



# Appendix A

## *Community Engagement*



Section 65583(c)(9) of the Government Code states, “local government shall make diligent effort to achieve public participation of all economic segments of the community in the development of the housing element, and the program shall describe this effort.” Meaningful community participation is also required in connection with the City’s Assessment of Fair Housing.

The initial Public Review draft was available to the public for over 30 days and all subsequent drafts were available to the public for at least 7 days. All public comments were considered by the City and addressed in the Housing Element where appropriate.

On September 29, 2022, the City held its first virtual community workshop to introduce the Housing Element update process and provide details on how the community could stay engaged through adoption and certification. The workshop and presentation were made available in both English and Spanish, and the recordings for both are available on the City's webpage.

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When it came down to the selection of housing types, workshop participants noted a greater need for multi-family housing and affordable units.

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Lastly, workshop participants were asked about what they valued about Santa Cruz's existing neighborhoods. They emphasized the importance of walkability, landscaping/streetscape, and proximity to resources, employment, and services.

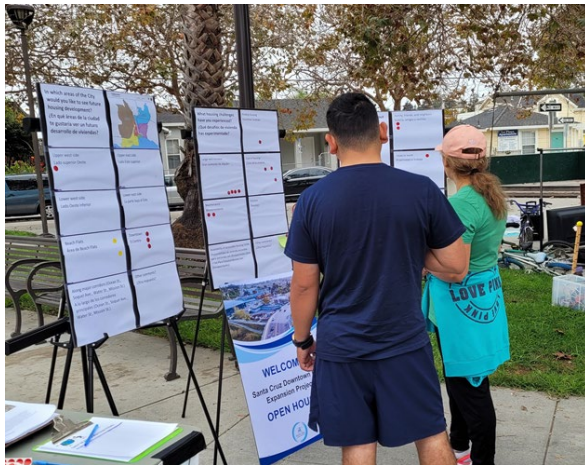
Between September 29 to November 14, 2022, the City gathered community feedback through an online survey. The survey posed questions regarding housing type needs, favorable locations for future housing development, policy considerations, and visions for the future of the City. A total of 421 survey responses were collected. Overall, the general sentiment was that affordable and multi-family housing is needed within the community. Participants felt that ADUs would be the best housing type to incorporate into existing single-family neighborhoods, but the Downtown area as well as the general west side and lower west side would be best suited for future multi-family developments. The full survey summary report is attached to this appendix.



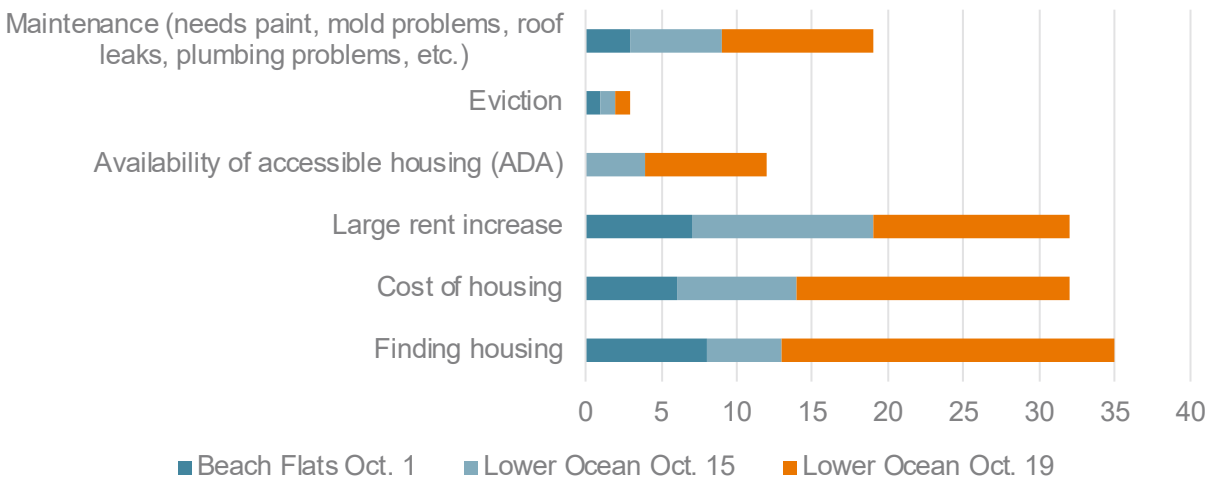
The City of Santa Cruz is updating the Housing Element for the 2023-2031 Planning Period. The Housing Element guides policies, programs, and actions that support and encourage housing growth for all income levels. Community input is important to create policies and programs that appropriately address the community's needs. Add your voice to this process and share the opportunity with your neighbors! The Housing Element survey is open through November 10, 2022. Please share this with your neighbors too. To take the survey, please visit Santa Cruz's Housing Element [website](#).

## 3. Neighborhood Events

City Staff attended several neighborhood and community events to provide information on the Housing Element and collect input from segments of the community that may be harder to reach. These included three neighborhood clean-up events in the Beach Flats and Lower Ocean Street communities and a Nueva Vista Community Resources food distribution event. Poster boards at the events included the questions listed below with dots for the participants to select an answer. The format of the boards was intended to facilitate quick participation. The following graphs illustrate the responses received at each event.

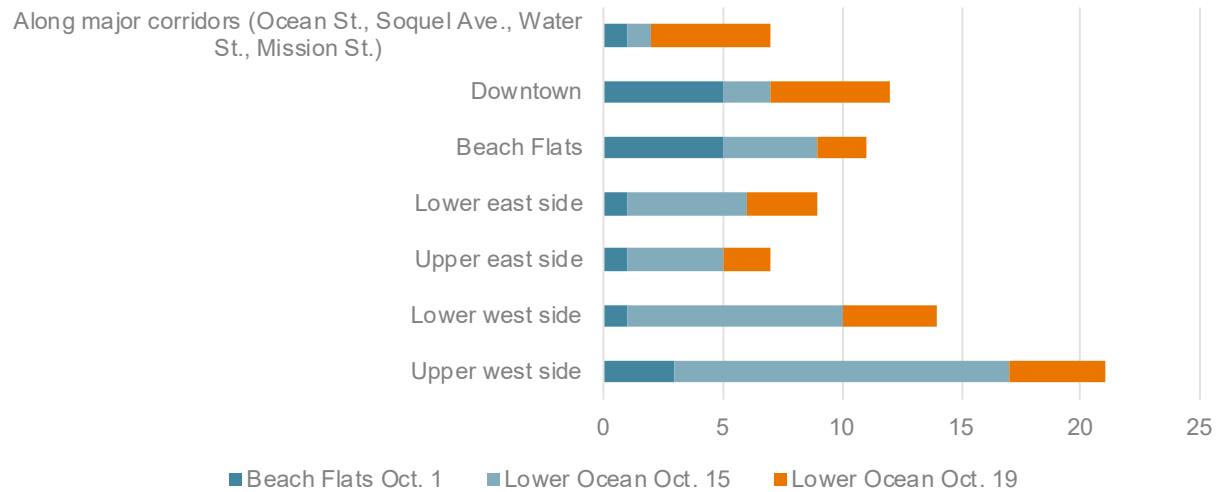


### What housing challenges have you experienced?

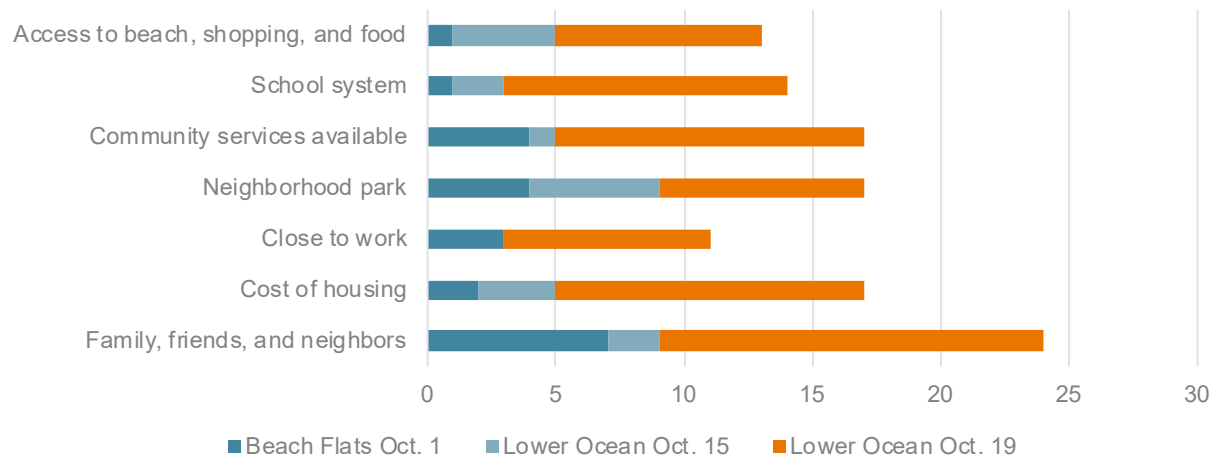




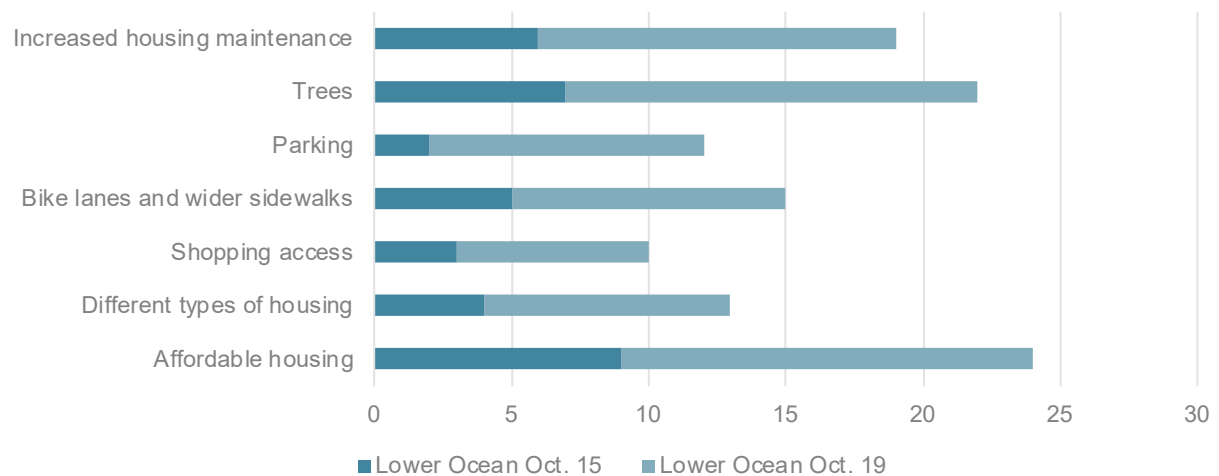
## In which areas of the City would you like to see future housing development?



## What do you value about your neighborhood?



## What would you like more of in your neighborhood?



## 4. Focus Groups

Between November 2022 and January 2023, the City held focus group meetings with various community groups, representatives, and housing developers. Responses from each focus group meeting can be found in the attachment of this appendix.

- **Seniors (November 29, 2022)**
  - Participants from the senior focus group felt that community integration, home affordability, and medical assistance are some housing challenges that they face. Participants had mixed opinions on the different housing needs and creative solutions and opportunities. They recommended various programs including subsidies from the County. Lastly, participants believed there should be a variety of services provided to seniors such as legal and technology services.
- **Students, YA, and Renters (November 29, 2022)**
  - Participants from this focus group felt that the lack of low-income housing and tenants' rights for students are some of the biggest housing challenges they face. Participants felt that Santa Cruz needs a variety of housing options but had mixed opinions on the types of programs the City needed the most. Participants proposed varying creative solutions and opportunities during the focus group meeting and identified some areas on the west side of the City, particularly near the UCSC campus, as areas of opportunity for future development.
- **LatinX – in-person meeting (December 5, 2022)**
  - The representatives from the LatinX stakeholder group felt that Santa Cruz needs a variety of housing options but had different opinions on the housing types. Housing types such as Single Room Occupancy (SRO) and workforce housing were proposed. The participants also recommended various programs such as funding for affordable housing and making resources easily accessible. They proposed outreach to affordable housing developers as a possible solution and opportunity in Santa Cruz. Areas beyond Western Drive and Golf Club Drive were identified by the participants as potential areas for future development.
- **Community Groups (December 7, 2022)**
  - Participants identified zoning constraints as one of the housing challenges that they face. There were no responses received for most needed Housing Types in Santa Cruz. Participants had mixed opinions on the types of programs Santa Cruz most needs and the types of partnerships that the City should seek out. Overall, participants identified parking requirements and density bonuses as possible creative solutions and opportunities in Santa Cruz. Finally, participants believed that land near transportation corridors would be suitable areas of opportunity for future developments.
- **Developers (December 7, 2022)**
  - For affordable units, participants felt that various permitting and development fees as well as the lack of vouchers presented development challenges. For market-rate units, participants had mixed opinions on development challenges in Santa Cruz. Participants also had mixed opinions on creative solutions and opportunities and areas of opportunity for future developments.



## *5. Planning Commission and City Council Meetings*

The City held meetings with Planning Commission on April 20, 2023, and City Council on April 25, 2023. An informational presentation for each provided details on the contents of the Public Review Draft Housing Element, the candidate sites identified, policies and objectives to advance the City's housing goals, and summaries of public involvement. City Staff answered questions and received guidance on revisions to be made prior to submittal of the Draft to HCD. These meetings also provided the community with opportunities to ask questions and make public comments.

## *6. City Council Housing Element Subcommittee*

Beginning in 2023, the Santa Cruz City Council created an official City Council Housing Element Subcommittee to provide input and feedback on the candidate sites selection and housing goals and policies. The subcommittee is comprised of Mayor Keeley and Councilmembers Kalantari-Johnson and Newsome who regularly met with City Staff to discuss revisions and additions to the Draft Housing Element. These Subcommittee meetings supplemented Planning Commission and City Council meetings and allowed for more in-depth review.

## *7. Other Outreach*

### **Santa Cruz YIMBY and COPA**

In addition to the specific events noted above, City representatives met individually with several groups as well as representatives of housing developers and individuals interested in the Housing Element. The groups included Santa Cruz YIMBY (Yes In My Back Yard) and COPA (Communities Organized for Power in Action), an organization made up of a variety of religious institutions dedicated to working together to help solve problems of social justice, food scarcity, and housing, among other community issues.

City representatives also gave presentations on the Housing Element Update at other events including a community meeting held for the Coral Street Visioning Project and a COPA-sponsored educational event on the housing crisis and the Housing Element. Interviews with various publications including the Santa Cruz Sentinel and City on a Hill Press provided additional information and outreach to the public.

The Council Subcommittee met twice in the summer of 2023 to specifically discuss COPA's April 2023 comments in more detail. Staff and Councilmember Kalantari-Johnson of the Subcommittee also met with COPA representatives in August 2023 to discuss the City's responses to their comments. Staff created a separate response matrix specific to COPA's comments to aid in these discussions and that document is included after the response table.

Following YIMBY's comments in April, staff reached out to representatives of the statewide YIMBY Law group and the local Santa Cruz YIMBY chapter. The Council Subcommittee also met twice to specifically discuss YIMBY's July 2023 comments. One meeting was with staff in July 2023 to review YIMBY's comments and consider changes to the Housing Element draft based on those comments. The other meeting was with staff and YIMBY representatives in August 2023 to review the City's responses to their comments and discuss further potential edits. Staff created a separate response matrix specific to YIMBY's comments to aid in these discussions and that document is included after the response table.

On October 30, 2023, the City's Code Enforcement Division began working with COPA to resolve an issue regarding substandard housing conditions reported to COPA by community members. Resolving this issue included outreach meetings with COPA and inspections of units for substandard living conditions through the Rental Program. Deficiencies were found, and a Compliance Plan will be created to resolve the deficiencies.

## **Community Leaders and Other Organizations**

In August 2023, staff met with Santa Cruz County Supervisor Ryan Coonerty to provide an overview of the Housing Element draft and next steps and discuss the draft policies and sites inventory. In September 2023, staff met with about 50 members of the Rotary Club of Santa Cruz to provide an overview of the Housing Element draft, housing policies, and housing production approaches at the City. In October 2023, staff met with about 40 members of Leadership Santa Cruz to discuss housing issues in the City and region and provide an overview of the Housing Element Draft.

On November 13, 2023, staff met with Miriam Greenberg, Professor of Sociology and Chair of the Social Sciences Division at the University of California Santa Cruz (UCSC), to discuss displacement risk mapping and anti-displacement policy strategies. Professor Greenberg was joined by UCSC PhD candidate Elena Losada as well as Raymon Cancino and Pamela Nell from Community Bridges, a community services provider and advocate for affordable housing and tenant assistance. Professor Greenberg and Elena Losada provided an hour and a half presentation on their review of displacement risk mapping methodologies and a preferred approach for mapping displacement risk in Santa Cruz. Preliminary findings were shared, and anti-displacement policy options were discussed. There will continue to be ongoing coordination with this group as it will help inform staff's effort to achieve Policy Objective 5.5b to adopt new anti-displacement policies, programs or code amendments by September 2025. The displacement risk mapping could provide an additional geographic element to be part of the City's anti-displacement work and allow for targeted approaches where new policy could be considered where it might be needed most.

## **Public Review Revisions**

With each resubmittal to HCD for review – including Technical Assistance revisions – the City made the redline Draft available for the mandates seven-day public review. Stakeholders, organizations, and community members were notified of the available draft and encouraged to provide comments and feedback. Responses to public comments are provided in the Public Comments section of this Appendix.

In addition, with the last round of revisions addressing HCD's October 2023 letter, the Santa Cruz Sentinel published an article promoting the request for feedback. The article provided an update on the status of the 6<sup>th</sup> Cycle Housing Element and listed the deadline for feedback and how community members could submit comments.

## ***8. Housing Element Update Webpage***

A webpage was created to provide background information and guide the public to outreach events and resources throughout the course of the update process. The website provides information about the update process, key features of the housing element, recorded meetings, a project timeline, resources, and contact information. The website also provided a link to the



community survey as well as a contact form for interested persons to sign up for the email list and provide comments to the Housing Element Update team. Over 2,900 community members are on this email list and receive notification when updates are made to the website, including when new drafts are available for review. The website is available at:

<https://tinyurl.com/santacruzhousingelement>.

All outreach materials, reports, and Drafts are available to the public through the Housing Element Update webpage.

In addition to the email signup available on the webpage, the City maintains a list of all groups and individuals who have expressed an interest in receiving information about the Housing Element. Notices about public events are sent to both the webpage list and the contact list. For public review of each draft of the Housing Element, the drafts were posted to the website and notices were sent to all interested parties and to those who had commented on previous drafts.

## B. Community Survey Summary Report

This section contains the summary report for the community survey conducted between September 29 and November 14, 2022.

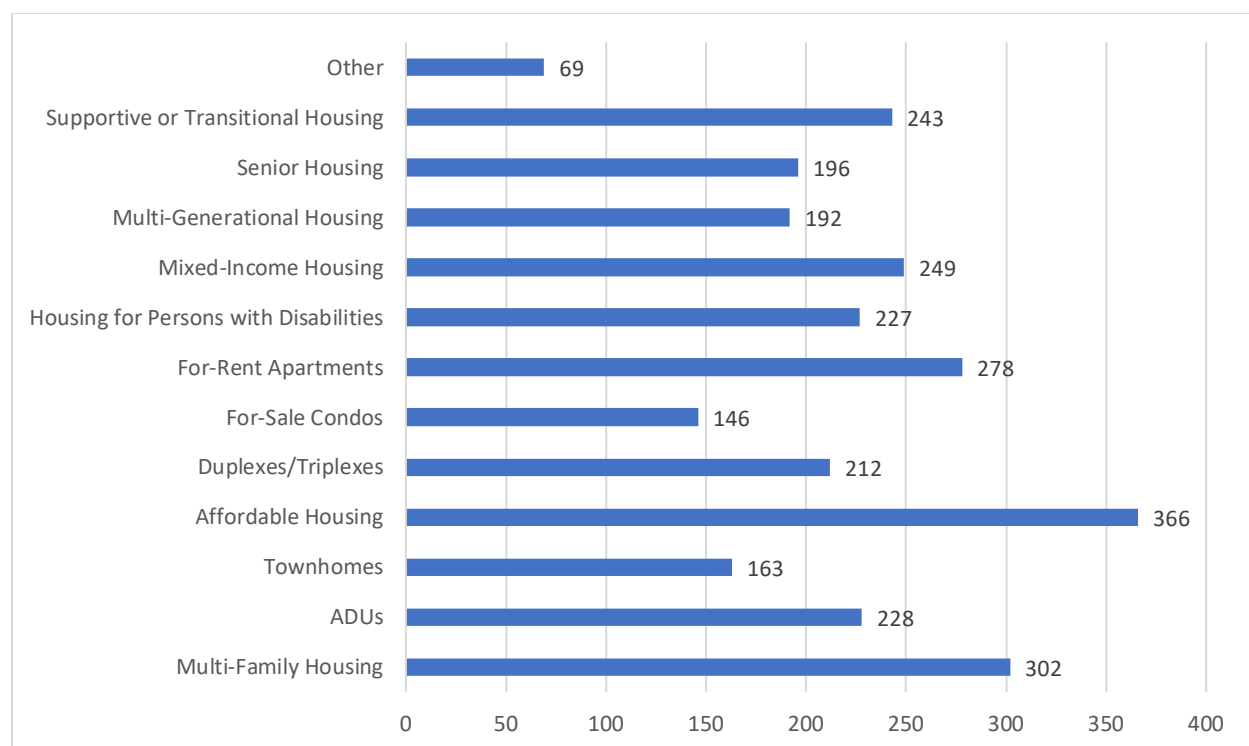


## Community Survey Summary Report

On September 29, 2022, the City launched an online community survey to gather input on housing needs and policy programs. The survey was available through November 14, 2022, and it gathered a total of 421 responses. This report details the input received and respondent demographics.

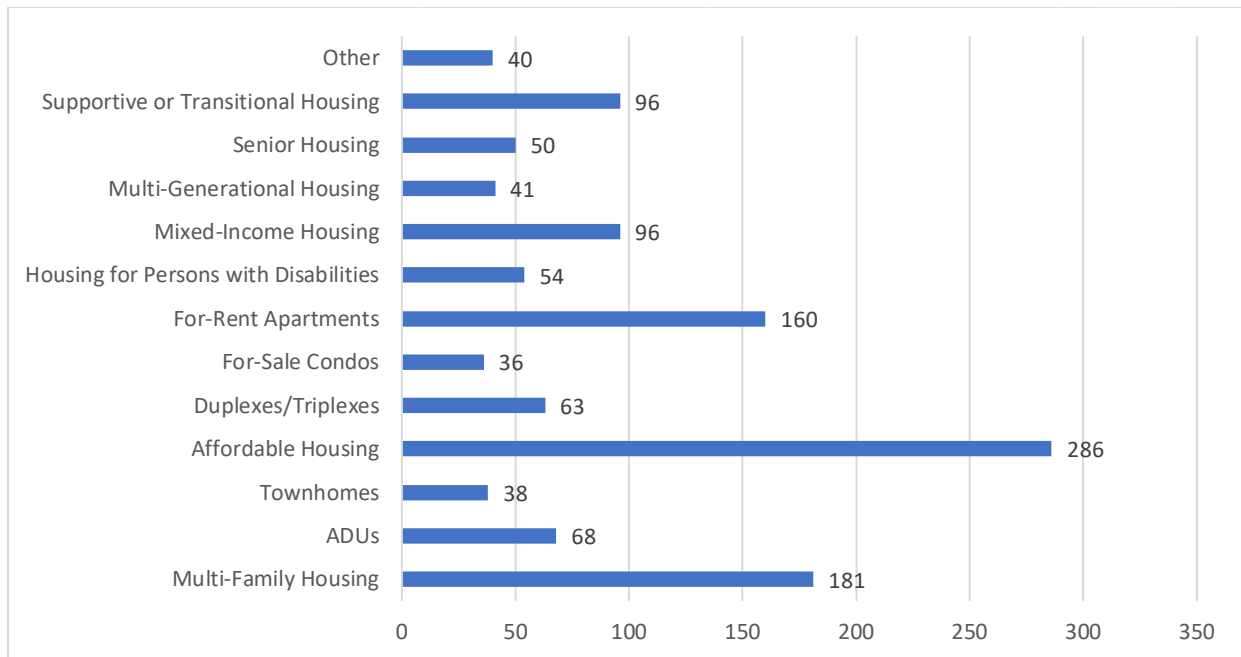
### 1. Housing Type Needs

The survey asked participants to select the housing types that they think are needed in Santa Cruz. Overall, the data shows a need for Affordable Housing and Multi-Family Housing over other housing types. Participants also highly favored For-Rent Apartments over For-Sale Condos. Participants least favored Townhomes and Multi-Generational Housing. **Table 1** includes additional recommendations provided under the Other category.



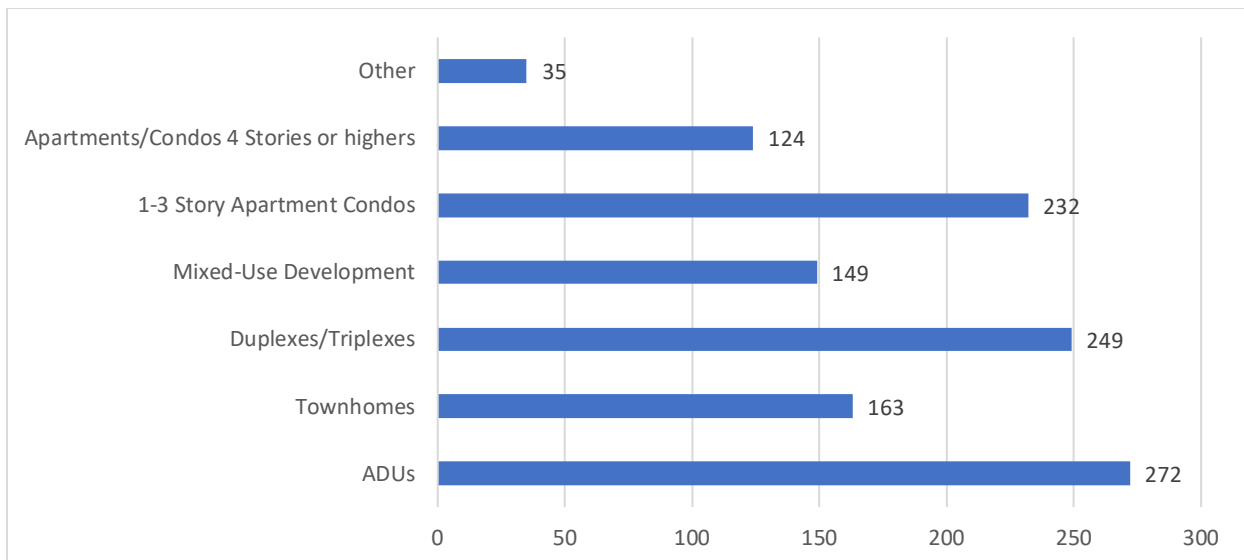
### 2. Priority Housing Types

Participants were asked to select three housing types from the previous survey question to prioritize in future developments in Santa Cruz. Overall, the data shows that participants favored Affordable Housing, Multi-Family Housing, and For-Rent Apartments.



### 3. Housing Types in Existing Single-Family Neighborhoods

To assess other housing opportunities, the survey asked participants what housing types they could see being added in existing single-family neighborhoods. Overall, most participants reported ADUs. In second and third, participants preferred Duplexes/Triplexes and 1-3 Story Apartments. The results show that participants were least interested in adding denser and taller developments and preferred to see a continuity in development types.

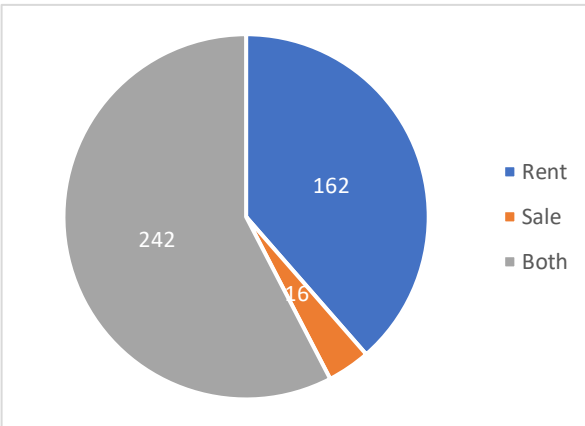


## 4. Areas for Housing Development

The survey asked participants if there were any areas where they think future housing should be developed. The responses highly favored the Downtown area, followed by the West Side, Lower West Side, and transit corridor. Participants generally showed interest in developing housing city-wide. Areas around High Street, Lower East, Bay Street, the Golf Course were recommended to be left as-is. All survey responses are shown in **Table 2: Recommended Areas for Residential Development**.

## 5. For-Sale or For-Rent Housing Needs

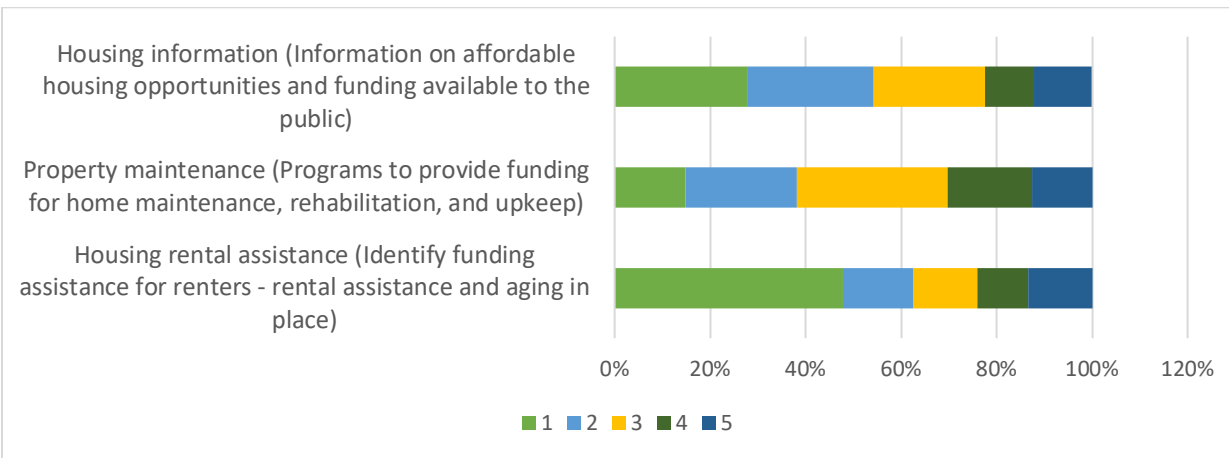
The survey asked participants what type of housing is more needed in Santa Cruz between for-sale and for-rent housing. The responses show a lack of both, but with an emphasis on for-rent. Few participants believed that there is a lack of just for-sale housing in the City.



## 6. Programs

### Community Assistance

To gain feedback and perspective on potential community assistance programs, participants were asked to rate different issues based on importance (1 being the most important and 5 being the least important). Overall, participants favored housing information and rental assistance. Property maintenance received the most 3-rating responses – indicating a general interest but not of heavy importance.

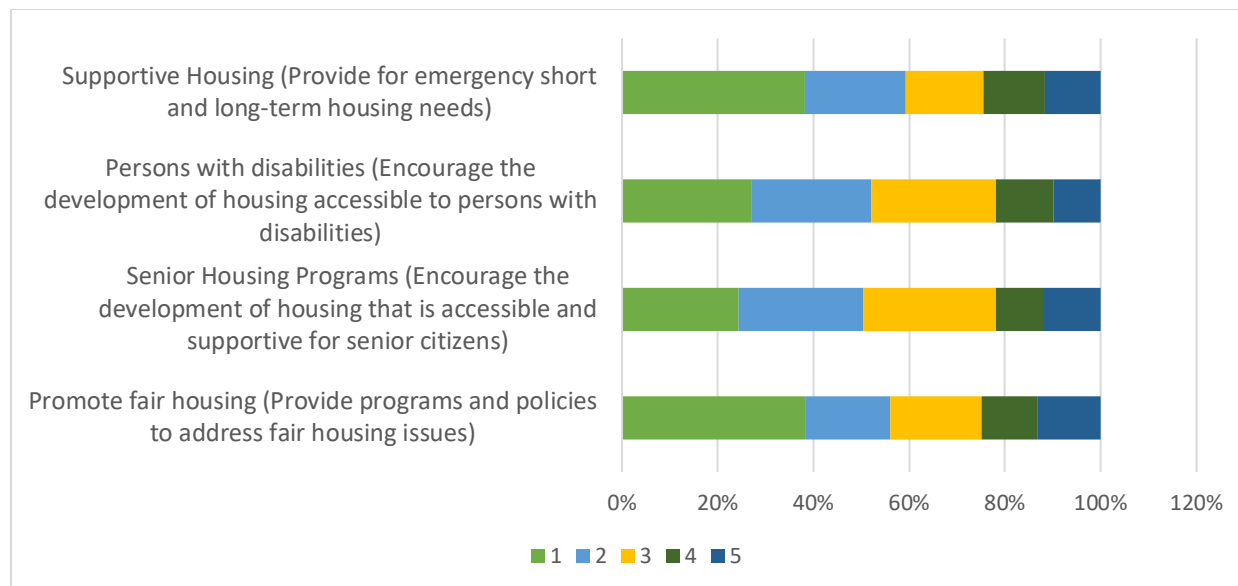


### Fair Housing

Additional programs relating to fair housing assistance were also provided to provide examples and gain insight into the community's sentiments on the topic. As with community assistance, participants were asked to rate the different issues based on importance (1 being the most important and 5 being the least important). Overall, most participants were in support of all four fair housing programs. Supportive housing and the promotion of fair housing both collected the most support through "1" and "2" ratings.

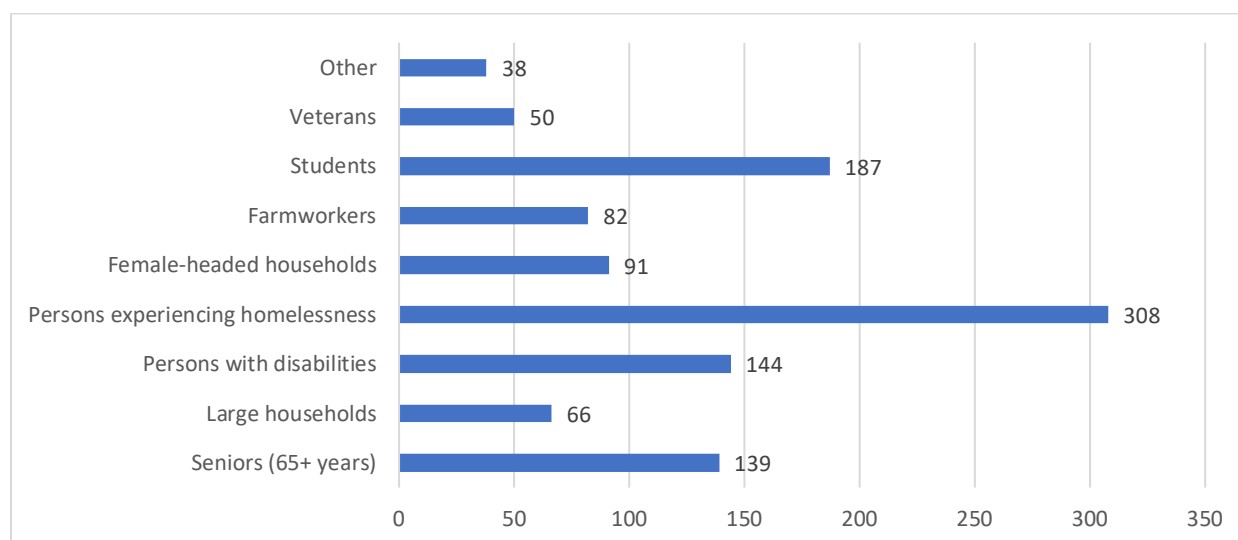


Programs to assist persons with disabilities and seniors collected the most “3” ratings – indicating an interest but not an urgency in addressing.



## 7. Special Housing Needs Groups

Jurisdictions are required to address the various housing needs of special needs groups. The survey asked participants which HCD-defined special housing needs groups were most in need of housing and/or related services in Santa Cruz. Overall, participants believed that persons experiencing homelessness were most in need of housing and/or related services. Students, persons with disabilities, and seniors over 65 years of age also received higher scores. This indicates a need to specifically address the needs of these four groups and consider additional programs for each. As part of the Housing Element outreach, the City held stakeholder meetings with students/renters, homeless and disability service providers, and seniors.





8. Vision for the Future of Housing in Santa Cruz

The survey below asked participants to describe their vision for the future of housing in Santa Cruz in 20 words or less. In total, 421 responses were received. Out of all of the responses, residents of Santa Cruz envisioned a future with affordable housing, housing variety, greater bikability and walkability, an increased in mixed-uses, and higher density near Downtown and transit corridors. All survey responses are shown in **Table 3: Vision for the Future of Housing in Santa Cruz**.

9. Demographics

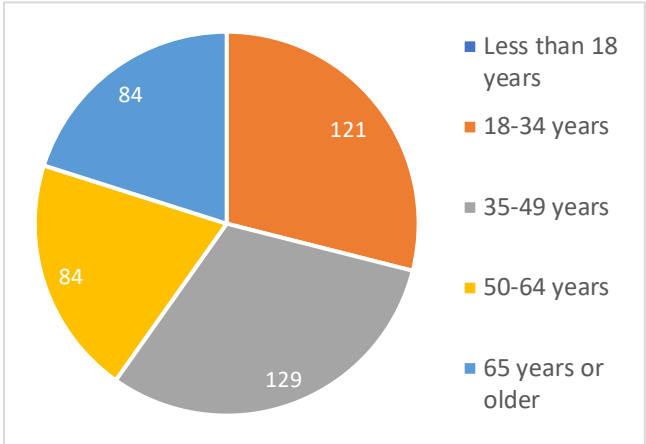
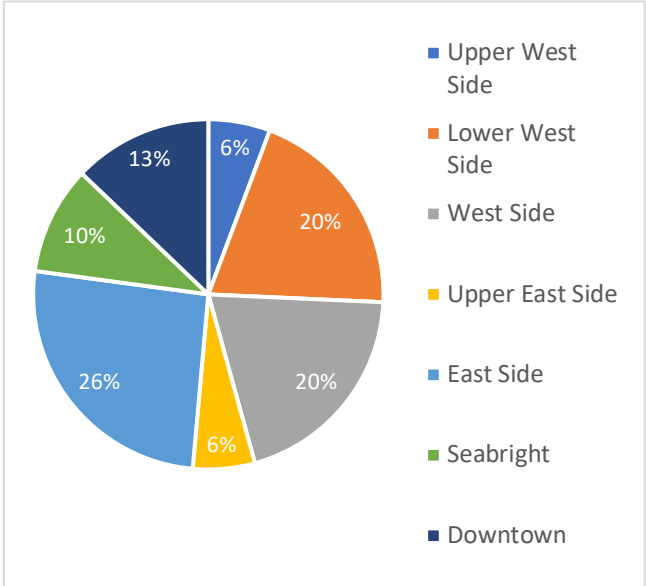
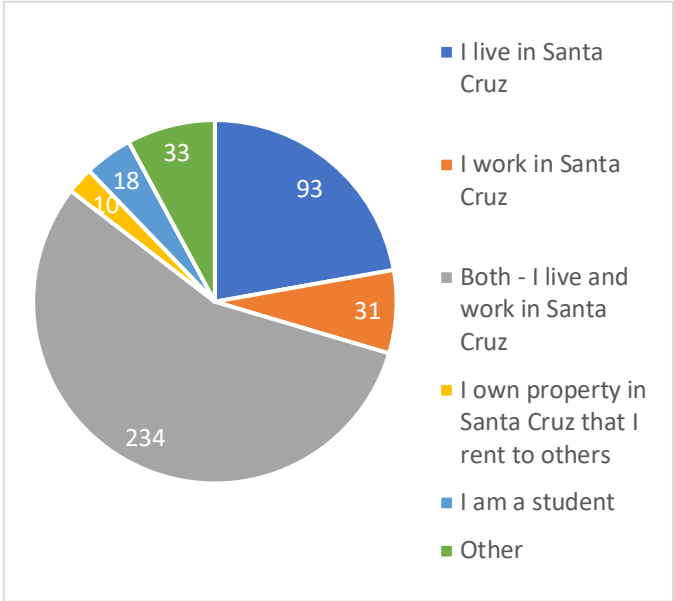
The survey concluded with questions on demographics to understand who was reached and who provided feedback. This was aimed at ensuring equity in engagement.

The questions collected information about whether participants live or work in Santa Cruz, which neighborhood or area they live in, whether they are a renter or homeowner, and their age.

At 56 percent, over half of participants live and work in the city. Another 22 percent live in Santa Cruz and seven percent work in the city. Students represented four percent of respondents. Eight percent selected “other.”

Of those who noted they live in Santa Cruz, 41 percent are renters and 51 percent are homeowners. In addition, 46 percent live on the west side of the city, 41 percent live on the east side, and 13 percent live downtown. This shows a fair split between the two sides of Santa Cruz where the majority of housing and neighborhoods are located.

Lastly, the age breakdown of participants also remained fairly even. A total of 20 percent were 65 years or older, 20 percent were 50-64 years, and 31 percent were between 35-49 years. Young adults between 18 and 34 represented 29 percent of respondents.



