Public Comment -- 3/20/24 PC Mtg., Item No. 7C, Annual Progress Reports

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Planning Commission,

I will likely have more detailed comments about the progress report but I already have an overarching concern that I recommend you think about as you review the table concerning the progress implementing our various housing element programs. I noticed a disconnect between the notes in the "Status of Program Implementation" column (#4) and the actual details and intent of the program itself, as shown in the "Objective" column (#2). In some cases, we have text describing things that have happened but they aren't actually connected to the listed program.

To illustrate, take Program H-4.1.2, Reduce Capacity Fees for Smaller Units. The notes say "ADU's no longer pay capacity fees per state law. Urban Unit Development units don't pay capacity fees if they are less than 750 SF." However, the actual language of the program itself is "Consider charging water and sewer capacity fees based on the size of the unit (either square feet or number of bedrooms) in order to ensure that each unit pays its fair share for capacity costs." Thus, what is stated as the purported "progress" is not really related to considering charging capacity fees based on square footage or number of bedrooms rather than on the current Equivalent Dwelling Unit (EDU) basis. In fact, we just reviewed the water and sewer capacity fees and completely failed to consider implementing this program--it wasn't even mentioned at all as part of the analysis of that recent Council action. I think the description of progress needs to be revised to accurately reflect what the program required, not some unrelated assertions about not charging capacity fees for ADUs, etc., which has nothing to do with the listed program. This is just one example in the current draft and I assume you will be able to find others, I have.

Even if we haven't made any progress on a particular program, that doesn't mean we should misrepresent things in this annual report by pointing to unrelated facts that superficially might seem like we have actually done something if the reviewer isn;t reading all that carefully.

Regards,

--Jacob