needed based on this info.	Constraints - Residential in coastal and inland areas. However, there is no exception for parking requirements for supportive housing within half-mile from transit. Program 4.G, Zoning Ordinances and General Plan Efficiencies for Housing includes an action to address this inconsistency with state law. pg. 167	Pg. 3-167	
Zoning for SRO Units	The element generally lists SROs as allowed uses with a conditional use permit (CUP) in some zones and lists development standards but should also analyze development standards and permit procedures as potential constraints. For example, private facilities, common space, management and parking requirement may be constraints. Analyze development standards and permit procedures as potential constraints, with respect to SRO units. Add or modify programs as needed based on this info.	Constraints- Added rationale for development standards and comparison to SRO dev stds in other cities. Not a constraint. Pg. 163-166	Pg. 3-163 - Pg. 3-166			
A	3	Land Use Controls	Identify and analyze all relevant land use controls impacts as potential constraints on a variety of housing types. Address impacts on cost, supply, housing choice, affordability, timing, approval certainty and ability to achieve maximum densities and include programs to address identified constraints. Note that units satisfying local inclusionary requirements can also be used to meet SDBL eligibility criteria.	Constraints - Addressed parking for smaller bedroom type on and Multifamily Height on pg. 76. For DB and IH- added that units built to satisfy local inclusionary housing requirements can be used to meet State Density Bonus Low eligibility criteria (pg. 54)	Pg. 3-96, Pg. 3-54	
		Local Processing and Permit Procedures	Evaluate the processing and permit procedures' impact as potential constraints on housing supply (number of units), cost, timing, feasibility and approval certainty.	Constraints - Section 3.3.6 (starts on pg. 112) provided analysis and we have expanded upon the presentation of constraints and included a table showing the approval process for inland and coastal areas (pg. 114 - 117). Acknowledge timing a constraint on pt. 117.	Pg. 3-112 - Pg. 3-117	
		Codes and their Enforcement	In addition to the overview of building code implementation in the current draft, identify local amendments to the building code and analyze impacts on the cost and supply of housing.	Constraints - addressed on pg. 138	Pg. 3-138	
		On/Off-Site Improvements	Identify typical requirements on development beyond street widths and analyze their impact as potential constraints on housing costs.	Constraints - changes made to table contents on pgs. 139-142	Pg. 3-139 - Pg. 3-142	
		Inclusionary Housing	Analyze the County's inclusionary housing requirements, including its impacts on potential constraints on the development of housing for all income levels.	Constraints - added more narrative of constraint to pg. 136-137	Pg. 3-136, 137	
		Housing for Persons with Disabilities (Reasonable Accommodation)	Accommodations for persons with disabilities: describe and analyze approval findings.	Constraints - additional analysis and findings provided on pgs. 146-148; added new action a Program H.5.E to address constraints	Pg. 3-146 - Pg. 3-148	
		Zoning and Fees Transparency	Clarify its compliance with new transparency requirements for posting all zoning and development standards on the County's website pursuant to Government Code section 65940.1(a)(1).	Constraints - updated information added to pages 77-78	Pg. 3-77, 78	
		Approval Time	Analyze any potential hindrances on the construction of the RHNA and add or modify programs as appropriate.	Constraints - addressed permit processing delays, developer-related timelines, and lack of available public subsidies as constraints and programs in Plan that address these constraints. Pg. 4.	Pg. 3-4	
A	5	Persons with Developmental Disabilities	Address the number of persons, trends, patterns within the County, challenges faced by the population, housing situation for individuals (e.g. independent living with parents, etc.), and effectiveness of policies and programs to address housing needs. To assist with this analysis, the element can utilize data from the California Department of Developmental Services.	Community Profile and Needs - further analysis provided on pgs. 56-57	Pg. 2-56 - 57	
		Farmworkers	Evaluate trends, characteristics, disproportionate needs, effectiveness of resources and strategies, magnitude of the housing need, including disproportionate housing need and the effectiveness of past policies, programs, and funding to help address those gaps. Add or modify programs as needed based on this info.	Community Profile and Needs - further analysis provided on pgs. 68-74	Pg. 2-68 - 74	