**Table 1: Other “Housing Types” Recommendations**

SROs	very low income senior housing/assisted living for seniors living on Social Security only;
Very dense housing	Housing for childcare providers
Student housing	Mental Health Supportive Housing and Tiny Homes
Housing no higher than 4 stories including affordable house & Density bonus	High density housing near centers of work, the university, and main transit routes. E.g 10+ story apartments
Price-Restricted Housing With Resale Restrictions	Co-living
Affordable mobile home parks on City properties	Housing opportunities for individuals experiencing homelessness who may have barriers to low-income housing. Also, meaningful housing opportunities for individuals with mental illness.;
On campus housing for UCSC students and staff	Small Entry Level units needed greatly, ex: micro apartments & micro flats. Alongside mixed-use buildings.;
Single income housing	Social/Public Housing
housing for Developmentally Disabled	Section 8 specific - people willing to accept vouchers and incentive for those people
There is nothing avail for adults with disabilities. we are struggling	Housing for homeless youth
Single-family housing	Free nightly private pods for anyone who asks. Junkie, student, traveler, mendicant monk, anyone
Tiny homes as transitional housing for those experiencing homelessness	Missing Middle Housing
Dense high rise apartment buildings	Low cost/subsidized RV park for those who can document a long term Santa Cruz residency;
Mixed-use developments	very low income senior housing/assisted living for seniors living on Social Security only;
Workforce housing	Housing for childcare providers
housing specifically for public servants (police officers, teachers, firefighters) and a separate neighborhood for ultra-dense UCSC housing	Mental Health Supportive Housing and Tiny Homes
Tiny home villages; including cooperative living resources and community	High density housing near centers of work, the university, and main transit routes. E.g 10+ story apartments
manufactured homes (aka mobile homes)	Co-living
tiny homes	Housing opportunities for individuals experiencing homelessness who may have barriers to low-income housing. Also, meaningful housing opportunities for individuals with mental illness.;
trailer courts with low cost mobile homes	Immediate transitional housing such as safe parking spaces for RVs, supportive camps for those most at risk of becoming "on the streets" homeless



Table 2: Recommended Areas for Residential Development
Multi-family in areas with high median income to increase equity and diversity.
West side
downtown, busy streets throughout town
Lower west side needs more mixed use development to be more walkable to amenities. Grocery store with apartments on top on the lower west side would be fab.
NOT on the corner of Branciforte and Water st.
Everywhere, no one can get housing.
Corridors should be prioritized for the most dense development (4+ stories), increase density in single family adjacent to corridors stepping it down as you get further from the major corridors, increase the housing types in single family neighborhoods to increase density and better utilize available land, we need to encourage as much infill redevelopment as possible
Near base of the UCSC campus and along major commuter routes to campus. All throughout the west side.
Downtown & lower West side near campus
downtown area and lower west side
Downtown; west side. Density near transit, services, schools, etc.
downtown and lower west side
Areas with access to everyday needs, like bus, shopping, recreation, grocery stores, etc.
corridors, downtown, harvey west? (unsure), lower ocean, beach flats, close to university (maybe along highstreet)
I think downtown and the upper west side near the base of the UCSC campus would be best as they are closest to transit leading to UCSC and downtown. Another area for more housing would be along the Mission Street corridor where there are more shops and transit as well.
downtown and base of UCSC campus
Downtown and the west side on the hill
The downtown core should absolutely be densified, with the mixed use library project and the Church parking lot project excellent examples. Single family zoning citywide should be abolished completely; at a minimum, it should be legal and simple to convert pretty much any existing SFH to a duplex to fourplex. Hundreds if not thousands of students and workers are renting existing single family homes at exorbitant rents because of the housing shortage. I live with six other students in a house built for one family on the upper west side, and I am considered lucky among my peers. It is absolutely the university's responsibility to build more housing on its campus but the Upper West Side and Lower West Side in particular need more units available to rent; it will massively ease UCSC students' housing burden (we are the most food and housing insecure student body in the UC system in no small part to the city's failure to build housing) and benefit existing residents and their children, who would otherwise never be able to live in this city.
Everywhere, but especially the areas of "highest resource" such as the upper and lower westside, de la viega, and seabright neighborhoods.
Upper westside on the large lot near Western Dr. Delaware Ave near Natural Bridges Dr. UCSC for student housing.
By westside Parrish/Safeway where Shebrah puts her giant signs
Convert San Lorenzo park
Upper Westside, close to the University

**Table 2: Recommended Areas for Residential Development**

Every single area of the City needs to have more housing. Downtown can be a focus, but we need to prioritize building housing near the main transit corridors, again in all areas of the City.
All over. Density is the answer.
Apartments/condos & duplex/triplexes in the Westside, as well as apartments/condos in the lower downtown area.
Multi-Unit apartments/condos should be developed with commercial below along Soquel Avenue, Ocean Street, Front, Pacific, Mission Street, etc. The major transit corridors for Metro with access to services close by.
High density housing that is subsidized in one form or another should be located near commercial and transit corridors. ADUs and duplexes are appropriate in neighborhoods with single family homes.
Santa Cruz has already added many units in high rise buildings. It isn't appropriate or necessary to continue to build beyond where commute and services can be provided. If we want to maintain a good quality of life, there are limits to be considered. We needn't house everyone that wants to live here, it isn't possible.
Restricting or eliminating short term rental properties could free up housing for year-round tenants. My neighborhood used to have many homes that rented to students and young professionals. Those properties were sold and converted to Airbnbs. The city enjoys the tax revenue but has removed hundreds of units of housing.
No
I think housing needs to be developed everywhere in Santa Cruz, with an emphasis on higher densities along transportation corridors.
1) All curches in SCC that benefit from tax breaks should be REQUIRED to house homeless families/teens in their parking lots (this program can/should be expanded before entering any more neighborhoods). Perhaps the more they take on, the more of a tax break they rcv. 2) No more housing of homeless/trailors in Prospect Heights due to risk and people entering park hiking trails (we're doing our fair share w/the Armory, and their still creating fies/encampments in and adjacent to DeLa park. So best to try another neighborhood as part of this/large motor home test before finalizing and growing at the Armory.
Downtown - good transit connections, high density mixed used Mission - major corridor, good transit, mixed use Soquel corridor - same reasons
Harvey West seems like a great place to build larger apartment buildings, but only if proper walking/biking and busing infrastructure could be put in place to encourage non-car transportation. UCSC should also be allowed to build more housing for students on campus, so off-campus rentals can free up for residents. Please, no more hotels.
Watsonville
East side, downtown
Opportunities to the optimize & intensify housing availability and densities should be considered everywhere, including in SFD neighborhoods
Downtown. Going into neighborhoods with 6+ story hideous buildings is outrageous, insulting to our entire City and cowardly on the side of City Government. What is happening with that giant complex that is supposed to be built on Ocean Street? That has been on the books for years but nothing is happening there. Stay out of the residential neighborhoods!!!

**Table 2: Recommended Areas for Residential Development**

West end industrial, midtown, and downtown. Each has walkable grocery and services already in place. The infrastructure should also be more robust than Seabright or Live Oak. The roadways are already constrained making no need to expand public transport or marking and signaling. There's probably points to bank against California climate goals as well.
North side of Delaware along the trail
West side industrial area. Watsonville.
East side especially along Soquel Ave., there are bus stops, stores, and restaurants making it a good area to develop
Anywhere and everywhere there is space.
Everywhere, but downtown is highest priority, then exurban/urban core.
Harvey west and surrounding area such as Golf Club Drive....close to employment centers.
Soquel, Water, Ocean St, Mission St... transportation corridors
downtown, East side, near campus, along Bay St.
downtown along the river south of Laurel and along river street to highway one
I'd love to see more 4+ story buildings on the west side to help address the UCSC housing crisis.
All of the above.
along the main corridors of ocean, mission, soquel and water, and downtown
Anywhere there is an already-developed area with a surface parking lot. Westside, midtown, by Ocean Ave, near the boardwalk.
I thought the corridor idea the city was working on a few years ago was ideal. I attended a meeting to try to say so, but I was shouted down. Build along transit corridors, group near grocery stores, and, of course, concentrate downtown.
Seabright, downtown, Mission Street corridor.
Increase housing density downtown to take advantage of the shops/services, walkable neighborhood, and transit. Also maximize extra space on the west side by incentivizing homeowners to build ADUs and/or expand their homes for multi-family housing. Develop in desirable and walkable neighborhoods like Seabright and Live Oak too. Everywhere, really. We need more housing to meet demand and we need density to reduce car dependency (thereby improving air quality, noise, and GHG).
Everywhere especially West side near bus line yo UCSC, lots of infill opportunities also rezoning of unused industrially zoned space along Delaware and just below Route 1
Delaware & natural bridges drive area. Along train tracks on west side. Former homeless garden area.
Delaware Avenue; along the train tracks; open space near Toadal Fitness west side; Antonelli Pond area.
Re-zone unused or vacant industrial land. For example along the bike path/Delaware for multifamily housing.
Site of former sushi restaurant on Soquel -same side as Ristorante Italiano. Seems to be a large lot. Housing along Ocean St, with continuous bus route along its length. Develop housing at the Emeline complex. Maybe the large field on Meder, for UCSC apartments. However, concerns about limited water supply and storage capacity must be considered realistically before adding more housing. And traffic impacts, of course.
East and west side. Downtown and midtown. UCSC campus
housing should be spread along the corridor streets at current zoning heights and densities; most of the corridors consist of open land (parking) or one story buildings, so lots more housing can be

**Table 2: Recommended Areas for Residential Development**

provided by just going to 2 to 3 stories; the exception would be the upper part of Ocean Street which is more devoted to tourist and commercial uses and very busy -- not the most desirable street to live on.
Anywhere. Westside: Develop that commercial space next off Delaware near Santa Cruz Nutritionals. Downtown: Already in the works Eastside: Plenty of old commercial buildings along Water Street can be demolished and new housing complexes can go there.
Downtown -- hub for transportation e.g., on/off hwy 17 & 1 as well as central bus depot. Downtown -- less need to travel for groceries, food, entertainment, and outdoor public spaces Downtown -- the ability to go above the height restriction (which we definitely should go above the height restriction)
Mission St., Ocean St., Water St. - Plenty of room for dense, in-fill and mixed-use development
Westside
UCSC needs to be able to house at least all of the Freshman class plus more ON CAMPUS
Everywhere, especially our areas of high opportunity such as DeLa, Westside, and Seabright.
downtown-converting office building interiors to affordable housing.
river district-housing could be built in underutilized space near Costco.
east side neighborhoods with large lot sizes are good candidates for duplex/triplex or ADUs
Downtown - High density, near public transit, continue to revitalize the Downtown business environment, makes the area safer for everyone with more residents out & about. Westside area around Harvey West Park - higher density near Hwy 1/17/9 highway transportation nexus, make the area safer with more residents around. Along major road corridors with public transit-- Mission/Water, Soquel, and Westside around Swift St-Mission-Delaware.
Any and all areas situated more than 30 feet above the presnet mean sea level.
Upper Westside for students. Corridors such as Water, Soquel and Mission Streets for young professional commuters. Downtown for families.
Downtown should not be a commuter zone. We want people downtown who will enliven the city with their presence - familles. If we dedicate Downtown to students and young professional commuters downtown will remain an area devoid of a community feeling because the residents will always be gone (at work/school) and are a transient population. We need a community of long term dedicated residents who will bring vitality and a sense of 'ownership' to the city's core.
Upper and Lower westside for University students and faculty
Downtown, upper and lower Westside
Build through the city low attractive housing. The industrial area on the west side would be a great area for a few high density buildings. Don't cram everything into south downtown. The project in Live Oak is great.
Downtown--Mixed Use
Lower East and West. Let downtown be downtown.
Westside on Mission. Eastside Soquel Ave. Downtown. UCSC - mandate on site housing for all students, No more on Water street, it is being maxed out with upcoming developments. WE do not need more smog/emissions.



**Table 2: Recommended Areas for Residential Development**

Prioritize dense development near transit with the purpose of reducing car-dependency and creating walkable neighborhoods.
All
East side for professionals who work on the west side
Everywhere
Seems like lots of pressure on Mid Town lately. What about traffic/safety/infrastructure? With all the kickbacks or tax incentives for development, where is the planning and support for substantial extra need?
If we as a community are asked to absorb the demand, the city and state and all stakeholders of the push need to be supportive and effective in securing ongoing safety and infrastructure demands.
Does the west side truly bear it's fair share (of both state mandates and of ever expanding UCSC housing needs?)
What about all the land on the west side around Swift and the old Wrigley building areas? Kind of unfair to have mid town neighborhoods bear the brunt on state-mandated growth so disproportionately.
Upper/Lower West Side, downtown
I don't think that there should be these massive, Las Vegas style apartment buildings here. There is no such thing as "affordable housing" here. If a townhome costs \$400,000, it is considered affordable but it is not. I think that the use of "affordable Housing" as a descriptive is used to allow developers to build huge ugly buildings. There is no way to accommodate every single human that wants to live here "affordably". If someone wants affordability they are looking at the wrong place to live. Its just an unfortunate fact.
anywhere we have vacant land which is not a lot
Downtown and upper west side
I can't think of any area of the city where housing is not needed. For the Developmentally Disabled it is best to be bear service providers and public transit for the service providers.
Anyplace near a Metro route or shopping area. Near Cabrillo College (I know that's not the City of Santa Cruz, but it makes sense). NOT higher than 3 stories along the river or coastline. West side for student housing.
As all as it's in a safe community, it doesn't matter where it's located.
all areas
All around
Dont know and i am not an expert as to what housing or where. Others are more knowledgeable ... I do know that ALL housing for special needs adults is at 100% capacity. There is a massive unmet need here. We are not unique as this exists almost everywhere. It has become nearly impossible to afford to buy a 2nd home for an adult special needs person and staff it (staffing is short and terrible also) as fixer uppers start at about 800,000 dollars or more.
I think we are putting in way too many low income units already. This city cannot sustain the amount of building that is already in progress.
Downtown, east side
Anywhere within the Santa Cruz area. There is no affordable housing for those with disabilities, thus we are still waiting for a voucher for my son.

**Table 2: Recommended Areas for Residential Development**

East side
Support focusing higher-density development on main transit corridors: Soquel, Water, Ocean, Mission, Swift, Bay, Delaware, Natural Bridges.
far westside - delaware, shaffer, mission st ext, downtown - mixed use and affordable housing
In all neighborhoods
Downtown, but more housing needs to be mandated in Live Oak and in the County. The requirement for so much housing in the City needs to be reevaluated on many levels.
Lower east side
Live Oak and Westside
all- there ae possibilities everywhere and it should be spread out throughout the community
Downtown, including possible expanded dt zone. Best location for affordable housing close to transit, jobs and services
Live oak, Westside industrial area
Corner of market street and water street Old adolfs Along the corridors. Water street between Morrissey and n Branciforte ,Soquel avenue between ocean and Morrissey 3 story limits so as to not take light and sun away from adjacent buildings Also downtown and not totally familiar with west side Along the Raul trail!!!!
Downtown and major transit corridors like mission and the mission extension/delete areas, soquel ave, water street and ocean street and the beach flats. These are already denser areas on transit corridors with easy access to commercial areas.
Along transit corridors, eastside, downtown, westside
Transport corridors
Along transit lines. There should be no automobile parking and instead transit passes provided to residents.
Housing should be along major public transportation corridors
Along transportation corridors with appropriate height limitations.
Lower West side is underdeveloped with mostly single family housing. It is a huge waste of space.
Downtown
Westside, especially in relation to the University students Along the main streets and transit corridors
As climate change continues we should recreate our past wetlands and floodplains. We should develop new downtowns in the upper and lower parts of both the Westside and the Eastside. Development should take place on higher ground and let much of our current downtown return to its natural environment as a wetland. We must completely eliminate parking minimums and allow at least 4 story buildings on every lot in the city if we are serious about tackling our housing shortage.
East side , SoQuel , live oak, pleasure point Santa Cruz mid town
Along busy thoroughfares such as Ocean St, Soquel Ave, Mission St., Delaware Ave, Seabright Ave, etc.
Upper westside, mostly. some on lower westside without destroying the beachy feel of the neighborhood. The eastside has been bearing the brunt of housing development. the unique charm of downtown is in danger of destruction by proposed high rises. keep the neighborhoods walkable!

**Table 2: Recommended Areas for Residential Development**

Both great parts of westside Mission and eastside Soquel could use and handle development of mixed use with heights greater than 3 stories with commercial on ground, they are both on transit, much better than "walling off" downtown with 7 story monoliths. Whose bone head idea was that?
I avoid living downtown because of how often people are yelling there. I have had guys yell at, loudly insult, jump at me, and follow me there. It has also scared my dog to the point I can't take him with me there anymore. I would think building housing more densely there would make the most sense, except I understand other people feeling the same way about not wanting to be harassed so much.
I wonder about developing more housing up in the area of Thurber Ln and Branciforte and certainly around the UCSC campus and up past the Hilltop Apartments.
As a 37-year-old who doesn't want to live with roommates or be married, with a dog, I prefer ADUs. It would be nice to have more homes to buy, but I think it still seems like a pipedream that houses would be built to the point they would become "affordable." I think it is just the case that more houses would exist that cost the same. The actual apartment buildings in the area seem to be extremely unaffordable.
Downtown
No options should be eliminated, it will also speed up things, without a selection process, all options are options.
No one area should have to take the brunt of extra housing and where's the water coming from?
The City is being ruined by over-development, with no thought about water, traffic, beach access and other quality of life issues. We don not want to become San Jose by the sea!
Lower westside
On major corridors ie soquel and water . Ocean. mission street. Find something up the coast a little bit
Downtown needs revival. Westside adu's for students to be integrated into the community.
Prioritize downtown for general single or elderly renters to create community oriented residential areas and Upper West Side for student renters
Other neighborhoods need multi-generational housing with a mix of unit sizes
Most areas of the city could support some future housing but NOT until there is a comprehensive plan for moving people to jobs, recreation, etc. This means separate or separated routes for cars, bicycles and pedestrians. With bicycles going 25 mph or more they cannot be mixed with pedestrians and since everyone eventually walks, that must be given a high priority. Priory must also be given to adding housing in a way that is complimentary to the existing neighborhoods and that means few if any high rise development (over 4-5 stores generally) and setbacks from transportation routes. Further the city must use citizen oversight committees as done with the water plans and lessen the influence of city planners and the money they waste on plans that go nowhere and always will==wharf plan, east and west side corridor plans, etc. all of which were not desired by the residents of the city.
I'd like to see housing clustered in walkable parts of neighborhoods like midtown and live oak. We need more on Westside around Almar too but traffic on Mission is a problem.
Stop creating market rate housing all over the city! This is just bringing more commuters to Santa Cruz, clogging our roadways and making us an even greater bedroom community for Silicon Valley. We need low income housing for people who live and work in Santa Cruz County! There should be a height limit on all new development. We pay a lot of money to live in Santa Cruz because we like the small town vibe. We do not want Santa Cruz to become another Silicon Valley mess of urban sprawl

**Table 2: Recommended Areas for Residential Development**

lacking any charm. The city leaders need to consider this with all new developments. They should be six stories or less. They should be created with a visual theme such as Victorian so that our town continues to have charm. Look to downtown Santa Barbara for inspiration. This town required that development follow a theme and the town is quite lovely. Our short-sightedness to not consider the visual appeal of new development is resulting in a loss of charm for our city. This will also result by starting to create skyscraper developments that do not belong in a small beach town.
The Westside just past 711 on Mission. This area is just empty space for 50 miles for the most part downtown but not in environmentally sensitive areas
The city needs to preserve the charm of Santa Cruz. If you turn it into San Jose you will be sacrificing assets for short period of gain. Look to LA and how Victorian neighborhoods, such as along Olympic Blvd, were sacrificed to multistory apartments -and now the whole location is unsavory. Growth is not always the best. You should thwart growth by developers and instead put the power in individual home owners, not corporations. People will build ADUs, if you make that process less complex, and even support it. The story is the city makes it super difficult.
Build multistory student dormitory complex with gondolas to campus somewhere to the East of campus.
Downtown
As close to UCSC as possible, tall and dense housing for students. Also, infill downtown and beach flats with tons of dense cheap housing near bus lines.
UCSC campus
Upper west side, upper east side, and areas close to the ocean could use some low-income housing to bring a more varied demographic to these areas of privilege
Downtown and near transit. Rental units should be prioritized near UCSC and Cabrillo.
Soquel corridor; downtown; lower Westside; upper Westside; east side
downtown should build up, multi story mixed use, large buildings, it can become a real city
Areas w/ single family homes on larger lots close to public transportation and/or grocery stores, etc.
I think they should be in every area. Not just clustered into one area.
city owned lots, motels/hotels with little use - allow conversion to housing, industrial buildings with little to no use - allow conversion to housing, commercial buildings with little to no use - allow conversion to housing. Where underutilized lots abut existing low-rise or single story housing, insure any new housing development on those lots are limited in height with step backs on 2nd story and above facing existing housing, such that no solar blocking/noise/traffic impacts upon, and no looming building masses impact upon, existing bordering housing.
Westside, off Delaware
Downtown, and major corridors for 3 story apartments.
Asus in residential areas, giving major tax and permit cost breaks. Also, back off on ridiculously restrictive building codes.
Everywhere where transit and mobility options exist.
West side, end of Delaware near Marine Lab. There is empty space there that could accomodate multiple units.
Downtown and the east side corridor
The "outer" areas of the west side (as Mission Street heads towards Western Drive), upper east side, upper west side are all potential areas for housing development, and I am sure there are more.



**Table 2: Recommended Areas for Residential Development**

<p>However, I believe we need to be very careful about "over developing" in the historic downtown area. Years ago, a lot of community effort went in to envisioning what we wanted our downtown to be like, and I fear that infill housing development of large, multi-story buildings is really not at all the vision that we worked so hard to make a reality. (The same goes for large, multi-story hotels!) There are main bus lines that connect to many areas in our city that are suitable for housing development, and many grocery stores and services are in walking or biking distance as well. The rail/trail also provides quicker walking routes to stores and services on the west side. I do not believe that the downtown area should be our main focus for large, infill development. There are plenty of other appropriate and accessible areas within the city limits.</p>
<p>There should be a lot of opportunity to densify along arterials and in existing mixed-use areas (Bay, Mission on the westside, the area around the UCSC entrance, downtown and south of downtown, along Soquel and Water, Seabright).</p>
<p>Lower west side (south of King and area between Swanton and Fair), lower east side. These areas have some vacant areas, older homes which are most likely not to current codes, and some existing multi family/apartment structures. I realize this may require the accommodation of some zoning law changes</p>
<p>Please plan, design, and build communities and neighbourhoods not just housing. Have a vision. Ask yourself would I want to live here, would I want my parents or children to live here? What will this look like in, 3, 5, 10, 20 years from now. What are the demands on the infrastructure?</p>
<p>Stop the development; make what we already have truly affordable..... not Silicon Valley prices. Us local renters are being pushed out.</p>
<p>Downtown- taller buildings already fit in. More walkable and won't affect traffic as bad Upper Westside- to alleviate already over impacted east side</p>
<p>I don't understand this question. Santa Cruz needs more housing, period. Santa Cruz neighbors do everything to slow down construction, so any area is fine. The priority should be housing, the area does not matter, I think.</p>
<p>East side of Santa Cruz but in a controlled manner ..</p>
<p>Downtown</p>
<p>Wherever there is space to build.</p>
<p>Downtown (within reasonable walking distance to public transit and shopping for folks without cars. Also need major improvements to existing public transportation) Golf course (some folks love it, and I hate to take that away, but it's a water-waster, and the land could be better used for housing, imo) Possibly west and north, like towards the Dimeo dump but maybe that's too sprawl-ly. Also out at the end of Delaware, like by the homeless garden? 🐶</p>
<p>west side</p>
<p>Housing development out toward Schaefer Road</p>
<p>Central to down town &amp; public transportation</p>
<p>Downtown, lower west side, empty lots on Soquel Ave or Water Street such as old Ginza restaurant, not being used and is an eye sore.</p>
<p>Harvey west</p>
<p>Single family houses in downtown should be converted into at least multiplexes, preferably apartments. Upper west side (particularly around Nobel) should be upzoned to allow for dense multiuse development to create a student district near UCSC</p>

**Table 2: Recommended Areas for Residential Development**

Areas to be developed should be served by public transit so that commuting to work & shop is feasible
The Greenbelt initiative that was passed in the 70s worked for issues and circumstances 50 years ago but needs to be revisited. Residential neighborhood Development should be considered in the gray whale ranch and more creek preserve, Arana Gulch And pogonip properties.
Corridors Water, Broadway, Downtown, Soquel
Everywhere!
UCSC
Downtown. And any large empty lots where neighbors will not be impacted by loss of sunlight exposure.
West side is convenient for UCSC campus access, but I think if buses were improved that connected the East side to campus then that would also be feasible.
wherever there is lower density. it needs to be near transportation and commercial areas and also where there are nearby schools and parks.
I support more mixed-use development downtown. I think the city would benefit from replacing parking with housing and investing more in transit. Curbing sprawl and increasing walkability / transit-friendliness is not only the only environmentally-friendly path forward, it's also beneficial for forming good communities!
Upper west side and the lower west side are good targets for development. That will be attractive for folks associated with the university and boost density
All of them! Put housing everywhere
Downtown, lower Westside
west side needs to take some of the burden of housing development. All seems slated for downtown and eastside so far.
Downtown
Downtown. That area has traditionally multi story apartment buildings. It concentrates those buildings in one area rather than impacting residential neighborhoods with massive high-rise development which is being pushed into the residential neighborhoods because of the "affordable" units that can be added to circumvent restrictions on the height of the buildings. The City of Santa Cruz needs to grow a spine and not be cowed by whiny for-profit developers who claim that the project would otherwise not work for them financially, We MUST see those financial projections - they are never disclosed. We have a right to see those financials as it involves public funding/allowances. You and I both know that we are being brainwashed by these "affordable" housing developers.
Downtown, and upper west side.
West side more density SRO housing along transit throughways close to campus.
Eastside on Soquel Avenue where the car dealerships are. I live here. We can handle affordable apartments here if the buildings aren't massive. Also, Fred Keeley has been researching the lot on Market and Water right behind his house. That project should go forward. Until we have about 2,000 affordable rental units, I don't believe any other for-profit developers should be allowed to build luxury apartments. The county should also finalize its tiny home ordinance updates so people can move forward with tiny home villages on rural properties. There are tons of empty parking lots on the westside where people could be allowed to temporarily park RVs while they rebuild homes destroyed by fire. The city could pay a manager to live there in one.
Housing needs to be developed throughout the city, not one area. As well as the county as a whole!

**Table 2: Recommended Areas for Residential Development**

No over 10 story buildings downtown. It would dramatically change the skyline and take away the feel of low key Santa Cruz. We shouldn't have to change the town under pressure of the Warriors and Tech Companies of downtown. The Westside has several empty areas. UCSC should take some of the brunt of meeting the new housing required by the state. Interspersed through the corridors, mainly Soquel because of the school on Water/B-40.
Lower westside. Along major and medium corridors and near commercial area
No.
I would say everywhere but only because I'm not well informed enough to know if any areas need it more.
Vacant lots should be developed first. All parts of the city are feasible.
Lower west side by natural bridges
Areas along existing and future transit routes and bikeways
Downtown can certainly be redeveloped to feature taller mixed-purpose buildings (i.e. businesses on the ground floor and affordable apartments on all other floors). I support the in-process construction of apartments that is currently happening on Laurel and Pacific/Front St, and hope to see more buildings like this in the future.
High density SRO at UCSC/Westside - that's where the demand is growing.
Everywhere. Everywhere needs new housing.
Everywhere
Beach flats, towers downtown, charge tourists for the view on the top.
All of them. Build baby build!
everywhere
Throughout the entire county since this current lack of housing impacts all areas of the county.
Downtown, transit corridors, anywhere you see empty parking lots and strip malls, near campus.
I believe it's important to keep parks, existing homes (that are lived in), and small businesses in their place, and not repurpose them into homes.
1/2 mile from all active transportation and transit routes tall apartments should be legalized
All neighborhoods should be building more housing. Zoning should be changed so larger buildings can go into SFH neighborhoods. We also need to abolish parking minimums throughout the city - this will also help in building more housing.
Centralized around the main public transit lines and the biggest employment areas to minimize traffic - so downtown/westside for the city and UCSC, Aptos for Cabrillo, the neighborhoods around Dominican Hospital. Also increasing funding and improving public transit should be part of this project.
Upper west side needs more student apartments. Lower east side needs help
Because of the severity of the housing shortage anywhere with available lots should be considered.
Because UCSC is at the mercy of statewide housing policy for students, housing along bus routes between the campus and downtown would ease the strain county-wide. (To this effect, if it is possible to revisit the land use agreement for the campus to build more on-site housing, even better) Additionally, affordable units near downtown would be ideal due to the number of service-sector jobs that support our bustling tourism industry! Service staff should be able to live near their jobs, especially since those jobs often don't pay well enough to purchase a reliable vehicle. Along that same line, denser housing options should be available along public transportation routes, such as the Soquel Ave/Water St. arteries, extending to Trevethan/city limits.

**Table 2: Recommended Areas for Residential Development**

East side of Santa Cruz on the north side of Soquel Ave.
DOWNTOWN! Also around River street between San Lorenzo Lumber and the Tannery (maybe even upstream of there). These are great places that can support much larger buildings and mixed-use.
Everywhere
All areas could use further development. Housing prices are insane, and more housing that supports multiple families and apartments is desperately needed
Downtown should have more high rises. Harvey west seems like it has a lot of potential. Any where there is a surface parking lot should be developed.
The far west side along Delaware Avenue seems to have a lot of open space and it is close to key roads, public transportation and other necessities. There is a stretch along water Street between brands of 40 and Seabright where there Seems to be space, again along a major corridor near public transportation and other necessities.
More commercial based areas, such as downtown and areas around town where there are businesses for dense housing
downtown, upper and lower west side, upper and lower east-side
Downtown - it's the most pedestrian area and well served by metro
Busy roads- Mission St, Water St, Broadway, Front, Laurel, get UCSC to build housing for more students on or near campus
The artichoke farm for sale in westside could be another multifamily neighbourhood. All the 1 story businesses on mission or delaware are taking massive space and could be 3-4 story mixed use buildings.
downtown and midtown, anywhere along public transportation routes/hubs
west side toward Davenport, San Lorenzo, anywhere there's a camp really
Mid town / lower east side along bus lines Soquel and water streets
To begin with- downtown, no questions asked. Mixed use development surrounding a dense walkable downtown core would make santa cruz a wonderful place to live. And now, controversially- the west side is an excellent candidate for medium and high density housing in my opinion. So much of the land within it is used by small, low quality single family homes built in the 1970s. Tearing them down and replacing them with mixed use or purely residential developments would be an absolute boon for residents. Imagine living above a coffee shop, or walking directly to a laundromat without having to deal with mission street! Speaking of, mission street should also be considered as a candidate for tall buildings- frankly, there's no 'character' left to 'ruin.' Any changes to it would almost certainly be an improvement.
Skyscrapers providing affordable housing for workers downtown. Mixed-use developments and ADUs in Live Oak and Upper Westside because there is plenty of space for greater development in these areas.
Downtown where there are transit options. The business district could use it too!
Rental apartments in upper west side for students. Apartments and mixed-use development at all commerce/employment hubs.
Seabright/East side has a lot of single family homes and sprawling business development that tends to have a lot of vacancies. Business buildings that are vacant may be better used as affordable housing If zoning would permit. It's also perceived to be a higher income area where more people have summer beach homes that aren't actually occupied year round and Airbnb's.
the corridors should be dense, dense, dense. they should have active commercial frontages and nodes of gathering spaces/hubs where people can gather to eat/shop/hang out/work.

Table 2: Recommended Areas for Residential Development
a) expand downtown, b) build up on corridors, c) build way more dense housing on the far west side
Downtown could be utilized so much more, allow mixed use zoning same on the westside. No more urban sprawl build sense and tall affordable housing.
Everywhere
Seabright/midtown & westside along mission
Lower west side has plenty of open space; hotels have been developed there, why not permanent housing. Housing should be spaced evenly around the city, perhaps according to the old transit corridor housing development plan which was shamefully scrapped. Other than that, most neighborhoods could take multiple duplexes, four-plexes. One per block would have a modest impact, and more than that would probably not affect neighborhood life much.
On ucsc's campus
Mixed use and apartments/condos downtown, 1-3 story apartments/condos lower west side
Lower west side - vacant lots off Swift Street. Infill of vacant lots within single family neighborhoods with multiplexes and multi-story housing.
Areas where the majority of workforce are located ie near UCSC, downtown, Live oak
Anywhere we have open land!
West side, upper and lower.
Everywhere. We are desperately in need of housing so all areas need to be looked at.
Close to job centers, transit, social/community gathering spaces, and stores. Walkable communities (not super far west in food deserts)
Downtown and Westside. Downtown can probably take higher density and west side has too many single family homes.
Lower west side on Delaware Ave between Almar and Natural Bridges. There are huge vacant lots and it is perfectly placed between all 3 UCSC campuses (CSC, WRP, Residential Campus) and close to restaurants, shops, and bus lines. Lower west side on mission street. Mission street is poorly planned and needs a major overhaul but if the street becomes safer, increased housing should be placed there. Seabright along Soquel ave
Delaware Ave., downtown, Mission St., various empty lots in neighborhoods
Anywhere
All areas
Downtown. It's close to everything.
Yes, all of the above.
Downtown, Above Downtown near Costco could use heavy upzoning (up to 10 stories), to prevent urban sprawl and be close to public transport & walkable. And any lot where there's currently a strip mall should be upzoned to mixed-use urban development, lots of potential space.
Downtown and live oak
What about building in the Swanton Road area?
Everywhere
Lower west side.
Upper/Lower Westside, lot of open land use for housing development especially for low income workers in the City.



**Table 2: Recommended Areas for Residential Development**

The circles on the west side
Down town, then expand east and west. New affordable housing needs transportation connections. I am a Euro who has lived in Asia, Europe, and Australia. I never owned a car till I moved to Santa Cruz. I got my first car at age 30 in Santa Cruz because I could not get to work via public transportation. My first purchase in CA was a bicycle and then the realization set in.
Within .5 miles of transit corridors
Westside should be upzoned
Lower Westside near Delaware, continued in live oak, Davenport (within reason and with respect to coastal preservation)
Both. We need housing for people everywhere in Santa Cruz.
Downtown and along public transportation lines
Downtown, midtown areas
Upper west side.
Busy areas. Front St, River St, Water St, Mission St, Soquel Ave (Drive?), Laural St, Broadway UCSC could do with building some as well
downtown, west side, build in parking lots and convert existing buildings to housing. rezone to allow for housing converted to mixed use/multifamily. focus on sustainable measures (ie. retrofit vs. new shells)
Between Ocean Street and the levee
Downtown
Downtown, soquel/water/midtown
Make sure exclusive neighborhoods are made accessible to everyone by building multi family housing—upper and lower Westside, not just downtown. The entire neighborhood north of High would be very walkable for ucsc students. Make sure to include mixed used in all neighborhoods, so people don't have to drive to go to the corner store
I think we should build in areas that are unlikely to flood.
Downtown and lower east side. We need more housing, not more traffic. Combine with more transit and protected bike lanes and everyone wins.
Everywhere. Seriously. Build new housing absolutely everywhere. Build it in my backyard (Carbonera).
Especially Downtown given transit options, but I think Westside, Lower East Side and Downtown provide best options given transit and walkability, but you could still build a ton of smaller apartments in the upper east side, banana belt, some larger townhomes in Carbonera. never going to hit the goals if you don't build everywhere.
UCSC staff and students— to unburden the shortage ripples that occur in the rest of the community. Next should be new affordable units in Aptos and Capitola. Create new housing in areas near Cabrillo/surrounding and anticipate it will lower commute times for other people needing to commute to/from outer county areas.
Capitols or Scotts valley
Downtown, SoLa, NOLO. Build dense housing because close to transit. 1000s of new residents will revitalize downtown businesses and we can have local-serving business. Also: give tax breaks to downtown property owners who rent to local businesses.
Close to public transit--downtown/midtown.
Everywhere

**Table 2: Recommended Areas for Residential Development**

Base of campus, lower westside
Downtown.
near kaiser arena - that area would be perfect for a large 10+ story development
Literally anywhere
Any empty lot. There's not many opportunities so all need to be maximized.
Lower Westside (my neighborhood) with additional bus service.
Everywhere
Downtown, lower east side, lower west side. All have opportunities to re zone some lots, expand others, and build ADUs.
Downtown, lower west side (near Wrigley, Toadal Fitness), along corridors
I think there are opportunities to add more housing on both sides of town. The east side needs some renovation which could include more apartments, and duplexes. We need to provide affordable housing for our workforce.
All parts, but especially re-zoning any single-family plots.
Downtown near transportation hubs and the west side near the University
Lower west of the west side (mixed use near the west end), definitely downtown, definitely just east of the river, definitely large mixed use near Capitola mall
UCSC for students
Everywhere, but especially close to transit.
Lower westside. I currently live there and feel that the area is ideal for development as it's safe and out of the way.
everywhere! The most demand for renting is definitely on westside and not being met
(1) UCSC on-campus housing. Because they have the land and it would minimize traffic to/from UCSC.
(2) Downtown. Because it has a bus transit hub and portions offer good redevelopment opportunities.
multi-family/duplex allowed on any lot over 60x100
Heavily downtown and near the rail line. Moderately elsewhere.
- As close to UCSC as possible. Students need housing close to campus
- midtown
Aptos watsonville santa cruz capitola
Everywhere. We have a large RHNA allocation so it's best to build as much as we can, everywhere we can.
Along major corridors like Soquel, Water, Mission, and downtown, as well as adjacent to UCSC.
Vacant lots, vacant parcels, vacant UC campus land...inventory vacant locations and evaluate for feasibility and appropriate housing development
Downtown and west side. Some close to the downtown for convenience of markets (and places of work) and close to UCSC for the students who want housing.
West side
Everywhere and anywhere EXCEPT downtown. What we build downtown will not survive the sea level rising. PLEASE PLEASE PLEASE take climate change seriously, and build for the future, not just the next twenty or thirty years. If that.
I think every neighborhood should have more housing/development

**Table 2: Recommended Areas for Residential Development**

Upper/lower east and west sides.
With wise urban design that focusses on walkable communities and access to public transit (5-15 minute walk from BUS lines AND future RAIL), we should be building all along these corridors. We also need to build mix use so that people do not need to drive to get their basics like groceries, a nice meal in a small restaurant, etc. We need to change zoning so that we are building dense little villages near transit so people have easy access to shift away from cars for local needs.
downtown, lower westside along Mission, Eastside along corridors: larger parcel sizes will allow greater density. Dependence on construction of ADUs will not provide the units needed because that would require property owners to subsidize construction on lots where such units can feasibly be built. A neighbor built an ADU in my neighborhood with the hope that she could charge an affordable rent, but the construction costs were so high that she found that she had to charge market rate rent to cover her loans! To me, this means that ADUs will not address affordability issues in this area.
This should be a holistic approach and all areas of the city should be looked at. That way we all fulfill the need and not just specific areas. Looking at things as a whole would net more available space instead of picking certain neighborhoods. We could also look at empty retail spaces that have sat empty for a long time and see what could be done with it.
Both West side and east side. Lots of single family homes, not enough rentals.
Next to public transit and other public services including markets...
Near transit or future transit & cycling corridors (Rail trail, Soquel Ave, Broadway, Bay St), West side (industrial/commercial areas), densifying the UCSC/Bay St area, East Side
lower west side, downtown, ocean st area
Transportation corridors
ADU's everywhere but the City would need to quit requiring ridiculous, arbitrary deterrents like builder must replace the city owned alley, or be restricted to 10' setbacks if the front door is on the the side but only 5' if it's on an alley, etc.
West side Delaware project that seems to have been abandoned.
Housing development should be infill. Rezoning should happen for previously disturbed blocks (like industrial area on Westside) to build high density affordable housing. We don't need luxury housing built by private developers. We need social, public housing. We don't need to build housing on open space that has high ecological value, like UCSC plans to do. All development should be infill at this point. There is enough space for nature and buildings. The choice between nature and housing is a false dichotomy.
Every time you entertain the idea of a new hotel (Laurel & Front comes to mind) think about how much better affordable housing would be for our town.
Everywhere, but particularly in the downzoned wealthy neighborhoods, because this will help break our anti-density culture.
Everywhere
More student housing near the campus and throughout the Westside.
Mission St/Hwy 1 Corridor on the West side. I'm a west side resident and am tired of the Nimbyism on the East side. I think starting infill development on this transit corridor, supported by interconnected active transportation routes would be a great addition to the west side and would provide a great example of the benefits on a well thought out, integrated sustainable/smart growth/compact development as called for by the general plan.



Table 2: Recommended Areas for Residential Development
Corridors everywhere!

**Table 3: Vision for the Future of Housing in Santa Cruz**

More transit, more transit oriented development, increased density with taller buildings for housing and a mix of all housing types.
Housing environment where sale and rental prices are achievable to a wider spectrum of people.
Corridors. Downtown
Santa Cruz could become a walkable paradise that is truly welcoming to all incomes.
anything that is NOT on the corner of Branceforte and Water St.
Current and future residents of Santa Cruz will have access to a wide range of safe, affordable, and secure housing.
Abundant choices for residents of all backgrounds and income levels
High density housing since we have little land available.
Please do a downtown wide EIR and specific plan EIRs for smaller areas and then create a matrix of non-subjective practical design standards that then allow for projects to be approved at a staff level. Commit to having projects approved in 6 months from the date of a preliminary submittal.
A range of housing types available to households across all incomes and ages.
With such high demand the quickest solution is to provide multi-family housing.
We can't go out into our natural areas, so we must go up with taller buildings so people have homes.
dense, walkable, transit-oriented development located close to amenities, jobs, and institutions (i.e. UCSC, downtown, boardwalk).
Hopefully it's better for the UCSC students for the future
I envision mixed high density development that is centered around reliable public transport like the train and buses.
more housing in general. more incentives for developers to develop. more accessibility for housing for students
Single family neighborhoods rezoned for duplexes/triplexes. Downtown parking-lots rezoned for affordable apartments and condos. Rent caps in low income neighborhoods
Dense, walkable urban core; abolish SFH; mixed use neighborhoods; no more unhoused; apartments for UCSC students; children of locals can afford to buy a home
Housing should be easily accessible and affordable at ALL income levels. Housing should be offered with a good mix of 9-month and 12-month leases to support students while also not pushing out the working class.
More housing for people of all income levels, with denser multi-family housing in every neighborhood; with no required parking for more walkable, bikeable neighborhoods.
Make sure UCSC builds housing to house all 19,000 + students. Build 100% affordable housing rentals for low and very low income with state & federal dollars. The city staff should spend their time applying for grants to contribute to projects so no project will be over 4 stories high. Improve the bus system.
My vision would be safe places for people to live (the streets/cars are not safe)
Small scale additional housing units located in existing residential neighborhoods (specifically including the upper Westside) making use of ADU/SB 9. NO mixed use high rises.
Every area of the City should be upzoned to promote new diverse housing types.
Denser multi-use developments in which people need not drive.
A more welcoming downtown with community open/green space and greater residential density.



**Table 3: Vision for the Future of Housing in Santa Cruz**

You have to make it easier for people to build without permitting and developments costs making affordability nearly impossible. Many of the fees charged are barriers to development. The endless litigation when someone does want to do a project is also problematic.
This survey would have been FAR more useful if data were provided on the demographics of those in need of housing. If you don't have that data, it should be generated. It is unfair to ask residents to prioritize assistance to certain groups (seniors, unhoused etc) without the relevant data. Furthermore, there are existing zoning regulations that would make some development far more feasible than others. It is a complex issue and warrants a more thoughtful approach.
We need housing development of all types and we need it yesterday. A critical component of housing development is the development of protected bike lanes on our key corridors so that short local trips can be done safely by bike. The Class II painted bike lanes are not enough to keep people safe and encourage bicycling.
1) Adhere to parking study, 2) little new housing/parking downtown (tourists don't want to see), and 3) MORE HOUSING ALONG ENTIRE PLANNED (LIGHT) RAIL LINE.
I see a Santa Cruz where the people who work here can afford to live here. I see a place where property crimes are not tolerated as they are now so that people can better enjoy their homes. I see motels and hotels being converted to housing, putting the needs of residents ahead of visitors and moneymaking.
Mixed-use, medium-high density, affordable, with minimal concessions to parking and regressive land use
I think it's important for new housing and development in Santa Cruz to thoroughly look at the city's and its residents water and electricity needs. As Santa Cruz moves to green light more developments, there needs to be an emphasis on using new and emerging technologies so that our growing population uses water and electricity in the most efficient ways possible. Gray water systems, solar panels, and battery storage should be mandatory. The city also needs to fully take into account where housing will be the most effective to keep people out of their cars, as the city's transportation infrastructure is already at capacity.
Affordable, well-maintained, attainable, purchaseable by individuals, not dense
A place where those who want safe homes can find them
Greater housing stock citywide for every income bracket (including intensified housing within SFD areas with ADUs & townhome opps)
Stay out of residential neighborhoods with your high-rise atrocities! Plenty of room along Ocean Street and Mission St commercial zones.
Modest housing to support retail, education, service workers, and government employees. Lowered UC consumption. Density. Honesty.
Get the homeless off the streets and out of parks. We pay so much to live here but the city is a landfill from these people.
We need to address the housing situation using all available means including zoning changes and rent control. We need to work with neighbors to avoid battles about viable project - suggest including neighbors EARLY in the design process
I believe that developers and city leaders are the ones most benefiting from all new housing projects proposed and in process of development. It is a lose lose situation for people that cannot afford homes over \$1 mil. People with up to \$200k a year income cant get ahead and the housing problem will only exponentially progress without making it worthwhile for those who can't afford this housing market. We need housing that can be beneficial to lower income owners. A person buying a \$1.6 mil home will be investing in that property with nothing to lose as the property holds precious value.

