City of Lompoc Informal Draft Preliminary Review

Received: March 28, 2024

Prior Review: January 29, 2024

Previous Letter Finding	Page #	Prelim Review	Notes
Sites Inventory and Analysis			
Progress in Meeting the Regional Housing Need Allocation (RHNA): The element was revised to include a brief discussion of phasing and anticipated buildout timelines for the Burton Ranch and River Terrace projects and indicates some projects are under review. However, the element should also describe whether there are any known barriers to development in the planning period and clarify remaining steps, where applicable.	2-118	Yes	
Progress in Meeting the Regional Housing Need Allocation (RHNA) (cont.): While Program H-A.20 (Available Sites Inventory) was revised to monitor development progress of approved and pending projects, the Program should also commit to when additional actions (e.g., rezoning) will be completed.	1-27-1-29	Yes	
Realistic Capacity: While the element now lists recent developments by various factors such as built density by zone, it must still address whether 100 percent nonresidential uses are allowed in mixed-use zones and if so, account for the likelihood of 100 percent nonresidential uses in these zones in the capacity assumptions. Please refer to HCD's August 9, 2023 review for additional information. ***Prior Review:*** While the element states that half of the current projects in nonresidential zones are 100 percent residential, it must address whether 100 percent nonresidential are allowed in these zones (e.g., mixed-use, commercial, old town commercial), and if so, account for the likelihood of 100 percent nonresidential uses in this zone in the capacity assumptions. For example, the element could analyze all development activity in the pertinent zones, how often residential development occurs, and whether any incentives for residential development in these zones exist. Depending on the results of a complete analysis, the element may need to adjust residential capacity calculation, policies, and programs accordingly. The element should include	1-21, 2-126-2-127	No	OTC zone: 75% of past projects have included a residential component; revise realistic capacity assumptions for sites in this zone to account for likelihood of nonresidential Program H-A.13 should commit to annual monitoring of sites in mixed-use zones and identifying alternative sites and/or rezoning within 6 months

an analysis based on factors such as development trends, performance standards, or other relevant factors.			
Suitability of Nonvacant Sites: While element was revised to include some additional information on recent development examples, it must still evaluate past development trends relative to the indicators of redevelopment potential (e.g., floor area ratio (FAR), improvement to land value (ILV) ratio, age of structure, etc.) to provide support for the identified factors to demonstrate how they are indicative of redevelopment potential on nonvacant sites. For example, when including recent development examples, the element should list specific site characteristics of prior uses that relate to the factors utilized in the analysis.	1-34, 2-128-2-135 2-139-2-143	No	Added discussion for each factor independently, but analysis should address how multiple factors together indicate development potential and describe how past project examples relate to the sites in the inventory
Suitability of Nonvacant Sites (cont.): For your information, the element relies on nonvacant sites to accommodate 50 percent or more of the housing needs for lower-income households, which triggers requirements to make findings based on substantial evidence that the existing use is not an impediment and will likely discontinue in the planning period. While the resolution of adoption includes the appropriate findings, any changes to the analysis should be reflected in future re-adoption of the element.	Reso	FYI	
Suitability of Small Sites: The element was revised to include a brief discussion of the circumstances leading to potential consolidation of some small sites, including common ownership and shared ingress/egress. However, the element identifies several sites that do not relate to these indicators. The element should provide analysis of past trends or utilize other evidence of circumstances and conditions leading to potential for consolidation to analyze the potential of redevelopment for all small sites. In addition, the element should add or modify programs to promote consolidation, including significant incentives, monitoring, evaluation of effectiveness and adjustment, as appropriate.	1-20, 2-136	No	Program H-A-12 should commit to adopt incentives by 2/15/2025 and adopt additional incentives, if necessary, by midway through the planning period (2/15/2027); the program should also clarify trigger for the action to occur (e.g., if development is not progressing on small sites as identified in the inventory) Program should be revised to include additional incentives for consolidation (e.g., waived fees, expedited processes, graduated density)
Replacement Housing Requirements: The City's memo that accompanied housing element explains that no identified sites have residential uses subject to affordability or similar affordability requirements. However, the element should clarify these conditions and, if necessary, include appropriate analysis and programs. Please see HCD's prior review for additional information.	1-35, 2-135	Yes	Program H-A.29

