

# CITY OF YREKA

## REVISION AND COMMENT MATRIX

The below matrix provides a summary of the May 2023 revisions to Yreka’s adopted Housing Element. Revisions that are in response to a suggested modification from HCD’s April 14, 2023 letter are noted.

Page or Section #	Description of the Edit	Notes <sup>1</sup>	Notes <sup>2</sup>
<b>Chapter 1</b>			
Pg. 1	Minor clarifying edits to 2nd paragraph		
<b>Chapter 2</b>			
Pg. 17	timing of Program HE-4.3.1 modified	Revision responds to item 3 of 4/14/23 HCD letter.	
Pg. 19	Program HE-5.1.2 modified to include reference of JADUs	Revision to avoid confusion whether JADUs are included	
Pg. 19	timing of Program HE-5.1.2 modified	Revision responds to item 3 of 4/14/23 HCD letter.	
Pg. 21	Program HE-6.1.6 modified	Revision responds item 4 of 4/14/23 HCD letter.	
Pgs. 22-23	Policy HE-7.2 and Program HE-7.2.1 modified	Revision responds item 4 of 4/14/23 HCD letter.	
Pg. 1	Table 2-1: table title reformatted to match Housing Element's theme		
Pg. 10	Program HE-3.1.1: edits to clarify that the action plan contained in the table that begins on the following page constitutes the City's AFFH Action Plan, and that the AFFH Action Plan addresses the fair housing issues and contributing factors identified in section 5 of Appendix B.	Revision responds to item 1 of 4/14/23 HCD letter.	
Pgs. 11-14	Added Table 2-2 label and table title to match document theme, added improve navigation.	Revision responds to item 1 of 4/14/23 HCD letter.	

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Pgs. 11-14	Combined columns "City AFFH Action" and "AFFH Goals", and added language of how the action addresses an identified fair housing issue. To "Geographic Targets" column added specificity whether an AFFH action regarding Yreka's information whether an action specified whether an action is related to a "high resource area" and/or a "low resource area"	Revision responds to item 1 of 4/14/23 HCD letter. Actions 3.a, 3.d, 4.a, 4.b, 5.a, 5.b, and 5.c employ place-based strategies to encourage community conservation and revitalization. Revisions responds to item 1 of 4/14/23 HCD letter.	The edit also reduces previous redundancy between the "City AFFH Action" and "AFFH Goals" columns
Pgs. 11-14	In "City AFFH Action" column, items 3.b, 3.d, 3.e: replaced "education" with "awareness"	Usage of "awareness" is more appropriate in this context.	
Pg. 25	Qualified Objectives table header renumbered to be sequential with preceding tables in chapter.		
<b>Appendix A* page numbers are approximate</b>			
59	Corrected the parcel count of vacant M-1 parcels from 50 to 43. This resulted in an adjustment to the acreage from 460 acres to 240.	The count error was due to inadvertent inclusion of M-2 zoned parcels. Emergency shelters are not permitted in M-2.	Revision responds to item 2 of 4/14/23 HCD letter.
59	Added median parcel sizes, count of M-1 vacant parcels between 0.50 and 10 acres, and count of parcels outside those thresholds		Revision responds to item 2 of 4/14/23 HCD letter.
60	Using YMC 15-bed limit, added resulting capacity. Compared capacity yield to the number of sheltered	Potential capacity of vacant M-1 parcels between 0.50 & 10 acres is 420 persons, which exceeds the # of sheltered persons.	Revision responds to item 2 of

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	persons counted in the 2021 PIT in table A-26		4/14/23 HCD letter.
60	Added references and narrative to programs and in-progress City activity to demonstrate reuse and redevelopment opportunities for emergency shelters	Revision responds to item 2 of 4/14/23 HCD letter.	
4.3.8 & 4.3.9	Corrected incorrect table references		
<b>Appendix B</b>			
section 5	added reference to Table 2-2, Chapter 2, the AFFH Action Plan		

**Attachment:**

April 14, 2023 letter from the Department of Housing and Community Development to Jason Ledbetter, City Manager.