**Table 3: Vision for the Future of Housing in Santa Cruz**

Lower income individuals need access to investment in property value which does not happen in rental situations or with ridiculous HOA or so called low income housing buying assistance that actually makes buyers stuck unable to sell and unable to make any profit from their sale.
Mixed-use housing near transit stops to allow for folks to not need cars and easily access their needs.
Affordable for all people, focusing on lower income, not the wealthy.
Density where it can exist. Missing middle elsewhere.
More of it! For decades Our community viewed housing as a plague and an environmental blight. This needs to change!
Housing is desperately needed
Every household, regardless of income, has access to choices about what type of housing and what neighborhood they live in.
dense and diverse
More small rentals
Dense, mixed-use development along transit corridors - more housing at all levels.
Mixed types of housing in all neighborhoods. Green and visually suited to the neighborhood they are in.
abundant, dense multi-family housing for people at all income levels that is accessible to public transportation
Transit-oriented development, mixed zoning, multi-family, no one unhoused.
A town where people can run their errands on foot or by bicycle, and cars no longer take up half the space in the town. A town with a lively, thriving downtown and interesting neighborhoods. A town served by regular train service.
Please just build more units and don't let established homeowners continue their nitpicking, NIMBY-ism, and perpetual gridlock.
Walkable neighborhoods with dense housing for mixed income levels (a solid portion low income). Pedestrian paths, bike lanes, and public transit throughout to provide accessible transportation to community services and shops.
Multifamily housing both market rate and affordable allowed on infill sites and on large single family lots, rezone unused industrially zoned land especially on west side to allow multifamily
Convert under utilized commercial space to housing
Allows our kids to live in Santa Cruz by growing the housing stock.
I would like to see supportive housing that goes away over time. Should be hand up not lifelong
I'd like SC to have a variety of housing available that helps teachers, restaurant workers, city employees etc. live close to where they work without having to spend all their income on rent.
Stop cramming people in. Incremental development at human scale. Community-led design. Retain neighborhood integrity. Push back against RHNA numbers!
A lot denser housing environment with protected bikeways throughout the city.
healthy, sanitary, airy, garden-like, with open space, human-scale
More equitable. Build enough affordable housing so that the property values decrease and the middle class will be able to purchase homes again.
Land trusts. 50% of housing off the speculative market. Free to move (unlike rent control). Affordable. Imaginative. Different.
Sufficient rentals at a variety of prices. Dense mixed-use development Downtown and along commercial thoroughfares. Entry points for homebuyers.

**Table 3: Vision for the Future of Housing in Santa Cruz**

AFFORDABLE, FAIR, ACCESSIBLE HOUSING FOR CITY RESIDENTS MUST BE A PRIORITY. MAKING "SENIOR" 55+ NOT 65+
More affordable with less focus on single-family homes.
students have affordable housing and less homeless
Reduce barriers to constructing housing. More housing means lower prices for everyone.
Housing for families who live and work in Santa Cruz should be a priority. I don't like seeing all these multi story buildings with SROs that will be rented to UCSC students. The university needs to figure out their housing problems and not expect the city to house such a large percentage of their student population.
Need more affordable housing in the city core, or next to transit centers. More mixed-uses to include all types of housing.
A mix of all levels - no more than 20% of housing should be for ultra-low income. Single family homes still have a place in society.
Dense, abundant, affordable housing for all income levels in bikeable and walkable 15 minute communities
A place where students aren't paying extreme prices and aren't homeless or living in cars.
I believe co-op housing will be the future.
higher density along transit corridors and a variety of housing types available in neighborhoods to promote diversity of residents
High density housing Downtown, more housing along major road corridors, bike paths and trains. Affordable housing prioritizing racial equity and Housing-First approaches to homelessness.
More for less
Most, if not all, new dwelling units should be in multifamily, multi-story rental housing projects. As many as possible should be public housing projects and non-profit Housing developments.
Infill development and density increases in residential neighborhoods, Soquel/Water/Mission corridors. Modest development downtown. Prioritize safe commuting by bike and by foot. Decrease vehicle speeds.
Housing where my children who were born here can come back and raise a family. Multi-generational housing in the low density zones, and apartments along the transit corridors. 15 minute neighborhoods. Limit short term rentals.
Higher population density without adequate infrastructure and natural resources.
No buildings above seven stories. Attractive buildings like the Calypso (better architecture) less density and more building on west side industrial area.
Affordable housing for those struggling with homelessness and mental illness, which would benefit our local economy and EVERYTHING ELSE.
All new housing is guaranteed for EXISTING SC residents. Mandate UCSC to house all students admitted. Allocate housing for working residents in need who support economy - house cleaners, food industry workers, retail/food sale cashiers/workers, public workers. Beautiful multi story buildings with shops/restaurants/bars downtown. Limit tall developments in existing neighborhoods to 2 story, so none is negatively impacted. Remove housing from parks and open spaces, no camping, no shelters. Build an actual shelter for mentally ill, rehab for drug addicts and low level security for law breakers, include homeless shelter in plan.
Dense, multifamily developments along transit corridors to reduce car-dependency and promote walkable neighborhoods.

**Table 3: Vision for the Future of Housing in Santa Cruz**

The ideal - Intermixed single and multi-family living spaces with shared common areas, village like. Also, areas of apartments with open spaces and retail establishments.
Affordable, functional housing available for sale for citizens who have no generational wealth
Not very good. The affordable component (O) for privately funded projects has killed all insensitive to build any affordable middle income housing!
Respectful development protecting how special Santa Cruz is(was). No special advantage to outside developers.
Pull the reigns back on building. I know Lee Butler is all in on build baby build but it's still not that easy to build an ADU here. The Planning Dept spent big bucks to develop build ready plans in the beginning but look at them! Have a dozen sets of plans available that are build ready, so people don't have to deal with the disfunction of the now plan check process at the City. Have a staff person down there that is familiar with water and fire requirements pertaining to water pressure and fire sprinklers to let a homeowner know what exactly they can build pertaining to an ADU.
more public low-income housing to hold back the gentrification of bay area money
A community that cares for its own, including the developmentally disabled and elderly.
More Section 8, and affordable housing available near Metro lines and schools. Fewer luxury or Swift/Curry developments. Few buildings over 3 stories tall. Don't turn SC into SJC.
I hope that there's more homes for people.
More affordable housing for all disadvantage groups of people who have been experiencing financial and medical challenges.
Farm workers
Unaffordable forcing many to move away. I don't see help for special needs people
I would like to see more support for residence who own property. Put in place laws that support landlords as much renters. Our city cannot support these huge developments being put in downtown. Landlords would be more willing to rent out their properties if we felt that we would not lose control of our property. You would have more rentals on the market. I am afraid to rent to anyone other than family.
Decreased permitting costs, reduced setbacks and downtown housing density.
In the future, individuals with disabilities who are unable to have a regular income, would have access to housing supported by a program which would allow for in home support, while enabling the individual to choose where to live. In other words, ample housing choices with Section 8 being prioritized to those with physical and developmental disabilities. We have to wait years and are still waiting to receive Section 8 for my son.
More accessible information regarding upcoming housing developments Provide affordable housing for low income homeless and disabled
Sufficient housing: affordable, aspirational, and neighborhood integrity.
I would like my city to be a place where dense walkable neighborhoods filled with mixed types of housing is the norm and applauded. I believe the housing nexus is crucial to a vibrant community, a more climate friendly community and a place with ALL types of housing.
Affordable, green, inclusive
Building is excessive for our City. Petition Sacramento lawmakers to reevaluate our housing quotas.
A glorious mix of housing. Particularly lots of apartment buildings along Soquel in inner Santa Cruz
Don't punish homeowners (ie empty home tax). Encourage homeowners with inexpensive options to provide ADUs or convert a big home to multi-use.

**Table 3: Vision for the Future of Housing in Santa Cruz**

<p>Infill with tiny homes, studios, and such, esp on large homes with larger properties.</p> <p>Cooperative housing.</p> <p>Scale needed and wanted developments to a neighborhood, unlike 831. Developers working WITH neighborhoods to identify infill possibilities.</p>
To maintain community there needs to be housing for all income levels
Decent, affordable housing for all, in safe, family friendly neighborhoods
I don't think people should get to live here just because they want to - would rather focus on people with jobs and families in town, to keep them employed and supported.
Provide more affordable and very affordable housing to help those in need and to give them a chance
Multi-story density in areas near transit corridors and more adu and duplex/triplex I'm residential neighborhoods.
Mixed use dense development along transportation corridors, ADUs, duplexes and triplexes in neighborhoods
Dense high-rise growth along transport corridors.
walkable neighborhoods. fewer automobiles. car free side streets. on street parking replaced by protected bike lanes and wider sidewalks.
Build more multifamily housing at the urban center
Maximize the available opportunities for various segments of the community so that spirit and culture of Santa Cruz is enhanced.
Low rise with unit based rent control and just cause eviction.
More housing development similar to Pacific Station South, North, and the Library Affordable Housing project. More for sale opportunities/less rentals for low income earners with priority to BIPOC who have been left out of generational opportunities for home ownership and building equity.
Publicly owned and managed, rent controlled, abundant social housing. No parking minimums. Walkable.
Affordable!!!!
Abundant housing for a variety of income groups and household sizes.
Walkable, low rise village model of neighborhoods containing variety of housing mixed with locally owned commercial spaces for shopping and dining.
Housing solutions should not all be solved downtown. Westside and eastside have areas that could benefit from mixed use developments. Townhouses, condos, work well out in the neighborhoods can be more affordable than houses. Stronger leadership must be made with UC to take responsibility for housing students, staff and instructors.
Developing more affordable housing. I have the great benefit of living in affordable housing--it is what enables me to continue to live in Santa Cruz and contribute to benefit of my community.
For me personally, I don't want to have to be so anxious trying to find housing as a single adult with a dog. I received a 60 day notice on the house where I rent and the situation is such that I don't know if I will be able to continue to live and work in Santa Cruz. I have been living in Santa Cruz for over 8 years and used to work for the county. It seems rent has come close to doubling since I moved here. It would be nice to be able to buy a house in this county eventually, but a more immediate and urgent goal is being able to afford a rental that will allow a dog. I am suspect of wealth in real estate being concentrated with individuals and companies purchasing many houses and selling them for more or charging high rent so people whose jobs are needed in the community can't afford to live here.
Many inland folks want to live by the coast. Housing here will always be expensive.



**Table 3: Vision for the Future of Housing in Santa Cruz**

Sustainable, affordable, equal housing, of all kinds. Community maintenance and support in all areas. Complete update of municipal utilities also.
No high rise housing! No housing the can't be supported by our limited water supplies.
Santa Cruz is over-crowded, and growth should not be encouraged. No to SJ by the sea!
Easier ADU rules
Do not build any more housing until you've secured infrastructure needs. The roads are still impacted after years of waiting for relief, the train will do very little if anything to solve this problem and our water supply is limited. It's a no brainer. You wouldn't run a household like the city has been running our community. Stuffing huge largely unaffordable apartments for the majority of our population (50% are renters according to survey) into a small downtown area. There are few high paying jobs in this community forcing many more to commute over the hill to afford our outrageous prices for rentals and purchasing. Finally give up the money the state sends us. Does Carmel stuff dense housing into their community?
Not everyone can live here and we should stop trying to house people from other places that came here to live off our services on the street. get the temporary shelter and beds so everyone is off the street. If you offer it they cant sleep on the street or park or my yard. UCSC needs to house most of their students
Housing should be a balance of high density on traffic corridors and in the downtown area with adu's integrating renters into westside neighborhoods. By supporting more adu's, homeowners can afford their homes and supervise and maintain their rental adu's on their own property.
Streamlined systems and processes to spend housing-related money wisely
Protect the quality of life in Santa Cruz. Slow growth and allow the current residents of the city to guide development, not city planners or developers
Clustered multilevel affordable housing available to buy and rent spread throughout Santa Cruz neighborhoods. I'm NOT interested in market rate housing at this time. We want working families to stay and put down roots.
Developing low income housing for those who live and work in Santa Cruz County that is six stories or less and has a visual thematic appeal to our beach town vibe. Please stop selling out our charming community to the profiteering of developers.
A housing market where every person can find reasonable priced housing and have an opportunity to have a place to live.
more lower income and special needs, slow overall growth, environmentally sensitive, improve traffic
The city needs to take control from the developers. We need to preserve Santa Cruz's assets, one if which is the Victorian architecture. It would be wise for the city to require all structures over 3 floors to fit into a stylized format, much like Santa Barbara. A mission style or Victorian style would make new development at least blend into the community, and with luck, might even create new building treasures that will be admired 100 years into the future. The development at 154 W Cliff Dr next to the Three Sisters Inn is in my mind one of the best examples of excellent building. That structure will be admired, painted, and thought of something to be photographed by future visitors -and it is just a housing structure. Why not require these mega-developers to meet similar requirements? At least make our city continue to look nice, if you are required by law to over develop it. That's also my perspective, we are overdeveloping, not everyone can live wherever they wish, or almost all of the US would move to Hawaii.
Multi-use with affordable housing development encouraged near the river on both sides. ADU additions on single family lots

**Table 3: Vision for the Future of Housing in Santa Cruz**

Make Pacific Ave look like Santana Row. For a start, all council members and planning department personnel should visit Santa Row. It is only a short drive away.
Solve the rental problem by building an off campus multistory dormitory complex for UCSC students perhaps with gondolas to campus.
Building no more than 3 stories with plenty of open space for light and air circulation. No large concrete blocks.
Keep single family neighborhoods and increase density downtown.
Ensure that college students have plenty of options of live in buildings and neighborhoods with other students and not mixed in with families and seniors, ensure families can easily bring in pre-built ADUs or have ADUs built to house extended family as needed, and seek out opportunities to tear down single-family houses in bad shape on big lots/in rows together to build more affordable townhouses for teachers, firefighters, and police officers right in the City.
Solve the infrastructure Problem first, adequate water and traffic issues cannot support 3700+ new units! If I wanted to live in San Jose I would move there.
The whole state needs to provide asylum and treatment for drug addicts and mentally unhealthy people so they aren't living outside. Homeless people camping in public places who are unwilling to take advantage of offered help should not be tolerated. Young people, especially those with families and those who grew up here, need affordable homes. The permit process and codes for new buildings need to be made cheaper and easier and more rational.
Vibrant, bikeable, walkable and dense downtown with public squares and space. A usable riverfront.
function, affordable, beauty but were will we get the water?
Accessibility for mid to low income residents
Downtown becomes an actual city. High rise mixed use housing/retail, fill in all the blank and low developed spots. Parking underground. Water cistern storage on every property.
Affordable, accessible, community-facing/enhancing housing, flexible to meet need (e.g., readily adapted to meet needs of residents, e.g., smaller units that can be linked to accommodate larger family/co-housing group)
To see younger families actually be able to live in Santa Cruz and not get overwhelmed with debt and anxiety when trying to find a place to live.
Build 90% extremely low, very low, and low income housing units, 10% market rate units. Flip the formula.
off-street parking, smaller functional homes/apartments
I would like to see tiny homes approved on land/property in city and county.
Stronger tenants rights laws that balance the power of landholders and renters
Santa Cruz is a tourist and service oriented town. It cannot survive without room for the working class. Second residence homes, airbnbs, should be illegal or discouraged by tax policy. UCSC should be compelled and supported to create on campus housing to free up in city units for service workers.
robust housing in the downtown area; robust housing for UCSC both students and employees; robust housing adjacent transit.
low cost multifamily housing units.
More rental along the transportation corridors
A community where people who work here can afford to live here, the housing needs of low income families are met, and UCSC provides much more on-campus housing.

**Table 3: Vision for the Future of Housing in Santa Cruz**

More density, more walkable, more mixed-use.
Dense affordable housing in defined areas, with emphasis on helping seniors/working families, as opposed to throwing more \$ at homelessness
Commensurate with income and providing quality of life settings. Again, building communities and thriving neighborhoods not just housing.
See prior comment
Well planned development in very urban areas and preserved neighborhoods and there character
More housing. There is a ton of space in Santa Cruz, it's just not used or used poorly. More people will bring in more money, more kids and some new dynamic to an aging city dominated by UCSC.
Controlled growth with mixed family and senior housing. Preserving green space.
Clearly two groups should take priority: 1. Low and medium employed persons working in Santa Cruz 2. A segment of the homeless population that would qualify (disabled, drug-free, and/or simply poor)
i live in a trailer court which i bought under rent control . the city gave our homes to a developer barry swenson who did not like rent control. when the lease expires in my 80s i will be homeless in a tent. i am so crippled now that to get out of a chair will be a struggle. Santa Cruz will be roofs for the rich and very rich tents for the rest. my friend just got a \$400 rent raise. she, husband and child moved to Florida. Friend's grown kids in Texas and Idaho.
Affordable housing for UCSC staff. I recently had to move away while still working at UCSC for a cheaper housing. For the same price of a single room in a 6 bedroom house (with modified bedrooms for more space. 3 rooms were actual bedrooms) I am renting a 2 bedroom apartment in Santa Clara.
Abundant housing to accommodate all, especially service workers who support our major industry (tourism). Make UCSC do it's share to accommodate its students.
Larger multi-story transitional/supportive space for unhoused persons; condos/apartments for students.
This topic has been tossed around for at least two decades. Talked about and talked about with little to no action. Forming committees does not build or create housing. The situation with students, the University should render this one of their main priorities,...stop admitting more students than they can house, for starters.
Sustainable housing for the community designed to lower carbon footprint & close access to public amenities
Higher density downtown but with 3-6 stories instead of high rises. More housing such as live/work spaces on lower west side, also with up to 6 story buildings. More housing on corridors as businesses change, mixed use with retail on ground floor, 3-4 stories. More low income senior housing with some services (transportation, meals, etc), more people able to transition from homelessness into permanent housing.
Provide some safe affordable housing for workers and a manageable finite number of homeless
build massive amounts of housing as quickly as possible, especially downtown and near UCSC
Sufficient and diverse housing options to meet demand for residents of all ages, incomes & circumstances
We need to build all categories of housing. Especially residential neighborhoods.
Planning department waiving all permitting fees, affordable housing means affordable building for homeowners too-lessen restrictive measures that hinder building homeowners to build multi-family and ADU's.
More mixed use housing... with apartments over commercial space.

**Table 3: Vision for the Future of Housing in Santa Cruz**

Help for the unhoused in a humane fashion, off City sidewalks and streets
Build 100% affordable housing without changing the character of Santa Cruz.
More affordable housing
housing that fits the city's income spectrum. more low income housing for families, seniors. more co-ops
Building for higher density, walkability, transit-friendliness. More affordable housing. Accountability for abusive landlords.
Dense enough to support car-free lifestyles and allow folks to stay long term.
Fewer landlords with more than a couple of properties, more protection for tenants, and no empty houses.
Enough units to provide a housing-first solution to homelessness. Green construction to minimize new units' dependence on fossil fuels. Rent-controlled units available for students.
A city that is affordable/accessible to multiracial low and middle income residents, seniors and disabled folks.
Housing that is TRULY affordable for all people who work/have worked in Santa Cruz (including tourist industry workers, transitional housing for homeless, seniors).
Affordable housing only with LEED certified buildings that meet the values and aesthetic of Santa Cruz.
More rentals at affordable rates are needed (perhaps bring back conversation around rent control). Early educators who do not make a living wage, and do make it so our local economy flows, need affordable housing.
Property developed for people to live in who are employed and working in Santa Cruz. Deed restricted or otherwise controlled
Housing priority is given to Santa Cruz residents and people who work in Santa Cruz. There is an ample supply of affordable rentals and housing to own. Low interest loans are available to people working in public service in Santa Cruz.
More available affordable housing, rental and owned, for young families with good access to employment, schools and transit.
People off the streets. Affordable housing for all and landlords held responsible for keeping their units clean and habitable.
Housing for the unhoused. Homeless communities are not all "drug addicts" and just need of a safe place to live.
Expand downtown and underused commercial space. Leave single family neighborhoods alone.
Get the unhorsed off the street
Santa Cruz should try to maintain the ambiance of a small downtown but infill areas surrounding with housing for low wage earners. This has the benefit of allowing workers to live near jobs, reducing traffic on the roads as people have to commute in from less expensive areas. Don't create opportunities for more high income renters to move to Santa Cruz which creates more imbalance of who can afford to live here.
We need to house the people who work here. Salaries are never going to keep up with rent if real estate investors are allowed to profit from rents. That's old fashioned thinking.
Affordable for all ages, combination of housing types, use of green technology, connect to public transit, accommodate ev powered bikes/cars.
Not overdeveloped with too much packed-in housing. Make building fit the character of Santa Cruz. Preserve our small town culture. We are not Silicon Valley.

**Table 3: Vision for the Future of Housing in Santa Cruz**

Diverse housing options everywhere to foster a diverse and inclusive community.
Continue with reasonable development of townhomes and ease the ability to built ADUs. Do not change the character of the town by building large apartment complexes, especially in single family neighborhoods.
More multi story housings units and apartment complexes, most big complexes I've seen near UCSC campus are one story which hardly makes sense. Build up!
Multi-story multi-use (shops/offices below, housing above) in areas like downtown. Townhomes or ADUs in places like East side and West side.
Affordable
Provide abundant, well maintained social housing by buying existing apartment complexes and building new ones
I envision a city where there are more than enough affordable units to meet the needs of the community.
No one without a home.
Dense and crowded is not QOL. Denser is not cheaper. Ask SF.
There just needs to be MORE housing in general. Let the university build more dorms and apartments for students, have more multistory apartment buildings. Type of housing matters less than quantity
To own property in the town I was born in... Let's be real, it's unachievable.
Moderately dense city with minimal single family housing. Duplexes, triplexes, condos, townhouses, and mixed-use development line the streets. There are minimal to no setbacks so as to stop wasting valuable land.
A place where everyone is welcomed and homed. A place where I feel secure to invest my future inheritance from the coming housing crash. A place that has a unique and weird character.
Build more housing period. The logjam of a project having to meet very narrow, and often economically unfeasible, criteria prevents us from moving forward.
Build up not out. Subsidize landlords so rent goes down. It's time we build some legitimately tall buildings.
Get rid of zoning, build dense, walkable, mixed use developments with public transit
Enough supply to support long-term residents, students, and tourist rentals. Apartment/condo buildings that aesthetically fit into our communities.
create affordable housing so those of us who work in Santa Cruz stop getting priced out of living in Santa Cruz
More density, allow more mixed development in SFH areas, act with urgency that matches the scale of the crisis.
Prioritizing permanent or long standing members of the community who have families, ties, and live and work here.
Abundant and accessible. Transit oriented
It is incredibly hard to build in Santa Cruz. The zoning needs to be simplified and things like parking minimums should be abolished to make it faster and cheaper to build. We also need community involvement. We need supportive shelters for the unhoused and more student housing on campus. We also need PUBLIC housing so it's not just a few landlords and developers profiting off our public lands. When thinking about building in neighborhoods like south of Laurel, the existing low income neighbors need to be guaranteed housing during and after construction. We can't just give away land to developers for stadiums and luxury hotels, we need this to go into the people that already live



**Table 3: Vision for the Future of Housing in Santa Cruz**

here. If Kaiser/the Warriors want a stadium they should be stepping up to provide affordable housing at the same time.
Affordable housing for the service workers this area relies on.
Build up. Provide student housing closer to the college. Fix the flats
It being feasible for those who work in Santa Cruz to live in the city.
Equitable opportunity for all income brackets and greater public transportation options which reduces congestion and pollution.
Plentiful, variety of prices, for sale and for rent, allow students to live in reasonable housing and not forced to share bedrooms
Higher density housing near places of work, the university, and main transit routes.
Much denser in the "urban" cores where there's significant commercial activity. Also, make it a lot easier for UCSC to build on-campus. A big part of our housing crunch is a constantly growing student population, and it's not their fault that the university keeps getting sued whenever they want to build.
More of it
Walkable, accessible, multifamily multi-unit housing and support programs that build community and support everyone.
More affordable housing options to support lower incomes
More high rises, no height limits especially downtown. Removal of zoning restrictions, allowing denser development. More mixed use.
Having a Range of housing stock that is well integrated into the existing community in terms of better utilizing space near services.
Dense mixed use housing
densify housing opportunities where transportation infrastructure is already in place. create more rental space to accommodate students. add multifamily units in single family neighborhoods
Walkable/bikeable neighborhoods with green space. Development concentrated to already developed areas to preserve undeveloped lands for wildlife and environment
Increased density in all neighborhoods, I'm ok with taller buildings downtown. Affordable units mixed in with market rate units is very important
Reduce the use of ADUs that only increase the price of housing further. Rent control is vital. Need more mixed income apartments and small single family homes without HOA or age restrictions. Prioritize those who work in Santa Cruz over those over the hill.
more affordable high-density housing downtown, more UCSC-designated housing close to campus, and not developing neighborhoods that can't handle increased traffic. building along bus routes, aka high-density housing downtown and along mission
end the nimby stranglehold. provide housing so we don't have to be unsafe walking to jury duty, tbh.
Criminals should live in jail. Then it will be easier to help the rest of the homeless population
High density, mixed use, tall buildings. In my back yard. Infill development now!
Far more transitional housing, and urban development of affordable housing. I hope to be able to live downtown on a teacher's salary.
Enough housing to place people immediately in decent housing who are homeless or at risk of homelessness.
All people who work here can afford to live within walking distance of their job.

**Table 3: Vision for the Future of Housing in Santa Cruz**

Landlords held accountable for price gauging, harassment of tenants and property neglect, less racism in housing opportunity, broader section 8 acceptance and more housing options for those with disabilities
A community that prioritizes housing our neighbors by building for students, seniors and families at all income levels.
Santa Cruz is growing in size and I think the idea of it being this cute, little beach community is going to have to change. the town is growing into a city and has easily become a major part of the bay area. increase public transport, build up with shopping on the ground level. make many small areas of concentration, scattered throughout the community. if people's needs are met within a short distance, downstairs or across the street, that is going to create less auto traffic and increase jobs for that micro community.
Every building is owned by the people who live in it or by the state
Make more big housing units
catch up on 40 years of preventing housing supply, significantly exceed the minimum RHNA targets for development at all income levels
Santa Cruz is a college town and no longer a bedroom town like it was in 1960 before the UC was built, accept your role.
More housing, less development restrictions
Thoughtful density around commercial and transit corridors in order to a lively walkable/bike-friendly city
Evenly-distributed higher-density housing, not concentrations of it in one or two neighborhoods.
Affordability of home buying for locals, educators and single moms to own a home!!
More construction of affordable apartments/condos and ADUs
Remove exclusionary zoning and parking requirements that prevent high density housing from being built. We need much more housing.
rent control, more low-income housing, low barrier transitional housing for the houseless, fewer restrictions for adus, UCSC expanding housing
over priced
More housing options, fair rental practices. Restricting landlord abuse.
Lots of affordable options for renters and buyers young and old.
Affordable/priority housing for locals.
Smaller lots & units.
Like now but more dense, with a tram line along the greenway.
High-density multi-use housing in the downtown area, westside, and eastside. Less single-family housing and less car-centric infrastructure.
Rent control, more affordable housing for rent and for sale, transitional housing including tiny homes for individuals experiencing homelessness
Clean, safe, affordable
Allow more building Government should get out of the way Housing abundance can mitigate housing scarcity
Housing is affordable, tenant's rights are protected, and housing opportunities are expanded for very low income people.
Affordable housing. Not expensive. Cheap and easy to find. Inclusive.

**Table 3: Vision for the Future of Housing in Santa Cruz**

Dense and cheap mixed-use housing for single people and families along transit corridors
"For Sale." *Entry-Level.* Microapartments, Mixed-Use commercial/residential, upzoned (6–10 stories), local architecture, walkable, close downtown & public transit.
More options for people being priced out of their neighborhoods. Preventive measures to prohibit landlords from drastically raising rents or seasonally evicting residents yo boost summer rentals.
I would like to see more apartment buildings and affordable condos.
Housing for all income levels in mixed use developments
more people in each building (including the ones sitting empty as vacation rentals)
Anyone who wants to live here can live here without incomprehensible financial stress. Housing is sustainable and developers are ethical. Less homes are empty year round. Vacation home owners pay empty house taxes.
Adding more affordable housing for local and working class residents.
A place where millennials and genz can invest in their collective future and generations to come
Build up. I have lived around the planet and Santa Cruz is startling by the lack of high density accommodation. High density here is 3 storey duplexes, that is not high density building. And the high density requires public transportation and adequate water supply so we don't need more parking.
Increased capacity. Decreased barriers to maintaining/enhancing current stock (reduced setbacks, cheaper permits). Student housing by UCSC. Supportive housing away from downtown.
Santa Cruz should become the mini-Sf it's already started to become except without all the single family housing
Houses and apartments everywhere. Fuck NIMBYs.
More ADU and well built density condos/apts more incentive to accept vouchers in existing places.
If it keep escalating, we'll have no community left.
Fair housing is needed. I want to see homelessness decrease. Big families deserve help. Farm workers deserve the best living conditions there is to offer. I want to see ACTUAL change. Actions not words.
Affordable housing for all.
Affordable options for the middle class community members - educators, healthcare workers, city workers, etc.
Multi use areas expanded
Affordable, accessible housing for the working families of Santa Cruz. No skyscrapers, no luxury apartments for wealthy transplants.
Median rent that is 1/3 or less of median income.
Some nice looking small houses that are affordable
Mixed income housing that takes advantage of urban infill and existing buildings to build net zero carbon buildings and to set an example in our region.
Integrated market rate and low cost housing throughout the city (rent & buy). Ability for my kids to buy here.
The internet implodes and all the tech millionaires go away. We have drum circles and community gardens. Take naps and make love
Highrises downtown
Denser housing and denser mixed-use communities
Tall dense mixed income and mixed use buildings in walkable neighborhoods with low speed traffic, high frequency transit, and safe bicycle facilities

**Table 3: Vision for the Future of Housing in Santa Cruz**

I feel very bad about this towns future
Affordable housing for all with equitable access to public transit.
More robust mixed use downtown core with mid rise buildings and improved transit.
Every major thoroughfare requiring MINIMUM heights of 4 stories to build anything new so that we maximize our use of space. Use new state laws to bypass parking requirements. Build all kinds of housing, everywhere.
Options for students and aging in place inside the community. Housing units for teachers, police, fire members. Less out of state/out of country investors/landlords.
Everybody housed in nothing less than micro tiny homes without sacrificed liberty freedom or dignity
It should be hard to own a vacation home in Santa Cruz. Hotels and motels should be encouraged, and houses converted to short-term rentals and offices discouraged by fees, policies, and taxes.
Young people and seniors living downtown in rental apartments will revitalize Santa Cruz and provide the economic engine to support diverse businesses.
Small (the units themselves, not the amount of units), affordable, within already developed areas, ecological.
More housing, period.
Medium/high density affordable housing spread throughout the city, with access to open space and public transit, walkable, and aesthetically designed
High density downtown.
Affordable based on cost of labor, in the hands of humans not corporations.
Seems a solar powered desalination plant needed to support more population
Rent control, landlord oversight, affordable new home buyer programs. Tax breaks to low income homeowners.
Mixed use main street style communities - long term rentals above, shops, services, and jobs below
We need more supply and I'm unbothered by how we get it
We need more entry level ownership homes.
Higher density being ok
One that allows residents from all walks of life to find the housing they need.
Mixed use along corridors. Multi-story mixed income housing in the outer westside and downtown. Duplex/triplex incentives in single-family home neighborhoods but limited in height based on neighborhood aesthetic (i.e. 1-3 stories).
Most of our workforce cannot afford to buy or rent here resulting in long commutes, job burnout and clogged highways. We need to develop workforce housing for all income levels.
Easier, cheaper and quicker process to go from proposal to stage t actual construction. Local interest groups should have less power to stall the process. More focus on walkability and transit, less on prioritizing traffic flow.
Santa Cruz desperately needs more housing of all types, concentrated along transportation corridors, as well as housing for people who use Section 8 benefits
Mixed use, high density to preserve green spaces and avoid needing to drive everywhere.
Lots of student housing near USCS to lessen the strain on non students renting
More multi-family housing, especially apartments and townhomes.
Equitable opportunities for diverse community, without massive high rise development.
Rural/suburban mix, not urban development.

**Table 3: Vision for the Future of Housing in Santa Cruz**

My vision is to increase the availability for affordable housing, as well as increase the opportunities for homeless shelters
For it not to be in the top 5 most expensive places to live
Denser housing on UCSC campus and near transit lines. Gradual transitions from tall buildings to single family houses.
Allow multi-family dwellings in traditional R1 zones, go vertical in more denser areas like downtown.
More of every type within the city's existing footprint. Where possible, neighborhoods should be mixed-use and less car-centric.
Teachers can afford, enough for UCSC students, no longer most expensive place to live
Build more affordable housing for low income .
Housing everywhere, for everyone. Walkable neighborhoods with easy access to amenities and multimodal transit options.
Affordable for a single full time income with child
Where people can live where they work. Where people who make minimum wage can afford rent with one job.
High density multifamily housing around public spaces in walkable neighborhoods with regular buses, and bike paths and EV stations everywhere.
Accessibility and availability for all. Innovative design and construction to be used and shared as a solution to housing crisis.
Transformative housing abundance -- people aren't stressed about lack of supply but focused on building productive *NEW* Santa Cruz.
More apartments and condos across the city, with a focus on housing students off campus to lower housing costs for all.
Density would be increased throughout Santa Cruz except in areas affected by sea rise and located near public transportation.
focus on extremely-low, very-low and low-income housing of various sizes (1, 2, 3 bdrm), very little market-rate, to reflect community needs
Everyone is housed or comfortably located outside with proper partnering with housed communities
Mixed-use, multi-family affordable workforce housing near transit and out of the floodplain.
i will not have a future of housing in Santa Cruz if the city continues to support the gentrification and high rent prices.
Well designed dense infill community interactive walkable downtown 5-minute walk to urban community spaces, shopping, transit and dense mixed-use housing 'villages' from north to south along transit lines. Reduce sprawl, prioritize public transit centered communities on BUS and future RAIL line.
Social housing on all city owned lots.
multi-unit, multi-story affordable & supportive housing in mixed use developments: close to transit & services/retail/walkable.
That housing would be viewed as a basic human need or right instead of a commodity. That we can control the market and make things more affordable for everyone.
More affordable housing opportunities, both rental and homeownership, for extremely low to medium-income residents
Everyone is sheltered in a place where they can not only be safe, but happy. Every single person, no matter.
Supporting affordable housing and legalizing camping/rvs for houseless folks.

**Table 3: Vision for the Future of Housing in Santa Cruz**

Affordable housing
Thoughtful, well-designed, responsive, supportive, and inclusive housing for ALL, even and especially the poor. More support and demand for non-profit and affordable housing (not luxury housing).
Priority on low and very low income housing; affordable deed restricted housing; limits on additional market rate housing.
Denser urban development, multi use buildings in urban areas
Genuinely promote solar & alternative energy, and ADU's by actually eliminating all regulations that aren't valid health or safety protections,
Housing for people that work here.
Workers can afford to live here. Housing is guaranteed, not a commodity. Renters have bargaining power, landlords kept in check.
Public housing for all, decriminalizing vehicle homelessness and giving people vehicles in the interim
Dense, walkable, abundant.
Our housing policy aims to provide an abundance of housing such that anyone who wants a home can have one.
We must provide much more housing — prioritizing those most in need — with infill, repurposing, missing middle, and green spaces included.
Pedestrian centered, mixed-use infill development along transit corridors and downtown which contain a minimum of 20% affordable housing.
affordable
Affordable, diverse, friendly, medium density, bike and public transit based, art, culture and eco-tourism hub, the anti-Carmel.



## C. Public Comments

This section contains all comments submitted on public review drafts throughout the entirety of the update process; this includes the original Public Review Draft prior to the first submittal to HCD and subsequent public review drafts with revisions from HCD comments and technical assistance.

## Public Comments

### 1. Public Review Draft Housing Element

The Santa Cruz Public Review Draft 6<sup>th</sup> Cycle Housing Element was made available to the community from March 24 to April 24, 2023.

#### Online Feedback Form

An online “Feedback Form” was also available to collect responses feedback on each chapter and appendix. The following provides all the comments received, including notes as to how each comment has been addressed.

Chapter 1: Introduction	City Response
<p>* Comments and Questions</p> <p>** General Plan-Level comments</p> <p>*** Transit - Much is made of the City’s public transit, but the fact remains that the service is modest at best, both in terms of coverage and in terms of service level (headway, hours of operation). The City (with Metro) needs to make clear (1) specific targets for service-level and coverage improvements, (2) specific measures that the City (with Metro) will take to meet those targets, and (3) timelines for achieving those targets. While these specifics may be beyond the scope of this particular document, the document should be able to reference responsible entities and plans in the Circulation Element.</p> <p>*** Parks - With appropriately-increased focus on higher-density MFR development, the City must center the development, access, and maintenance of the City Parks system, so that MFR residents have ample and ready access to outdoor facilities for recreation and relaxation. There is no mention of this in the document; I submit that this is a glaring omission and one that cuts against achieving appropriate health-oriented equities. The City must commit to an enhance parks program as part of this RHNA cycle. That effort should include consideration of and, as appropriate, improvement or development of active-transportation-based “safe routes to parks” from areas of high-density development.</p> <p>*** Active Transportation - While mentioned, the Housing Element, along with the Circulation Element, must center the development and/or enhancement of active transportation facilities throughout the City, and especially along or adjacent to the areas and corridors targeted for higher-density development. This work must contemplate Safe Routes to Schools, as well as to parks, critical resources (food shopping, etc.), and commercial centers. The City should develop and enforce clear standards for protecting and preserving existing active transportation corridors, as we (rightly) focus on increasing the housing density on our transit corridors and downtown. Those clear standards should be called out in this document.</p> <p>*** Locating Density - The document notes that we have 224% of the capacity needed in order attain the RHNA 6 goals (that is, develop-able lands allow for a 124% overage above the RHNA 6 target). As such, it’s clear that the City would be able to reduce the maximum densities allowed on shallow parcels immediately adjacent to existing homes (as along Water and Soquel in the Branciforte area). Zoning these parcels so that</p>	<p>The Housing Element provides some analysis of transit in Appendix E; however, it does not do a deep-dive into transit systems – this may be found in the Mobility Element of the General Plan. The same is true for active-transportation and road safety.</p> <p>Sites were selected along major corridors to provide opportunity for mixed-use and residential developments within close proximity to commercial needs, employment opportunities, and community services. This will facilitate a move away from car-reliance towards active transportation.</p> <p>The total unit capacity percentage is well above the RHNA need to do sites including affordability assumptions for all income levels. In order to meet the RHNA for lower and moderate-income RHNA, the above-moderate income units are proportionally increased. It should be noted that a number of currently identified above-moderate income units will in reality be affordable – these include inclusionary units and density bonus units which cannot</p>

## City of Santa Cruz 6<sup>th</sup> Cycle Housing Element Update

### Public Comments

Chapter 1: Introduction	City Response
buildings “max out” at 3 stories (at most 4 with bonuses) would go a long way to gain community favor for the overall plan, and reduce the potential conflicts that may arise when out-of-scale projects are proposed (as was the case with 831 Water St). Doing so would clearly NOT threaten the City’s ability to achieve its RHNA 6 goals; as such, the City should carefully review and adjust the target zoning for parcels that meet these criteria.	be projected through the Housing Element. As such, the above-moderate income unit potential will be lower than what is currently identified in Appendix G.
* Editorial suggestions ** [Page 1-1] “Monterrey” should be “Monterey”	Typo has been corrected.
No retail. More parking on site	Comment has been noted.
How will this impact city water use and traffic. Mission Street in particular is already at capacity morning, noon and night. Side streets such as King, Bay and California are already impacted with overflow traffic from Mission. Even though we have had an extraordinary amount of rain this year, what about the years to come when we fall back into drought conditions.	Access to water services is detailed in Appendix E and considered adequate for the development of the 6 <sup>th</sup> Cycle RHNA. The Housing Element seeks to identify housing opportunities in areas that promote walking, biking, and transit use. However, the City will continue to assess traffic trends and continue to coordinate with METRO on transit services.
I realize the RHNA numbers are based on state requirements, AND wouldn't it be sweet if Santa Cruz exceeded the RHNA numbers for low and very low income housing. I was shocked to see that the number of above moderate income units is greater than the low and very low combined.	The City cannot include unit projections for inclusionary units, nor density bonus units. Above moderate-income units will in reality be lower as they include inclusionary and density bonus units.
The City of Santa Cruz is not meeting the RHNA for very low-income and low-income housing. It is imperative for the City of Santa Cruz' City Council to require the developers to build less market-rate housing. The developers need to increase the number of low and very low-income housing. It is not wise to crowd up the city with new residents when current residents need places to live. and none are available. Seek private, state, and federal dollars to build low-income and very low-income housing.	The City has met its 5 <sup>th</sup> Cycle RHNA for all income levels as of April 13, 2023. This is not reported in the 2022 Annual Progress Report (APR) given the date, but it will be reported in the 2023 APR.
There is zero population growth in California, Santa Cruz County, and the city. The numbers of housing units suggested is ridiculous and will lead to massive vacancies.	Comment has been noted.

Chapter 2: Policy Plan	City Response
* Comments and Questions ** General Plan-Level comments *** Specific comments *** 1. [Page 2-4] Goal 1.2f should include some consideration, based on the evolving and changing character of the community’s economy, of whether the industrial lands are zoned for highest/best use, and triggers for	1. Comment has been noted. 2. The city cannot require project economics from a developer. 3. Comment has been noted.