Electronic Sites Inventory: 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. While the City submitted the sites inventory in the appropriate form, any changes to the inventory should be reflected in the form and the form should be re-submitted as part of adoption. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance.	N/A	FYI	FYI for subsequent submission
Zoning for a Variety of Housing Types (Emergency Shelters): The element was revised to describe development standards for emergency shelters; however, parking and other standards (pp. 2-106 and 2-86) do not appear consistent with statutory requirements. For example, parking requirements, generally, should be limited to the amount needed for staff and the City appears to require a space per ten beds. As a result, the element should add or modify programs to address these constraints.	1-14, 2-107-2-109	Yes	
Zoning for a Variety of Housing Types (Emergency Shelters) (cont.): While Program H-A.8 was revised to remove the conditional use permit requirement for emergency shelters in the Mixed-Use (MU) Zone, the program should specifically commit to permit emergency shelter without discretionary action pursuant to Government Code section 65583 (a)(4)(A).	1-17	Yes	
Programs: As noted above, the element does not include a complete site analysis; therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis; the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition, the element should be revised, as follows:	N/A	FYI	
Program H-A.20 (Available Sites Inventory): While the Program was revised to commit to rezoning within one year of the adoption deadline, it should clarify this action will be completed by February 15, 2024.	1-28	Yes	See rezoning FYI below
Program H-A.14 (Accessory Dwelling Units (ADU): While the Program was revised to monitor production and affordability of ADUs and adopt additional incentives; if necessary, the Program should also commit to take appropriate action within a specified time period (e.g., six months).	1-22	No/~	The program is revised to commit to adopt additional incentives if necessary in 2026, but should instead commit to take action within 6 months
Governmental Constraints			
Land Use Controls: HCD's prior review found that the element must analyze the City's development standards for potential constraints. The element was revised to include a few hypothetical examples for evaluating these standards but should further address potential constraints, as follows:			

Old Town Commercial (OTC) and Mixed-Use (MU) Zones: The element should address heights and the proposed residential FAR in the OTC as potential constraints. For example, the element could address these potential constraints by committing to increase the FAR for residential use to 1.0 and heights to allow four stories.	1-24, 2-85-2-86	?	Program H-A.16 is revised to commit to allow residential FAR of up to 1.0 and increase height limits to 50 ft to allow four stories in the OTC and MU zones Removed commitment to allow 75% residential floor area in the OTC zone; Clarify how residential floor area requirement and residential FAR work together
R-2 and R-3 Zones: The element mentions height limits of 25 feet in the R-2 and R-3 zones, which appear to be inconsistent with heights described in Table H-34. The element should resolve this discrepancy and amend programs as needed to address any identified constraints.	2-85	Yes	
Program H-A.21 (Affordable Housing Incentives Program): In addition to increasing allowable densities in the R-3 zone, the Program should commit to amending development as appropriate, including heights (e.g., three stories), to facilitate achieving maximum densities.	1-29-1-30	Yes	
Housing Programs: AFFH			
While the element includes many meaningful actions to affirmatively further fair housing (AFFH), it should expand place-based actions toward community revitalization. Actions should have specific commitment, discrete timing, metrics or numeric objectives and geographic targeting. Examples of place-based strategies include 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, infrastructure, streetscape improvements, safe routes to school and other community development activities. In addition, programs should be revised, as follows:	1-33-1-34	No	Program should include additional commitments to place-based investments
Program H-A.1 (Housing Priorities and Funding): The Program should add a metric or numerical objective regarding rehabilitation for the planning period.	1-13	~	Rehabilitation objective should be 20 very low and 20 low-income units (40 total), in line with quantified objectives and other programs
Program H-A.11 (Affirmatively Furthering Fair Housing): The Program should add metrics for the various actions.	1-19-1-20	~/No	Increase anti-displacement objective

Program H-A.16 (Place-based Strategies): The Program should add geographic targeting.	1-24	Yes	
Program H-A.18 (Fair Housing Services): The Program should add metrics for the various actions.	1-26	Yes	
Program H-A.19 (Missing Middle Housing): The Program should add geographic targeting and a metric.	1-27	Yes	
Program H.A-27 (Place-based Housing Rehabilitation and Community Investment): The Program should add metrics for the various actions where appropriate.	1-33-1-34	~	Rehabilitation objective should be 20 very low and 20 low-income units (40 total), in line with quantified objectives and other programs
Other			
Rezone Timing	1-27-1-28	FYI	Element should include a policy for sites identified in multiple planning periods (see rezone review)
Modification Authority	Reso	?	Re-adoption needed?