A	6	An analysis of existing assisted housing developments that are eligible to change from low-income housing uses during the next 10 years due to termination of subsidy contracts, mortgage prepayment, or expiration of restrictions on use.	Update to address HCD findings that Chualar Farm Center is at-risk in the ten-year period.	A/Risk Housing: The Housing Authority of the County of Monterey confirmed that although the HCD restrictions expired in 2024, the property is also financed by USDA, whose affordability restrictions remain in place in perpetuity. As a result, this property is not at risk of losing its affordability status. (pg. 6-3)	Pg. 6-3	
B	1	Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09.	*Program H-2.A (Encourage, Incentivize and Monitor Accessory Dwelling Units): While the Program commits to implement alternative actions if assumptions in the sites inventory are not met, it should also commit to when the alternative actions will be complete.	Housing Plan - Program updated to provide timeframe for when alternative actions will be completed. pg. 8-8 - pg. 8-12	Pg. 8-8 - Pg. 8-12	
			*Program H-2.H, H-3.A and H-3.C (Rezoning for the Shortfall of RHNA Capacity): The element should clarify which of these Programs are intended to address the shortfall of capacity to accommodate the RHNA and must modify Program(s) with specific commitment and discrete timing to meet all requirements pursuant to Government Code sections 65583, subdivision (c)(1) and 65583.2, subdivisions (h) and (i).	Identified H-3.A as the program intended to address shortfall and the commitment to all requirements per Government Code sections 65583, subdivision (c)(1) and 65583.2, subdivisions (h) and (i). Pg. 8-27	Pg. 8-27	
			*Program H-2.D (By-right Approval on Reuse of Prior Housing Opportunity Sites): The Program must be implemented within one year of the statutory deadline (December 15, 2024).	Housing Plan - Program updated to address the schedule of action. Pg. 8-11	Pg. 8-11	
			*Program H-2.E (Mid-Cycle Review): The Program should commit to when alternative actions will be completed upon a mid-cycle review.	Housing Plan - Program updated to address the schedule of action. Pg. 8-12	Pg. 8-12	
			*Program H-3.D (Coordination with Public Entities): The Program should also commit to a schedule of actions to facilitate development in the planning period in stride with assumptions in the inventory such as numerical objectives.	Housing Plan - Program updated to address schedules of action. Pg. 8-30	Pg. 8-30	
			*Infrastructure and Large Sites: As noted in Finding A2, Programs must be added or modified based on a complete analysis.	Added Programs H-4.I and H-4.J, H-4.K, to address constraints related to water/unt capacity constraints pg. 8-44 to 45 Added to Program H-2.K for development of large sites. Pg. 8-39-40	Pg. 8-39, 40	
			*Pipeline Projects: Given the element's reliance on pipeline projects, the element should add or modify programs to facilitate development (e.g., coordination with applicants to approve remaining entitlements, expediting approvals) and monitor progress toward completion in the planning period, including alternative actions (e.g., rezoning) to be completed by a specified date if pipeline projects are not progressing toward completion in the planning period.	Housing Plan - revisions made to Program H-2.C, to address review of the pipeline project process and addressing housing they fall short of their schedule. Pg. 8-10	Pg. 8-10	
			*Program H-4.G (Zoning Ordinances and General Plan Efficiencies): The Program should clearly commit to permanent supportive housing in all zones allowing multifamily development without discretionary action and comply with other provisions of Government Code section 65651.	Housing Plan - Program updated to address permanent supportive housing. Pg. 8-37	Pg. 8-37	
			*Program H-2.M (State and Federal Funding for Affordable Housing): The Program should be modified with specific commitments to deliverable and proactively identify development and funding opportunities.	Housing Plan - Program updated to address specific commitments to deliverable and proactively identify development and funding opportunities. Pg. 8-19, 20	Pg. 8-19, 20	
			*Program H-2.P (Available Resources): The Program should commit to at least annually and proactively send out targeted email notifications to affordable housing developers and other relevant stakeholders.	Housing Plan - Program updated to address annual and proactive outreach (targeted email notifications) to affordable housing developers and other relevant stakeholders. Pg. 8-21, 22	Pg. 8-21, 22	