## City of Santa Cruz 6<sup>th</sup> Cycle Housing Element Update

### Public Comments

Chapter 2: Policy Plan	City Response
<p>when/whether zoning changes (e.g., to mixed commercial/residential) are called for.</p> <p>*** 2 [Page 2-8] Inclusionary Ordinance. The document refers to reviewing the Inclusionary Ordinance in order to maximize development of affordable housing without “being a barrier to housing development.” While I acknowledge that excessively high inclusionary levels can effectively prevent development, at present it’s not possible to assess the impacts of inclusionary ordinances, because developers are not sharing their business models and project economics. Developers who want to take advantage of density bonuses should be willing to share their project economics; the City should require it. It should not be the City’s obligation to blindly incent development.</p> <p>*** 3. [Page 2-8] Vouchers. Further, the notion that developers can’t make affordable units “pencil” at a time when citizens have Housing Choice Vouchers that landlords won’t honor is simply disingenuous. Landlords/developers can receive full market value for deemed affordable units simply by accepting these vouchers!</p> <p>*** 4. [Page 2-13] Childcare. The Housing Element makes much of the City’s “commit[ment]” to childcare. And yet the City (and County) in the recent CORE grants process completely eliminated City support for existing childcare programs (which the City and County had supported in the past). This community support enabled local child-care centers to provide low-cost care to lower-income families. Before developing new childcare facilities, the City should support and enhance existing programs to their capacity. Objective 3.2a should be re-written from “continue to assist” to “restore and expand assistance to”, since there is no currently-funded support for childcare.</p> <p>*** 5. [Page 2-14] Homelessness Response. The City’s focus should be on supporting the development of shelter and facilities, not providing services. The County should be the lead agency for funding and supporting services delivered in those facilities (and facilities throughout the County).</p> <p>*** 6. [Page 2-16] UCSC. As relates to Policy 3.5, if I read this correctly (UCSC committed to 25% of housing for new facility/staff - 558 additional new housing units), then UCSC expansion will consume at least 1500 units of our RHNA 6 goal. It’s not clear to me how that helps further our goal of providing ample affordable housing for the community - the document should make clear how that goal reasonably fits within the overall Housing Element’s goals.</p> <p>*** 7. [Page 2-16] Affordability. Further, the City and University should work together to ensure that on-campus housing is provided below prevailing market, in order to relieve UCSC pressure on local housing stock, availability, and affordability.</p> <p>*** 8. [Page 2-27] Transit and active transportation. Policy 7.3 should be more explicit. Transit - Much is made of the City’s public transit, but the fact remains that the service is modest at best, both in terms of coverage and in terms of service level (headway, hours of operation). The City (with Metro) needs to make clear (1) specific targets for service-level and coverage improvements, (2) specific measures that the City (with Metro) will take to meet those targets, and (3) timelines for achieving those targets. While these specifics may be beyond the scope of this particular document, the document should be able to reference responsible entities and plans in the Circulation Element. Active Transportation - While mentioned, the Housing Element, along</p>	<p>4. City passed childcare impact fee in 2021. City will continue to seek additional funding sources.</p> <p>5. Comment has been noted.</p> <p>6. Comment has been noted.</p> <p>7. The City does not have control over UCSC housing but will continue to encourage more affordable housing on the campus.</p> <p>8. Comment has been noted.</p>

## City of Santa Cruz 6<sup>th</sup> Cycle Housing Element Update

### Public Comments

Chapter 2: Policy Plan	City Response
with the Circulation Element, must center the development and/or enhancement of active transportation facilities throughout the City, and especially along or adjacent to the areas and corridors targeted for high	
No retail. More parking on site	Comment has been noted.
How will this impact city water use and traffic. Mission Street in particular is already at capacity morning, noon and night. Side streets such as King, Bay and California are already impacted with overflow traffic from Mission. Even though we have had an extraordinary amount of rain this year, what about the years to come when we fall back into drought conditions.	Comment has been noted.
The planning department and city council need to visit Santana Row in San Jose. We could do the same here.	Comment has been noted.
<p>The housing goals look good. I appreciate the vision.</p> <p>Maybe it's feedback for 2.5a. I'm not sure where it fits in. Santa Cruz currently has a rent control loop hole that allows property owners to evict long term tenants without just cause. This is used to evict folks who have rent controlled spaces so landlords can charge more rent. Santa Cruz needs stricter rent control measures to ensure the continuation of affordable housing.</p> <p>Yes, to continuing to encourage/force the university to provide housing for its students.</p> <p>Policy 6.1 It's not possible to obtain a Housing Choice Voucher or even get on the waitlist.</p>	Comment has been noted.
It is not a good policy to assume people can travel on the poorly capable bus system in Santa Cruz. The bus system needs re-organization	Comment has been noted.
Why are you not upzoning R-1 zones? Please allow for multi-family development on all residential parcels!	The City is not able to rely on the upzoning of single-family zones to address RHNA. The purpose of the Housing Element is to identify capacity opportunities within the guidelines established by the State Department of Housing and Community Development.
Chapter 2 is designed to increase poverty in our city at the expense of others.	Comment has been noted.
<p>I was glad to see much of the policy focused on affordable and fair housing. Especially 6.3 Support the development and marketing of accessible housing, senior housing, and tenant services.</p> <p>The most commonly indicated obstacle to housing indicated in your community engagement survey was finding it in the first place! People need to be able to go to one place to find out what is available. That is starting to happen at the downtown library. For fairness there needs to be bilingual support for finding housing. A simplified application process, also with bilingual support.</p>	Comment has been noted.

## City of Santa Cruz 6<sup>th</sup> Cycle Housing Element Update

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Chapter 2: Policy Plan	City Response
<p>Policies are words, but we need actual mechanisms and systems in place to deliver the goals of the policies</p> <p>The second most important policy for me, is 7.3 Transit -oriented housing.</p> <p>In short, I'm looking for transit-oriented housing, without parking or retail space. This would maximize land use for more people to have affordable places to live, while allowing/creating shared green space with trees apart from the buildings.</p>	
<p>More student housing in city of Santa Cruz is needed, and more student housing at UCSC is needed</p>	<p>The City is including UCSC units as part of its candidate housing sites strategies. These units have received approval from the UC Board of Regents and are planned to be constructed and completed within the Planning Period. The City will continue to encourage student housing development.</p>
<p>I was disappointed by the policy plan. I have several concerns:</p> <p>(1) First, the high regard for ADUs seems misplaced. These units are overwhelmingly small and unaffordable - rents for studios, which ADUs are often characterized as, more than doubled in Santa Cruz between 2021 and 2022. Encouraging more development of unearned income and housing that is barely large enough to meaningfully cover one person is not something to applaud. If the city continues to pursue ADUs, it should do so with incentives that encourage larger units and specific affordability covenants/restrictions, or requirements to these effects whenever possible under state law. If ADUs simply represent additional opportunities to create unearned income by holding onto housing, then we are encouraging speculative investment, creating incentives to hold on to property even after residents leave to move somewhere else, and thus hurting renters and would-be homeowners who are unable to access the shrinking and more expensive market of homes.</p> <p>(2) Second, the policy plan could be more specific about ELI housing. I appreciated the planners' comments about ELI housing, particularly what the city has done so far to promote more low income housing. Nonetheless, the actual Housing Element does not make specific commitments towards ELI housing, relies on a methodology for estimating ELI housing needs that is nonsensical given the data about our city's renters. The Housing Element relies on the assumption that ELI housing constitutes 50% of the VLI RHNA numbers. However, the city's own data shows that VLI renters outnumber ELI renters by 2:1, suggesting a more reasonable plan is that somewhere in the ballpark of 66% of the VLI RHNA number should be designed for ELI renters. Failing to do so means that meeting the VLI RHNA number will not result in housing access for many of the renters that earn below 60% of AMI. The Housing Element should contain specific commitments to ELI housing and, to the extent possible, consider ELI-specific needs. While a number of developments mentioned</p>	<ol style="list-style-type: none"> <li>1. ADUs are only one smaller part of the City's housing strategy, but they do play an important role in providing affordable and naturally affordable housing and can create more housing options in areas of high opportunity.</li> <li>2. The Policy Plan chapter now includes more mentions of ELI specifically.</li> <li>3. Comment has been noted.</li> <li>4. Comment has been noted.</li> </ol>



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### Public Comments

Chapter 2: Policy Plan	City Response
<p>during the Planning Commission meeting may have included ELI housing, the actual Housing Element mentions only the Library Development and the two Pacific Ave developments as having ELI-specific housing.</p> <p>(3) Third, there is little in the way of preservation to ensure existing affordable housing stock, including naturally affordable housing, is protected from investment pressures. The consideration of a right of first refusal as a specific policy recommendation is laudable, but not meaningful without community land trusts or sufficient financing for organizations that might purchase and preserve affordable housing stock. Other policies that might discourage converting affordable housing into market-rate housing, like limits on building conversions, are not mentioned and should be considered while the city and state continue to work on creating more robust funding for preservation endeavors.</p> <p>(4) Fourth, there was a concerning lack of effort to provide meaningful protection for renters. Policy 4.1 deals with rental assistance, but mentions only providing emergency temporary assistance or support with security deposits and sets the goal of "at least 50 renters," which is underwhelming given the size of the city's renter population and the number of renters facing extreme rent burden. Loftier, robust goals are necessary if renters are going to be protected while we wait for affordable housing pipelines to materialize. The other measure to help renters (6.1) is HCVs, but a substantial share of HCVs go unused in California each year (although we have not found data for Santa Cruz specifically). Additionally, discrimination against HCV recipients is rampant - it is publicly visible on housing postings. If HCVs are a cornerstone of the Housing Element, auditing and enforcement of Source-of-Income discrimination must also be incorporated.</p>	

Appendix A: Community Engagement Summary	City Response
* Editorial suggestions	Comment has been noted.
** [Throughout] Inconsistent use of "LatinX" and "Latino". Consult with the community about preference and use one or the other, but not both.	
No retail. More parking on site	Comment has been noted.
How will this impact city water use and traffic. Mission Street in particular is already at capacity morning, noon and night. Side streets such as King, Bay and California are already impacted with overflow traffic from Mission. Even though we have had an extraordinary amount of rain this year, what about the years to come when we fall back into drought conditions.	Comment has been noted.
When the community tries to engage to tell the City Planners and the City Council what they want in the way of housing the City Council does not vote in accordance with the residents. The survey data in the past has been slated to accomplish what the planners wanted.	Comment has been noted.
These kinds of surveys are filled out by activists or government employees and are meaningless	Comment has been noted.

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Appendix A: Community Engagement Summary	City Response
Good to see this comprehensive data collected Housing Element Update Survey from the community, which confirms my own assessments and experiences. The charts were particularly helpful. I noted the in-person input from technology disadvantaged neighborhoods who said their #1 housing challenge was finding housing. They most wanted more affordable housing -- and trees! Less important to them was parking & shopping access. So why the emphasis on mixed use so prevalent as a policy in the city? Parking and retail take up much space needed for housing.	The City's main goal through the Housing Element Update process is to facilitate affordable housing development. Mixed-use developments allow for a mix of affordability levels within close proximity to resources, and thus decreasing travel-related costs.
<p>While there is no doubt that the staffers put significant effort into community engagement, this is still an incredibly small and non-representative sample. Somehow renters constitute only 40% of your respondents, when an accurate sample would be above 50%.</p> <p>I would encourage you to try to perhaps improve the representativeness (although I understand you also used focus groups)</p> <p>I was also concerned with how community engagement translated into recommendations. Rent control and just cause protections are left out, despite appearing in the feedback text, and while ADUs get a specific callout in Chapter 2, policies with far more support than ADUs, like MFH and zoning, did not get a callout.</p>	Note that this figure is only a representation of survey respondents. The City held focus group meetings with renters, students, and young adults on November 29, 2022, to get specialized input from the renter community.

Appendix B: Review of Past Performance	City Response
<p>Comments and Questions</p> <p>** General Plan-Level comments</p> <p>*** [Throughout] Benchmarking. There are many missed opportunities for the document to benchmark Santa Cruz demography, in order to provide needed context for the public and for planners and policy-makers, and in order to highlight those areas where Santa Cruz notably differs from other communities or national standards. In my opinion, it's not enough to simply compare Santa Cruz to other parts of the County, given that county communities differ widely. It would be helpful to add comparisons to other benchmarks / communities (e.g., in many cases Santa Barbara or Santa Monica may be relevant comparators; in other cases, statewide or nationwide numbers may (also) be useful). Specific instances include:</p> <p>[Page B-2] Seniors (12.5% of population)</p> <p>[Page B-3, C-20] Disabilities (9.7% of population)</p> <p>[Page B-7] ELI households (25% of households)</p> <p>[Page C-10] HH size (2.4 persons per HH)</p> <p>[Page C-17] Overcrowding (% by owner v renter)</p> <p>[Page C-18] Cost-burdening (55.4% of renters)</p> <p>[Page C-25] Poverty (20% living in poverty)</p> <p>[Page C-26] Homelessness (benchmark outside of our area, please)</p>	Language recommendations have been applied.

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### Public Comments

Appendix B: Review of Past Performance	City Response
<p>** Specific comments</p> <p>*** [Page B-8] UCSC. The text here is unclear and potentially self-contradictory regarding the University's commitment to student housing. The document refers to the settlement agreement between the City and UCSC, which requires the University to provide housing for 2/3 of its student population. The document then indicates the LRDP proposes 10,125 on-campus beds and 579 off-campus beds. That is NOT 2/3 of the LRDP's target student population. The Element needs to make clear whether and, if so, how the University plans to meet the settlement agreement terms, or make clear that the University does not plan to do so (and the resulting impacts on the local housing situation).</p> <p>* Editorial suggestions</p> <p>** [Page B-3] "...Loudon Nelson..." should be "...London Nelson..."</p> <p>** [Page B-6] "...homeless persons' being..." should be "...homeless persons being..."; bullet for Janus item formatting inconsistent with other bullets</p> <p>** [Page B-7] CHAS is used without definition (not defined until page C-11)</p> <p>** [Page B-8] "...50 unit affordable..." should be "50-unit affordable..."; "...full-time while attend school..." should be "...full-time while attending school..."</p>	
Need parking on site	Comment has been noted.
How will this impact city water use and traffic. Mission Street in particular is already at capacity morning, noon and night. Side streets such as King, Bay and California are already impacted with overflow traffic from Mission. Even though we have had an extraordinary amount of rain this year, what about the years to come when we fall back into drought conditions.	Comment has been noted.
Past performance has been very poor. The residents speak up but the residents are ignored in the majority of the cases with it comes to approving buildings in Santa Cru.	Comment has been noted.
The emphasis on poor people listing vouchers as accomplishments is pathetic. They are still poor people living off others and welfare is the business of the Federal government, not cities.	Comment has been noted.

Appendix C: Housing Needs Assessment	City Response
<p>* Comments and Questions</p> <p>** Specific comments</p> <p>*** [Page C-10, C-23, etc.] The numbers presented relating to single-adult households (HHs) are inconsistent and/or unclear throughout. For example, on page C-10, Table C-9 cites 1,680 "Female HH, No Spouse Present", while Table C-10 cites 1,008 "Female Households, No Spouse" and 1,680 "Male Households, No Spouse". Tables C-24 and C-25 (pages C-23, 24) suggest that only female-headed HHs are in poverty (210 single-parent HH living in poverty v 210 Single Parent Female HH Living in Poverty). That seems incredible to me. Need to make a thorough and critical review of all of these figures in order to ensure consistency, validity and accuracy. Also need to clarify whether referring to single-person HHs or single-parent HHs (with dependent children).</p>	Language recommendations have been applied and data corrections made.

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Appendix C: Housing Needs Assessment	City Response
<p>Again, these HH numbers are difficult to make sense of throughout.</p> <p>*** [Page C-19] Reference to female-headed (presumably no-partner) HHs as “special needs”, per HCD. I would suggest that the Element should certainly center HCD-designated special needs HHs, and should also note that male-headed (presumably no-partner) HHs will, in many cases, evidence the same special needs as female-headed HHs (need for childcare, etc.). Analyses breaking out female-headed no-partner HHs should also break out male-headed no-partner HHs.</p> <p>* Editorial suggestions</p> <p>** [Page C-2] Formatting of numbers in the 2020 Actual column needs attention.</p> <p>** [Page C-11] CHAS used and defined here; used previously, without definition, on page B-7.</p> <p>** [Page C-17] The narrative regarding Table C-17 (overcrowding prevalence, owner v renter occupied) does not comport with the numbers presented in the table. Fix the narrative so that it makes sense based on the numbers (215 is 3.3% of 6,515, which is nowhere to be found in the table).</p> <p>** [Page C-22] The narrative relating to Table C-23 (on the following page) should be cleaned up. It refers to “five or more” and “six or more” and “seven or more” occupant HHs, but the data are actually 5-person, 6-person, and 7 or more. Also, the text says that there are more owner-occupied 5- and 6-person HHs, but that’s not reflected in the data; all of the categories have more renter HHs than owner HHs.</p> <p>** [Page C-27] Using West Valley College as an example “out of area” commuter school seems an odd choice. How about SJSU or SCU instead? How many folks commute to WVC?</p> <p>** [Page C-29] “...nearby jurisdiction.” Should be “...nearby jurisdictions.”</p> <p>** [Page C-32] “...higher to the ACS...” should be “...higher than the ACS...”</p> <p>** [Page C-33] “the U.S... .” Should be “The U.S. ...”</p>	
No retail. Parking on site	Comment has been noted.
How will this impact city water use and traffic. Mission Street in particular is already at capacity morning, noon and night. Side streets such as King, Bay and California are already impacted with overflow traffic from Mission. Even though we have had an extraordinary amount of rain this year, what about the years to come when we fall back into drought conditions.	Comment has been noted.
<p>Table c-32</p> <p>Shocking to see the percent of seasonal, vacation, or occasional use. Would love to see additional movements in place to revive the idea of an Empty Home Tax. It worked in SF. It could impact the amount of housing stock available or raise funds for affordable housing.</p> <p>Table C-35</p> <p>Teachers are very low to low income in this table. I worked on housing elements in different jurisdictions. It seemed like if people knew that building affordable housing means building teacher housing, they might be more open to it.</p>	<p>Comment has been noted.</p> <p>Table C-6 details employment in the City by sector – “Education services, health care, and social assistance” represents 13% of employment in the City.</p>

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Appendix C: Housing Needs Assessment	City Response
The needs are for low-income and very low-income housing. The City of Santa Cruz planning department needs to apply for grants for building housing as Salinas and Monterey do. The city manager needs to take action to make this happen.	The Policy Plan establishes a number of actions to the City will take to continue to collaborate with local jurisdictions.
The population statistics are complete bullshit. Population growth is less than zero for a few years. TOTAL BULLSHIT. Also, WHO CARES about racial demographics? Job growth numbers are COMPLETE BULLSHIT. The population growth is ZERO! Lots of statistics based on 2020 numbers. a LOT has changed since then	Comment has been noted. The Housing Needs Assessment data is based on the latest available at the time the document was written.

Appendix D: Fair Housing Assessment	City Response
<ul style="list-style-type: none"> <li>* Comments and Questions</li> <li>** Specific comments</li> <li>*** [Page D-54] Vouchers. I would like to understand why there is an “extreme shortage of housing vouchers” - what are the causes of this shortage, and what can we do, as a community, to fund or create more vouchers (as well as get landlords to accept them)?</li> <li>* Editorial suggestions</li> <li>** [Page D-5] “...policies...” should be “...policies...”</li> <li>** [Page D-23] “...it is consider as...” should be “...it is considered as...”</li> <li>** [Page D-47] “...less than one persons...” should (probably) refer to one percent?; similarly with “...and one identified as Asian...”? If the latter is, indeed, one person, then say so.</li> <li>** [Page D-52] Reference to exponential population growth is inaccurate and hyperbolic. Exponential growth is growth that accelerates over time (<a href="https://en.wikipedia.org/wiki/Exponential_growth">https://en.wikipedia.org/wiki/Exponential_growth</a>). That is not the case here. “Rapid” or “accelerated” growth seems more appropriate.</li> </ul>	Language recommendations have been applied.
No retail more parking on site	Comment has been noted.
How will this impact city water use and traffic. Mission Street in particular is already at capacity morning, noon and night. Side streets such as King, Bay and California are already impacted with overflow traffic from Mission. Even though we have had an extraordinary amount of rain this year, what about the years to come when we fall back into drought conditions.	Comment has been noted.
TOTAL BULLSHIT. NO, there is nothing wrong with communities that don't correspond to your ideal demographic profiles, or income profiles. We do NOT want to be 100% homogenized by force into your asshole ideas of utopia.	Comment has been noted.

Appendix E: Housing Constraints	City Response
<ul style="list-style-type: none"> <li>* Editorial suggestions</li> <li>** [Page E-3] “...\$100 a square foot...” should be “...\$100 per square foot...”; “...Discloser Act...” should be</li> </ul>	Language recommendations have been applied.

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Appendix E: Housing Constraints	City Response
<p>“...Disclosure Act...”; the narrative regarding approval rates by ethnicity are inconsistent. One paragraph cites 60% for American Indian; the other, 45.2% - correct as appropriate.</p> <p>** [Page E-45] Reference to 4.2 million gallons per day (GPD) to SCWD service area is incorrect. The SCWD serves an average of closer to 6.5MGD year round (lower in winter; higher in summer). The 4.2 MIGHT be correct for customers within the City Limits; would need to confirm that with SCWD.</p> <p>** [Page E-45] “...pipped...” should be “...piped...”</p> <p>** [Page E-46] “...and potable and domestic...” should be “...and potable domestic...”</p>	
No retail. More parking on site	Comment has been noted.
How will this impact city water use and traffic. Mission Street in particular is already at capacity morning, noon and night. Side streets such as King, Bay and California are already impacted with overflow traffic from Mission. Even though we have had an extraordinary amount of rain this year, what about the years to come when we fall back into drought conditions.	Comment has been noted.
Santa Cruz is constrained by available land.	Comment has been noted.
Nobody gives a shit about racial statistics.	Comment has been noted.

Appendix F: Housing Resources	City Response
No retail. Parking on site	Comment has been noted.
How will this impact city water use and traffic. Mission Street in particular is already at capacity morning, noon and night. Side streets such as King, Bay and California are already impacted with overflow traffic from Mission. Even though we have had an extraordinary amount of rain this year, what about the years to come when we fall back into drought conditions.	Comment has been noted.
The city of Santa Cruz Planners and city manager needs to meet with the city manager and planning staff and commissions of Salinas and Monterey to learn how to apply for Federal and State Grants to gain the funds to build 100% affordable housing via grants. Santa Cruz has a very high homeless rate which would make our town a top candidate.	Comment has been noted. The City will continue to regularly coordinate with local jurisdictions, agencies, and organizations to maximize potential funding opportunities and address homelessness. The Policy Plan establishes actions to further engage neighboring communities in addressing homelessness in the region.

Appendix G: Housing Sites Inventory	City Response
<p>* Comments and Question</p> <p>** General Plan-Level comments</p> <p>*** Locating Density - The document notes that we have 224% of the capacity needed in order attain the</p>	Language recommendations have been applied.



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Appendix G: Housing Sites Inventory	City Response
<p>RHNA 6 goals (that is, develop-able lands allow for a 124% overage above the RHNA 6 target). As such, it's clear that the City would be able to reduce the maximum densities allowed on shallow parcels immediately adjacent to existing homes (as along Water and Soquel in the Branciforte area). Zoning these parcels so that buildings "max out" at 3 stories (at most 4 with bonuses) would go a long way to gain community favor for the overall plan, and reduce the potential conflicts that may arise when out-of-scale projects are proposed (as was the case with 831 Water St). Doing so would clearly NOT threaten the City's ability to achieve its RHNA 6 goals; as such, the City should carefully review and adjust the target zoning for parcels that meet these criteria.</p> <p>** Specific comments</p> <p>* Editorial suggestions</p> <p>** [Page G-5] "...recently developed sites..." should be "...recently-developed sites..."</p> <p>** [Page G-31] "...the construction a..." should be "...the construction of a ..."; "SRO's" should be "SROs".</p>	
<p>I am extremely underwhelmed at the size of the housing sites inventory. What is this, a RHNA for ants? The housing inventory has to be at least three times bigger than what is proposed.</p>	<p>The City is mandated by State law to identify capacity to meet the RHNA. The City will continue to work with the community, developers, and organizations to facilitate housing production throughout the Planning Period.</p>
<p>No retail. Parking on site</p>	<p>Comment has been noted.</p>
<p>How will this impact city water use and traffic. Mission Street in particular is already at capacity morning, noon and night. Side streets such as King, Bay and California are already impacted with overflow traffic from Mission. Even though we have had an extraordinary amount of rain this year, what about the years to come when we fall back into drought conditions.</p>	<p>Comment has been noted.</p>

Appendix H: Glossary	City Response
<p>No retail. Parking on site</p>	<p>Comment has been noted.</p>
<p>How will this impact city water use and traffic. Mission Street in particular is already at capacity morning, noon and night. Side streets such as King, Bay and California are already impacted with overflow traffic from Mission. Even though we have had an extraordinary amount of rain this year, what about the years to come when we fall back into drought conditions.</p>	<p>Comment has been noted.</p>

Additional Feedback on the Public Review Draft	City Response
<p>Here is rest of my commentary on Chapter 2, which was truncated due to Microsoft Forms limitation:</p> <p>*** [Page 2-27] Transit and active transportation. Policy 7.3 should be more explicit. Transit - Much is made of</p>	<p>Language recommendations have been applied.</p>

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Additional Feedback on the Public Review Draft	City Response
<p>the City's public transit, but the fact remains that the service is modest at best, both in terms of coverage and in terms of service level (headway, hours of operation). The City (with Metro) needs to make clear (1) specific targets for service-level and coverage improvements, (2) specific measures that the City (with Metro) will take to meet those targets, and (3) timelines for achieving those targets. While these specifics may be beyond the scope of this particular document, the document should be able to reference responsible entities and plans in the Circulation Element. Active Transportation - While mentioned, the Housing Element, along with the Circulation Element, must center the development and/or enhancement of active transportation facilities throughout the City, and especially along or adjacent to the areas and corridors targeted for higher-density development. This work must contemplate Safe Routes to Schools, as well as to parks, critical resources (food shopping, etc.), and commercial centers. The City should develop and enforce clear standards for protecting and preserving existing active transportation corridors, as we (rightly) focus on increasing the housing density on our transit corridors and downtown. Those clear standards should be called out in this document.</p> <p>*** [Page 2-28] Wildfire. City zoning and building policies must incorporate the learnings from recent urban-area fires (e.g., Santa Rosa), so that our built environment is appropriately protected from wildfires that become urban fires. Flood / sea-level rise. City zoning and building policies must reflect flooding risks in low-lying or flood-prone areas. Specifically, building code should ensure that vital building infrastructure is safe from flood waters (whether caused by weather or sea-level rise, or a combination of the two).</p> <p>* Editorial suggestions</p> <p>** [Page 2-2] Make left-indentation of the "Goals" descriptive text consistent (text for Goals 1 and 4 differs from others)</p> <p>** [Page 2-5] "...community to potential barriers to..." re-write to make sense; "...to recognized..." should be "...to recognize..."</p> <p>** [Page 2-8] "...the City's Inclusionary." Should presumably be "...the City's Inclusionary Ordinance."</p> <p>** [Page 2-16] "USCS" should be "UCSC"</p> <p>** [Page 2-20] "...are home to large a proportion..." should be "...are home to a large proportion..."</p> <p>** [Page 2-22] "...previously known a..." should be "...known as..."</p> <p>** [Page 2-25] "...produces and delivers to nearly..." should be "...produces and delivers water to nearly 100,000 customers ..."</p> <p>** [Page 2-27] "...compliment the..." should be "...complement the..."</p>	
<p>Housing yes with parking for each unit on site. Forget retail instead help the downtown ghost town which will only get worse with their parking lost to renters.</p>	<p>Comment has been noted.</p>
<p>How will this impact city water use and traffic. Mission Street in particular is already at capacity morning, noon and night. Side streets such as King, Bay and California are already impacted with overflow traffic from Mission. Even though we have had an extraordinary amount of rain this year, what about the years to come when we fall back into drought conditions.</p>	<p>Comment has been noted.</p>
<p>Many local/CA cities require story-poles to identify the height and mass of proposed buildings. Buildings the size and mass as proposed should be shown before approval is given. I have spoken with California Story Poles</p>	<p>Comment has been noted.</p>

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Additional Feedback on the Public Review Draft	City Response
<p>at 800 987 8046. They serve many cities in CA., several locally. It is only right and fair that the City of Santa Cruz be fully transparent about the scale of the proposed buildings. It is disingenuous to move forward without providing more info to residents/voters. I have been in Santa Cruz all my life, 72 years, as my family purchased an allotment in Paradise Park in 1924. I understand progress and the need for housing but a 12 story building and the other proposed development south of Laurel will shock people if completed. It is not right to not “show residents/voters the scale of the development”.</p>	
<p>The concern we have is the destruction of the crucial values of the residents of this area. Constructing megastructures that resemble early Soviet Russian designs is the opposite of why people want to live here. The developers could care less about the monstrosities they build. They often do not live here.</p> <p>It is so obvious that certain members of City leadership in the past and present are very willing to allow our community to become an uninviting destination for visitors. The city of Carmel is very aware of the need to keep the beauty of the area they live in. Do you truly think coming into town to visit the ocean, and driving by the Soviet style architecture is going to promote tourism? How short sighted are you? We depend on being a tourist destination. Ugly, oversized structures will mean loss of revenue.... pretty obvious.</p> <p>Years ago, the fight to save Lighthouse Field was successful. And now, it is a tourist haven. Then, someone wanted to construct a parking structure on West Cliff Dr. Again, that was prevented, and West Cliff is still attractive. However....look at what has been allowed. The money voted for to refurbish our downtown library has been misappropriated. Every other branch in the county has already been worked on. Some ill advised members of our City thought it was a great idea to take that money and give it to an out of town developer who thinks libraries should be in dark basements. Really? You think that is the desire of the residents of Santa Cruz? NO. Also, to claim it is for low income people, is a sad example of dishonest developers, hoping we are too stupid to notice how few low income units are actually built. The developers think we should look like San Jose. Then, all of the folks who come here from San Jose will lose the chance to enjoy a beautiful seaside town. Instead, they may think they never left town. It will look exactly like the worst parts of the valley.</p> <p>We are so saddened by what you are creating for our young people. Long after the ugly monstrosities are built, Santa Cruz will no longer be a place of beauty. The young will hear stories of how it used to be, but sadly, is no more. Is this really the legacy you wish to leave? We are at a time where we need to have creative and sustainable growth. We are limited by our water supply. This area can only support a limited amount of people due to the environmental constraints. As city leaders, you are heading towards environmental disaster when we run out of water. Do you expect us to reduce our usage so developers can make their money? Are you prepared for the loss of tourism once you have destroyed the village atmosphere of Santa Cruz?</p> <p>I would hope that you seriously consider the issues we have mentioned in this essay. Perhaps you might even make it easier for people to respond to your request for input. You might learn something. You might think twice about destroying the very thing that provides income to this area.</p>	<p>Comment has been noted.</p>
<p>I'd love to see Santa Cruz go big and lead by example by chucking the RHNA numbers and building a greater percentage of very low and low income housing in this cycle.</p>	<p>The City is mandated by State law to identify capacity to meet the RHNA. The City will continue to work with the</p>

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Additional Feedback on the Public Review Draft	City Response
	community, developers, and organizations to facilitate housing production throughout the Planning Period.
<p>1. Add incentives for a Mobile Home interest rate &amp; term to be the same rate &amp; term as a Residential home - especially for seniors over 62 years old (Mobile Home mortgages are usually much higher than for residential).</p> <p>2. Allow for a Mobile Home Duplex - add incentives to exchange an older Mobile Home for a Duplex Mobile Home (oneside for the owner &amp; a studio for a renter).</p> <p>3. Allow Bike Sharing in Mobile Home Parks.</p> <p>4. UCSC must support building more housing for staff on/off campus, and change the static data (The current breakdown is 80% for Faculty, 15% for Staff &amp; 5% for nonsenate academics - including housing for staff families).</p> <p>5. More housing along the Rail/Trail.</p> <p>6. Allow detached bedrooms in Mobile home parks as ADU's.</p>	Added: Objective 6.4e. Maintain the City's Mobile Home Rent Control Ordinance.
This housing element does not plan well for the future of Santa Cruz. Building additional market rate units and removing parking will not be beneficial to our town.	Comment has been noted.
Please recommend to the politicians that short-term/vacation rentals should be illegal or HEAVILY restricted in the City. That is what hotels are for. Short-term rentals are horrendous for our housing stock and the City needs to rid them. South Lake Tahoe has banned short term rentals and Palm Springs has placed a cap on only 36 days per YEAR for a short-term rental. So many homes are wasted on this use that is terrible for the locals - please enact change.	Comment has been noted.
UPZONE UPZONE UPZONE! Please convince the politicians to upzone this city so that supply doesn't keep sitting artificially depressed. UPZONE R-1 to allow multi-family development!	Comment has been noted.
You are out of your fucking minds increasing housing into a housing crash when there is absolutely zero population growth.	Comment has been noted.
Thank you for all the effort that went into stating these policies. Now on the next step of actually implementing them in a transparent and equitable way.	Comment has been noted.
<p>I have lived in Santa Cruz most of my life. We cannot build our way to affordability and I wish our electeds and other city staff would work with the community to respond to absurd state mandates with innovative and realistic recommendations rather than jump at the noise coming from Sacramento which orders a one-size-fits-all non-solution to every city in the state to build, build, build. This thinking destroys towns and brings in second home buyers from elsewhere, driving up the cost of housing while our leaders scamper faster around the hamster wheel to meet political goals NOT reflective of the community they are supposed to serve and, please be honest with yourselves, not to mention us, do very little to assist our service workers, teachers, etc. in affording a home.</p> <p>At the very least, do NOT build higher than the eight story behemoths already planned. You can do that much for us, can't you? Help us keep some of the character that is Santa Cruz. We are not San Jose. Don't make us one. And yes, we want height poles. We do not want 12 or 17...are you kidding us?!?...story buildings with so little parking it's laughable if it weren't so tragic. I get that we want to greatly reduce traffic but with the Warriors Arena, new luxury hotel, etc., it ain't gonna happen. I drive an electric car. I ride my bike. I'm</p>	Comment has been noted.

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Additional Feedback on the Public Review Draft	City Response
<p>watching my hometown transform into a place I can't recognize. So call me names. Call me a NIMBY. That's just wrong and too simplistic. I know we need to house our residents. I just don't believe the way it's being approached is going to make a big difference. I've already heard friends (local) say that they will buy one of the new condos for their families to enjoy. I can only imagine the same being discussed around the state by folks who already own homes. I hope to get more involved now that I have retired.</p> <p>And housing the homeless?? These projects will do next to nothing to meet that ideal.</p>	
<p><b>Policy 1 – Housing Production</b></p> <p>We are thrilled that the City has met their 5th cycle goals, however, with no rezoning taking place to meet the 6th cycle production goals, policies to increase housing production will be of huge importance. It is stated under Policy 1.2, and more fully in Appendix D: Fair Housing Assessment, that most new housing will be concentrated in the central core of the City, meaning along major commercial corridors and on major opportunity sites. With this area receiving over 45% of the new housing, including over 40% of the Very Low and Low-Income sites, we believe that the City should be looking towards additional opportunities to meet AFFH goals, including in majority single-family neighborhoods of other districts.</p> <p>We believe the City can and should go further to enable more housing types in its most resource rich neighborhoods. Objective 1.3e intends to utilize SB 10 to increase residential density in transit rich areas, which in Santa Cruz are not high resource. The SB 10 scope should be expanded to include urban infill sites in high resource districts outside of transit rich areas to allow for more affordable housing throughout the City.</p>	<p>The downtown area is the most amenity rich in the city and is the most sustainable area to grow. The Housing Element does still support densification efforts in lower-density areas so there is a reasonable balance of objectives.</p>
<p><b>Pipeline Projects</b></p> <p>A large source of new units for the City during the 6th cycle will be from pipeline projects. For jurisdictions relying heavily on pipeline projects, HCD recommends that "...the element should include programs with actions that commit to facilitating development and monitoring approvals of the projects, including the number of units and affordability (e.g., coordination with applicants to approve remaining entitlements, supporting funding applications, expediting approvals and monitoring of project progress, including rezoning or identification of additional sites, if necessary)." We suggest that the city commit to implementing such a recommendation to facilitate development, such as by proactively monitoring and facilitating post-entitlement developments with technical and/or financial assistance.</p>	<p>The City was successfully able to meet its 5<sup>th</sup> Cycle RHNA due to concerted efforts and development facilitation. The City aims to also meet its 6<sup>th</sup> Cycle RHNA and will continue working closely with the development community to make this happen, including pre-existing efforts such as monitoring and assistance.</p>
<p><b>Mid-Cycle Review</b></p> <p>Under Policy 1.1, the City commits to providing new housing through adoption of the Housing Element (1.1a) and review and annual publication of sites inventory (1.1b). The City can make a stronger commitment to appropriate progress towards its 6th cycle goals. We would like to see an objective with a more active mid-cycle review and adjustment. Tying this review to commitments to increase housing production such as rezoning, ADU incentives, or removing development constraints would allow the City to minimize impacts of falling behind in the 6th cycle. Making these commitments specific now would reduce the staff time required to implement mid-cycle. As part of the mid-cycle review, the City should create objectives that monitor the progress of pipeline projects. This should include automatic entitlement extensions until midway through the</p>	<p>Comment has been noted.</p>

## City of Santa Cruz 6<sup>th</sup> Cycle Housing Element Update

### Public Comments

Additional Feedback on the Public Review Draft	City Response
6th cycle, a commitment to advocate for city-entitled projects to be approved by the Coastal Commission, and proactively reaching out to all pipeline projects to confirm that there is still development interest.	
<b>Objective Standards</b> The City should expand Objective 1.2b to include a policy that any project found consistent with Objective Standards is placed on the consent agenda for all hearing bodies. Such projects should only be appealable to council if denied by the planning commission, or if the appeal is related to consistency with objective standards. This would greatly increase the incentive for developers to design projects compliant with the standards.	Objective was amended to include language that Objective Standards supersede subjective ones.
<b>Parking</b> We are pleased to see that elimination of parking minimums is intended as a policy objective, however it is not stated as a commitment in objective 1.3c. In the City's work to achieve this, we believe the elimination of such requirements within a mile walking area of five or more amenities (pharmacies, grocery stores, transit stops, etc), and in very low vehicle travel areas, would be a good intermediate policy stepping stone.	Comment has been noted.
<b>FAR and Density</b> A significant constraint to development of 2+ bedroom units is the units/ acre density requirement, something that does not apply to smaller units such as SROs. In order to increase the number of family sized (2+ bed) units built, this constraint should be removed or significantly modified. This should also be addressed by increasing the FAR for projects consisting of 50% or more 2+ bedroom units. This increase should allow the same net number of units as if they were proposed as SROs or a similar unlimited density unit.	The City has Flexible Density Units (FDUs) which are small units that do not count towards unit/acre density. This can incentivize a developer to build smaller, more naturally affordable units, and can also incentivize development of larger 2+ bedroom units supported by additional FDUs when units/acre densities are met.
<b>Policy 2 - Affordable Housing</b> The ordinance options allowing 100 percent affordable residential development to be considered a "by-right" use would greatly speed along much needed affordable housing. As such, we urge expedited approval of Objective 2.2g to 2024 or earlier rather than a quarter of the way through the 6th cycle. A commitment to developing or declaring city parking lots downtown surplus by a certain date with the goal of providing affordable housing would also be a valuable policy. As part of objective 2.4c, we support establishing a Community Opportunity to Purchase program to give qualified non-profit organizations the right of first offer or refusal to purchase certain properties offered for sale in the City. We also support establishing a Tenant Opportunity to Purchase program to help prevent displacement, empower tenants, and preserve affordable housing when the owner decides to sell.	Comment has been noted.
<b>Policy 3 - Special Needs and Homelessness</b> Permanent supportive housing is a key solution towards solving homelessness. Policy 3.4 should explicitly indicate equitable distribution (and development potential) of such housing across all districts. Persons with disabilities benefit from the development of extremely low- and very low-income housing. Objective 3.1c falls short of any commitment to develop housing, only to "publicize housing accessible to persons with disabilities". The City should increase incentives for extremely low housing in objectives under	Comment has been noted.