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

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April 14, 2023

Jason Ledbetter, City Manager  
City of Yreka  
701 Fourth Street  
Yreka, CA 96097

Dear Jason Ledbetter:

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

Thank you for submitting the City of Yreka's (City) housing element adopted February 7, 2023 and received for review on February 15, 2023. Pursuant to Government Code section 65585, subdivision (h), the California Department of Housing and Community Development (HCD) is reporting the results of its review.

The adopted housing element addresses most statutory requirements described in HCD's December 12, 2022 letter; however, additional revisions are necessary to fully comply with State Housing Element Law (Article 10.6 of the Gov. Code), 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).)*

Goals, Priorities, Metrics, and Milestones: While Program HE 3.1.1 (*Affirmatively Further Fair Housing*) was revised to additional information regarding timing, geographic targets, and outreach methods, each action should also include measurable metrics and milestones. Additionally, while the element include some actions to address AFFH, the element must include significant and meaningful to enhance housing mobility, provide new housing choices and affordability in higher opportunity areas, place-based strategies for community revitalization and displacement protection.

2. *The analysis shall determine whether the inventory can provide for a variety of types of housing, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing, and whether the inventory affirmatively furthers fair housing. (Gov. Code, § 65583, subd. (c).)*

*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... (Gov. Code, § 65583, subd. (c)(1).)*

Zoning for a Variety of Housing Types (Emergency Shelters): While the revised element evaluates typical parcel sizes for emergency shelters, it should also specifically analyze to what degree those parcel sizes are appropriate to accommodate a shelter, especially given the maximum bed limit of 15 and parcel sizes are less than 0.5 acres. In addition, as found in HCD's prior review, the element should evaluate the reuse or redevelopment opportunities for shelters.

Chapter 654, Statutes of 2022 (AB 2339), adds specificity on how cities and counties plan for emergency shelters and ensure sufficient and suitable capacity. Future submittals of the housing element may need to address these statutory requirements. For additional information and timing requirements, please see HCD's memo at <https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/ab2339-notice.pdf>.

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 zoning available to encourage a variety of housing types.

3. *Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the Housing Element through the administration of land use and development controls, the provision of regulatory concessions and incentives, and the utilization of appropriate federal and state financing and subsidy programs when available. The program shall include an identification of the agencies and officials responsible for the implementation of the various actions. (Gov. Code, § 65583, subd. (c).)*

Program HE 4.3.1 (Housing Conditions Survey) and Program HE 5.1.2 (State Program Funding): The Programs should provide specific commitment and an appropriate timeline to apply for funding annually.

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. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)*

Program HE-6.1.6 (Family Definition): While the element was revised to include Program HE-6.1.6 to revise the City's definition of family, the program should specifically commit to revising the definition to remove any identified constraints, namely subjecting families to be related by blood and excluding group homes for utilizing the definition of family. Please see HCD's prior review for additional information.

Program HE 7.2.1 (Group Homes): As found in HCD's prior review, this program should be revised to allow group homes for seven or more persons in lower density zones (e.g., R-A and R-1) similar to other residential uses. Additionally, this program should commit to removing requirements for group homes to be a single family residence or meet licensing requirements. Zoning code regulations that isolate and regulate various types of housing for persons with disabilities may pose a constraint on housing choice for persons with disabilities.

The element will meet the statutory requirements of State Housing Element Law once it has been revised and adopted, if necessary, to substantially 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 fails to adopt a compliant housing element within 120 days of the statutory deadline (February 15, 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 fails to 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.

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 should continue to engage the community, including organizations that

Jason Ledbetter, City Manager  
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represent lower-income and special needs households, by making information regularly available and 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.

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 Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; 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 meets housing element requirements for these and other funding sources.

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

Sincerely,



Paul McDougall  
Senior Program Manager