B	2	Modify programs to assist in the development of housing for lower-income and special needs households	*Program H-5.G (Farmworker Housing): The Program should be expanded based on a complete analysis of farmworker housing needs. In addition, the Program should consider approaches to address the housing needs of farmworkers in existing housing stock such as rehabilitation, weatherization or other conservation efforts. Finally, the Program should be revised with discrete timing (e.g., at least annually, by 2026) for all deliverables.	Housing Plan - Program has been updated to address HCD's revisions and provide and include some additional content to address additional analysis completed in the Community Needs HEU section. pg. 8-49, 50	Pg. 8-49-50	
			*Persons Experiencing Homelessness: The element must include specific actions to assist in the development or conservation of housing or address the needs of persons experiencing homelessness. For example, as noted on page 5-17, the element could retain and modify Program H-5.C (Homeless Service).	Housing Plan - Created a new program to address actions for People experiencing homelessness (H-5.M, Persons Experiencing Homelessness) pg. 8-56 - pg. 8-58	Pg. 8-56 - Pg. 8-58	Updated program number to H-5.M
			*Program H-2.Q (Sufficient Water and Sewer Resources): The Program should commit to discrete timing (e.g., by 2026) for establishing a procedure to grant priority sewer service to developments with units affordable to lower-income households.	Housing Plan - Program updated to address schedule of action. Pg. 8-23	Pg. 8-23	
			*Program H-1.A (Preservation and Monitoring of Affordable Housing): The Program should commit to outreach and coordination with qualified entities that can acquire and manage at-risk developments.	Housing Plan - Program updated to address HCD comments and add more actions to help in the effort of preserving and monitoring affordable housing. Pg. 8-3	Pg. 8-3	
			*Rehabilitation: The element should consider additional actions toward the rehabilitation of the existing housing stock.	Housing Plan - Program H-2.C Maintain/Update Sites Inventory has had an action added addressing the rehabilitation of housing stock, supporting acquisition and rehabilitation. pg. 8-11 Program H-5.C, Farmworker Housing Production also has an action added to address the rehabilitation of existing housing stock. pg. 8-49	Pg. 8-11, Pg. 8-49	
B	3	Programs based on constraints	As noted in Findings A3 and A4, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the County may need to revise or add programs and address and remove or mitigate any identified constraints.	Housing Plan - Program updated to address the removal of CUP and permitting group homes for 7+ residents. Pg. 8-47	Pg. 8-47	
			In addition, Program H-5.F (Housing Opportunities) should commit to permit group homes for seven or more persons (regardless of licensing) in all zones allowing residential uses, including inland and coastal areas. In addition, the Program should commit to address the CUP as a constraint, including permitting the use as a residential use, similar to other uses of the same type in the same zone.			
B	4	AFFH	As noted in Finding A1, the element requires a complete AFFH analysis. Depending upon the results of that analysis, the County may need to revise or add programs. In addition, 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.	Noted and done.		
C		Quantified objectives for new construction, rehabilitation and conservation.	Quantified objectives should be expanded for rehabilitation and conservation.	Housing Plan - Updated figures added to pg. 67	N/A	
D		Public Participation	Expand the discussion of public comment themes and how those comments were incorporated into the element, including clarifying linkage to responsive actions. Also consider additional public outreach strategies going forward that include lower-income and special needs households and neighborhoods with higher concentrations of poverty and lower-income households.	Appendix A Public Engagement - discussion of additional meetings held have been added to pg. 3-5; Additional narrative on the public draft review added to pg. 7; additional content on the communities served for some of the outreach engagement added to pgs. 8-30; updated public comment theme narrative and housing plan programs addressing public comments/themes has been added to pgs. 30-37	Pg. A-3 - Pg. A-5 Pg. A-7 Pg. A-8 - Pg. A-30 Pg. A-30 - Pg. A-37	
E		General Plan Consistency	Discuss how internal consistency will be maintained throughout the planning period	Introduction - updated content addressing this found on pgs. 5-6	Pg. 1-5 - Pg. 1-6	