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### Public Comments

Additional Feedback on the Public Review Draft	City Response
<p>Policy 2 - Affordable Housing, such as additional density bonus (Policy 2.3) or modification of the inclusionary ordinance (objective 2.1a) or by-right approval (objective 2.2g) to favor more extremely-low homes.</p>	
<p><b>The University</b>  The two objectives related to the University of California, Santa Cruz (UCSC), 3.5a and 3.5b, are vaguely worded to “Continue to collaborate...” and “Support state legislation...” which are repeats from the 5th cycle. Note that as recently as 2022, the City formally expressed opposition to proposed legislation intended to facilitate more housing at UCSC.  The City has been and continues to be a significant barrier to development at UCSC, as evidenced by past and ongoing litigation<sup>6</sup>. This is not acknowledged in the constraints portion of the City’s housing element. The city should make a good faith effort to analyze the barriers it presents to housing construction and planning with regards to UCSC and propose programs to mitigate these impacts. The city should commit to providing municipal services to new housing at UCSC and a policy to not sue over housing production on campus or to obstruct UCSC housing projects through other means such as withholding water access via the Local Agency Formation Commission process.</p>	<p>The City’s current litigation with UCSC is seeking greater housing commitment from UCSC, not to delay housing.</p>
<p><b>Policy 5 - Neighborhood Vitality</b>  Policy 5 opens with the following context: “Quality of life is shaped, in part, by neighborhood conditions in Santa Cruz. As an older, established community, Santa Cruz requires a concerted effort to encourage the maintenance, rehabilitation, and improvement of housing and to promote sustainable, livable neighborhoods in the face of increasing density.” We wholly reject the framing that density and sustainable, livable neighborhoods are incompatible. The city should update this language.</p>	<p>Updated</p>
<p><b>Policy 6 - Affirmatively Furthering Fair Housing</b>  As discussed in our Housing Production section, a majority of new housing is being planned along major corridors. This leaves out many exclusive and high opportunity neighborhoods from producing their fair share of housing.  Creation of missing middle housing isn’t mentioned within the policy plan - the City should adapt zoning regulations that would incentivize this form of housing. Examples include reducing minimum lot size, lot width, and parking requirements (kudos to the latter already being included!)  We believe the City can and should go further to enable more housing types in its most resource rich neighborhoods. Objective 6.2d should use SB 10 to increase density in R1 districts, not just to allow construction of Flexible Density Units (FDUs). FDUs are a housing type, not a zoning district. The time frame for zoning amendments to expand housing opportunities in single family zones should be sooner than 2029 as proposed in Objective 6.2c. Similarly, the City’s deadline for updating the local SB9 ordinance consistent with State Law should be earlier than 2027.  Policy 6.4 recognizes that displacement may follow new development. Improvements of community assets, as proposed in Objective 6.4a may also result in displacement. This objective should include applicable anti-displacement strategies.</p>	<p>Comment has been noted. City follows SB 9 state law and does have posted guidelines.</p>

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### Public Comments

Additional Feedback on the Public Review Draft	City Response
<p><b>Sites Inventory - Small Sites Program</b></p> <p>The site inventory identifies a significant number of small parcels for development, many of which are projected to accommodate low income units. Per HCD's Site Inventory Guidebook "A parcel smaller than one half acre is considered inadequate to accommodate housing affordable to lower income households, unless the housing element demonstrates development of housing affordable to lower income households on these sites is realistic or feasible." The City claims that many of these parcels have development opportunities due to common ownership with adjacent parcels; the Housing Element includes no objectives in the Policy Plan with specific incentives to facilitate consolidation. We recommend an incentive program such as a FAR density bonus for projects which involve small lot consolidation.</p>	<p>Objective 1.1e has been added to promote the development of affordable units on small parcels through lot consolidation and coordination with property owners.</p>
<p><b>Upzoning Near Potential Light Rail Stations</b></p> <p>The RTC has multiple scenarios for a passenger light rail route. In most scenarios stations would be located on the Westside, Bay/California, Downtown, and Seabright. We encourage a program to look at additional density along the Coastal Rail Trail, with a focus on these station locations.</p>	<p>Comment has been noted.</p>
<p><b>Tenant Protections</b></p> <p>As a majority-renter city, it is important that we have strong tenant protections. There are a number of programs we would like to see implemented or expanded in the City including:</p> <ul style="list-style-type: none"> <li>• Elimination of or cap on rental application fees</li> <li>• Creation of a rental registry. This was recently passed by both Salinas and Monterey</li> <li>• Local preference for people employed in the county</li> <li>• COPA and TOPA programs (see Policy 2 - Affordable Housing)</li> <li>• Conduct a disparate impact analysis of non-high(est) resource areas and apply a live-work preference if it matches county demographics</li> </ul>	<p>Comment has been noted.</p>
<p><b>Need for Active Language, Dates and Measurable Metrics</b></p> <p>Objectives/Time frames lack active language, dates, and measurable metrics to determine the success of the objective. Time frames are often a recitation of the process, not a commitment to an outcome. Some examples:</p> <p>Policy 1 - Housing Production</p> <ul style="list-style-type: none"> <li>• 1.2d - Time frame should be tightened to the action phrase "Adopt rezonings for the Ocean Street Area plan by the end of 2024, and submit to Coastal Commission as Local Coastal Program Amendment by [date]"</li> <li>• 1.3b - Time frame is to "Meet annually with the development community to consider process improvements." Also, 1.4b time frame is to "Meet annually with the development community". These are commitments to meetings; they should include development of an action or improvement plan based on input.</li> <li>• 1.3c time frame should be tightened to the action phrase "Eliminate minimum parking requirements citywide by January 2028"</li> </ul>	<p>Multiple updates made.</p>

# City of Santa Cruz 6<sup>th</sup> Cycle Housing Element Update

## Public Comments

Additional Feedback on the Public Review Draft	City Response
<ul style="list-style-type: none"> <li>1.5a and 1.5b are focused on important facilitation of ADU development, and both commit to “consider” amendments or modifications, with no dates. 1.5e Time frame should be tightened to “Amend ADU owner occupancy regulations by May 2024”</li> </ul> <p>Policy 2 - Affordable Housing</p> <ul style="list-style-type: none"> <li>2.1a and 2.1b and 2.2a Time frames all are “Review...and present...” related to the Inclusionary Ordinance. The language should be tightened to the outcomes: <ul style="list-style-type: none"> <li>2.1a “Amend Inclusionary Ordinance to ensure requirements provide maximum number of affordable units or deeper levels of affordability without behind a barrier to housing development by [DATE]”</li> <li>2.1b “Amend Inclusionary Ordinance with programs and incentives to increase rental and home ownership opportunities for workforce housing by [DATE]”</li> <li>2.2a “Amend Inclusionary Ordinance to update affordable housing options such as provided offsite or incentivizing land dedication by [DATE]”</li> </ul> </li> <li>2.2g - Time frame should be tightened to the action phrase “Allow 100 percent affordable residential development to be considered a “by-right” use by December 2024” (new date suggested).</li> <li>2.3a and 2.3b lack specific commitments and action language related to Density Bonus Ordinance as it exceeds State Density Bonus law.</li> <li>2.4b, 2.4c and 2.6 include the vague language of “on an ongoing basis” and “whenever possible” which are difficult to ascertain for success.</li> <li>2.4a, 2.4b and 2.5a “coordinate” or “partner” with others to an unspecified outcome or milestone with date.</li> </ul> <p>Policy 3 - Special Needs and Homelessness</p> <ul style="list-style-type: none"> <li>3.1a, 3.1c, 3.2a, 3.2b, 3.2c, 3.3a, 3.3g, 3.3h, 3.3i, include the vague language of “on an ongoing basis” and “when possible” which are difficult to ascertain for success.</li> <li>3.1c, 3.2a, 3.3c, 3.3e, 3.4a 3.5a “Work with”, “Assist”, “coordinate with”, “actively seek partnerships”, “continue support for”, “continue to collaborate” to unspecified outcomes or milestones with date.</li> </ul> <p>Policy 4 - Housing Assistance</p> <ul style="list-style-type: none"> <li>4.1a, 4.2b “Continue to contract...”, “Continue to support....” with unspecified outcomes or milestones with date.</li> </ul> <p>Policy 5 - Neighborhood Vitality</p> <ul style="list-style-type: none"> <li>5.5b - Time frame should be tightened to the action phrase “Implement new anti-displacement measures by September 2025”</li> <li>5.3a, 5.3b includes the vague language of “Explore...” and “Seek out...” which are difficult to ascertain for success.</li> <li>5.1a, 5.2a, 5.4c, 5.5a “Continue to implement”, “Continue to administer....”, “Continue to support....”with unspecified outcomes or milestones with date.</li> </ul>	

## City of Santa Cruz 6<sup>th</sup> Cycle Housing Element Update

### Public Comments

Additional Feedback on the Public Review Draft	City Response
<ul style="list-style-type: none"><li>• Time frame should be tightened to the action phrase “Amend Zoning Ordinance to increase base zoning consistent with SB10 by December 2026.”</li><li>• 6.2c - Time frame should be tightened to the action phrase “Amend Zoning Ordinance to expand housing opportunities in single-family zones by December 2026.” (proposed new date)</li><li>• 6.2d - Time frame should be tightened to the action phrase “Amend Zoning Ordinance to increase base zoning consistent with SB10 by December 2026.”</li><li>• 6.1e, 6.2f, 6.4a, 6.4c, 6.4e include the vague language of “on an ongoing basis” which is difficult to ascertain for success.</li><li>• 6.1a, 6.1b “Coordinate”, “Support...”, “Provide support”, “Continue to administer....”, “Continue to support....” with unspecified outcomes or milestones with date.</li><li>• 6.2c and 6.2d - these similar initiatives for single-family and high resource areas should have synchronized dates of 2026.</li><li>• 6.2e - local SB 9 ordinance to align with state law should be sooner than 2027</li><li>• 6.4a - investment in “areas of highest need” can spur displacement, this objective should include anti-displacement efforts</li><li>• 6.4b - Time frame should be tightened to the action phrase “Amend the City’s Relocation Ordinance by September 2025”</li></ul> <p>Policy 7 - Resource Conservation and Environmental Stewardship</p> <ul style="list-style-type: none"><li>• 7.1a, 7.1b, 7.1c, 7.2b, 7.3a, 7.3b, 7.4b, include the vague language of “on an ongoing basis” with unspecified milestones with date.</li><li>• We appreciate the reference to the Climate Action Plan in 7.2a, which has specific measures and actions.</li></ul>	

## City of Santa Cruz 6<sup>th</sup> Cycle Housing Element Update

### Public Comments

#### Comment Letters

In addition to comments submitted through the online feedback form, comments were also submitted through letters sent directly to the City. These are included in Appendix A but have not been included in this response table given length. All letters which included language revisions were reviewed and applied throughout the appropriate Chapters and Appendices. The City has read through each letter and taken all comments into consideration. Listed below are some of the specific changes that were made to the Housing Element based on the public letters received:

- **Communities Organized for Relational Power in Action (COPA) comments**

The City coordinated early with COPA during the creation of the Public Review Draft and added a few policies at that time to specifically address COPA comments, including Objective 5.5b relating to anti-retaliation and Objective 6.4f relating to cost reductions for rental applications. Additional changes include:

- 2.2d support for renter protections
- 6.2c City working with Council Subcommittee on further ideas to expand housing opportunities in single-family zones.
- 4.1a Increased metric from 70 to 100 (it was 50 in first public review draft and 70 in first HCD draft so it was increased again). Also added in language to support “culturally responsive outreach”.
- 5.4a added “culturally responsive outreach” and “work with community members to promote increased participation”.

- **April 2023 Santa Cruz YIMBY comments:**

- Additional calculations were performed for the density assumptions made on the average square footage of residential developments using FAR and the density calculations used in the Sites Inventory were confirmed.
- The pipeline projects table was revised to refine the project affordability numbers.
- More research and refinement were made for the number of units and affordability level of units on the UCSC campus.
- Additional policies were added to consider workforce housing – see Objectives 2.1b and 3.7b.

- **MidPen Housing coordination**

Changes were made to the pipeline projects table to refine the project unit affordability numbers.

- **Housing Choices comments**

The policies and objectives were strengthened and refined to be more concrete since the Public Review Draft.

# City of Santa Cruz 6<sup>th</sup> Cycle Housing Element Update

## Public Comments

### 2. HCD Technical Assistance Public Review – July 2023

Revisions to the Santa Cruz Draft 6<sup>th</sup> Cycle Housing Element, based on Technical Assistance provided by HCD mid-way through the review of the first draft, were made available to the community from July 18 to July 25, 2023. Commenters were provided with a City email address to submit comments on each chapter and appendix. The following provides all the comments received, including notes as to how each comment has been addressed.

Feedback on the July 2023 Technical Assistance Re-Submittal	City Response
<b>Chapter 2: Policy Plan</b>	
Policy 1.7 - Meaningful public engagement. This is a real concern when many involved community members see over and over how the city claims to seek public input about various projects and plans, yet ignores what a sizeable percentage of people say. The city needs to do better!	Comment has been noted.
It is important that the city make efforts to convert or re-purpose existing buildings for housing. It is much better for the environment and perhaps decreases displacement of residents.	Comment has been noted.
Objective 1.3b - mentions annual meetings with development community and Planning staff. For the sake of transparency, these meetings should be observable, so that the public doesn't think there are "back room deals" being negotiated.	Staff will have focus group conversations as needed with a variety of groups.
There is also mention that the "city will utilize lobbyists" and affordable housing advocates. I'm not sure what "lobbyists" means as far as the city spending money to hire people for that purpose.	Policy 2.2, and specifically Objective 2.2d specify what the City will utilize lobbyists for: -Policy 2.2 calls for the City to utilize lobbyists to promote affordable housing development. -Objective 2.2d. Direct City lobbyists to concentrate on state and federal legislation that would help fund affordable housing. Lobby the state and national governments for affordable housing funding yearly prior to legislative sessions and on an ongoing basis.
It has been documented that many families with children cannot find adequate housing. Yet so much of the proposed housing is SROs, studios, and 1-bedroom units. More 2- and 3-bedroom units should be included in subsidized housing projects. (Yes, "subsidized" is the reality.)	Most state and federal grants require that half of the units are two- and three-bedroom units. In other instances, Planning will not require developers to build larger unit sizes if they do not wish. Doing so otherwise would be considered an impediment to housing. However, the City supports family-size units. Policy 3.1 seeks to promote the development of affordable housing for families. In addition, the City's inclusionary ordinance requires inclusionary units to reflect the mix of unit sizes in a new housing development.



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### Public Comments

Feedback on the July 2023 Technical Assistance Re-Submittal	City Response
<p>Though it is suggested that these small and very small apartments would be desired by seniors, students, etc., I really question whether seniors would be content living in what could essentially be a college dorm. Seniors (55 and older) should be able to have the opportunity to live in an all-senior community, like La Posada, at "affordable" levels.</p>	<p>Objective 5.3b. calls for the City to seek out funding to help seniors age in place, which would provide opportunity for seniors to reside in a variety of housing types. Policy 6.3 and Objective 6.3a seek to support the development and availability of housing to seniors and do not restrict such potential housing to small apartments.</p>
<p>UCSC MUST be legally required to provide housing for a greater percentage of students, faculty staff, before being allowed to increase enrollment. On campus, preferably.</p>	<p>The City is seeking to have UCSC on campus housing development tied to enrollment increased. While the City does not have authority over UCSC or housing development on its campus, the document contains several policies and objectives to promote student housing development on campus, including Policy 3.5, Objective 3.5a, and Objective 3.5b.</p>
<p>2.6a - Include projected water use for all housing in the Housing Element. Yes, we residents should be able to see these figures.</p>	<p>The housing element sites inventory is used to show that there is capacity for housing in the City that meets the needs of RHNA targets. It does not dictate housing development. These sites have already been planned for housing under the existing Zoning Ordinance and the General Plan. These sites have already been considered in water use projections. Additionally, new infill development is often more water efficient than the use it is replacing.</p>
<p>Include child care facilities in EVERY housing project. Why were none included in Pacific Station North and South? The Library-Mixed Use project of 124 apartments will only provide child care for 16 children.</p>	<p>The City cannot require child care facilities in all developments; comment has been noted.</p>
<p>Though the Housing Element mentions "neighborhood vitality," and protecting existing neighborhoods, that seems to conflict with several planned changes. I think it is important to continue the requirement that ADUs have an owner living on the property, who can be held accountable for tenant disruptions to the neighborhood. Do not eliminate the owner occupancy requirement!</p>	<p>Related to Goal 5. Comment noted.</p>
<p>I also am concerned that supportive housing (above 50 units) can be approved "by right", with ministerial approval.</p>	<p>Related to Objective 3.4d. Comment has been noted.</p>
<p>I wish the Housing Element more strongly outlined opportunities for renters to purchase or rent-to-own homes. They could build up equity rather than just paying landlords. With such a high</p>	<p>This is not feasible; however, non-profit organizations may buy properties and implement their own rent-to-buy program.</p>

## City of Santa Cruz 6<sup>th</sup> Cycle Housing Element Update

### Public Comments

Feedback on the July 2023 Technical Assistance Re-Submittal	City Response
percentage of renters, we are cultivating a transient population of people who really don't have a stake in our community.	
I was happy to read that the city is seeing to become an AARP Age-Friendly Community (6.3c). Recent news stories report that our local population of seniors is growing, and they will need city services, city infrastructure designed with them in mind (parks, public transportation, etc.).	Comment has been noted.
<b>Appendix E: Housing Constraints</b>	
Also important was something in the South of Laurel Area Plan - #8 - "Use the existing heritage trees as a basis for streetscape design." There are far too many Heritage Trees being destroyed in this city. Respect the Heritage Tree Ordinance and inform architects that they must design projects to accommodate the heritage trees on the site.	Comment has been noted.
<b>Appendix G: Housing Sites Inventory</b>	
Do you know why UCSC numbers were changed/revised from 1900 to only 300? That seems like a large manipulation/change or miscalculation by ~84%. Where did all the potential units go? Thank you in advance for any response.	UCSC is still planning to construct the same amount of housing, and the City is supportive of UCSC constructing student housing. However, the state is very particular about what kind of housing counts toward the Regional Housing Needs Allocation (RHNA) numbers and doesn't count student dorms, for example. The City's Housing Element must demonstrate that we have adequate capacity to build the number of units required by our RHNA allocation (and this does not reflect the reality of what will be built at UCSC, which is considerably more). So, we decided to take a conservative approach and include only those units in the UCSC development pipeline that we felt confident the State would count toward the RHNA requirement (e.g. not a dorm or other non-standard housing). That is why we reduced the number between the original draft that went out for public review in March and the draft that was submitted to HCD in May. The number stayed the same in the revisions that were released for public review last week.

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### Public Comments

Feedback on the July 2023 Technical Assistance Re-Submittal	City Response
	That being said, we acknowledge that housing comes in an array of types, and that is why one of our proposed policies in the Housing Element (policy 1.4c) is to lobby the state to allow non-standard housing types to be counted toward RNHA numbers.
Somewhere in the document it said we have to have enough housing "for everyone." That will NEVER be possible, as Santa Cruz is a desirable coastal community. It will always be more expensive to live here.	Comment has been noted.
The document should not downplay the poor service level of our Metro bus system. It must be greatly improved if it will actually decrease single car trips. Not everyone can ride a bike or e-bike. Traffic will just get intolerably worse for everyone with the addition of thousands of more residents.	Comment has been noted.

## City of Santa Cruz 6<sup>th</sup> Cycle Housing Element Update

### Public Comments

### *3. HCD Letter Revisions Public Review – August 2023*

After revising the draft Santa Cruz Public Review Draft 6<sup>th</sup> Cycle Housing Element in response to formal review comments received from HCD on August 8, 2023, the revised draft was made available to the community from August 21 to August 28, 2023. Commenters were provided with a City email address to submit comments on each chapter and appendix. The following provides all the comments received, including notes as to how each comment has been addressed.

Feedback on the August 2023 Re-Submittal	City Response
<b>Chapter 2: Policy Plan</b>	
Objective 1.1d enforces unit replacement requirements and should include monitoring unit loss due to consolidation, e.g. the conversion of multi-unit homes into single-family. This could include penalties, such as ADU requirements or other fees.	This is already required to comply with Government Code section 66300 as 1.1d states. A housing project covered under the replacement and no net loss requirements is a property with 2 or more units.
<b>Objective 1.2a</b> adopts an EIR for the Downtown Expansion Plan. The City should consider more units in the Downtown Expansion Plan to account/prepare for future RHNA cycles.	Noted. Staff will continue to consider future capacity in its planning work.
<b>Objective 1.3g</b> is a good addition - we hope that this allows the City to increase the number of units in the Downtown Expansion Plan for future cycles.	Noted
<b>Objective 1.5a</b> includes a review of ADU development and we are pleased to see the added timeline commitment of 18 months. There is still an opportunity for a menu of actions that would facilitate development if it lags such as: <ul style="list-style-type: none"> <li>o Allowing multiple ADUs</li> <li>o Developing a concession program</li> <li>o Other financial or technical incentives</li> </ul>	Objective 1.5a was updated to reflect this comment.
<b>Objective 1.5e</b> could be tightened to “Amend ADU owner occupancy regulations by May 2024.”	Objective 1.5e was updated. It will be updated again before final certification, given that the fate of AB 976 (Ting) will be known at that time. Given community interest in this topic, outreach will be conducted.
<b>Objective 1.6a</b> related to the Planned Development Permit process could be incorporated into a local density bonus program.	Noted
In <b>Objective 2.1a</b> , we suggest this be moved earlier than 2026.	Any amendments to the Inclusionary Ordinance will take some time given the level of market study and outreach needed so the City cannot move this date earlier at this time. Note too that the state’s recent changes to allow a 50% Density Bonus have improved the outcomes of the City’s current Inclusionary Ordinance related to depth of affordability because developers will now also provide very low income units in addition to low income units so that they can meet the City’s inclusionary ordinance of 20% and receive the full 50% state density bonus.

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### Public Comments

Feedback on the August 2023 Re-Submittal	City Response
<b>Objective 2.2c</b> explores additional funding for affordable housing, but only focuses on the potential ballot measure. This could be expanded to a menu of options - e.g. parcel tax tied to upzoning land, impact fees for single-family projects.	Parcel tax would also require a ballot measure. Updated the text from “ballot measure” to “ballot measures” to show that multiple options may be explored. The “such as” language leaves open the possibility of a variety of options.
We appreciate the target number of VLI units in <b>Objective 2.2f</b> . Consider a menu of options for “facilitate”, e.g. ministerial approval, subsidies such as land or funding.	For this particular objective, the small-units allowances themselves facilitate VLI and LI production. Other objectives speak to further facilitation through various means, such as ministerial approval.
We like the newly added <b>Objective 2.2i</b> ! There could be an <b>added objective</b> that is not specific to faith-based organizations to encourage ALL developers to consider Santa Cruz, i.e “why Santa Cruz is a good place to build affordable housing”.	Noted . Other objectives speak to the City’s outreach to the development community on at least an annual basis.
As part of <b>Policy 2.4</b> , we still support establishing a Community Opportunity to Purchase program to give qualified non-profit organizations the right of first offer or refusal to purchase certain properties offered for sale in the City. We also still support establishing a Tenant Opportunity to Purchase program to help prevent displacement, empower tenants, and preserve affordable housing when the owner decides to sell.	Noted
We appreciate the change to <b>Objective 2.5a</b> . This is another opportunity to add a menu of options for assistance for at-risk units, or those with expiring covenants.	This objective seeks to preserve at-risk units and to coordinate with affected tenants in advance. Assistance objectives are included elsewhere in the policy chapter.
We appreciate the tightening of language in <b>Objective 3.1b</b> . This is an opportunity for a menu of options for how the city will “Assist in the development...”, e.g. financial assistance? Land?	Objective 3.1b updated to include menu of options.
We recommend a program that identifies city land and adopts ministerial approval for permanent supportive, transitional housing or homeless shelters or homes accessible to persons with disabilities.	Policy 3.3e supports the development of supportive housing and homelessness services at the Coral Street campus, part of which is on City-owned land.
<b>Objective 3.1c</b> is a good program! Fair Housing Act/reasonable accommodations update should be earlier than January 2025	The City’s Code currently includes reasonable accommodations under 24.12.120 and follows the Fair Housing Act. The updates proposed in 3.1c would include any additional changes beyond the current complying program or other clarifications desired.
<b>Objectives 3.2a, 3.3g, 3.3h and 3.3i</b> lack milestones with dates.	3.2a is ongoing and will be effectuated on a case-by-case basis as projects and/or funding opportunities are available. References to Childcare Impact Fee and Children’s Fund were added. 3.3g - updated. 3.3h - use of City’s lobbyists added to increase specificity. This is ongoing. 3.3i – this is an ongoing part of the City’s daily operations.

## City of Santa Cruz 6<sup>th</sup> Cycle Housing Element Update

### Public Comments

Feedback on the August 2023 Re-Submittal	City Response
Few objectives in Policy 3 related to Homelessness focus on developing housing. It is unfortunate to have <b>Objective 3.3j</b> about unsanctioned camps included.	The draft has several policies regarding extremely low income housing, supportive housing, etc. that are not in this section specifically but would still apply. Note the “relevant policies” line below each objective whenever a policy is linked with other policies and there is overlap. 3.3j is based on policies and goals of the Homelessness Response Action Plan, which is a regional effort supported by the City. 3.3j is an objective specifically regarding mitigation of any environmental degradation caused by unsanctioned camps. This includes litter removal and cleaning of public water sources. The City believes everyone is entitled to healthy and clean public spaces.
<b>Objective 3.3i</b> low-barrier navigation centers update to state requirements should be earlier than June 2025	Noted.
We are happy to see the ministerial approval added to <b>Objective 3.4d</b> and recommend a lower threshold than 50 units.	Ministerial approval for qualifying AB 2162 Supportive Housing project of 50 units or fewer is already required by the state. Council has consistently deemed qualifying projects above 50 units as by-right as well.
<b>Objective 3.5a</b> does not include how the city will facilitate development of units on campus.	Coordination with UCSC executives and staff occurs regularly, and the objective has been updated.
<b>Objective 3.5b</b> (legislation) is vaguely worded to “Support state legislation...” which repeats from the 5th cycle. Note that as recently as 2022, the City formally expressed opposition to proposed legislation intended to facilitate more housing at UCSC.	Noted.
The City could develop a Student Housing Overlay that builds on their Flexible Density Units (FDUs) and encourages housing for students in the city.	Noted
<b>Objective 5.1a, 5.4c, 5.5a</b> lack milestones with dates.	5.1a is daily and ongoing 5.4c – updated. 5.5a is ongoing.
<b>Objective 5.2a</b> What options is the City considering?	Objective 5.2a updated
<b>Policy 6.1</b> focuses on Housing Vouchers with a high reliance on the Housing Authority. The City should consider a city-sponsored voucher program using funding such as CDBG and HOME grants.	The City applies for and receives a lot of CDBG and HOME funding which is used towards assistance programs. Note Policy 3.6 and Objective 3.6a.
<b>Objective 6.1a</b> could include a menu of options for the landlord incentives.	Objective 6.1a updated
<b>Objective 6.2d</b> The time frame for zoning amendments to expand housing opportunities in single family zones should be sooner than 2029. This initiative for single-family and high resource areas should be synchronized with the <b>Objective 6.2e</b> date of 2026.	Objective 6.2d timeline has been moved up to January 2029. Staff has applied for the REAP 2.0 grant to fund this project and



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### Public Comments

Feedback on the August 2023 Re-Submittal	City Response
	if that grant award is accepted, this project completion will be moved up to 2026.
<b>Objective 6.2f</b> should also include updating the Local Coastal Plan (LCP).	Many of these objectives include LCP amendments and when necessary, the City will update the LCP accordingly.
<b>Objective 6.3a</b> the initial milestone of listing properties should be earlier than June 2027.	Noted
<b>Objective 6.4b</b> should be tightened to the action phrase “Amend the City’s Relocation Ordinance by September 2025”	Objective 6.4b updated
<b>Objective 7.1a, 7.1b, 7.1c, 7.2b, 7.3a, 7.3b, 7.4b</b> lack milestones with dates.	7.1a, 7.1b, and 7.1c relate to ongoing efforts by the Water Department and Public Works Department. 7.2b Milestones and dates outlined in other City documents related to sustainability such as the Climate Action Plan. 7.3a Implementing the General Plan’s vision regarding transit oriented development is an ongoing effort. 7.3b this is an ongoing effort 7.4b Updated
The City should add the University to their commitment to provide infrastructure in <b>Objective 7.1c</b> . The City has been and continues to be a significant barrier to development at UCSC, as evidenced by past and ongoing litigation.	Various objectives speak to providing infrastructure for residential projects. As noted previously, the City’s goal in the current litigation is to require UCSC to provide housing on their campus in conjunction with student enrollment growth. The water litigation is about where UCSC grows and the required process associated with that growth.
<b>Objective 7.3b</b> promotes bikeable/walkable neighborhoods, but with few specifics. This could reference current ongoing efforts such as updating the City’s Active Transportation Plan.	Objective 7.3b updated
<b>Transit Oriented Development and Alternative Modes of Transportation.</b> We still encourage a program to look at increased density along the Coastal Rail Trail, with a focus on station locations to ensure rail service is feasible.	Noted. The Regional Transportation Commission’s 2015 Rail Transit Feasibility Study identified 10 years of implementation steps. Steps identified for the first five years have not commenced, so the timing of the rail service will be beyond the timeframe of this upcoming Housing Element Cycle. The General Plan action LU4.2.3 calls for preparation of a Rail Transit Land Use Plan, which the City will undertake in the future after the RTC planning is complete and adopted.
<b>Appendix A: Community Engagement</b>	
<b>Regarding Community Engagement and the results of the survey noted in Appendix A:</b> (sorry if I am mis-reading the numbers shown in the tables of survey results)	Regarding the survey, comment has been noted. The total of 421 is the number of survey responses from the online survey as described on page A-3.

## City of Santa Cruz 6<sup>th</sup> Cycle Housing Element Update

### Public Comments

Feedback on the August 2023 Re-Submittal	City Response
<p>Survey responses of 421 individuals in a city of 61,000 should not be the basis of conclusions drawn by the Planning Dept. <b>In looking further at the tables/charts in the Appendix, I cannot tell if 421 is the total number of survey participants from all the focus groups listed.</b> The chart labelled "Priority Housing Types" shows 180 participants expressed a preference for For-Rent Apartments, and 286 for "Affordable Housing." Did respondents even have a clear understanding of how "affordable housing" is defined? Unless the survey specified how much an individual or family had to earn (AMI) and how much the "affordable" units rent for (or anticipated to rent for in currently and future planned projects), people have vague, "feel good" ideas of what "affordable" means in reality.</p> <p>And although only 36 responders chose "For Sale Condos" in chart #2, in chart #3 there were many in favor of "Apartments/Condos." "1-3 story apartment condos" showed 232 in favor. It is unclear to me whether "Townhomes" would be for rent or for sale.</p>	<p>Regarding affordable units, comment has been noted.</p>
Appendix D: Fair Housing Assessment	
<p><u>Regarding the language in Affirmatively Furthering Fair Housing:</u> I would like to see evidence that densification of single-family neighborhoods in the High Opportunity zones will result in better economic, health or educational outcomes or opportunities for residents of multi-unit apartments built in those neighborhoods. It will not "achieve racial equity" simply because the proportion of residents of different races or ethnic backgrounds is not "equal" in Santa Cruz. I was under the impression that there are no "bad" city schools, that there are parks and open spaces within a short distance of every neighborhood, and that there are no particularly toxic, industrial environments that impact Santa Cruzans in other areas of the city. Kids in Beach Flats attend the same schools as kids in the single-family neighborhoods of the westside (Bayview Elementary, Mission Hill Middle School, Santa Cruz High). Therefore the city seems to meet the AFFH Principles and doesn't have to "relieve disparities" beyond what state law already allows (4 units on a single-family lot). More units than that, up to 10, as suggested by planners at the Aug. 22 City Council meeting as part of their application for a REAP grant, as made possible in Portland, Minneapolis, and other larger cities, would be very disruptive to those who live in single-family neighborhoods.</p>	<p>Comment has been noted</p>
<p><u>Outreach and Engagement,</u> the state's letter states "In addition, the element should address the number of fair housing complaints and the characteristics of complaints..." How many complaints has the city received in the past several years? About which element addressed by the AFFH goals?</p>	<p>Page D-66 was revised to note that there were no fair housing complaints in the City in the last Housing Element cycle.</p>
<p><u>Local Data and Knowledge:</u> "The element must include local data, knowledge and other relevant factors to supplement the analysis...The element could utilize knowledge from local and regional advocates..." There is a range of "advocates" who have different visions of how the city should grow/change/develop. There are groups like Our Downtown Our Future,</p>	<p>Comment has been noted.</p>

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Feedback on the August 2023 Re-Submittal	City Response
<p>Campaign for Sustainable Transportation, youth climate action advocates, the Sierra Club, etc. To my knowledge, the city has not reached out to those groups to get their input. I suspect they have connected with YIMBY, a well-funded organization, though.</p>	
<p><u>Housing Conditions:</u> It must include data on condition of the existing housing stock and estimate number of units in need of rehabilitation and replacement. What are the conditions of housing in the Beach Flats and Lower Ocean St that are in poor condition? Are landlords held responsible to make repairs? (Perhaps undocumented renters are hesitant to complain, but that's not something the Planning Department is required to address.)</p>	<p>Information added to page D-44 indicates that code compliance staff estimates the Beach Flats and Lower Ocean Street neighborhoods have the highest rates of poor housing conditions. If a complaint is received and verified, then the property owner would be held responsible for repairs through the code compliance process.</p>
<p><u>Farmworkers:</u> Given the goal of reducing Vehicle Miles Travelled and assuming there are not many farms within the city of Santa Cruz, but rather in south county and Davenport that employ farmworkers, wouldn't it make more sense to build additional housing closer to where the farmworkers worked? Of course they should have access to good schools, health care, parks, etc.</p>	<p>Pages D-64 to D-65 discuss farmworker housing needs in Santa Cruz and the greater region and references several policies that would target special needs groups such as farmworkers within the City. Comment regarding proximity of farmworker employment has been noted.</p>
<b>Appendix E: Housing Constraints</b>	
<p><u>Infrastructure:</u> "...it must also clarify whether sufficient total water and sewer capacity (existing and planned) can accommodate the regional housing need..." <i>Though the city may be contemplating desal or other water treatment options to accommodate thousands of more residents, there is no guarantee that city residents/voters will approve of that.</i></p>	<p>As described on page E-64, the City's current Urban Water Management Plan confirms that the City is able to provide water capacity to accommodate the regional housing need. The plan provides a variety of options to augment water supply, most of which would not require voter approval.</p>
<p><u>Zoning for a Variety of Housing Types:</u> "The element should clarify shelters are <b>permitted without discretionary action</b> in a zone that allows a residential use..." <i>This will likely meet with opposition and the Planning Department should not think it has the power to force such uses on the residents of this community. The same is true of Transitional and Supportive Housing in residential areas.</i></p>	<p>State law AB 2339 requires emergency shelters to be permitted without discretionary action in a zone that allows residential use. Pages E33-34 clarify that emergency shelter regulations are consistent with the state law in that they are allowed in the Public Facilities district, which allows farmworker housing, and emergency shelter requirements in the zoning ordinance are objective standards.</p>
<b>Appendix G: Housing Sites Inventory</b>	
<p><u>Realistic Capacity:</u> "The element must provide support...demonstrating how the City arrived at these assumptions for realistic capacity." What city planners think is "realistic capacity," many residents see as over-development that will result in poorer quality of life, traffic, water rationing, need for more police, more schools, more medical providers.</p>	<p>Comment has been noted. Revisions were made to Page G-25 and Table G-9 on Pages G-25 and G-26 to remove 100 percent realistic capacity assumption and replace it with an 80 percent assumption. This change is reflected in the sites list as well.</p>

## City of Santa Cruz 6<sup>th</sup> Cycle Housing Element Update

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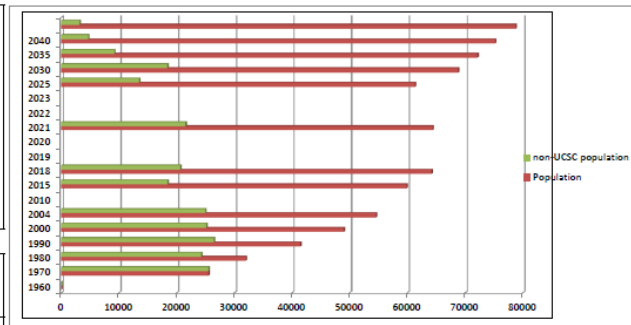
Feedback on the August 2023 Re-Submittal	City Response
	Analysis was also completed to determine the likelihood of non-residential development on mixed use infill sites. This analysis is reflected on Page G-25.
Additional Feedback	
<p>I made an effort to model population of City as a function of UCSC in the attached .xlsx spreadsheet (i pasted a screenshot below). Historical City population and # of UCSC students is fairly well known.</p> <p>I'm still looking for consistent data on the historical number of employees at UCSC. I'm currently using 0.4 * the number of students.</p> <p># of CITY residents who provide services to UCSC folks is just a guess, but heavily influences the result. Changing this number above 115% reduces non-ucsc population to near 0 by 2040 ! This data is particularly hard to gather, due to privacy about where folks work and live.</p> <p>The bar graph on the right will change accordingly as you experiment; red is total population and the green is the non-ucsc population part of total.</p>	See related spreadsheet image below. Comment has been noted.

# City of Santa Cruz 6<sup>th</sup> Cycle Housing Element Update

## Public Comments

This spreadsheet is an amateur effort to model the population of the City of Santa Cruz as a function of UCSC population. You are invited to ADD/CORRECT DATA and to play with the BIG GREEN numbers to model different outcomes. -- thanks Kathy.duncan@pacbell.net

	published-CITY population (including forecast from 6th cycle housing element)	Total 3-Qtr Ave UCSC student populations (UCSC data, WAG interpolation)	Estimate % of students living in CITY (including on campus)	published # of UCSC employees (data hard to find) (conflicting #s; CITY financial reports, county financial reports, UCSC)	Estimated UCSC employees per UCSC student, (WAG linear interpolation from published data)	Estimate % of UCSC employees and retirees? living in CITY (used 2014 UCSC housing market study)	"UCSC folks" = employees, students, retirees living in CITY	WAG Estimate of # of CITY residents per "UCSC folks", who live in CITY solely to provide services (retail, food, government, medical, home repair, insurance etc)	total ucsc - driven population in CITY (students, staff, retirees + residents providing services to UCSC folks)	End Game Santa Cruz
			90%		0.40	50%		110%		
YEAR	Population		of ucsc students	still looking for consistent data	UCSC employees per students	of UCSC employees living in city	addition of previous 2 columns	# residents needed/ ucsc folks	addition of previous 2 columns	non-UCSC population
1960	25,596	0			0	0	0	0	0	25,596
1970	32,076	3,092	2,783	?	1,237	618	3,710	4,081	7,792	24,284
1980	41,483	5,953	5,358	?	2,381	1,191	7,144	7,658	15,002	26,481
1990	49,040	9,456	8,510	3,227	3,782	1,891	11,347	12,482	23,829	25,211
2000	54,593	11,734	10,561	?	4,694	2,347	14,081	15,489	29,570	25,023
2004				3,741						
2010	59,934	16,451	14,806	7,364	6,580	3,290	19,741	21,715	41,457	18,477
2015	64,223	17,276	15,548	?	6,910	3,455	20,731	22,804	43,536	20,687
2018				8,400						
2019				4,200						
2020	64,424	17,000	15,300	8,266	6,800	3,400	20,400	22,440	42,840	21,584
2021				?						
2022				?						
2023	61,352	18,980	17,082	?	7,592	3,796	22,776	25,054	47,830	13,522
2025	68,845	20,000	18,000	?	8,000	4,000	24,000	26,400	50,400	18,445
2030	72,218	25,000	22,500	?	10,000	5,000	30,000	33,000	63,000	9,218
2035	75,257	28,000	25,200	?	11,200	5,600	33,600	36,960	70,560	4,697
2040	78,828	30,000	27,000	?	12,000	6,000	36,000	39,600	75,600	3,228



1964 PRO-GROWTH General Plan amended by "environmental movement" / 1977 Western Drive Master Plan 1976, the chair of Planning Commission Thompson presiding over development at 555 Western Drive said: "We have a very serious housing crisis in this city" <sup>2</sup>

1996 555 Western Drive developed into Cypress Park after 2 decades of battling with Western Limits Association et al. <https://mediafiles.ucsc.edu/ppc/studies/EmployeeHousingMarketStudy.pdf>  
<https://www.sccoplanning.com/PlanningHome/EconomicDevelopment/DataandDemographics/Employment.aspx>  
 2012 General Plan amended by State Declared Housing Crisis and "sustainability/social justice" movements <https://www.cityofsantacruz.com/government/city-departments/finance/financial-reports>

<sup>3</sup> ucsc employees from CITY financial report 2019

<sup>4</sup> ucsc employees from CITY financial report 2019

ucsc not mentioned in CITY financial report 2021 or 2022

City general plan changed to use GROSS LOT AREA (rather than NET) for density calculations, city increases # of units for some parcels by 500%, refuses to accept applications for less than required densities  
 city population estimate 6th cycle housing element  
 city population estimate 6th cycle housing element  
 city population estimate 6th cycle housing element  
 city population estimate 6th cycle housing element  
 city population estimate 6th cycle housing element

2014 BRAILSFORD & DUNLAVEY report for UCSC

<https://mediafiles.ucsc.edu/ppc/studies/EmployeeHousingMarketStudy.pdf>

UCSC Employees	2004	2005	2006	2007	2008	2009	2010	2011	2012	% Change
Faculty	723	740	772	769	807	782	761	740	786	9%
Senior Management	228	219	271	296	350	349	343	352	352	54%
Academic Staff	411	410	443	481	463	422	475	455	413	0%
Support Staff	2,379	2,427	2,495	2,547	2,584	2,388	2,305	2,210	2,187	-8%
Total Employees	3,741	3,826	3,981	4,103	4,710	3,641	3,884	3,757	3,738	0%

Faculty and staff indicated in focus groups that the greatest burden to transitioning to UCSC was the ability to find affordable housing. Survey analysis indicated that the scarcity of homes in their desired price range, monthly mortgage payments, and down payment were their biggest obstacles to homeownership as shown in Figure 2.19. Many indicated that if subsidized housing was not available, they would not be able to continue at their current position.

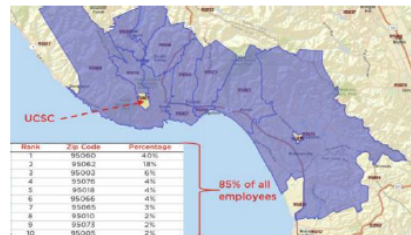


FIGURE 2.19: HOUSING MARKET STUDY AREA

According to Santa Cruz's 2011 Comprehensive Annual Financial Report, [33] the top employers in the city are:

#	Employer	# of Employees
1	University of California, Santa Cruz	7,364
2	County of Santa Cruz	2,319
3	City of Santa Cruz	780
4	Planetree	505
5	Santa Cruz Beach Boardwalk	347
6	Cetco	239
7	Threshold Enterprises	213
8	Community Bridges	212
9	New Teacher Center	211
10	Santa Cruz Biotechnology	204

1.  
from City microfiche...

CITY OF SANTA CRUZ  
CALIFORNIA

For Council Meeting  
Date of July 24, 1976

TO : CITY COUNCIL  
FROM : CITY PLANNING COMMISSION  
SUBJECT : CRITERIA FOR DEVELOPMENT OF LANDS AT 555 WESTERN DRIVE - REFERRAL FROM CITY COUNCIL

Recommended Action

It is recommended that the City Council approve in a minute order the criteria for development of the lands at 555 Western Drive as set forth in a Planning Commission Report of June 24, 1976.

2015 ish State declares housing crisis  
2015 ish

## City of Santa Cruz 6<sup>th</sup> Cycle Housing Element Update

### Public Comments

#### 4. COPA and Santa Cruz YIMBY Comments

The City also separately received comments from two organizations, COPA (Communities Organized for Relational Power in Action) and Santa Cruz YIMBY, between April and July 2023. City Staff and members of the City Council Housing Element Subcommittee meet with each of these groups to discuss their comments and provide responses. The responses to each group are shown in the following tables.

