

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

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CITY OF FORT BRAGG

REC'D JUL 31 2019

July 26, 2019

Marie Jones, Director
Community Development Department
City of Fort Bragg
416 N. Franklin Street
Fort Bragg, CA 95437

Dear Marie Jones:

RE: Review of the City of Fort Bragg's 6th Cycle (2019-2027) Draft Housing Element

Thank you for submitting the City of Fort Bragg's draft housing element update received for review on May 28, 2019, along with revisions received on July 2, 16, and 18, 2019. Pursuant to Government Code section 65585, subdivision (b), the Department of Housing and Community Development (HCD) is reporting the results of its review. Our review was facilitated by a telephone conversation on June 27, 2019 and various other communications with Marie Jones, Community Development Director and Sarah McCormick, Assistant Planner. In addition, HCD considered comments from Jacob Patterson pursuant to Gov. Code section 65585, subd. (c).

The draft element, incorporating the revisions submitted, meets the statutory requirements of state housing element law. The housing element will comply with state housing element law (Article 10.6 of the Government Code) when it is adopted, submitted to and found in compliance by HCD, in accordance with Gov. Code section 65585.

A broad goal of the housing element is the "...early attainment of decent housing and a suitable living environment for every Californian...", including persons experiencing homelessness or at risk of experiencing homelessness. Actions detrimental to this goal are inconsistent with housing element law. Housing elements must have a schedule of actions with timelines that have a beneficial impact in the planning period to implement the policies and achieve the goals and objectives of the housing element. Accordingly, the city's element contains meaningful programs to address the needs of persons experiencing homelessness that are an essential part of compliance with housing element law. For example, the element includes: Program H-2.8.1 (Ongoing Estimates of the Demand for Emergency Housing), Program H-2.8.2 (Inter-Agency Cooperation), Program H-2.8.3 and H-2.8.4 (Transitional and Supportive Housing), Program H-2.8.5, H-2.8.6, and H-2.8.7 (Emergency Shelters), Program H-2.8.8 (Evidence-Based Homeless Services) Program H-2.8.9 (Safe Parking Pilot Program), and Program H-2.8.10 (Define Group Home). The city must continue timely and effective implementation of these and other

programs, including Program H-1.7.5 (Allow Higher Densities By Right). Action or inaction inconsistent with timeframes set forth in the city's housing element may trigger review. Further, any action detrimental to the goals of these programs to address the needs of persons experiencing homelessness such as ordinances that impact the living environment of persons experiencing homelessness may be inconsistent with these programs, and if so, will trigger a review of the housing element, potentially impacting the city's compliance status.

To remain on an eight-year planning cycle, the city must adopt its housing element within 120 calendar days from the statutory due date of August 15, 2019 for Mendocino Council of Governments localities. If adopted after this date, Gov. Code section 65588, subd. (e)(4) requires the housing element be revised every four years until adopting at least two consecutive revisions by the statutory deadline. For more information on housing element adoption requirements, please visit our website at: http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sb375_final100413.pdf

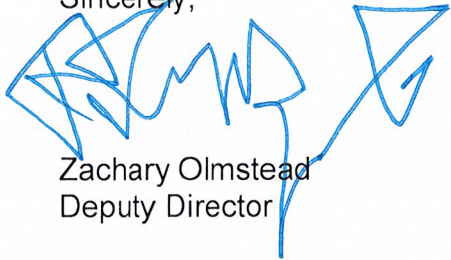
Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the city must continue to engage the community, including organizations that represent lower-income and special needs households, by making information, including bilingual material and translation services, regularly available while considering and incorporating comments where appropriate.

For your information, some general plan element updates are triggered by housing element adoption. For example, a jurisdiction must address environmental justice in its general plan by the adoption of an environmental justice element, or by the integration of environmental justice goals, policies, and objectives into other general plan elements upon the adoption or next revision of two or more elements concurrently on or after January 1, 2018. (Gov. Code, § 65302, subd. (h).) 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: http://opr.ca.gov/docs/SB244_Technical_Advisory.pdf and http://opr.ca.gov/docs/Final_6.26.15.pdf.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, CalTrans Senate Bill (SB) 1 Sustainable Communities grants; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and the SB 2 Planning grant as well as ongoing SB 2 funding consider housing element compliance and/or annual reporting requirements pursuant to Gov. Code section 65400. By having a compliant housing element, Fort Bragg will meet housing element requirements for these funding sources.

HCD appreciates the hard work and dedication Marie Jones, Community Development Director, and Sarah McCormick, Assistant Planner, provided in preparation of the housing element and looks forward to receiving Fort Bragg's adopted housing element. If you have any questions or need additional technical assistance, please contact Hillary Prasad, of our staff, at (916) 263-1784.

Sincerely,



for

Zachary Olmstead
Deputy Director