COPA Letter Comment (4.24.23)	Responses and Section Reference
<b>Goal 2: Affordable Housing</b>	
<b>2.1a</b> COPA endorses maintaining the city's current 20% inclusionary ordinance.	Noted
<b>2.2c</b> COPA endorses the proposal for a city bond measure to finance the subsidization of housing construction for greater percentages of below-market-rate units. COPA stands ready to engage in the policy discussions on this concept and participate in the necessary outreach and organizing to secure passage of such a ballot measure.	Noted. 2.2c language was changed to reflect general support for ballot measure rather than City bond measure.
<b>2.2d</b> COPA encourages City lobbyists to work on state legislation to ease pressure on renters. We would like to see state legislation to eliminate application fees, place a cap on security deposits, and provide right to-counsel for tenants facing eviction.	Noted
<b>2.2g</b> Pt. 1: COPA strongly supports the policy of "by right" approval for housing projects that provide 100% affordable units. The City successfully exercised this policy for COPA-member Calvary Episcopal Church for its 60 units currently under construction on its parking lot.  Pt. 2 In addition, COPA urges the City to expand areas of the City that are eligible for by-right approval by applying the standard created by the State under AB2011 to all new development (both residential and commercial) to ensure that new projects have the benefit of streamlined entitlement approval while ensuring local workers are paid fair wages with health benefits.	Pt. 1: Noted. The City does use a by right approval process for 100% affordable housing projects that qualify as supportive housing.  Pt. 2: Will not consider ministerial by right approval City-wide through expansion of AB 2011 to residential zones at this time.
<b>2.3</b> Pt. 1 COPA endorses the use of density bonuses to encourage greater number of units. Furthermore we encourage city staff to explore further incentivization of density by offering additional subsidy to cover additional construction of below-market-rate units, which could be financed with proceeds of a city-wide bond measure.  Pt. 2 COPA recommends the elimination of density limits. There are presently no limits on density for Single Room Occupancy units (SRO's) and single-family homes, and this only incentivizing these housing types over the others.	Pt. 1: Will not consider additional subsidy at this time. The City does not subsidize for profit development, but existing incentives can be utilized. However, 2.1a will require review of the Inclusionary Ordinance for additional ways to meet that requirement and greater flexibility may incentivize production of more affordable units.  Pt. 2 There is no density limit in all parts of the City controlled by Floor Area Ratio (FAR) rather than



City of Santa Cruz 6<sup>th</sup> Cycle Housing Element Update  
Public Comments

COPA Letter Comment (4.24.23)	Responses and Section Reference
	<p>development units per acre (DU/AC). This includes all the downtown and all mixed-use areas such as the corridors.</p> <p>Planning is also seeking to apply for a grant to plan to limit size of single family and allowing additional housing types (such as fourplexes) in single-family zoned areas.</p>
<p><b><u>2.4c</u></b> COPA recommends the City adopt two policy tools to facilitate the acquisition of existing properties for conversion to deed-restricted units. We urge the city to create a Community Opportunity to Purchase Program. The Community Opportunity to Purchase Act (COPA) gives qualified non-profit organizations the right of first offer, and/or the right of first refusal to purchase certain properties offered for sale in the City; and the creation of a TOPA – Tenant Opportunity to Purchase Act, TOPA, or “Tenant Opportunity to Purchase Act”, is an anti-displacement housing policy that gives tenants options to have secure housing when the property they rent goes up for sale, while also preserving affordable housing.</p>	<p>Not considering COPA And TOPA at this time. This program would require extensive new staff resources and funding. While this program has benefits, the costs associated with it are high. Based on initial analysis of other Cities’ programs, the cost/benefit ratio would be much worse than other potential programs so it would not be an efficient use of City resources. The only Cities that have such a program are large and highly resourced. The program comes with other potential issues such as significantly slowing the real estate transaction process. This could impact owners, sellers, and buyers, especially smaller scale “mom and pop” owners. These challenges have made it difficult to implement elsewhere and is not something the City wishes to pursue at this time.</p>
<b>Goal 3: Special Needs and Homeless</b>	
<p><b><u>3.2</u></b> Given the high degree of rent-burdened families in our community, COPA strongly endorses the policy to include childcare centers within housing construction to increase the opportunities for affordable childcare in our community.</p>	Noted
<p><b><u>3.3</u></b> COPA strongly supports the partnerships to provide the Continuum of Care for homeless individuals.</p>	Noted
<b>Goal 4: Housing Assistance</b>	
<p><b><u>4.1a</u></b> COPA endorses the continuance of the security deposit loan program in partnership with the County Housing Authority, however, the program delivery needs improvement to really be effective. The program is not well publicized and the communication, particularly in Spanish, is confusing. COPA recommends the program be changed to allow an applicant to pre-qualify for the</p>	<p>The metric of 50 households was increased to 100 households. While the City and Housing Authority will seek to assist as many households as possible, as a minimum goal, 100 households is more reasonable based on recent assistance trends. Added language “culturally responsive outreach” to the objective as well.</p>

## City of Santa Cruz 6<sup>th</sup> Cycle Housing Element Update

### Public Comments

COPA Letter Comment (4.24.23)	Responses and Section Reference
<p>loan so a tenant can respond quickly once they secure a unit to rent. In a tight rental market, decisions are made within hours and a multi-day, multi-step approval process has discouraged applicants from even trying to apply for this assistance. COPA also recommends greater funds for rental assistance and broader eligibility. The metric of “50 households” over the Cycle period is too low to be meaningful. We suggest a metric that reflects the portion of households that are at highest risk of housing instability illustrated in Table C-18 that reports 3,155 households spend more than 50% of their income on housing. Assuming 25% of these households may encounter an emergency where they may not be able to pay rent in a given month, a metric of 800 households would be more appropriate.</p>	
<b>Goal 5: Neighborhood Vitality</b>	
<p><b>5.2b</b> COPA has found that many tenants are too fearful to report unsafe and illegal living conditions. They are not aware of the law or their rights and the responsibilities of the landlord to provide safe and healthy living conditions. We strongly endorse ‘expanded outreach’ on rental inspection program and code enforcement by working with community groups like COPA.</p>	Noted
<p><b>5.4a</b> COPA applauds the City for recognizing the need for targeted outreach to renters in the neighborhoods South of Laurel St, Beach Flats, and Lower Ocean. It is important this outreach be done on evenings and weekends and in the Spanish language.</p>	Noted. Added language “culturally responsive outreach” to the objective as well.
<p><b>5.5a</b> Pt. 1 COPA strongly endorses this policy to “protect susceptible populations while improving infrastructure, resources and access to affordable units.”</p> <p>Additionally, COPA strongly recommends the City work toward a comprehensive set of policies that would prevent displacement and provide stronger renter protections and relief from the high rent-burdens many experience in Santa Cruz. COPA proposes the following ideas:</p> <ul style="list-style-type: none"> <li>a. Eliminate application fees</li> <li>b. Cap security deposits to be a % of the rent or equivalent to one month’s rent only.</li> <li>c. Improve security deposit loan programs by pre-qualifying tenants before apartment search</li> <li>d. Increase legal assistance funding for more attorneys. There is an urgent need for greater access to free, bilingual legal assistance and “affirmative representation” for retaliation cases, and for displacement cases to be pursued. More funds for Tenant Sanctuary and California Rural Legal Assistance is need to increase staffing hours and hiring of attorneys. No tenant has the funds to pursue a case of retaliation for example.</li> </ul>	<p>Pt. 1 Noted.</p> <ul style="list-style-type: none"> <li>a. Not feasible at this time. Will continue to work with the Housing Authority through Objectives 2.4a, 6.1b, 6.1c, 6.4f and consider this or other ways to reduce/eliminate fees.</li> <li>b. State law allows 2 months and we cannot be below that. Looking into whether we can make that a maximum.</li> <li>c. Noted. Covered by Objectives 4.1a and 6.2b</li> <li>d. Noted. Covered by Objective 6.3b</li> <li>e. Noted. Covered by Objectives 4.1a, 5.4a, 5.5c, 6.3b, 6.4d</li> <li>f. Not considering this at this time. This was previously contemplated when the rent control</li> </ul>

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<p>e. Proactive tenant outreach and education programs to explain rights, assistance programs.</p> <p>f. Rental Registry to provide accurate data on rental market trends.</p> <p>g. Increase funding for rental assistance, possibly as a portion of Transient Occupancy Tax for renters who live and work in Santa Cruz as a way to support the hospitality workforce and prevent them from leaving the City.</p> <p>h. Partnership with District Attorney and/or the County Public Defender to enforce existing local and state civil codes to uphold tenant protections.</p> <p>i. Research models that allow rent with the option to buy for condos and townhomes.</p>	<p>measure was being considered and did not receive support.</p> <p>g. Noted. Covered by Objective 6.1b. Looking into whether there can be a workforce preference.</p> <p>h. Outside of City purview. Not considering it at this time.</p> <p>i. Not feasible at this time. Financing models do not support mixed ownership projects.</p>
<b>Goal 6: Affirmatively Furthering Fair Housing</b>	
<p><b>6.1c</b> COPA endorses the policy of coordinating with the Housing Authority to pursue more funding for housing vouchers and the removal of barriers to utilize housing vouchers.</p>	Noted
<p><b>6.3b</b> COPA strongly endorses the need for increased funding of bilingual legal assistance and outreach for tenants.</p>	Noted
<b>Goal 7: Resource Conservation and Environmental Stewardship</b>	
<p>COPA strongly supports policies to “Support transit-oriented development and non-motorized transportation.” and believes that the urban compact form of development will aid in achieving this goal.</p> <p>COPA recommends the City implement a policy that affirms support for preference in leasing of new and existing affordable units that prioritize people who work in the community. Because such preferences get people closer to where they work, they have the added public benefit of not only ensuring that local workers get access to affordable housing opportunities but also reducing greenhouse gas emissions and traffic by reducing worker commutes to jobs in the City of Santa Cruz. Data analysis must be done to ensure that the demographics of the workforce in the target area (city or county) is reflective of the workforce as a whole to ensure no disparate impact is created on a protected class or group.</p> <p>Such a preference can also be expanded to include not only local workers but also local, low-income residents in those neighborhoods where low-income residents are at risk of displacement due to gentrification pressures. An example of such a program is the one implemented by the County of Santa Cruz at the 17th and Capitola affordable housing project in Live Oak. Data analysis must be done to ensure that such a preference does not create a disparate impact on a protected</p>	<p>Santa Cruz has an existing local preference program. City Code references the local preference in 24.16.045 (6) &amp; (7). See below:</p> <p>6. As consistent with state and federal law, preferences for rental inclusionary units shall be given in the following priority order:</p> <ol style="list-style-type: none"> <li>Residents of the city of Santa Cruz for at least one year.</li> <li>Those employed in the city of Santa Cruz.</li> <li>Residents of the county of Santa Cruz for at least one year.</li> <li>Those employed in the county of Santa Cruz.</li> </ol> <p>7. As consistent with state and federal law, preferences for ownership inclusionary units shall be given in the following priority order:</p> <ol style="list-style-type: none"> <li>Those who live or work in the city of Santa Cruz.</li> <li>Those who live or work in the county of Santa Cruz.</li> </ol>

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group, but neighborhood based, anti-displacement preferences have been successfully implemented across the State in neighborhoods that are classified as “areas of economic distress” and that are home to a disproportionate number of low-income residents that are at risk of displacement.	
<b>Appendix G: Housing Sites Inventory</b>	
We would like to see the City identify and include its surface parking lots to be included on the site inventory. The surface parking lots could be reconfigured as housing projects, including parking on the lower levels so as not to lose city-owned parking resources. The downtown mixed use library is a good example of this potential. Parking funds could be used to finance construction (MidPen Housing coordinated a model project with San Mateo).	The City has included all the City-owned sites downtown based viability and feasibility of affordable housing.
The City has an impressive list of pipeline projects. To facilitate the completion of these pipeline projects in an expeditious manner, we urge the City to make a commitment to refrain from lawsuits that would inhibit the University of Santa Cruz to proceed with its student and faculty housing projects.	The City will not commit to refrain from future lawsuits. The only lawsuit between the City and UCSC is the City seeking greater USCS commitments to housing and is not inhibiting housing. Objectives 3.5a and 3.5b continue to support UCSC in its effort to produce housing.
The City could take additional steps to accelerate the pipeline projects by expediting the review process or identifying ways to provide administrative approvals.	The Objective Standards process approved last year instituted new administrative approvals for multifamily housing. Various policies will continue to seek more streamlining.
Of the 2492 units proposed, we recommend timelines be established as metrics to encourage a timely review process.	City has timely review timelines established by State law. Staff added status updates and noted potential constraints is the most recent revision.
It appears that the City does not need to complete any further re-zoning to meet its RHNA target numbers. We suggest the City continue to identify areas that could be re-zoned to further encourage property owners to consider land use for housing.	Noted

YIMBY Comment Letter (7.5.23)	Responses and Section Reference
<b>Goal 1: Housing Production</b>	
It is stated under Policy 1.2, and more fully in Appendix D: Fair Housing Assessment, that most new housing will be concentrated in the central core of the City, meaning along major commercial corridors and on major opportunity sites. With this area receiving over 45% of the new housing, including over 40% of the Very Low and Low-Income sites, we believe that the City should be looking towards additional opportunities to meet AFFH goals, including in majority single-family neighborhoods of other districts.	The downtown area is the most amenity rich part of the City and is the most sustainable area to grow. The Housing Element does still support densification efforts in lower density areas so there is a reasonable balance of objectives. Changing the general plan and zoning in areas where SB 10 does not apply is more time consuming and more costly, particularly as it relates to required CEQA work, which also

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<p>We believe the City can and should go further to enable more housing types in its most resource rich neighborhoods. Objective 1.3e intends to utilize SB 10 to increase residential density in transit rich areas, which in Santa Cruz are not high resource. The SB 10 scope should be expanded to include urban infill sites in high resource districts outside of transit rich areas to allow for more affordable housing throughout the City.</p>	<p>can be challenged – leading to more time and cost. Many of the SB 10-eligible areas are in high-opportunity areas, e.g., a large portion of the Upper Westside (1/2 mile in each direction from Bay St.), Lower Westside (1/2 mile from Bay and Mission), and East Side (1/2 mile from various Soquel Ave. stops). These locations provide intensification options that are both in areas of good educational and economic outcomes <i>and</i> locations in close proximity to everyday needs, like employment, shopping, services, and transit.</p> <p>However, staff does believe increasing density in single family neighborhoods is important for a variety of reasons, especially AFFH. This is work Planning is hoping to do if it receives REAP 2.0 funding from AMBAG and HCD for the project noted at the 8/22/23 Council meeting.</p>
<p><b>Pipeline Projects</b> A large source of new units for the City during the 6th cycle will be from pipeline projects. For jurisdictions relying heavily on pipeline projects, HCD recommends that “...the element should include programs with actions that commit to facilitating development and monitoring approvals of the projects, including the number of units and affordability (e.g., coordination with applicants to approve remaining entitlements, supporting funding applications, expediting approvals and monitoring of project progress, including rezoning or identification of additional sites, if necessary).” We suggest that the city commit to implementing such a recommendation to facilitate development, such as by proactively monitoring and facilitating post-entitlement developments with technical and/or financial assistance.</p>	<p>Each project has potentially different needs, but policy language was revised to include greater committal to specific action or provide a list of potential options to consider should the production of housing need promotion. Revised policies in this vein include 1.3b, 1.5a, 2.2g, 2.2i, and 2.4a,</p>
<p><b>Mid-Cycle Review.</b> Pt. 1 We would like to see an objective with a more active mid-cycle review and adjustment. Tying this review to commitments to increase housing production such as rezoning, ADU incentives, or removing development constraints would allow the City to minimize impacts of falling behind in the 6th cycle. Making these commitments specific now would reduce the staff time required to implement mid-cycle.</p> <p>Pt. 2 As part of the mid-cycle review, the City should create objectives that monitor the progress of pipeline projects. This should include automatic entitlement extensions until midway through the 6th cycle, a commitment to advocate for city-entitled projects to be approved by the Coastal</p>	<p>Objective 1.3b calls for at least annual meetings with the development community to understand what changes can be implemented to improve project feasibility. Objective 1.5a commits to an annual review, not just a mid-cycle review. Additionally, staff will be revising this policy to include a suite of potential incentives to consider should additional progress in housing production be desired. Objective 1.1b calls for an annual review of the inventory. 6.2a also calls for annual coordination with the development community.</p>

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Commission, and proactively reaching out to all pipeline projects to confirm that there is still development interest.	Pt. 2 Noted, and some of the objectives, like 1.3b, will naturally work towards these goals.
<p>Objective Standards</p> <p>The City should expand Objective 1.2b to include a policy that any project found consistent with Objective Standards is placed on the consent agenda for all hearing bodies. Such projects should only be appealable to council if denied by the planning commission, or if the appeal is related to consistency with objective standards. This would greatly increase the incentive for developers to design projects compliant with the standards.</p>	Noted. Objective 1.2b was amended to included language that Objective Standards supersede subjective ones.
<p>Parking. We are pleased to see that the elimination of parking minimums is intended as a policy objective, however it is not stated as a commitment in objective 1.3c. In the City's work to achieve this, we believe the elimination of such requirements within a mile walking area of five or more amenities (pharmacies, grocery stores, transit stops, etc), and in very low vehicle travel areas, would be a good intermediate policy steppingstone.</p>	Noted
<p>FAR and Density</p> <p>Pt. 1 A significant constraint to development of 2+ bedroom units is the units/ acre density requirement, something that does not apply to smaller units such as SROs. In order to increase the number of family sized (2+ bed) units built, this constraint should be removed or significantly modified.</p> <p>Pt. 2 This should also be addressed by increasing the FAR for projects consisting of 50% or more 2+ bedroom units. This increase should allow the same net number of units as if they were proposed as SROs or a similar unlimited density unit.</p>	<p>Pt. 1 The City has Flexible Density Units (FDUs) which are small units that do not count towards unit/acre density. This can incentivize a developer to build smaller, more naturally affordable units. At up to 650 s.f. in size, FDUs can accommodate small, 2-bedroom units which is a real desire for some families., and FDUs can also incentivize development of larger 2+ bedroom units that are supported by additional FDUs when units/acre densities are met.</p> <p>Pt. 2 Noted. This is an idea Planning will explore further, especially if the City sees a prevalence of studio and one bedroom projects.</p>
<b>Goal 2: Affordable Housing</b>	
<p>Pt. 1 The ordinance options allowing 100 percent affordable residential development to be considered a "by-right" use would greatly speed along much needed affordable housing. As such, we urge expedited approval of Objective 2.2g to 2024 or earlier rather than a quarter of the way through the 6th cycle. A commitment to developing or declaring city parking lots downtown surplus by a certain date with the goal of providing affordable housing would also be a valuable policy.</p> <p>Pt. 2 As part of objective 2.4c, we support establishing a Community Opportunity to Purchase program to give qualified non-profit organizations the right of first offer or refusal to purchase</p>	<p>Pt. 1 Noted. The City does allow expedited review of 100% affordable currently if it qualifies as supportive housing.</p> <p>Pt. 2 A COPA or TOPA program will not be considered at this time. See comments on the response letter to COPA under 2.4c above.</p>



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<p>certain properties offered for sale in the City. We also support establishing a Tenant Opportunity to Purchase<sup>4</sup> program to help prevent displacement, empower tenants, and preserve affordable housing when the owner decides to sell.</p>	
<b>Goal 3: Special Needs and Homelessness</b>	
<p>Pt. 1 Permanent supportive housing is a key solution towards solving homelessness. Policy 3.4 should explicitly indicate equitable distribution (and development potential) of such housing across all districts.</p> <p>Pt. 2 Persons with disabilities benefit from the development of extremely low- and very low-income housing. Objective 3.1c falls short of any commitment to develop housing, only to “publicize housing accessible to persons with disabilities”.</p> <p>Pt. 3 The City should increase incentives for extremely low housing in objectives under Policy 2 - Affordable Housing, such as additional density bonus (Policy 2.3) or modification of the inclusionary ordinance (objective 2.1a) or by-right approval (objective 2.2g) to favor more extremely-low homes</p>	<p>Pt. 1 Noted, and Objective 3.4b was updated.</p> <p>Pt 2. Noted. Objectives 3.1c and 3.1d were updated, and various objectives were strengthened as it relates to ELI and VLI housing.</p> <p>Pt. 3 Policy 2.3 and Objectives 2.1a and 2.2g will consider potential ways to incentivize different levels of affordability, including ELI.</p>
<p>The University</p> <p>Pt. 1 The two objectives related to the University of California, Santa Cruz (UCSC), 3.5a and 3.5b, are vaguely worded to “Continue to collaborate...” and “Support state legislation...” which are repeats from the 5th cycle. Note that as recently as 2022, the City formally expressed opposition to proposed legislation intended to facilitate more housing at UCSC.</p> <p>Pt. 2 The City has been and continues to be a significant barrier to development at UCSC, as evidenced by past and ongoing litigation<sup>6</sup>. This is not acknowledged in the constraints portion of the City’s housing element. The city should make a good faith effort to analyze the barriers it presents to housing construction and planning with regards to UCSC and propose programs to mitigate these impacts. The city should commit to providing municipal services to new housing at UCSC and a policy to not sue over housing production on campus or to obstruct UCSC housing projects through other means such as withholding water access via the Local Agency Formation Commission process.</p>	<p>Pt. 1 Noted</p> <p>Pt. 2 The City’s current LRDP litigation with UCSC is seeking greater housing commitment from UCSC, not to delay housing. The crux of the LRDP litigation is the City wanting UCSC’s planned enrollment increases to be tied to UCSC constructing new student housing. Doing so would help protect the City from being impacted by even greater housing pressures should enrollment be increased without any new student housing development to support it (as is currently possible under UCSC’s Long Range Development Plan).</p> <p>UCSC has also recently sued the City, arguing that the City was contractually obligated to provide water service to areas outside the City’s existing service area, without UCSC having to go through the appropriate LAFCO approval process. The trial court agreed with the City. The trial court ruled that the City is not obligated to provide the water service to UCSC outside its service area and that, absent</p>

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	annexation of the new service area to the City, UCSC is legally required to engage in the LAFCO process before the City provides water service to new areas. As of now, UCSC is free to annex the new service area to the City or go through the appropriate LAFCO process to add areas where it would be served by City water. In addition, UCSC has ample property in its current service area where development could occur without having to annex or engage LAFCO for approval.
<b>Goal 5: Neighborhood Vitality</b>	
Policy 5 opens with the following context: “Quality of life is shaped, in part, by neighborhood conditions in Santa Cruz. As an older, established community, Santa Cruz requires a concerted effort to encourage the maintenance, rehabilitation, and improvement of housing and to promote sustainable, livable neighborhoods in the face of increasing density.” We wholly reject the framing that density and sustainable, livable neighborhoods are incompatible. The city should update this language.	Revision made in 7/26/23 submittal to HCD
<b>Goal 6: Affirmatively Furthering Fair Housing</b>	
<p>Pt. 1 As discussed in our Housing Production section, a majority of new housing is being planned along major corridors. This leaves out many exclusive and high opportunity neighborhoods from producing their fair share of housing. Creation of missing middle housing isn’t mentioned within the policy plan - the City should adapt zoning regulations that would incentivize this form of housing. Examples include reducing minimum lot size, lot width, and parking requirements (kudos to the latter already being included!) We believe the City can and should go further to enable more housing types in its most resource rich neighborhoods. Objective 6.2d should use SB 10 to increase density in R1 districts, not just to allow construction of Flexible Density Units (FDUs). FDUs are a housing type, not a zoning district. The time frame for zoning amendments to expand housing opportunities in single family zones should be sooner than 2029 as proposed in Objective 6.2c.</p> <p>Pt. 2 Similarly, the City’s deadline for updating the local SB9 ordinance consistent with State Law should be earlier than 2027.</p> <p>Pt. 3 Policy 6.4 recognizes that displacement may follow new development. Improvements of community assets, as proposed in Objective 6.4a may also result in displacement. This objective should include applicable antidisplacement strategies.</p>	<p>Pt. 1 Staff is seeking to do this work sooner should Planning receive REAP 2.0 competitive funding from AMBAG.</p> <p>Pt. 2 The City follows state law as required and does have SB 9 guidelines posted. Updating the Ordinance simply to reflect what is already required is not a high priority. However, should REAP 2.0 grant funding be approved, Planning will adopt an SB 9 ordinance sooner than 2027, as the project would include developing objective standards for a variety of development in single family neighborhoods, such as SB 9 projects.</p> <p>Pt. 3 Noted, and Objective 5.5b on Anti-displacement policies was strengthened in this revision.</p>
<b>Miscellaneous</b>	

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<p><b>Sites Inventory - Small Sites Program</b>  The site inventory identifies a significant number of small parcels for development, many of which are projected to accommodate low income units. Per HCD's Site Inventory Guidebook "A parcel smaller than one half acre is considered inadequate to accommodate housing affordable to lower income households, unless the housing element demonstrates development of housing affordable to lower income households on these sites is realistic or feasible." The City claims that many of these parcels have development opportunities due to common ownership with adjacent parcels; the Housing Element includes no objectives in the Policy Plan with specific incentives to facilitate consolidation. We recommend an incentive program such as a FAR density bonus for projects which involve small lot consolidation.</p>	<p>Objective 1.1e was added to promote the development of affordable units on small parcels through lot consolidation and coordination with property owners.</p>
<p><b>Upzoning Near Potential Light Rail Stations</b>  The RTC has multiple scenarios for a passenger light rail route. In most scenarios stations would be located on the Westside, Bay/California, Downtown, and Seabright. We encourage a program to look at additional density along the Coastal Rail Trail, with a focus on these station locations.</p>	<p>Noted. Transit use is most beneficial when jobs uses are located near stations, not residential.</p>
<p><b>Tenant Protections</b>  As a majority-renter city, it is important that we have strong tenant protections. There are a number of programs we would like to see implemented or expanded in the City including:</p> <ol style="list-style-type: none"> <li>1. Elimination of or cap on rental application fees</li> <li>2. Creation of a rental registry. This was recently passed by both Salinas and Monterey</li> <li>3. Local preference for people employed in the county</li> <li>4. COPA and TOPA programs (see Policy 2 - Affordable Housing)</li> <li>5. Conduct a disparate impact analysis of non-high(est) resource areas and apply a live-work preference if it matches county demographics</li> </ol>	<ol style="list-style-type: none"> <li>1. Will not be considered at this time, but 6.4f does call for exploration of a similar objective with community partners.</li> <li>2. Will not be considered at this time</li> <li>3. The City has an existing local preference program. City Code references the local preference in 24.16.045 (6) &amp; (7).</li> <li>4. Will not be considered at this time</li> <li>5. Noted</li> </ol>
<p><b>Need for Active Language, Dates and Measurable Metrics</b>  Objectives/Time frames lack active language, dates, and measurable metrics to determine the success of the objective. Time frames are often a recitation of the process, not a commitment to an outcome</p>	<p>Multiple revisions of this nature were made in the 7/26/23 draft submittal to HCD. Additional edits related to this comment were made in this latest revision as well.</p>

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#### *5. HCD Technical Assistance Public Review – October 2023*

Revisions to the Santa Cruz Draft 6<sup>th</sup> Cycle Housing Element, based on Technical Assistance provided by HCD mid-way through the review of the second draft, were made available to the community from October 12 to 19, 2023. Commenters were provided with a City email address to submit comments on each chapter and appendix. The following provides all the comments received, including notes as to how each comment has been addressed.

Feedback on the October 2023 Submittal	City Response
<p>I live in Deanza and I am a strong proponent for mobile homes for seniors.. as both rental and home ownership. since there are only 3 mobile home parks in city of Santa Cruz, and only for for seniors.. over 55, how is this housing “preserved and sustained without rent control in the city? I have been trying to advocate for this issue for last 1.5 years without a lot of interest but no movement.</p> <p>can you assist to strengthen the language in element to preserve mobile homes in city for more than moderate plus income persons?</p> <p>I have a list of recc. That I sent mayor that I can send you too. hopefully it’s a document in process!</p>	<p>Policy Objective 6.4e relates to mobile home rent control. Staff and the Council subcommittee have reviewed this policy and deemed it sufficient with no further edits needed. The additional list referred to in the comment is also related to mobile park rent control and is satisfied by the existing policy.</p>
<p>How many additional potential units were created in the City as a result of the General Plan change to use GROSS rather than NET for density calculations?</p> <p>Which parcels besides our lot at 190 westview court were affected? For instance, 5 additional potential HU's were added to ours.</p> <p>How many potential HU's IN TOTAL did the city get from this change?</p> <p>I haven't come across a discussion of how this change to the General Plan came about. Scrounging for HU's? imitating another jurisdiction? or something else?</p> <p>I can look harder for a discussion in city docs. Just thought one of you guys might remember the rationale.</p> <p>I know the City and County struggle to control the growth of UCSC campus.</p> <p>fyi: I've discussed my concerns about the University's displacement of Santa Cruz City residents, with Ian Klein at LAO.</p> <p>He asked me to send my end-game-santacruz spreadsheet. It will be interesting to get his fact-checking and feedback. Maybe i'm exaggerating the effect. I asked Ian if the State/Regents have considered adding a sister campus in Watsonville, and he said this had "come up" but is complex and far future.</p> <p>And of course that decision should be made in Watsonville.</p>	<p>There was not a change in the City’s General Plan regarding the changes this comment references. However, there was a change to the City’s slope regulations which allow for additional land area to be considered for housing development.</p> <p>UCSC’s growth and process for planning for growth are separate from the City’s processes. However, as noted in Policy Objective 3.5a, the City will continue to collaborate with UCSC as it relates to housing and growth plans.</p>
<b>COPA Letter 10.19.23</b>	
<p>In the early community meetings, COPA leaders asked if it was appropriate to propose tenant support policies in the Housing Element. We were encouraged by your consultants to contribute</p>	<p>Additional explanation regarding the rejection of community/tenant opportunity to purchase programs was</p>

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Feedback on the October 2023 Submittal	City Response
<p>our ideas. We held a COPA civic academy attended by 81 residents in February attended by Mayor Keeley and Councilmember Brown. We submitted our suggestions and received your responses, some of which were rejected without any explanation (community or tenant purchase opportunity programs, in effect in some cities) while you explained that some already existed (local preference) which was instructive. You did incorporate two concepts we proposed, to provide “culturally responsive outreach” and increase the goal for the number of people served by the existing security deposit program.</p> <p>However, we do want to state on the record that overall, we notice a lack of urgency and ambition to stem the tide of homelessness and displacement that faces most Santa Cruz tenants every single day. As the least affordable community in the nation, we expect more can be done to keep families housed through the policy options we proposed and expected more willingness to seriously consider community-generated solutions.</p> <p>To be specific, regarding Policy 4.1a, we shared how the existing security deposit program is cumbersome, not well marketed, with language barriers and therefore, underutilized. Based on our comments in April, you increased your initial goal from assisting 50 households to 100 over the life of the planning cycle, justified by the “recent assistance trends.” Based on the stories our members have shared, the low number of “recent assistance trends” is more than likely due to the barriers to access the program and its poor design to meet the real-world situation facing tenants in a tight rental market. It is not sufficient to point to a program and check that box if the program itself needs to be evaluated and improved to have real impact for renters to stay housed. Given the large number of rent-burdened tenants, (over 3000 pay more than half their income on rent), COPA expected to see more commitment to examine and improve this program.</p>	<p>added to the responses to the April 24 letter from COPA. This program was rejected at this time based on analysis of current and proposed programs in other cities and finding the significant cost and staff resources of the program make it infeasible. Should more funding and staff be available, it was also determined that this program does not have a strong cost/benefit ratio and that other programs with more impact should receive additional resources first.</p> <p>The City continues to seek additional resources to assist households. Policy 4.1’s metric of 100 households is set at a minimum to establish a commitment based on what is currently feasible, with the City continuing to work towards assisting more as resources are available. Other actions are included in the Housing Plan for the City to continue seeking funding opportunities to increase City resources.</p> <p>Based on this comment, Policy objective 4.1a has been further revised to include the desire to work with community partners to better understand potential barriers to the current program and consider changes based on those findings. A timeline for these potential changes to be considered is included.</p>
<p>Another opportunity to take immediate action to prevent tenants from losing their homes, is to provide a more robust system of legal assistance to teach both tenants and landlords the law, their rights and their respective responsibilities. Policy 6.3b states the City will continue to fund bilingual assistance, and let service providers know about funding opportunities, but the goal of reaching 50 households is unambitious and woefully disproportionate to the need. Given that more than 3000 households are rent burdened and housing insecure and the high degree of fear of retaliation or eviction inevitable in a tight rental market, a proactive and larger scale effort to ensure tenant and landlord education is necessary if we are serious about preventing homelessness.</p>	<p>Additional language regarding promotion of bilingual tenant legal services has been added to Policy Objective 5.5c. Appendix F also provides information on additional community resources available to residents, including the Community Advocate Resources Team and Continuum of Care system which provide legal assistance to special housing needs groups.</p> <p>In addition, the City currently contracts with California Rural Legal Assistance (CRLA) and Tenant Sanctuary to provide bilingual fair housing assistance and landlord and tenant legal information.</p>

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### Public Comments

#### *6. Second HCD Letter Revisions Public Review – November 2023*

After revising the draft Santa Cruz Public Review Draft 6th Cycle Housing Element in response to formal review comment received from HCD on October 27, 2023, the revised draft was made available to the community from November 3 to 10, 2023. Commenters were provided with a City email address to submit comments on each chapter and appendix. The following provides all the comments received, including notes as to how each comment has been addressed.

Feedback on the November 2023 Re-Submittal	City Response
<p>Thanks for the clear direction to the changes. Once again, I'm impressed by Staff's work here, by the town's progress against RHNA 5, and the town's capacity to achieve RHNA 6 goals (depending upon developers' activity, of course). I'm confident that our town will be "doing its part" to address our critical housing situation.</p> <p>I also appreciate the narrative regarding whether and to what extent various UCSC development outcomes "count" against our RHNA 6 goals. I will admit to some frustration that so many of these units may not count, and with the University's weak commitment to true affordability for many of those beds (with the effect that students are motivated to move off campus and further exacerbate the town's critical housing situation). I believe that the University should provide truly affordable on-campus housing, well below "market" costs.</p> <p>I do have a question regarding the 831 Water St project that is included in the Appendix G inventory in several spots. I think that there may be some inconsistent information in the Appendix (or I may be mis-interpreting the information provided). Specifically:</p> <p>[Page G-8] The project is described as "Mixed-use SB35 streamlining project with 50% affordable residential and commercial."</p> <p>[Page G-12] The project is described as including "55 deed-restricted L" (out of 140 total units)</p> <p>[Page G-14] The project is shown to include 55 "moderate" and 85 "above moderate", with Affordability deemed "Lower".</p> <p>My understanding of the project that was approved by Council in December 2021 (see page 25.8 of the Council packet for the 14 Dec 2021 meeting), is that it includes 55 affordable units (80% of AMI, rent at 60% of AMI). I will concede that the project went through many changes during its review process, and also that I'm unclear about whether these units are deemed affordable at the "moderate" or "low" income level. As a result, I'd appreciate some clarity regarding:</p> <p>How the project qualifies as including 50% affordable units, when only 55 are deemed affordable out of 140 planned units (more like 40% affordable)?</p> <p>Whether the deed-restricted units are considered affordable to households of "lower" or "moderate" income?</p> <p>In addition, it would seem that the document should be edited to make the references to this project internally consistent.</p>	<p>831 Water used a density bonus to achieve the 140 units. Per density bonus law and SB 35 legislation, the 50% affordable requirement is on the "base" units, not on the total units of the project (which includes the density bonus units). The base project without density bonus is 109 units so 55 affordable units are needed to achieve the 50% required by SB 35 and then the project proposed another 31 density bonus units to reach 140. The affordable units are low income so it was just a typo when "Moderate" was in the table on G-14 – this typo has been corrected.</p>

## City of Santa Cruz 6<sup>th</sup> Cycle Housing Element Update

### Public Comments

Feedback on the November 2023 Re-Submittal	City Response
<p>Regarding the anti-growth measures, we see the redlines in October and understand that you wish to more broadly address such measures throughout the planning period.</p> <p>The statement “The City does not currently have an adopted growth management measure, and as such, this is not considered a constraint to housing development, and particularly affordable housing development, in the City.” is technically true. However, the certification date for the Housing for People measure is November 21st before the HE deadline and the likelihood that it qualifies for the ballot is high.</p> <p>Given that this anti-growth measure is more than theoretical (and a definite constraint), we advocate for a clearer picture of the impacts and routes to minimize impacts wherever possible if it does pass. It should be more explicitly addressed in the Housing Element plan.</p> <p>We look forward to seeing your analysis/impact report sooner than the due date of Feb 13, 2024. Thank you in advance for that work.</p>	<p>While the measure will be certified for the ballot prior to the Housing Element being certified, it will not be voted on until March. It is currently not a definite constraint, and that is why we approached like we did. At this time, planning staff are broadly aware of the serious impacts of measures like this one and included that information in the Housing Element.</p> <p>The City will be hiring an expert consultant to do a detailed analysis and impact report on the measure and that is anticipated to be presented to the Council and public in January. This will provide the public with a better understanding of the measure’s impacts prior to the vote.</p>
<p>After looking at the document, I would just like to uplift the portions about doing more outreach to the Spanish-speaking members of our community. I grew up in the Beach Flats, so I know immigrant communities are typically the last to hear about anything the city does. Partly due to the language barrier. I was happy to see that this issue had already been discussed.</p> <p>However, I was concerned to find no mention of whether these new affordable housing plans will be available to our undocumented community members. Usually immigration status can deter members of my community from seeking new housing. I encourage the city to look into this and make sure the new affordable housing developments are accessible to our undocumented Santa Cruzans.</p>	<p>The City’s Affordable Housing Trust funding and assistance programs do not require verification of documented/undocumented status. However, if a program or project has federal funding, the federal funding program regulations may require verification of documented/undocumented status from someone in the household even if the City doesn’t require it. State housing-related funding programs do not require verification of documentation status.</p>
<p>Recently, population growth figures for CA have been revised way DOWN. This new information shows Santa Cruz needs NO MORE Market Rate units and the overall number needed is far below your number proposed for 2023-2031.</p> <p>Traffic is terrible already and UCSC still wants to grow.</p> <p>Our water resources are already strained and you should NOT be recommending more units than is truly necessary for these reasons:</p> <ol style="list-style-type: none"> <li>1) When you propose more units you are taking away the water rights of people who have been established here for decades and provide food and shelter-plants for native wildlife and birds and fruits and garden produce for people, too!</li> <li>2) Water “quotas” from the Santa Cruz Water Department are not set to allow even very careful maintenance of established plantings. These plantings include preservation of</li> </ol>	<p>Even with the potential population trends you note, the city, region, and state are woefully short of the housing needed. For instance, in Santa Cruz County, many population projections show that most new housing units would not increase population greatly since there is a latent demand created by so many people currently living in crowded housing conditions.</p> <p>There are well-studied and known housing needs for both market rate and affordable housing in the city, region, and state. Because of this, the state has housing targets that Santa Cruz must try to reach for both market rate and</p>



## City of Santa Cruz 6<sup>th</sup> Cycle Housing Element Update

### Public Comments

Feedback on the November 2023 Re-Submittal	City Response
<p>hillsides necessary to the safety of properties on steep slopes. Example: Even though I have rainwater catchment of 1060 gallons in tanks and graywater to plantings from both my washer and my shower, my recent water need/use was 100% over my SCWD allotment with ZERO leaks. I have explained extensively how I must maintain vegetation on both a steep uphill and a steep downhill into the canyon to protect my property, but the SCWD has not given me a fair allotment even though my water use used to be seen as fine.</p> <p>3) While SCWD has worked to keep our energy use low so our water is consistent with our SC Climate Policy, building the number of units in your proposed policy will expose the whole City to drought conditions and require more water production that is extremely energy intensive and costly. This will push people to let go of the resources that help our pollinators, our native plants, birds and wildlife and heat up our City, too.</p> <p>4) SCCity will be forever a drain on climate instead of meeting our climate neutrality goals if we have to build a water factory!!! This will be more and more expensive as climate worsens and the pressure raises the price of fossil fuels.</p> <p>5) 4). Much of the units now proposed are in low elevation areas where they will be inundated by sea level rise.</p> <p>6) Even our sewage treatment plant is at risk from overtopping from storm surges as early as 2030 and we need our City's resources to shore up against sea level rise.</p> <p>Our sewage treatment plant serves south to Aptos and each area has been given new housing unit quotas.....do we even have the capacity at our sewage treatment plant to handle all this increase? How much will it cost us to increase it if all the areas that use it build so much more housing?</p>	<p>affordable housing. The Housing Element is the tool used to how the state how it seeks to achieve those targets. In addition to the City doing its part to help solve the housing crisis, the state has a penalty for not meeting both market rate and affordable housing targets and that is taking away local decision-making and environmental review to streamlines housing development. For both of these reasons, it is in our interest to support both market rate housing and affordable housing.</p> <p>As for water, our general plan has studied much more housing than is currently built. This goes for sewage as well. The City has planned for growth and continues to. One really important thing to keep in mind too is that new development is significantly more water efficient than older development it is replacing. Even adding a lot more new housing will not create much of an increase in water use because it would be demolishing older, less water efficient buildings. And when there is an increase, it would be a drop in the bucket compared to the City's overall water use. The potential problems, and the severity of those problems, that the city faces with regards to water are the same with new development and without. The solutions that the Water Department is working on seek to solve water supply problems that are vastly larger than the increase in demand from more housing development.</p> <p>As for the environment, Santa Cruz (and especially downtown Santa Cruz) is the most sustainable place to grow in the whole region given its access to jobs, transit, education, business, daily needs, recreation, and amenities. Given the housing need, housing that is not built in Santa Cruz will be built in less sustainable places further away from these things, putting greater pressure on open space and habitats and increasing traffic, fossil fuel demand, and pollution to a far greater degree than housing built in Santa Cruz. We work closely with our Sustainability team to make</p>

City of Santa Cruz 6<sup>th</sup> Cycle Housing Element Update  
Public Comments

Feedback on the November 2023 Re-Submittal	City Response
	sure this work aligns with our Climate Action Plan and that any future units built in the lower part of downtown in the floodplain for instance, will be developed with resiliency in mind. I strongly believe that building more affordable and market rate housing in Santa Cruz is better for the environment than not building it.

## D. Community Letters and Input

This section contains all comments submitted by the community throughout the Housing Element Update process.



The City of Santa Cruz

Via email: [mvanhua@santacruzca.gov](mailto:mvanhua@santacruzca.gov)

Cc: [HousingElements@hcd.ca.gov](mailto:HousingElements@hcd.ca.gov)

*April 20, 2023*

**Re: Santa Cruz's Draft Housing Element**

To the City of Santa Cruz:

Thank you for responding to Sunday's letter. We rescind our charge of inaccuracy, and appreciate the City's intent to outpace its RHNA.

We are frustrated, above all, that [this happens](#), and [this](#), and worse, to millions, across the continent. Many of your staff likely suffer, too, from today's unaffordable housing prices. Our frustration is with that, and with a 40,000-word governing statute that has so far failed to compel equal protection for dense housing throughout entire cities.

Thank you for hearing our frustration. To the extent we are mistaken about the City's downtown expansion pipeline capacity and commitment to allow 60–111 du/ac in the mixed-use zones, we trust the City is drafting its housing element in good faith.

We attribute today's housing crisis largely to decades of "minimum requirements for lot size and lot widths and maximum construction standards for height, lot coverage, and density." (Draft, pp.E-28 to -30.) Such constraints remain widespread, when they can be abolished. But we credit that they are listed in the City's constraints analysis (*ibid.*). That's really what we want "remove[d]." (Gov. Code § 65583(c)(3).) It would be "appropriate" in a housing shortage, and we support its "legal[] possib[ility]." (*ibid.*). If the City perceives any legal obstacles to removal, we are happy to help the City address them.

We hope the final housing element can be as clear and concise as possible, given the unintuitive statutes, and look forward to working with you.

Best,



**Keith Diggs**

Attorney, YIMBY Law

[keith@yimbylaw.org](mailto:keith@yimbylaw.org)





In response to the ever-increasing cost of living, Santa Cruz YIMBY advocates for abundant housing at all levels of affordability to meet the needs of a growing population in Santa Cruz County. The Housing Element is an opportunity for the City of Santa Cruz to address the housing crisis on its own terms. We support sustainable growth, including along transportation corridors and activity centers and a commitment to lower Vehicle Miles Traveled by housing people near services and jobs. The following are our comments on the City of Santa Cruz's 6th cycle Housing Element draft in no particular order.

### ***The University***

One of the largest sites for new housing in the next eight years will be UC Santa Cruz. The city acknowledges this in their site inventory and policy plan. Despite this, the city has been and continues to be a significant barrier to development at the university, as evidenced by past and ongoing litigation<sup>1</sup>. This is not acknowledged in the constraints portion of the city's housing element.

The city should make a good faith effort to analyze the barriers it presents to housing construction and planning with regards to UCSC and propose programs to mitigate these impacts. We suggest a commitment to providing municipal services to new housing at UCSC and a policy to not sue over housing production on campus.

We would also like the city to provide a reference for the affordability levels assumed for the UC Santa Cruz units. While there has been talk of these rents being set below market rates, providing a reference to a commitment is important as this is the single largest source of affordable units for the city in this cycle.

### ***Pipeline Projects***

The largest source of new units for the city during the 6th cycle will likely be from pipeline projects. For jurisdictions relying heavily on pipeline projects, HCD recommends<sup>2</sup> that "...the element should include programs with actions that commit to facilitating development and monitoring approvals of the projects, including the number of units and affordability (e.g., coordination with applicants to approve remaining entitlements, supporting funding

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1

<https://lookout.co/santacruz/ucsc-cabrillo/story/2023-04-18/city-of-santa-cruz-ucsc-in-talks-end-lawsuit-over-student-enrollment-housing-plans>

2

<https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/housing-element/SmaBrisbaneDraftOut010423.pdf>

applications, expediting approvals and monitoring of project progress, including rezoning or identification of additional sites, if necessary).”

In order to meet this recommendation by HCD, the city should create policies to monitor the progress of pipeline projects. This could include automatic entitlement extensions until midway through the 6th cycle, a commitment to work with the Coastal Commission on facilitating housing proposed in the coastal zone, and proactively reaching out to all pipeline projects to confirm that there is still development interest.

### ***Policy 1 - Housing Production***

We are thrilled that the city has met their 5th cycle goals, however, with no rezoning taking place to meet the 6th cycle production goals, policies to increase housing production will be of huge importance.

Additionally, it is stated under Policy 1.2 that most new housing will be concentrated in the central core of the city, meaning along major commercial corridors and on major opportunity sites. While we laud recent progress that has been undertaken in the latter scope, we believe that the city should be looking towards additional opportunities as well as this scope could serve to not meet AFFH goals if new housing opportunities are restricted to downtown, commercial corridors, etc. In practice, this would serve to leave out neighborhoods such as Seabright, the majority of the West Side, Arana Gulch, etc. from seeing their fair share of development.

### ***Policy 2 - Affordable Housing***

The ordinance options allowing 100 percent affordable residential development to be considered a “by-right” use would greatly speed along much needed affordable housing. As such, we urge expedited approval of this policy to 2024 or earlier (currently by the end of 2025). A commitment to developing or declaring city parking lots downtown surplus by a certain date with the goal of providing affordable housing would also be a valuable policy.

As part of objective 2.4c, we support establishing a Community Opportunity to Purchase<sup>3</sup> program to give qualified non-profit organizations the right of first offer or refusal to purchase certain properties offered for sale in the city. We also support establishing a Tenant Opportunity to Purchase<sup>4</sup> program to help prevent displacement, empower tenants, and preserve affordable housing when the owner decides to sell.

### ***Small Sites Program***

The site inventory identifies a significant number of small parcels for development, many of which are projected to accommodate low income units. Per HCD’s Site Inventory Guidebook<sup>5</sup> “A parcel smaller than one half acre is considered inadequate to accommodate

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<sup>3</sup> <https://sf.gov/information/community-opportunity-purchase-act-copa>

<sup>4</sup> <https://ebclc.org/topa>

<sup>5</sup>

[https://www.hcd.ca.gov/community-development/housing-element/docs/sites\\_inventory\\_memo\\_final06102020.pdf](https://www.hcd.ca.gov/community-development/housing-element/docs/sites_inventory_memo_final06102020.pdf)



housing affordable to lower income households, unless the housing element demonstrates development of housing affordable to lower income households on these sites is realistic or feasible.” The city claims that many of these parcels have development opportunities due to common ownership with adjacent parcels; we would like to see the site inventory expanded to include these adjacent sites.

### ***Mid-cycle Review***

To ensure the city makes appropriate progress towards its 6th cycle goals we would like to see a commitment to a mid-cycle review and adjustment (if needed). Tying this review to programs to increase housing production such as rezoning, ADU incentives, or removing development constraints would allow the city to quickly make up lost ground and minimize impacts of falling behind in the 6th cycle. This would also be a time to review pipeline projects which have not progressed.

Additional mid-cycle programs could include ministerial approval for all site inventory projects and SB10 upzoning of small sites to 10 units per parcel.

### ***FAR and Density***

A significant constraint to development of 2+ bedroom units is the units/ acre density requirement, something that does not apply to smaller units such as SROs. In order to increase the number of family sized (2+ bed) units built, this constraint should be removed or significantly modified. This could also be addressed by increasing the FAR for projects consisting of 50% or more 2+ bedroom units. This increase should allow the same net number of units as if they were proposed as SROs or a similar unlimited density unit.

### ***Policy 5 - Neighborhood Vitality***

Policy 5 (Neighborhood Vitality) opens with the following context: “Quality of life is shaped, in part, by neighborhood conditions in Santa Cruz. As an older, established community, Santa Cruz requires a concerted effort to encourage the maintenance, rehabilitation, and improvement of housing and to promote sustainable, livable neighborhoods in the face of increasing density.” We wholly reject the framing that density and sustainable, livable neighborhoods are incompatible. The city should update this language.

### ***Missing Middle***

Creation of missing middle housing isn’t mentioned within the policy plan - the city should adapt zoning regulations that would incentivize this form of housing. Examples include reducing minimum lot size, lot width, and parking requirements (kudos to the latter already being included!). In Redwood City’s compliant 6th cycle housing element<sup>6</sup> amendments such as these are anticipated to result in an increase of at least 80 homes.

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<sup>6</sup> <https://www.welcomehomerwc.org/wp-content/uploads/2023/02/REDWOOD-CITY-HE-ADOPTED-2-13-23.pdf>

## ***Upzoning Near Potential Light Rail Stations***

The RTC has multiple scenarios for a passenger light rail route. In most scenarios stations would be located on the Westside, Bay/California, Downtown, and Seabright<sup>7</sup>. We encourage a program to look at additional density along the Coastal Rail Trail, with a focus on these station locations.

## ***Tenant Protections***

As a majority-renter city, it is important that we have strong tenant protections. There are a number of programs we would like to see implemented or expanded in the city including:

- Elimination of or cap on rental application fees
- Creation of a rental registry. This was recently passed by both Salinas<sup>8</sup> and Monterey<sup>9</sup>
- Local preference for people employed in the county
- COPA and TOPA programs (see Policy 2 - Affordable Housing)
- Conduct a disparate impact analysis of non-high(est) resource areas<sup>10</sup> and apply a live-work preference if it matches county demographics

## ***Parking***

We are pleased to see that elimination of parking minimums is included as a policy objective. In the city's work to achieve this, we believe the elimination of such requirements within a mile walking area of five or more amenities (pharmacies, grocery stores, transit stops, etc) would be a good intermediate policy stepping stone.

We also encourage the city to work with METRO and AMBAG to advocate for the creation of and planning for more high quality transit stops within the city in the 2050 MTP/SCS<sup>11</sup> (scheduled for June 2026). Such transit stops allow for more sustainable and affordable housing to be built.

## ***Objective Standards***

With the recent implementation of objective standards, the city should set forth a policy for staff to review and recommend if a project is consistent. If found consistent, the project should be placed on the consent agenda for all hearing bodies. Such projects should only be appealable to council if denied by the planning commission. This would greatly increase the incentive for developers to design projects compliant with the standards.

## ***Affirmatively Furthering Fair Housing***

As discussed in our Housing Production section, a majority of new housing is being planned along major corridors. This leaves out many exclusive and high opportunity

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<sup>7</sup> <https://sccrtc.org/wp-content/uploads/2015/11/ServiceScenarioMap.png>

<sup>8</sup> <https://www.ksbw.com/article/salinas-rental-registry/43523797>

<sup>9</sup> <https://www.montereyherald.com/2023/04/19/monterey-city-council-moves-ahead-with-rental-registry/>

<sup>10</sup> <https://belonging.berkeley.edu/2023-ctcac-hcd-opportunity-map>

<sup>11</sup> <https://www.ambag.org/plans/2050-metropolitan-transportation-plan-sustainable-communities-strategy>

neighborhoods from producing their fair share of housing. We encourage a policy to use SB10 or other means to expand housing opportunities in these neighborhoods and not limited to only Flexible Density Units (6.2d).

Permanent supportive housing is a key solution towards solving homelessness, the city should create a policy to ensure equitable distribution (and development potential) of such housing across all districts.



April 24, 2023

Mr. Matt VanHua  
Principal Planner – Advance Planning  
Planning and Community Development Department  
809 Center Street, Room 107  
Santa Cruz, CA 95060

Dear Matt,

COPA is eager to provide our feedback and recommendations in review of the Draft 6th Cycle Housing Element for the City of Santa Cruz. We appreciated the participation of Katherine Donovan, Mayor Keeley and Councilmember Brown in our March 19 Housing Civic Academy by listening to our stories and collaborating with COPA to include our voices in the draft Housing Element.

COPA is a nonprofit, nonpartisan organization of 28 dues-paying institutions - faith congregations, community-based organizations, schools and unions - teaching leadership and organizing for the common good on issues, including housing. We are engaging our membership in the Housing Element process across both Santa Cruz and Monterey Counties, and the cities of Santa Cruz, Capitola, Watsonville, Salinas, Seaside, Monterey and Pacific Grove.

On March 19, we collected 51 responses (out of 85 in attendance) to the questionnaires regarding housing affordability needs and the types of housing our members are seeking. Here are the results:

	1	2	3	4	5	6	7	8	Total # Units Needed by Income Level
<b>Acutely Low</b>	12	3	2			1			18
<b>Extremely Low</b>	4	4		2					10
<b>Very Low</b>	5	3			1				9
<b>Low</b>	1			1	1				3
<b>Moderate</b>									0
<b>Above Moderate</b>	1	7	1	1	1				11
									<b>51</b> <b>Households</b> <b>participated</b>

We also asked what types of housing are needed, based on the categories you had identified included in the community survey you conducted. Here are those responses:

<b>Types of Housing Needed:</b>	
<b>Senior Housing</b>	10
<b>Multi-generational Housing</b>	12
<b>Mixed-Income Housing</b>	14
<b>Housing for persons with disabilities</b>	8
<b>For-Rent Apartments</b>	21
<b>For-Sale Condos</b>	7
<b>Duplexes or Triplexes</b>	11
<b>Townhomes</b>	9
<b>Accessory Dwelling Units</b>	9
<b>Supportive or Transitional Housing</b>	3
<b>Other: housing authority voucher</b>	2
<b>Other: More Msr J</b>	1

Other: securing a mortgage	1
Other: own a home with ADU	1
Other: for-rent studio	2

## **COPA comments on Housing Element - Ch. 2 Policy Plan**

Overall, COPA strongly supports the priority of planning for sites along transit corridors, in the downtown, while pursuing the strategy of infill building and higher density. This “compact urban form” is a wise strategy to preserve open space and reduce car dependency to balance housing needs with environmental protection and conservation.

### **Goal 2: Affordable Housing**

- 2.1a: COPA endorses maintaining the city’s current 20% inclusionary ordinance.
- 2.2c: COPA endorses the proposal for a city bond measure to finance the subsidization of housing construction for greater percentages of below-market-rate units. COPA stands ready to engage in the policy discussions on this concept and participate in the necessary outreach and organizing to secure passage of such a ballot measure.
- 2.2d: COPA encourages City lobbyists to work on state legislation to ease pressure on renters. We would like to see state legislation to eliminate application fees, place a cap on security deposits, and provide right-to-counsel for tenants facing eviction.
- 2.2g: COPA strongly supports the policy of “by right” approval for housing projects that provide 100% affordable units. The City successfully exercised this policy for COPA-member Calvary Episcopal Church for its 60 units currently under construction on its parking lot.
  - In addition, COPA urges the City to expand areas of the City that are eligible for by-right approval by applying the standard created by the State under AB2011 to all new development (both residential and commercial) to ensure that new projects have the benefit of streamlined entitlement approval while ensuring local workers are paid fair wages with health benefits.
- 2.3: COPA endorses the use of density bonuses to encourage greater number of units. Furthermore we encourage city staff to explore further incentivization of density by offering additional subsidy to cover additional construction of

below-market-rate units, which could be financed with proceeds of a city-wide bond measure.

- Further, COPA recommends the elimination of density limits. There are presently no limits on density for Single Room Occupancy units (SRO's) and single family homes, and this only incentivizing these housing types over the others.
- 2.4c: COPA recommends the City adopt two policy tools to facilitate the acquisition of existing properties for conversion to deed-restricted units. We urge the city to create a Community Opportunity to Purchase Program. The [Community Opportunity to Purchase Act \(COPA\)](#) gives qualified non-profit organizations the right of first offer, and/or the right of first refusal to purchase certain properties offered for sale in the City; and the creation of a TOPA - Tenant Opportunity to Purchase Act, TOPA, or "[Tenant Opportunity to Purchase Act](#)", is an anti-displacement housing policy that gives tenants options to have secure housing when the property they rent goes up for sale, while also preserving affordable housing.

### **Goal 3: Special Needs and Homeless**

3.2 Given the high degree of rent-burdened families in our community, COPA strongly endorses the policy to include childcare centers within housing construction to increase the opportunities for affordable childcare in our community.

3.3 COPA strongly supports the partnerships to provide the Continuum of Care for homeless individuals.

### **Goal 4: Housing Assistance**

4.1a: COPA endorses the continuance of the security deposit loan program in partnership with the County Housing Authority, however, the program delivery needs improvement to really be effective. The program is not well publicized and the communication, particularly in Spanish, is confusing. COPA recommends the program be changed to allow an applicant to pre-qualify for the loan so a tenant can respond quickly once they secure a unit to rent. In a tight rental market, decisions are made within hours and a multi-day, multi-step approval process has discouraged applicants from even trying to apply for this assistance. COPA also recommends greater funds for rental assistance and broader eligibility. The metric of "50 households" over the Cycle period is too low to be meaningful. We suggest a metric that reflects the portion of households that are at highest risk of housing instability illustrated in Table C-18 that reports 3,155 households spend more than 50% of their income on housing. Assuming



25% of these households may encounter an emergency where they may not be able to pay rent in a given month, a metric of 800 households would be more appropriate.

## **Goal 5: Neighborhood Vitality**

5.2b: COPA has found that many tenants are too fearful to report unsafe and illegal living conditions. They are not aware of the law or their rights and the responsibilities of the landlord to provide safe and healthy living conditions. We strongly endorse 'expanded outreach' on rental inspection program and code enforcement by working with community groups like COPA.

5.4a: COPA applauds the City for recognizing the need for targeted outreach to renters in the neighborhoods South of Laurel St, Beach Flats, and Lower Ocean. It is important this outreach be done on evenings and weekends and in the Spanish language.

5.5 COPA strongly endorses this policy to "protect susceptible populations while improving infrastructure, resources and access to affordable units." Additionally, COPA strongly recommends the City work toward a comprehensive set of policies that would prevent displacement, and provide stronger renter protections and relief from the high rent-burdens many experience in Santa Cruz. COPA proposes the following ideas:

- a. Eliminate application fees
- b. Cap security deposits to be a % of the rent or equivalent to one month's rent only.
- c. Improve security deposit loan programs by pre-qualifying tenants before apartment search
- d. Increase legal assistance funding for more attorneys. There is an urgent need for greater access to free, bilingual legal assistance and "affirmative representation" for retaliation cases, and for displacement cases to be pursued. More funds for Tenant Sanctuary and California Rural Legal Assistance is need to increase staffing hours and hiring of attorneys. No tenant has the funds to pursue a case of retaliation for example.
- e. Proactive tenant outreach and education programs to explain rights, assistance programs.
- f. Rental Registry to provide accurate data on rental market trends.
- g. Increase funding for rental assistance, possibly as a portion of Transient Occupancy Tax for renters who live and work in Santa Cruz as a way to support the hospitality workforce and prevent them from leaving the City.
- h. Partnership with District Attorney and/or the County Public Defender to enforce existing local and state civil codes to uphold tenant protections.
- i. Research models that allow rent with the option to buy for condos and townhomes.

## **Goal 6: Affirmatively Furthering Fair Housing**

6.1c: COPA endorses the policy of coordinating with the Housing Authority to pursue more funding for housing vouchers and the removal of barriers to utilize housing vouchers.

6.3b: COPA strongly endorses the need for increased funding of bilingual legal assistance and outreach for tenants.

## **Goal 7: Resource Conservation and Environmental Stewardship**

7.3: COPA strongly supports policies to “Support transit-oriented development and non-motorized transportation.” and believes that the urban compact form of development will aid in achieving this goal.

COPA recommends the City implement a policy that affirms support for preference in leasing of new and existing affordable units that prioritize people who work in the community. Because such preferences get people closer to where they work, they have the added public benefit of not only ensuring that local workers get access to affordable housing opportunities but also reducing greenhouse gas emissions and traffic by reducing worker commutes to jobs in the City of Santa Cruz. Data analysis must be done to ensure that the demographics of the workforce in the target area (city or county) is reflective of the workforce as a whole to ensure no disparate impact is created on a protected class or group.

Such a preference can also be expanded to include not only local workers but also local, low-income residents in those neighborhoods where low-income residents are at risk of displacement due to gentrification pressures. An example of such a program is the one implemented by the County of Santa Cruz at the 17th and Capitola affordable housing project in Live Oak. Data analysis must be done to ensure that such a preference does not create a disparate impact on a protected group, but neighborhood based, anti-displacement preferences have been successfully implemented across the State in neighborhoods that are classified as “areas of economic distress” and that are home to a disproportionate number of low-income residents that are at risk of displacement.

## **Appendix G: Housing Sites Inventory**

Overall, COPA supports the City's list of housing sites identified along the corridors and infill opportunities in the residential neighborhoods. We have the following additional recommendations:

1. We would like to see the City identify and include its surface parking lots to be included on the site inventory. The surface parking lots could be reconfigured as housing projects, including parking on the lower levels so as not to lose city-owned parking resources. The downtown mixed use library is a good example of this potential. Parking funds could be used to finance construction (MidPen Housing coordinated a model project with San Mateo).
2. The City has an impressive list of pipeline projects. To facilitate the completion of these pipeline projects in an expeditious manner, we urge the City to make a commitment to refrain from lawsuits that would inhibit the University of Santa Cruz to proceed with its student and faculty housing projects.
3. The City could take additional steps to accelerate the pipeline projects by expediting the review process or identifying ways to provide administrative approvals.
4. Of the 2492 units proposed, we recommend timelines be established as metrics to encourage a timely review process.
5. It appears that the City does not need to complete any further re-zoning to meet its RHNA target numbers. We suggest the City continue to identify areas that could be re-zoned to further encourage property owners to consider land use for housing.

COPA looks forward to continue to engage with the City of Santa Cruz staff and elected Councilmembers and Mayor in the coming months to create a model Housing Element. For a city that is famous for being the least affordable, COPA is committed to becoming famous for the boldest and best Housing Element possible for the provision of affordable housing for our families who live and work here.

Thank you!

Barbara Meister, COPA leader from Holy Cross Catholic Church on behalf of the COPA Housing Strategy Team

# UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA

Local Union 505 ~ County of Santa Cruz

INSTITUTED AUGUST 12, 1881

225 Sea Ridge Road ~ Aptos, CA 95003

(831) 688-5025



F (831) 688-5027

ALWAYS DEMAND THE LABEL

April 5, 2023

Via Email: [mvanhua@cityofsantacruz.com](mailto:mvanhua@cityofsantacruz.com)

City of Santa Cruz  
809 Center Street  
Santa Cruz, CA 95060

**Attn:** Planning and Community Development Department  
**Re:** 6th Cycle Housing Element Update (2023-2031)

Dear Mr. Matthew VanHua,

Please accept these comments on the above referenced Housing Element Update on behalf of the members of Carpenters Local 505, which represents working men and women in the City of Santa Cruz and Santa Cruz County. Local 505 has long been at the forefront of training the next generation of construction workers, opening pathways to the industry for diverse and traditionally underserved populations, and embracing new technologies and delivery methods to expedite the construction of much needed housing.

We appreciate the opportunity and look forward to working together on this important endeavor.

To meet the urgent need for housing units outlined in the State's Regional Housing Needs Allocation (RHNA), as well as the policy goals outlined in the City of Santa Cruz Housing Element, it is vital that the City of Santa Cruz support efforts to build the local construction workforce. **However, the City of Santa Cruz's current housing element draft fails to address a major impediment to housing production that other cities have acknowledged and committed to addressing in their own, now-finalized housing elements.** Namely, neither Santa Cruz county nor the City of Santa Cruz have enough skilled, highly productive residential construction workers to build the nearly 4000 units that the City of Santa Cruz is supposed to produce over an 8 year time period.

As part of the 6<sup>th</sup> Cycle Housing Element process, the City of Santa Cruz must seek to build 3736 units over an eight year period. This is itself an almost 400 percent increase from the prior Housing Element cycle's RHNA goal of 747 units. However, as the housing crisis in our communities has continued to deteriorate in recent years, **the number of workers employed in residential building construction in Santa Cruz County has actually decreased by 13% since**

2016.<sup>1</sup> A continuously shrinking residential construction workforce cannot build 3736 units of housing in 8 years. As such, **the City should commit to developing a residential construction labor policy in its finalized Housing Element.** This policy should seek to alleviate the labor shortage impediment to housing in the City by investing in the development and retention of workers in the local residential construction labor supply.

To support the policy goals of the Housing Element, Local 505 is therefore requesting that the City add local hire and apprenticeship requirements to the General Plan and Housing Element for all residential construction projects larger than 10 units. The standards Local 505 is proposing in this comment letter would help to ensure greater benefits for the broader community, help ensure that construction labor needs are met, and guarantee that new residential development projects within the City are making needed investments in the region's skilled construction industry workforce.

### **The City Should Bar Issuance of Building Permits Unless Each Future Residential Development of 10 units or Above has a Viable Apprenticeship Program and Local Hiring Requirements**

The Carpenters propose the following additions to the Municipal Code of the City of Santa Cruz. for any residential project larger than 10 units

Permitting requirements in the Municipal Code of the City of Santa Cruz.

A person, firm, corporation, or other entity applying for a building permit under the relevant section of the Municipal Code of the City of Santa Cruz, California shall be required to comply with the apprenticeship, healthcare, and local hire requirements of the Housing Element and General Plan. Failure to comply with the requirements set forth in this section shall be deemed a violation of this article.

#### Apprenticeship:

For every apprenticeable craft, each general contractor and each subcontractor (at every tier for the project) will sign a certified statement under penalty of perjury that it participates in a Joint Apprenticeship Program Approved by the State of California, Division of Apprenticeship Standards **OR** in an apprenticeship program approved by the State of California Division of Apprenticeship Standards that has a graduation rate of 50% or higher and has graduated at least thirty (30) apprentices each consecutive year for the five (5) years immediately preceding submission of the pre-qualification documents. The contractor or subcontractor will also maintain at least the ratio of apprentices required by California Labor Code section 1777.5.

#### Local Hire Policy:

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<sup>1</sup> QCEW data: Difference between 2016 employment (1265) and 2021 (1100) (latest available) in Private NAICS 2361 Residential building construction for All establishment sizes in Santa Cruz County, California, NSA



Contractor will be required to provide documentation that the contractor will hire a minimum of twenty-five percent (25%) of staff for any job classification with more than four (4) employees employed whose primary residence, which is not a post office box, is, and has been, within Santa Cruz county within 180 days of the expected date of issuance of the Notice to Proceed for the project.

As part of making these proposals, Local 505 wishes to make the City of Santa Cruz aware that other cities in the wider region have started to incorporate language into their finalized housing elements that does commit to the development of residential construction labor policy. Both Redwood City and Menlo Park, for example, have included the following language as part of the policy goals in their respective housing elements:

**Housing element policy goal:** Encourage developers and contractors to evaluate hiring local labor, hiring from or contributing to apprenticeship programs, increasing resources for labor compliance, and providing living wages.<sup>2</sup>

**At a minimum, Local 505 strongly calls on the City of Santa Cruz to incorporate a similar commitment to develop residential labor policy in their own housing element.** This will help alleviate a major impediment to housing production: the labor shortage crisis in the residential construction.

While there has been a remarkable economic expansion in Santa Cruz in recent years, rising inequality and displacement adds to the City's affordability crisis and threatens to undermine the region's strong economy. Local 505 has a strong track record of developing many programs that will enable the City to meet the General Plan and Housing Element goals. These programs include a robust Joint Apprenticeship Training Committee, vigorous utilization of apprentices in the City of Santa Cruz, healthcare coverage for all members and their families, and innovation within the construction industry.

Joint Apprenticeship Training Committees (JATC's), such as the Carpenters Training Committee for Northern California (CTCNC), are a proven method of career training built around a strong partnership between employers, training programs and the government. This tripartite system is financially beneficial not only for the apprentice, but is a major benefit for the employer and the overall economy of the City of Santa Cruz. The CTCNC monitors current market conditions and adjusts the workflow of apprentices to meet the needs of the community, heading off any shortage of skilled workers. History has demonstrated that strong utilization of apprentices throughout the private sector helped California builders produce millions of units of housing.

CTCNC recruitment strategies include robust diversity and inclusionary outreach programs, such as pre-apprenticeship, with proven results in representative workplaces and strong local

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<sup>2</sup> See, page 322: [city-of-menlo-park-2023-2031-housing-element.pdf \(menlopark.gov\)](#)

See, page 52: [REDWOOD-CITY-HE-ADOPTED-2-13-23.pdf \(welcomehomerwc.org\)](#)

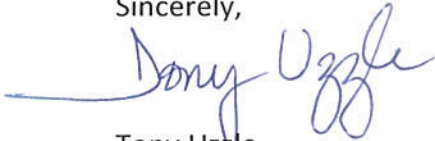
economies. It is imperative that our underserved populations have supportive and effective pathways to viable construction careers, while ensuring that employers are able to find and develop the best and brightest talent needed to thrive in a competitive economy.

Employer-paid health insurance plans for our members and their families provides preventative services to stay healthy and prevent serious illness. Timely care reduces the fiscal burden for our members and their families, and significantly reduces the utilization of safety-net programs administered by the City of Santa Cruz and Santa Cruz County.

Embracing new technologies and delivery systems will have a significant impact on the construction industry, particularly the residential sector. Increasing housing delivery methods reduces project durations and provides City of Santa Cruz residents housing sooner. Local 505 is at the forefront of ensuring that new construction technologies deliver those benefits while also creating work opportunities for those already in the trades as well as those looking to begin a construction career.

Local 505 is in a unique position to address many of the key ideas outline in the City of Santa Cruz Housing Element Update. By investing in the training and utilization of apprentices, performing outreach to ensure that the workforce closely mirrors the demographics of our local community, providing employer-paid healthcare for our members and their families, and promoting innovation in the residential construction sector, Local 505 is prepared to assist in closing the affordability gap in the City of Santa Cruz and the Bay Area. We look forward to engaging City staff and elected leaders as the Housing Element moves forward and working cooperatively to bridge the needs of the City with the skills and tools of Local 505.

Sincerely,



Tony Uzzle  
Senior Field Representative  
Carpenters Local 505





April 7, 2023

Matt VanHua

City of Santa Cruz, Planning and Community Development Department, Advance Planning Division  
809 Center St #206  
Santa Cruz, CA 95060

[mvanhua@santacruzca.gov](mailto:mvanhua@santacruzca.gov)

Re: Comments on the Draft Housing Element

Thank you for sharing this early draft of the Housing Element with the public. On behalf of the City of Santa Cruz's nearly 400 residents with developmental disabilities, Housing Choices is grateful for the opportunity to comment before it is sent to HCD. We also appreciate the work that the City of Santa Cruz Planning and Community Development staff has done to draft a Housing Element that prioritizes equity and inclusion and for including an analysis of the housing needs of residents with developmental disabilities as required by SB 812.

While we believe that this Draft does show that the City is taking seriously its obligation to Affirmatively Further Fair Housing for all City of Santa Cruz residents we found that there are some revisions or additions that should be considered in order to make sure that the Housing Element submitted to HCD is in full compliance with the state law. We believe with some minor changes this Draft has potential to be approved by HCD in a timely manner rather than requiring multiple rounds of revisions as seen in many other jurisdictions throughout the state. Some of our suggestions include further analysis of the special housing needs that exist within the city in accordance with HCD requirements so that the City may better prioritize and plan for the needs of the City's most vulnerable residents including but not limited to people with developmental disabilities. We also believe that the City should include more measurable metrics in its Policy Plan for each objective by including not only a date by when each objective will be implemented but number of units or people to be served to measure the success of each program in Affirmatively Furthering Fair Housing and/or achieving the City's RHNA goals. Lastly, while we support many of the new programs and policies already proposed in the Draft Housing Element we have included recommendations for refinements to the proposed programs as well as additional programs and policies the city should consider for inclusion in the Housing Element.

**About Housing Choices**

Housing Choices is a housing service provider funded by the San Andreas Regional Center (SARC) to support people with developmental disabilities to be fully integrated in the affordable housing supply within the Counties of Santa Cruz, Santa Clara, San Benito and Monterey. We provide housing navigation services for both individuals and families. We also partner with affordable housing developers to make inclusive housing commitments for people with developmental and other disabilities in their housing

projects. At these projects we provide onsite housing retention services. Our work over the past 25 years, including in the City of Santa Cruz at Water Street Apartments, shows that this model of housing plus services is highly effective in increasing housing access and stability for people with developmental disabilities.

The San Andreas Regional Center has contracted with Housing Choices to provide the City of Santa Cruz Planning and Community Development staff and Housing Element consultants with an assessment of the housing needs of people with developmental disabilities, as required by SB 812.

### **Missing Definition of Developmental Disabilities**

Understanding what defines a developmental disability is key to understanding their housing needs and accessibility requirements. While the housing needs analysis which appears on pages C-20 through C-22 of the Draft Housing Element does discuss some of the types of housing that would be appropriate for a person with a developmental disability it does not talk about the requirement for supportive services in order to live in the community which defines a developmental disability and differentiates the accessibility needs of a person with a developmental disability from those of a person who has a disability that is solely physical.

California state law defines developmental disabilities as a disabling condition that emerged before age 18, is expected to be lifelong, and is a substantial disability attributable to major impairment of cognitive and/or social functioning. A substantial disability is defined as “significant functional limitations...in three or more of the following areas of major life activity, as appropriate to the person's age: Receptive and expressive language; Learning; Self-care; Mobility; Self-direction; Capacity for independent living; and/or Economic self-sufficiency”. Developmental disabilities include intellectual disability, autism, Down syndrome, epilepsy, cerebral palsy, and other disabling conditions similar in their functional impact to an intellectual disability. A developmental disability by definition does not include conditions that are solely physical, psychiatric or learning disabilities (Section 4512 of the Welfare and Institutions Code and Section 54000-54002 of the Code of Regulations). Under California’s Lanterman Developmental Disabilities Services Act and the U.S. Supreme Court’s 1999 decision in *Olmstead v. L.C.*, people with developmental disabilities are entitled to receive community-based services that allow them to live in the least restrictive setting of their choosing. The shift to de-institutionalization has led to the closure of the most restrictive segregated settings and to the requirement, under SB 812, that local jurisdictions in their Housing Elements assess and plan specifically for the housing needs of people with developmental disabilities who receive supportive services from the state’s 21 Regional Center in order to live in their home community. San Andreas Regional Center (SARC) is funded by the Department of Development Services (DDS) to serve all Santa Cruz County residents with developmental disabilities. While SARC is able to fund the services needed for consumers to live independently they are not able to provide funding for housing which is why jurisdictions must plan for housing that is appropriate and accessible for this special needs population.

### **Incomplete Assessment of Housing Needs of People with Developmental Disabilities**

HCD has provided guidance for a complete analysis of special housing needs groups, which must include:

- A quantification of the total number of persons and households in the special housing needs group, including tenure (rental or ownership), where possible.

- A quantification and qualitative description of the need (including a description of the potential housing problems faced by the special needs groups), a description of any existing resources or programs, and an assessment of unmet needs.
- Identification of potential programs or policy options and resources to address the need

In addition for the analysis of the housing needs of people with developmental and other disabilities HCD further advises that jurisdictions should include:

- A discussion of resources, including existing housing and services for people with disabilities. Contact local, service providers such as the local Center for Independent Living, county health/mental-health departments, health-related nonprofits (e.g. United Cerebral Palsy, Crippled Children's Society, Heart Fund, Lung Association, Diabetes Association, Cancer Society, etc.) or school districts that maintain the number of students enrolled in special education programs, students requiring special accommodations and/or transportation, and students participating in home schooling.
- Identification of housing types (e.g. residential care facilities) that can accommodate people with disabilities and zoning and capacity available to facilitate these housing types.
- Housing programs or strategies to address identified needs.

While the City of Santa Cruz's draft analysis of the housing needs of people with developmental disabilities does quantify the housing need, because this quantification is based on zip code level data for only one of the zip codes within city limits it underestimates the true number of City of Santa Cruz residents who have a developmental disability. Furthermore, the draft housing needs analysis does not meaningfully discuss the factors driving the housing needs of this population nor does it discuss best practices for creating inclusive affordable housing for people with developmental disabilities requiring on-site supportive services funded by SARC in order for them to have equitable access to living in the community as a person without a disability.

In its quantitative analysis the city used data reported by the Department of Developmental Services (DDS) by zip code to estimate the number of residents with developmental disabilities living in the City of Santa Cruz. By requesting this information directly from SARC, Housing Choices was able to get city-specific data which is reflected in the table below:

**Table \_\_\_\_ City of Santa Cruz and Santa Cruz County Population with Developmental Disabilities**

<b>Age</b>	<b>City of Santa Cruz</b>	<b>City of Santa Cruz % of total</b>	<b>Santa Cruz County</b>	<b>Santa Cruz County % of total</b>
<b>Under age 18</b>	88	24%	407	29%
<b>18 and older</b>	275	76%	1009	71%
<b>Total</b>	363	100%	1416	100%

*Note: The City of Santa Cruz population with developmental disabilities was provided by San Andreas Regional Center as of November 2021. The Santa Cruz County population with developmental disabilities is based on county-level data published by the Department of Developmental Services as of June 2021.*

Housing Choices was also able to get data from SARC regarding the living arrangements of City of Santa Cruz residents with developmental disabilities to better understand where people are currently living and where there may be need for improvement in housing and services for this population. Assessing the housing needs of adults with developmental disabilities is of particular importance because as they age the adults will require a residential option outside the family home, whereas the family home is the preferred living option for children with developmental disabilities.

**Table \_\_\_\_ Living Arrangements of Adults with Developmental Disabilities in the City of Santa Cruz Compared to Santa Cruz County**

<b>Adult Living Arrangements</b>	<b>City of Santa Cruz</b>	<b>City of Santa Cruz Percent of Total</b>	<b>Santa Cruz County</b>	<b>County Percent of Total</b>
In the family home	151	55%	630	62%
Own apartment with supportive services	97	35%	248	25%
Licensed Facilities	23	8%	125	12%
Other (including homeless)	4	2%	6	1%
<b>Total Adults</b>	<b>275</b>	<b>100%</b>	<b>1009</b>	<b>100%</b>

*Note: The City of Santa Cruz population with developmental disabilities was provided by San Andreas Regional Center as of November 2021. The Santa Cruz County population with developmental disabilities is based on county-level data published by the Department of Developmental Services as of June 2021.*

As of November 2021, SARC reported that the family home is the most prevalent living arrangement for City of Santa Cruz adults with developmental disabilities, with 55% of adults living in the family home. This is lower than the County overall where 62% of adults live at home. While the family home is considered to be a community based living arrangement, as discussed below, there is an increased risk of displacement or homelessness when aging parents are no longer able to provide housing. Instead, for adults with developmental disabilities the most integrated and least restrictive living arrangement available to them is living independently in their own apartment with supportive services. In the City of Santa Cruz, only 35% of adults with developmental disabilities have been able to transition into their own apartment due to the lack of deeply affordable housing available. In addition, 8% of City of Santa Cruz adults with developmental disabilities live in licensed care facilities, a segregated housing type available to people with developmental disabilities where interaction with people without disabilities is more limited than in integrated housing settings. Without planning for more inclusive affordable housing for people with developmental disabilities to transition into when aging parents are no longer able to provide housing, the City of Santa Cruz will see more adults falling into homelessness, being displaced or being forced to live in segregated settings.

Some of the other relevant factors affecting the housing needs of people with developmental disabilities that are not discussed in the Draft Housing Element are:

- **Decline in Licensed Care Facilities in Santa Cruz County.** The Department of Developmental Services reports that between September 2015 and June 2021, there was a 7% decrease in the number of people with developmental disabilities able to be housed in licensed care facilities (including Community Care Facilities, Intermediate Care Facilities, and Skilled Nursing Facilities) in Santa Cruz County, even as the adult population in need of residential options outside the family home grew. This trend is the result of increased housing prices making it less financially

feasible for new facilities to open when old ones close as well as a decrease in demand as more adults choose to live in less restrictive settings increasing the need for affordable housing options coordinated with supportive services funded by the San Andreas Regional Center. The County's reduced supply of licensed care facilities increases the likelihood that City of Santa Cruz adults with developmental disabilities will be forced out of the County when their parents are no longer able to house them--unless there is a significant improvement in access to affordable housing.

**Table \_\_\_\_ Changes in Living Arrangements of Adults with Developmental Disabilities from 2015-2021 in Santa Cruz County**

<b>Adult Living Arrangements</b>	<b>2015</b>	<b>2021</b>	<b>Percent Change</b>
In the family home	477	630	32%
Own apartment with supportive services	231	248	7%
Licensed Facilities	135	125	(-7%)
Other (including homeless)	5	6	20%
<b>Total Adults</b>	<b>848</b>	<b>1009</b>	<b>19%</b>

Source: Department of Developmental Services Quarterly Report by County.

- **Increase of Autism Diagnosis Reflected in Increase in Adults in their 20s and 30s.** Growth in the Santa Cruz County adult population with developmental disabilities correlates with a well-documented annual increase in the diagnosis of autism that began in the mid-1980s and did not level out until after 2015. The cumulative impact of this trend is already seen in the growth of the Santa Cruz County population aged 18 to 41 with developmental disabilities and will continue into the future. This trend has significant implications for housing needs among City of Santa Cruz adults with developmental disabilities during the period of the 2023-2031 Housing Element, as the population can be expected to continue to grow at a faster rate than the general population.

**Table \_\_\_\_ Changes in Age Distribution of Adult Population in Santa Cruz County**

<b>Age</b>	<b>2015 Number</b>	<b>2021 Number</b>	<b>% Change</b>
18 to 31	395	484	23%
32 to 41	185	192	4%
41 to 52	103	135	31%
52 to 61	118	114	(-3%)
62 plus	47	84	79%
<b>Total adults</b>	<b>848</b>	<b>1009</b>	<b>19%</b>

Source: Department of Developmental Services data reported at the county level in June 2021 and September 2015

*Note: These data assume that all people with developmental disabilities under age 18 live in the family home. The impact of this assumption, if incorrect, is to underestimate the number of adults living in the family home who may need other residential living options.*

- **Longer Life Spans.** Between September 2015 and June 2021, the Department of Developmental Services reports that the number of Santa Cruz County residents with developmental disabilities age 62 and older grew by 79% (Table \_\_\_\_). This increase is generally attributable to well-documented gains in life span rather than migration of seniors into high cost Santa Cruz County. Longer life spans mean that more adults with developmental disabilities will outlive their parents and family members who are the largest source of housing for people with developmental disabilities in the City of Santa Cruz. And because older adults currently occupying a licensed facility in Santa Cruz County are living longer, this reduced rate of occupant turnover, coupled with closing facilities, will make it more difficult for middle-aged and senior adults who have been living with aging parents in the City of Santa Cruz to transition to licensed care when their parents pass away.
- **Displacement.** Notwithstanding 19% growth in Santa Cruz County's total population of adults with developmental disabilities, the Department of Developmental Services has documented a 3% decline in the age group 52 to 61 in Santa Cruz County between September 2015 and June 2021 (Table \_\_\_\_). In light of gains in life expectancy, this loss can reasonably be attributed to displacement from the county because of a lack of residential living options (either licensed facilities or affordable housing) when an elderly family caregiver passes away or becomes unable to house and care for the adult. Due to increased reliance on the family home as a living arrangement (based on a 32% increase of adults remaining in the family home in Santa Cruz County between 2015-2021) this trend is expected to continue to worsen unless more inclusive affordable housing is developed during the 2023-2031 RHNA cycle. Displacement takes a particular toll on adults with developmental disabilities who depend on familiarity with transit routes and shopping and services, as well as support from community-based services and informal networks built up over years of living in the City of Santa Cruz.
- **Higher Rates of Physical Disabilities.** People with developmental disabilities are more likely than the general population to have an accompanying physical disability. According to the Department of Developmental Services 26% of Santa Cruz County residents with developmental disabilities have limited mobility, 9% have a vision impairment and 4% have a hearing impairment. The need for an accessible unit coupled with the need for coordinated supportive services compounds the housing barriers faced by those with both cognitive and physical disabilities.
- **Ineligibility for Many Affordable Rental Units.** Some adults with developmental disabilities depend on monthly income of around \$1,000 from the Supplemental Security Income (SSI) program, pricing them out of many of the limited number of affordable housing units in the City of Santa Cruz. Those with employment tend to work part-time in the lowest paid jobs and also struggle to income-qualify for many of the affordable housing units now available for rent in the City of Santa Cruz.
- **Transit-Dependent.** Most adults with developmental disabilities do not drive or own a car so rely on public transit as a means to integration in the larger community.

By including this data in the City's Draft Housing Element the city can better plan to meet the current needs of residents with developmental disabilities and track changes over time in future Housing Elements.

The City of Santa Cruz has found a proven solution to address the housing needs of people with developmental disabilities at inclusive affordable housing projects such as Water Street Apartments, a strategy which is not included in the Draft Housing Element. At Water Street Apartments, 8 of the project's 40 units are set-aside for people with developmental disabilities allowing the developer to offer deeply affordable housing paired with on-site supportive services funded by SARC at no cost to the developer or residents with developmental disabilities. These services help people with developmental disabilities, who are typically on fixed or limited incomes and require supportive services to live independently, equitable access to find and retain stable housing thereby promoting integration and meeting HCD's requirement to AFFH. In order to meet the increasing housing needs of adults with developmental disabilities still living in the family home or wanting to transition out of institutional settings, the city must plan for more inclusive affordable housing properties. The following considerations should guide the City of Santa Cruz in this pursuit:

- Integration in typical affordable housing is a priority in order to Affirmatively Further Fair Housing for a group that has historically experienced no alternatives to segregated living and also to counter the displacement of adults with developmental disabilities out of the City of Santa Cruz.
- Coordination of housing with onsite supportive services funded by the San Andreas Regional Center should be encouraged. These fully funded coordinated services provide a supported pathway for people with developmental disabilities to apply for and retain an affordable apartment and are often as essential to a person with a developmental disability as a physically modified unit is to a person with a mobility, vision, or hearing impairment.
- A mix of unit sizes at inclusive housing properties would address the needs of those who require live-in aides, want to live with roommates or partners, or have children.
- Location of housing near public transit would accommodate the transit-dependency of most adults with developmental disabilities.
- Deeply affordable housing is needed by people with developmental disabilities. Per HCD guidance, the City should plan for at least 430 Extremely Low Income (ELI) units, or 50% of its Very Low Income RNHA allocation. ELI units are particularly important to people with developmental disabilities, and some of the City's planned production of ELI units should be subject to a preference for people with developmental disabilities.

We believe that the inclusion of these missing elements would strengthen the city's assessment of the housing needs of City of Santa Cruz residents with developmental disabilities. Furthermore, it would help the city to create more meaningful programs and policies to meet the housing needs of residents with developmental disabilities as required by Housing Element law.

### **Strengthening Impact of Programs**

We want to thank planning staff and the consultant who developed this draft for recommending a suite of new programs, policies and goals that we believe can create a more inclusive and equitable community. We are especially supportive of **objective 2.2c. Explore additional funding mechanisms...for affordable housing such as an affordable housing bond measure** as we have seen this strategy to be very effective in development of affordable housing in communities such as the City of San Jose as well as **objective 2.2g Present Council with ordinance options that allow 100 percent affordable residential development to be considered a "by-right" use that only requires ministerial Planning approval and Building Permits to be constructed in residential and mixed-use zones** as shorter



timelines for project approvals can reduce project costs and make sure that much needed affordable housing gets built more quickly.

While we believe that the programs outlined in the Housing Element will Affirmatively Further Fair Housing we are concerned that some lack the concrete steps, timelines and measurable metrics by which to evaluate success of these programs. Without all of these elements the city is at-risk of implementing ineffective programs with little or no effect on meeting its RHNA or Affirmatively Further Fair Housing for all special needs populations and protected groups. By including objective standards by which to measure the success of each program the City can better analyze and make changes in the future to improve these programs.

Other concerns and recommendations for strengthening the effectiveness of the Draft programs to increase the city's ability to meet its many goals and policies include:

- **Objective 2.1b. Review the Inclusionary Ordinance...**The City should commit to offering greater flexibility for developers to meet the inclusionary unit requirements to better serve the needs of the community. Most adults with developmental disabilities have incomes too low to satisfy minimum income requirements for the Low and Very Low Income units currently offered under the city's inclusionary ordinance and are effectively excluded from this housing option. California law (AB 1505, the "Palmer Fix") explicitly allows cities to adopt inclusionary housing ordinances that address a range of income levels from moderate-income to extremely low-income. The City should take advantage of this authority to make its ordinance more responsive to local needs by offering developers a menu of options for including affordable units, for example, by setting a higher percentage of units priced for moderate income and a lower percentage of units priced for extremely low income or targeted to special needs populations. Such a menu would address a broader range of the City of Santa Cruz's housing needs, while giving developers more options for meeting the inclusionary requirement. Example: San Mateo County Inclusionary Affordable Housing Ordinance; Redwood City Affordable Housing Ordinance.

*Sample Language: The City of Santa Cruz shall revise its inclusionary housing ordinance to offer developers a menu of options for achieving affordability, adjusting the percentage of units required to be affordable depending on the degree of affordability achieved (moderate-income, low income, very low income, and extremely low income) or special needs groups targeted, including, for example, people with developmental disabilities who will benefit from coordinated onsite services provided by the San Andreas Regional Center.*

- **Objective 2.2b Identify residential projects for City financial or regulatory incentives subject to City Council approval & Objective 4.2b Support the continuation of the Affordable Housing Trust Fund-** The City should commit to prioritizing local funding and resources for affordable housing development towards the development of housing at the deepest levels of affordability which are most difficult to achieve. City-owned land, land dedicated to affordable housing development through a land trust or under an inclusionary housing ordinance, and city housing funds are often essential to the development of affordable housing that is financially feasible. In creating guidelines for the scoring of any competitive proposals for these scarce resources, the City should grant additional points to affordable housing projects that address the housing needs of the residents who are most difficult to house under existing state and federal housing finance programs--for example, by prioritizing proposals with a higher number of Extremely Low Income units or that make a percentage of units subject to a preference for identified categories of special needs people who would benefit from coordinated onsite services, including but not limited to people with developmental disabilities who benefit from

services of the San Andreas Regional Center. Example: Kiku Crossing in City of San Mateo; City of San Jose Housing Department NOFA; San Mateo County Affordable Housing Fund NOFA

*Sample Language: In publishing requests for competitive proposals for any city-owned land, land dedicated to affordable housing or city housing funds, the City of Santa Cruz shall grant additional points to proposals that address the city's most difficult to achieve housing priorities, by, for example, providing a greater number of Extremely Low-Income units or committing to make a percentage of the units subject to a preference for people with special needs who will benefit from coordinated onsite services, such as people with developmental disabilities who receive services from the San Andreas Regional Center.*

- **Policy 2.3 Support the Density Bonus.** The City should commit to revising the density bonus to include additional incentives for the development of Extremely Low Income housing beyond that which is currently available for low and very low income units. Like many state and federal housing finance programs, the state density bonus program incentivizes the production of housing at the Low and Very Low Income level. However, these incentives have the effect of making much of the available affordable housing out of reach for residents on fixed incomes (including seniors and persons with disabilities) or who are working in low wage jobs and are thus unable to meet minimum income requirements to afford the rent assigned to the Very Low Income category. The City of Santa Cruz should add additional local incentives to the state density bonus law in its local density bonus ordinance or through development of an affordable housing overlay zone to make it more responsive to the impact of Santa Cruz County's high Area Median Income on the affordability of housing for City of Santa Cruz residents who are Extremely Low Income. The city should also include additional incentives for projects that make a percentage of units subject to a preference for identified categories of special needs populations who experience the greatest barriers to housing access including but not limited to people with developmental disabilities who benefit from services of the San Andreas Regional Center. Example: Palo Alto Affordable Housing Incentive Program; Menlo Park Affordable Housing Overlay

*Sample Language: In addition to implementing the California density bonus statute, the City of Santa Cruz shall provide an additional local density bonus, incentives, and/or concessions for housing projects that include at least 5% of the units for people at the Extremely Low-Income affordability level or which commit to make a percentage of the units subject to a preference for people with special needs who will benefit from coordinated onsite services, such as people with developmental disabilities who receive services from the San Andreas Regional Center.*

- **Policy 3 Special Needs and Homelessness.** As part of its commitment to meeting the housing needs of special needs populations including people who are unhoused the City should recognize that many of these special needs populations overlap with the population of Extremely Low Income households in the city. ELI households experience the highest rates of housing cost burden and are therefore at greatest risk of falling into homelessness. Without first solving the crisis of households becoming unhoused at a faster rate than new homeless housing resources are developed the City will continue to see the unhoused population growing. In order to keep more people stably housed the City should not only commit to developing at least 50% of its VLI RHNA as ELI housing but create policies and programs to specifically incentivize the development of ELI housing. Some strategies to consider are discussed above such as additional density bonuses and lowering the inclusionary requirements if deeper affordability or special needs groups are included. These new policies and programs should include measurable metrics to track progress in meeting the housing needs of specific special needs groups. Tracking the City's success in housing people with developmental disabilities and other special needs groups

is essential to determine whether policies and programs are having an effect in overcoming historic patterns of discrimination and exclusion from the current housing supply. A goal of 70 new Extremely Low-Income housing units for City of Santa Cruz residents with developmental disabilities over the period of the 2023-2031 Housing Element would represent meaningful progress towards the total unmet housing need of this special needs group.

*Sample Language: The City of Santa Cruz shall monitor progress towards a quantitative goal of 70 new Extremely Low Income housing units that are subject to a preference for people with developmental disabilities needing the coordinated services provided by San Andreas Regional Center to live inclusively in affordable housing.*

By making the above recommended revisions to the Draft Housing Plan the City can better address the needs of the most vulnerable special needs populations including but not limited to people with developmental disabilities.

In addition to these policy and program changes the city should also correct the language in **Policy 6.1 The City shall mitigate displacement risks and seek to remove barriers to housing choice vouchers** which incorrectly states that vouchers are accepted on a voluntary basis by landlords. As currently written this statement could cause confusion for both renters and landlords and lead to the spread of misinformation as California's Fair Employment and Housing Act was amended in 2020 to include protections from source of income discrimination with specific regulations on how income from households with rental subsidies should be calculated in determining income eligibility for rental units.

We urge you to consider our recommendations and make changes to the City of Santa Cruz Housing Element so that it meaningfully addresses the housing needs of its residents with developmental and other disabilities.

Sincerely,

*Kalisha Webster*

Kalisha Webster  
Senior Housing Advocate  
Email [kalisha@housingchoices.org](mailto:kalisha@housingchoices.org)  
Cell 650-660-7088

**From:** Matthew VanHua <mvanhua@santacruzca.gov>  
**Sent:** Monday, April 17, 2023 5:10 PM  
**To:** Galmiche, Ines  
**Subject:** FW: Engfer - Comments regarding RHNA 6 Housing Element DRAFT  
  
**Categories:** External

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**From:** Doug Engfer <[doug@engfer.org](mailto:doug@engfer.org)>  
**Sent:** Wednesday, March 29, 2023 1:09 PM  
**To:** Katherine Donovan <[kdonovan@santacruzca.gov](mailto:kdonovan@santacruzca.gov)>; Matthew VanHua <[mvanhua@santacruzca.gov](mailto:mvanhua@santacruzca.gov)>  
**Cc:** Sarah Neuse <[sneuse@santacruzca.gov](mailto:sneuse@santacruzca.gov)>; Samantha Haschert <[SHaschert@santacruzca.gov](mailto:SHaschert@santacruzca.gov)>  
**Subject:** Comments regarding RHNA 6 Housing Element DRAFT

Katherine and Matt -

Greetings! Hope you're well (and dry!).

This email contains the comments that I submitted to City Planning regarding the RHNA 6 Housing Element draft that was distributed for public comment, organized by document section as well as topical import. The formatting is clunky in order to facilitate working within the capabilities of the Microsoft Forms based comment feature on the City website. Given the limitations of that comment feature (character-count in particular), I'm sending this to you as a "belt + suspenders" play, to ensure that you can make sense of my submitted comments and questions. I've included Sarah and Samantha due to my observations (see "Locating Density") regarding zoning implications of our abundance of deemed-developable parcels (124% overage beyond RHNA 6 requirements).

Generally, I would like to commend the City and Staff on their good work both (1) achievements v RHNA 5 goals and (2) putting together a comprehensive and practicable plan for achieving our RHNA 6 goals. We need to (continue to) do our part to provide adequate and affordable housing in California.

- Introduction (Ch 1)
  - \* Comments and Questions
    - \*\* General Plan-Level comments
      - \*\*\* **Transit** - Much is made of the City's public transit, but the fact remains that the service is modest at best, both in terms of coverage and in terms of service level (headway, hours of operation). The City (with Metro) needs to make clear (1) specific targets for service-level and coverage improvements, (2) specific measures that the City (with Metro) will take to meet those targets, and (3) timelines for achieving those targets. While these specifics may be beyond the scope of this particular document, the document should be able to reference responsible entities and plans in the Circulation Element.
      - \*\*\* **Parks** - With appropriately-increased focus on higher-density MFR development, the City must center the development, access, and maintenance of the City Parks system, so that MFR residents have ample and ready access to outdoor facilities for recreation and relaxation. There is no mention of this in the document; I submit that this is a glaring omission and one that cuts against achieving appropriate health-oriented equities. The City must commit to an enhance parks program as part of this RHNA cycle. That effort

should include consideration of and, as appropriate, improvement or development of active-transportation-based “safe routes to parks” from areas of high-density development.

- **\*\*\* Active Transportation** - While mentioned, the Housing Element, along with the Circulation Element, must center the development and/or enhancement of active transportation facilities throughout the City, and especially along or adjacent to the areas and corridors targeted for higher-density development. This work must contemplate Safe Routes to Schools, as well as to parks, critical resources (food shopping, etc.), and commercial centers. The City should develop and enforce clear standards for protecting and preserving existing active transportation corridors, as we (rightly) focus on increasing the housing density on our transit corridors and downtown. Those clear standards should be called out in this document.
- **\*\*\* Locating Density** - The document notes that we have 224% of the capacity needed in order attain the RHNA 6 goals (that is, develop-able lands allow for a 124% overage above the RHNA 6 target). As such, it’s clear that the City would be able to reduce the maximum densities allowed on shallow parcels immediately adjacent to existing homes (as along Water and Soquel in the Branciforte area). Zoning these parcels so that buildings “max out” at 3 stories (at most 4 with bonuses) would go a long way to gain community favor for the overall plan, and reduce the potential conflicts that may arise when out-of-scale projects are proposed (as was the case with 831 Water St). Doing so would clearly NOT threaten the City’s ability to achieve its RHNA 6 goals; as such, the City should carefully review and adjust the target zoning for parcels that meet these criteria.

- \* Editorial suggestions

- \*\* [Page 1-1] “Monterrey” should be “Monterey”

- Policy Plan (Ch 2)

- \* Comments and Questions

- \*\* General Plan-Level comments

- \*\* Specific comments

- **\*\*\* [Page 2-4] Goal 1.2f** should include some consideration, based on the evolving and changing character of the community’s economy, of whether the industrial lands are zoned for highest/best use, and triggers for when/whether zoning changes (e.g., to mixed commercial/residential) are called for.
- **\*\*\* [Page 2-8] Inclusionary Ordinance.** The document refers to reviewing the Inclusionary Ordinance in order to maximize development of affordable housing without “being a barrier to housing development.” While I acknowledge that excessively high inclusionary levels can effectively prevent development, at present it’s not possible to assess the impacts of inclusionary ordinances, because developers are not sharing their business models and project economics. Developers who want to take advantage of density bonuses should be willing to share their project economics; the City should require it. It should not be the City’s obligation to blindly incent development.
- **\*\*\* [Page 2-8] Vouchers.** Further, the notion that developers can’t make affordable units “pencil” at a time when citizens have Housing Choice Vouchers that landlords won’t honor is simply disingenuous. Landlords/developers can receive full market value for deemed affordable units simply by accepting these vouchers!
- **\*\*\* [Page 2-13] Childcare.** The Housing Element makes much of the City’s “commit[ment]” to childcare. And yet the City (and County) in the recent CORE grants process completely eliminated City support for existing childcare programs (which the City and County had supported in the past). This community support enabled local childcare centers to provide low-cost care to lower-income families. Before developing new childcare facilities, the City should support and enhance existing programs to their

capacity. Objective 3.2a should be re-written from “continue to assist” to “restore and expand assistance to”, since there is no currently-funded support for childcare.

- \*\*\* [Page 2-14] **Homelessness Response.** The City’s focus should be on supporting the development of shelter and facilities, not providing services. The County should be the lead agency for funding and supporting services delivered in those facilities (and facilities throughout the County).
- \*\*\* [Page 2-16] **UCSC.** As relates to Policy 3.5, if I read this correctly (UCSC committed to 25% of housing for new facility/staff - 558 additional new housing units), then UCSC expansion will consume at least 1500 units of our RHNA 6 goal. It’s not clear to me how that helps further our goal of providing ample affordable housing for the community - the document should make clear how that goal reasonably fits within the overall Housing Element’s goals.
- \*\*\* [Page 2-16] **Affordability.** Further, the City and University should work together to ensure that on-campus housing is provided below prevailing market, in order to relieve UCSC pressure on local housing stock, availability, and affordability.
- \*\*\* [Page 2-27] **Transit and active transportation.** Policy 7.3 should be more explicit. **Transit** - Much is made of the City’s public transit, but the fact remains that the service is modest at best, both in terms of coverage and in terms of service level (headway, hours of operation). The City (with Metro) needs to make clear (1) specific targets for service-level and coverage improvements, (2) specific measures that the City (with Metro) will take to meet those targets, and (3) timelines for achieving those targets. While these specifics may be beyond the scope of this particular document, the document should be able to reference responsible entities and plans in the Circulation Element. **Active Transportation** - While mentioned, the Housing Element, along with the Circulation Element, must center the development and/or enhancement of active transportation facilities throughout the City, and especially along or adjacent to the areas and corridors targeted for higher-density development. This work must contemplate Safe Routes to Schools, as well as to parks, critical resources (food shopping, etc.), and commercial centers. The City should develop and enforce clear standards for protecting and preserving existing active transportation corridors, as we (rightly) focus on increasing the housing density on our transit corridors and downtown. Those clear standards should be called out in this document.
- \*\*\* [Page 2-28] **Wildfire.** City zoning and building policies must incorporate the learnings from recent urban-area fires (e.g., Santa Rosa), so that our built environment is appropriately protected from wildfires that become urban fires. **Flood / sea-level rise.** City zoning and building policies must reflect flooding risks in low-lying or flood-prone areas. Specifically, building code should ensure that vital building infrastructure is safe from flood waters (whether caused by weather or sea-level rise, or a combination of the two).

○ \* Editorial suggestions

- \*\* [Page 2-2] Make left-indentation of the “Goals” descriptive text consistent (text for Goals 1 and 4 differs from others)
- \*\* [Page 2-5] “...community to potential barriers to...” re-write to make sense; “...to recognized...” should be “...to recognize...”
- \*\* [Page 2-8] “...the City’s Inclusionary.” Should presumably be “...the City’s Inclusionary Ordinance.”
- \*\* [Page 2-16] “USCS” should be “UCSC”
- \*\* [Page 2-20] “...are home to large a proportion...” should be “...are home to a large proportion...”
- \*\* [Page 2-22] “...previously known a...” should be “...known as...”
- \*\* [Page 2-25] “...produces and delivers to nearly...” should be “...produces and delivers water to nearly 100,000 customers ...”

- \*\* [Page 2-27] “...compliment the...” should be “...complement the...”
- Community Engagement (App A)
  - \* Editorial suggestions
    - \*\* [Throughout] Inconsistent use of “LatinX” and “Latino”. Consult with the community about preference and use one or the other, but not both.
- Past Performance (App B)
  - \* Comments and Questions
    - \*\* General Plan-Level comments
      - \*\*\* [Throughout] **Benchmarking**. There are many missed opportunities for the document to benchmark Santa Cruz demography, in order to provide needed context for the public and for planners and policy-makers, and in order to highlight those areas where Santa Cruz notably differs from other communities or national standards. In my opinion, it’s not enough to simply compare Santa Cruz to other parts of the County, given that county communities differ widely. It would be helpful to add comparisons to other benchmarks / communities (e.g., in many cases Santa Barbara or Santa Monica may be relevant comparators; in other cases, statewide or nationwide numbers may (also) be useful). Specific instances include:
        - [Page B-2] Seniors (12.5% of population)
        - [Page B-3, C-20] Disabilities (9.7% of population)
        - [Page B-7] ELI households (25% of households)
        - [Page C-10] HH size (2.4 persons per HH)
        - [Page C-17] Overcrowding (% by owner v renter)
        - [Page C-18] Cost-burdening (55.4% of renters)
        - [Page C-25] Poverty (20% living in poverty)
        - [Page C-26] Homelessness (benchmark outside of our area, please)
    - \*\* Specific comments
      - \*\*\* [Page B-8] **UCSC**. The text here is unclear and potentially self-contradictory regarding the University’s commitment to student housing. The document refers to the settlement agreement between the City and UCSC, which requires the University to provide housing for 2/3 of its student population. The document then indicates the LRDP proposes 10,125 on-campus beds and 579 off-campus beds. That is NOT 2/3 of the LRDP’s target student population. The Element needs to make clear whether and, if so, how the University plans to meet the settlement agreement terms, or make clear that the University does not plan to do so (and the resulting impacts on the local housing situation).
  - \* Editorial suggestions
    - \*\* [Page B-3] “...Loudon Nelson...” should be “...London Nelson...”
    - \*\* [Page B-6] “...homeless persons’ being...” should be “...homeless persons being...”; bullet for Janus item formatting inconsistent with other bullets
    - \*\* [Page B-7] CHAS is used without definition (not defined until page C-11)
    - \*\* [Page B-8] “...50 unit affordable...” should be “50-unit affordable...”; “...full-time while attend school...” should be “...full-time while attending school...”
- Needs Assessment (App C)
  - \* Comments and Questions
    - \*\* Specific comments
      - \*\*\* [Page C-10, C-23, etc.] The numbers presented relating to single-adult households (HHs) are inconsistent and/or unclear throughout. For example, on page C-10, Table C-9 cites 1,680 “Female HH, No Spouse Present”, while Table C-10 cites 1,008 “Female Households, No Spouse” and 1,680 “Male Households, No Spouse”. Tables C-24 and C-25 (pages C-23, 24) suggest that only female-headed HHs are in poverty (210 single-parent HH living in poverty v 210 Single Parent Female HH Living in Poverty). That seems incredible to me. Need to make a thorough and critical review of all of these figures in



order to ensure consistency, validity and accuracy. Also need to clarify whether referring to single-person HHs or single-parent HHs (with dependent children). Again, these HH numbers are difficult to make sense of throughout.

- \*\*\* [Page C-19] Reference to female-headed (presumably no-partner) HHs as “special needs”, per HCD. I would suggest that the Element should certainly center HCD-designated special needs HHs, and should also note that male-headed (presumably no-partner) HHs will, in many cases, evidence the same special needs as female-headed HHs (need for childcare, etc.). Analyses breaking out female-headed no-partner HHs should also break out male-headed no-partner HHs.
- \* Editorial suggestions
  - \*\* [Page C-2] Formatting of numbers in the 2020 Actual column needs attention.
  - \*\* [Page C-11] CHAS used and defined here; used previously, without definition, on page B-7.
  - \*\* [Page C-17] The narrative regarding Table C-17 (overcrowding prevalence, owner v renter occupied) does not comport with the numbers presented in the table. Fix the narrative so that it makes sense based on the numbers (215 is 3.3% of 6,515, which is nowhere to be found in the table).
  - \*\* [Page C-22] The narrative relating to Table C-23 (on the following page) should be cleaned up. It refers to “five or more” and “six or more” and “seven or more” occupant HHs, but the data are actually 5-person, 6-person, and 7 or more. Also, the text says that there are more owner-occupied 5- and 6-person HHs, but that’s not reflected in the data; all of the categories have more renter HHs than owner HHs.
  - \*\* [Page C-27] Using West Valley College as an example “out of area” commuter school seems an odd choice. How about SJSU or SCU instead? How many folks commute to WVC?
  - \*\* [Page C-29] “...nearby jurisdiction.” Should be “...nearby jurisdictions.”
  - \*\* [Page C-32] “...higher to the ACS...” should be “...higher than the ACS...”
  - \*\* [Page C-33] “the U.S... .” Should be “The U.S. ...”
- Fair Housing (App D)
  - \* Comments and Questions
    - \*\* Specific comments
      - \*\*\* [Page D-54] **Vouchers**. I would like to understand why there is an “extreme shortage of housing vouchers” - what are the causes of this shortage, and what can we do, as a community, to fund or create more vouchers (as well as get landlords to accept them)?
  - \* Editorial suggestions
    - \*\* [Page D-5] “...policies...” should be “...policies...”
    - \*\* [Page D-23] “...it is consider as...” should be “...it is considered as...”
    - \*\* [Page D-47] “...less than one persons...” should (probably) refer to one percent?; similarly with “...and one identified as Asian...”? If the latter is, indeed, one person, then say so.
    - \*\* [Page D-52] Reference to exponential population growth is inaccurate and hyperbolic. Exponential growth is growth that accelerates over time ([https://en.wikipedia.org/wiki/Exponential\\_growth](https://en.wikipedia.org/wiki/Exponential_growth)). That is not the case here. “Rapid” or “accelerated” growth seems more appropriate.
- Constraints (App E)
  - \* Editorial suggestions
    - \*\* [Page E-3] “...\$100 a square foot...” should be “...\$100 per square foot...”; “...Discloser Act...” should be “...Disclosure Act...”; the narrative regarding approval rates by ethnicity are inconsistent. One paragraph cites 60% for American Indian; the other, 45.2% - correct as appropriate.
    - \*\* [Page E-45] Reference to 4.2 million gallons per day (GPD) to SCWD service area is incorrect. The SCWD serves an average of closer to 6.5MGD year round (lower in winter; higher in summer). The 4.2 MIGHT be correct for customers within the City Limits; would need to confirm that with SCWD.
    - \*\* [Page E-45] “...pipped...” should be “...piped...”

- \*\* [Page E-46] "...and potable and domestic..." should be "...and potable domestic..."
- Sites (App G)
  - \* Comments and Question
    - \*\* General Plan-Level comments
      - \*\*\* **Locating Density** - The document notes that we have 224% of the capacity needed in order attain the RHNA 6 goals (that is, develop-able lands allow for a 124% overage above the RHNA 6 target). As such, it's clear that the City would be able to reduce the maximum densities allowed on shallow parcels immediately adjacent to existing homes (as along Water and Soquel in the Branciforte area). Zoning these parcels so that buildings "max out" at 3 stories (at most 4 with bonuses) would go a long way to gain community favor for the overall plan, and reduce the potential conflicts that may arise when out-of-scale projects are proposed (as was the case with 831 Water St). Doing so would clearly NOT threaten the City's ability to achieve its RHNA 6 goals; as such, the City should carefully review and adjust the target zoning for parcels that meet these criteria.
    - \*\* Specific comments
  - \* Editorial suggestions
    - \*\* [Page G-5] "...recently developed sites..." should be "...recently-developed sites..."
    - \*\* [Page G-31] "...the construction a..." should be "...the construction of a ..."; "SRO's" should be "SROs".

Doug Engfer  
Santa Cruz

# Comments on City of Santa Cruz [Housing Plan](#) document

*from Housing Element draft (see [update page](#))*

Thank you for all the work on this Housing Element draft. It is clear that the City is committed to a Housing Plan that will work to address a housing and affordability crisis with some attention to broader issues like Climate and a focus on Fair Housing. It is also quite an accomplishment to be so close on your 5th cycle RHNA numbers.

These comments are only on the Housing Plan document - I'll submit comments on other sections as time is available.

## Scope and Timelines

A primary consideration with the Housing Plan is that many of the objectives speak to improvements and revisions but do not provide any baseline, scope or target outcome. It is hard to determine how one knows the objective has been achieved. As well, many of the programs have “ongoing” as the Metric - they lack milestones, timelines or a means to hold the City accountable for progress.

As noted in the next section, there is an opportunity to include information from the 5th cycle towards a more clear set of commitments in both scope and timeline.

Many of the objectives use vague language such as

- “Continue to...” “Expand...” “Improve...” - anything including these words should be able to establish a baseline or scope and identify milestones towards completion.
- “Facilitate...” - there are instances where the outcome of the City’s facilitation is unclear
- “Collaborate...” - any objectives with this should make clear the commitment to a shared outcome and a timeline.

There are words that are vaguely defined by context nor in the Glossary including:

- Affordable housing
- Sensitive populations
- Mixed-income (often before “neighborhoods” or “projects”)
- Alternative housing types

I recommend you look at Redwood City’s Housing Element

## Leverage Past Performance in 5th Cycle

For policies that are a repeat or continuation from the 5th cycle, how can lessons learned or commitments from the 5th cycle inform more specifics on outcomes and milestones/dates? Some examples include:

## Comments on City of Santa Cruz [Housing Plan](#) document

*from Housing Element draft (see [update page](#))*

- Policy 2.5 : You know from the 5th cycle (Program 2.6) that many at-risk units are Section 8 from the 5th cycle, and you have been working with individual property owners for incentives. How can this inform more specific outcomes for 6th?
- Planned Development permits (Policy 1.6) which appeared as Program 1.4 in 5th - what was the result of the study to be done?
- Permits and Review (Policy 1.3) which appeared as Program 1.5 - what about the city-wide fee study, should that be a milestone in 6th?
- Policy 2.2 (was Program 2.2 and Program 2.4) In 5th cycle, there were taxes in the objectives - Transfer Tax and TOT - Only one of these has passed. Recommend transfer tax or vacancy tax. As well, In the 5th cycle you mention the Pro-Housing Designation, but it is not in the 6th cycle Housing Plan. Can that be a milestone?
- Policy 3.6 (was Program 3.7) does not reflect the City's new Homeless Services Division and all its [commitments and funding](#) which is part of the 5th Cycle progress.
- Supposedly continued from the 5th cycle (was Program 4.5) is the development of a Fair Housing Plan - I don't see any reference in the 6th cycle Housing Plan.

### **Available Housing and AFFH**

The word “affordable” appears in the Housing Plan 67 times. This is a very important focus for the Housing Element. Policies related to the defined “affordable” income levels should remain and there must be strong commitments to affordable housing production, serving at-risk populations and preventing displacement.

However, it is clear that Santa Cruz is increasingly unaffordable to a wider range of residents - the majority of the city is cost burdened (over 30%) ([Fair Housing Assessment](#)). According to the National Low Income Housing Coalition, the [Two-Bedroom Housing Wage for the City of Santa Cruz](#) exceeds \$60. Therefore the Housing Plan should include policies that increase housing that is available to a full range of incomes. Santa Cruz needs more housing for everyone.

Policy 6.2 focuses on single-family zoning, which is terrific, and uses the phrase “affordable housing” to counter historical patterns of segregation. While AFFH definitely includes more affordable housing (VLI/LI) throughout the City and especially in single-family zoning which historically has reinforced segregation and exclusion,, addressing AFFH goes beyond that. If you look at [HCD guidance on AFFH](#), they say

“The goal of Affirmatively Furthering Fair Housing (AFFH) is to combat housing discrimination, eliminate racial bias, undo historic patterns of segregation, and lift barriers that restrict access in

# Comments on City of Santa Cruz [Housing Plan](#) document

from *Housing Element draft* (see [update page](#))

order to foster inclusive communities and achieve racial equity, fair housing choice, and opportunity for all Californians.”

**In a high resource area like Santa Cruz, AFFH must include housing opportunities and mobility for a range of income levels,** given that median income still has many residents cost-burdened. My suggestion is that you enhance the opportunity for naturally occurring missing middle in single-family zoning- duplexes, triplexes, quadplexes - all larger than ADUs, but less than Inclusionary Ordinance.

Similarly, there is a focus on “affordable” housing for mixed-income which is seen as the path to diversity of neighborhoods. While it may be the primary way the City promotes mixed-income development (Policy 2.1), naturally occurring missing middle adds another path to get to diverse, vibrant, walkable, bikeable neighborhoods. Let’s do both!

The phrase “missing middle” does not appear in the Housing Plan though the words “duplex”, “triplex” appear a lot in the community input. Making it easier to build missing middle and smaller infill projects throughout the city should be added other parts of the Housing Plan, e.g. Housing Production Policies (section I of the Housing Plan)

Redwood City’s [Housing Element](#) has an excellent summary of how they approach this vision (this HE is an excellent example of clear objectives and commitments to timelines as well):

*Increase Housing at All Income Levels in High Resource Neighborhoods by*  
*o Implementing SB 9 duplexes in single family neighborhoods,*  
*o Continuing to encourage accessory dwelling units in single family neighborhoods, (Program HI.5)*  
*o Increasing middle housing opportunities, and*  
*o Studying increasing densities (upzoning) in single family neighborhoods beyond SB 9 requirements (they have this as Program HI.4)*

## Fees and Process

It is terrific to see an objective that includes an ordinance (Policy 2.2g) to allow ministerial approval for 100% affordable residential development. In the interest of building infill/missing middle housing faster, you should

- extend ministerial approval beyond single-family and ADUS to smaller multi-family projects (less than 50 units?) meeting Objective Standards.

# Comments on City of Santa Cruz [Housing Plan](#) document

from *Housing Element draft* (see [update page](#))

- Review fees (not just to cover city costs!) with an outcome of incentivizing multi-family housing over single-family housing, including smaller multifamily projects.

## Explicitly Connecting to Other City Plans

The City has worked on other plans that intersect with the Housing Element that could inform this Housing Plan more explicitly. A notable example is the [Homelessness Response Action Plan](#) which has very specific objectives/actions that could be referenced in this Housing Plan, especially Policy 3.3.

The City's Climate Action Plan has a Measure (T1.7) which references the Housing Element and much of what it addresses, yet the only mention of the Climate Action Plan is in Policy 7.2 about green building principles.

*From the Climate Action Plan:*

### **T1.7 Efficient and Equitable Land Use (HIGH IMPACT ACTION)**

Accelerate housing development and support commercial and industrial development in city limits, concentrating the most intensive growth in transit corridors and central areas of the city to promote walking and biking to nearby jobs, entertainment, goods, services, and public transportation, through the General Plan Housing Element Update to be approved in 2023.

Prioritize expansion of affordable housing stock.

Partner to incentivize 15-minute neighborhoods, particularly within frontline neighborhoods communities, supported by dense housing and buildings, provision of locally sited essential services and amenities, and connected by a network of bike, pedestrian, and transit services.

## Renter Protections

There is a clear difference in income levels between renters and homeowners (see Table C-12). The Fair Housing Assessment also indicates that renters have overpayment rates, are a high % of residents in areas identified for displacement and at risk for homelessness.

It is great that you include anti-displacement policies in Policy 5.5, though you could be more specific with the recommendations from the UC Berkeley Urban Displacement Project that Santa Cruz does NOT have:

- Just Cause Eviction Ordinance (beyond the state law)
- Rent Stabilization or Rent Control (beyond Large Rent Increases Ordinance addition to Chapter 21.03)
- Rent Review Board and/or Mediation

# Comments on City of Santa Cruz [Housing Plan](#) document

*from Housing Element draft (see [update page](#))*

The other focus on renters comes in the form of rental assistance (e.g. security deposits) which is a continuation of existing work. Are there additional efforts to help renters? One example would be:

- Create a database that shows how many apartments are occupied, how many are vacant and what the rents are, and helps people eligible for rental protections (*aka* [Rental Registry](#))

## Climate and Transit

The City's Climate Action Plan has a Measure (T1.7) which references the Housing Element and much of what it addresses, yet the only mention of the Climate Action Plan is in Policy 7.2 about green building principles. The Climate Action Plan touches on use of transit corridors, affordable housing stock but also speaks to "15-minute neighborhoods, supported by dense housing and buildings, provision of locally sited essential services and amenities, and connected by a network of bike, pedestrian, and transit services." The 15-minute neighborhood shows up in the community outreach, but is not mentioned as a desired vision for Santa Cruz anywhere in the Housing Element.

There are some good elements related to modifications to parking. I would like to see more related to parking that affects the cost of production:

- Remove mandatory car parking requirements for new housing and allow conversion of existing parking to bike storage
- Replace traffic studies with quantifying Vehicle Miles Traveled (VMT), a more accurate measure of project impact, aiming to reduce the amount of time people have to spend behind the wheel. (learn more: [CalTrans and SB373](#))
- Allow condo and apartment rentals to unbundle parking, which makes the cost of a parking space a separate, opt-in item for renters. (learn more: [unbundled parking](#))
- Mitigate traffic and parking impacts and boost pedestrian and bicyclist rights, protections and accommodations, e.g. by requiring transit and bike-share subsidies for residents.

You also highlight transit-oriented development. You should be including the Rail/Trail in your corridors that are referenced in Policy 1.2 or other transit-oriented development policies.

## Special Needs

Your policies related to persons with disabilities are conflated with families. You have policies that address each of the other categories (farmworkers, students, homeless). FWIW, the word "veterans" does not appear once in your Housing Plan, should it?



## Comments on City of Santa Cruz [Housing Plan](#) document from *Housing Element draft* (see [update page](#))

Policy 3.1 merges families and persons with disabilities and its objectives are all over the place: preservation, childcare, development. Is this really two policies - one for families with children and the other for persons with disabilities?

Your policies to create housing for persons with disabilities feel incomplete and primarily in AFFH Policies (section 6). Housing Choices has specific suggestions for policies to support the disabled in the Housing Production or Affordable Housing or Special Needs, which generally include development of ELI units (as Housing Choices said in the workshop)

- Policies designed to increase the production of Extremely Low Income units, as well as adequate staff capacity to implement and monitor the impact of these policies (and include a Quantitative goal of ELI units with preference for people with developmental disabilities).
- For any city-owned land, land dedicated to affordable housing or city housing funds, grant additional points to proposals that address the city's most difficult to achieve housing priorities, i.e. providing Extremely Low-Income units or committing to make a percentage of the units subject to a preference for people with special needs.
- Provide an additional local density bonus, incentives, and/or concessions for housing projects that include at least 5% of the units for people at the Extremely Low-Income affordability level or which commit to make a percentage of the units subject to a preference for people with special needs.

Your policy 3.3 for the homeless includes “support housing solutions”, yet includes only one objective related to housing that is not shelter (Coral St). It is sad that you include TWO objectives related to unsanctioned camps which do nothing to house the unhoused, and your objective of waste disposal for those living in vehicles is a small step towards support of those whose only home is their vehicle. See above for the opportunity missed to connect the Housing Plan to the City's [Homelessness Action Plan](#)

## DETAILED Feedback on Policies

### POLICIES - HOUSING PRODUCTION

I.1a - could identify what buffer

I.1c - doesn't this already exist? [AFFH viewer](#) has transit stops and area

I.2 (all of it) - most of these dates are the first two years. What is beyond that?

I.3a - What does it mean to “streamline and improve”? What's your benchmark for “good enough” or “not good enough”? Is this objective simply to implement the system by December 2024?

I.3b - What does it mean to “promote efficiency and predictability”? What do you know now needs to improve towards greater project feasibility? Do you have any other references for best practices here? Is this objective met by simply having meetings? Or by developing an annual improvement plan?

I.3c - Great to see the date of January 2028 for elimination. Is this for housing of all types given that >97% are near transit?

I.3d - Seems the goal for fee review should go beyond making sure it covers City costs? Like the SRO in 5th cycle, what would be target or outcome desired for 6th cycle?

- Revise fees to incentivize larger multi-family housing (more bedrooms) over single family or SROs
- Consider other fee modifications that incentivize missing middle residential

I.3e - Good! Consider other options to produce housing: currently Single-Family and ADUs are ministerially approved

- Expand the types of projects eligible for ministerial approval by city staff, e.g. multifamily projects meeting objective standards that are under 50 units.

I.4 Consider moving the definition of “alternative housing types” to the Policy statement (and the Glossary!) - seems like you are considering “co-housing, housing cooperatives, live/work” at least.

I.4b - Good! Why not commit to the annual meetings (like previous) and a resulting improvement plan? You had a stronger statement in 5th cycle:

Examine development regulations to identify potential barriers to the development of alternative types of housing and, if such barriers are found, develop actions to remove or modify them as feasible.

I.4c - is “non-traditional” the same as “alternative housing types”? Is this objective developing a proposal of sorts by some date and working with HCD? As it is, it's really vague and hard to know when “encourage” is done. This is a repeat of Program I.3 in 5th cycle

## Comments on City of Santa Cruz [Housing Plan](#) document from *Housing Element draft* (see [update page](#))

I.5 General - Is “ADU” inclusive of “JADU”?

I.5b. - This is vague. Do you not already know ways you may modify the program “in a manner that facilitates the production of ADUs”? Here are some suggestions:

- Develop an ADU bonus program similar to [San Diego's](#), allowing the construction of one unrestricted ADU for every affordable ADU deed-restricted for 15 years.
- Reduction of parking requirements for attached or detached ADUs
- Develop an ADU ordinance that permanently removes owner-occupancy requirements beyond the sunset of state law.
- Incentivize new ADUs, including those that are rent-restricted for moderate- or lower-income households or that are prioritized for households with housing choice vouchers. Consider offering low- or no-interest loans, forgivable loans, impact fee waivers for ADUs that are 750 square feet or larger, allowances to facilitate two-story and second-story ADU construction, etc.
- You may also consider if the size of your ADUs/JADUs is an impediment.

I.5c - Good, though this seems to be multiple objectives, what part is new - the webpage update? The incentives? Seems you already have webpage with dev stds, fees and processes. If the incentives are new, consider it as a separate objective to identify incentives or development allowances that are more flexible. You might call it an ADU Bonus program such as:

- Develop an ADU bonus program similar to [San Diego's](#), allowing the construction of one unrestricted ADU for every affordable ADU deed-restricted for 15 years.
- Incentivize new ADUs, including those that are rent-restricted for moderate- or lower-income households or that are prioritized for households with housing choice vouchers. Consider offering low- or no-interest loans, forgivable loans, impact fee waivers for ADUs that are 750 square feet or larger, allowances to facilitate two-story and second-story ADU construction, etc.

I.5d - what is “streamlined processing” - what's the benchmark today? Aren't they ministerially approved?

I.5f - vague - is this something you can do (develop amendments) annually?

I.5h - is this different from what you do now, which is considered an “informal, voluntary” survey?

I.5i - vague. What do you consider “applicable building standards”. What programs are you expanding? What resources are you improving?

I.6a - vague. You committed to doing a study in 5th cycle (Program I.4)- what did you learn? What would be the targets for modifications?

I.6b - already part of your current program (I.4) - is there a new standard? What's the new criteria?

# Comments on City of Santa Cruz [Housing Plan](#) document

*from Housing Element draft (see [update page](#))*

1.7 - How can each of these objectives be “ongoing”? Are there any milestones in the next 8 years?

## **POLICIES - AFFORDABLE HOUSING**

2.1 - This intro: “The City recognizes that mixed-income neighborhoods provide a variety of benefits to the City including a chance for residents to learn from others of different backgrounds and interests. This helps to broaden perspectives and deepen understanding of other people’s values and points of view, leading to more respect and understanding.” is really odd. Is it income levels that encourage greater diversity? Or is it attainable housing that allows a diverse set of people to live in neighborhoods together?

2.1a - vague.

2.1b - oddly worded. Recommend:

- Commission studies to determine at what percentage an inclusionary rate becomes an impediment to housing development. Consider the impact on size of projects as well as affordability levels.

2.2b - vague - what might be the criteria?

2.2d - There are many housing bills - why would the lobbyist be focused just on funding affordable housing? This is a repeat of 5th cycle. You don’t appear to have lobbyists focus on anything else that would help get MORE housing - missing middle, preservation, etc.

Objectives 2.2e and 2.2f seem out of scope here when the focus is on regulatory and/or financial incentives.

2.3a - good to stay up to date on the State - what are the attributes of the local DBL that you want to “further facilitate production”? In the 5th cycle you indicated that “More work will be done regarding development agreements anticipated in the 2021-2023 time period.”

2.4a - What does “Coordinate with” mean? In the 5th cycle, you talk about partnering with affordable developers to obtain additional State HCD funding.

2.4b - Might you also set a target of units built in these partnerships?

2.4c - Might you also set a target of units built in these partnerships?

2.5 - repeat of 5th cycle - you already know from the work there that “Many units that appear to be at risk are part of a Section 8 program, which renews every five years. Thus, the City has been working with individual property owners to provide incentives to maintain affordability” You don’t mention anything about individual property owners (or landlords) in this objective. Housing Authority is probably one of the “interested agencies”?

## Comments on City of Santa Cruz [Housing Plan](#) document

*from Housing Element draft (see [update page](#))*

2.5a “Work with interested agencies and community organizations to preserve at-risk units by monitoring their status, providing technical and/or financial assistance in return for extended affordability controls, and review tenant notification prior to project conversion.” (Metric: ongoing) (AFFH)”

- Make more specific. You indicate that “Table D-15 below identifies deed-restricted, assisted rental properties within Santa Cruz, of which 444 units are at-risk of converting from affordable to market-rate units between 2023 and 2033” This objective can have a quantified target number.
- You can also consider other options for the funding - e.g. Create a publicly owned affordable housing developer non-profit that can apply for grant funding not available to government entities.

### **POLICIES - SPECIAL NEEDS and HOMELESSNESS**

In the Past Performance, you mention the 2015 All In -Toward A Home For Every County Resident (All In) Plan <https://housingmatterssc.org/wp-content/uploads/2018/11/All-In-Santa-Cruz-County-Plan.pdf>

This has some very specific action strategies. Do any of them that relate to housing apply?

Policy 3.1 merges families and persons with disabilities for “Special Needs”. The objectives are all over the place: preservation, childcare, development. Is this really two policies - one for families with children and the other for persons with disabilities?

Your policies to create housing for persons with disabilities is woefully inadequate. As you heard from Housing Choices during the workshop, a focus on developing ELI housing would be a good direction. Here are suggestions:

- Policies designed to increase the production of Extremely Low Income units, as well as adequate staff capacity to implement and monitor the impact of these policies (and include a Quantitative goal of ELI units with preference for people with developmental disabilities).
- For any city-owned land, land dedicated to affordable housing or city housing funds, grant additional points to proposals that address the city’s most difficult to achieve housing priorities, i.e. providing Extremely Low-Income units or committing to make a percentage of the units subject to a preference for people with special needs.
- Provide an additional local density bonus, incentives, and/or concessions for housing projects that include at least 5% of the units for people at the Extremely Low-Income affordability level or which commit to make a percentage of the units subject to a preference for people with special needs.

3.2a - what does “assist” mean?

## Comments on City of Santa Cruz [Housing Plan](#) document

*from Housing Element draft (see [update page](#))*

3.2b - How does the city “include childcare centers and facilities” in new residential developments and employment centers - is this on all projects - private, public, large, small? Is this on projects that have family-sized homes?

Note that 5th cycle had a more specific objective: Work with nonprofit organizations to identify proposed housing projects suitable to families with children and consider providing financial assistance, subject to availability and City Council approval, to facilitate and encourage their development.

Overall - this policy is intended to support housing solutions in addition to supportive services. One of the objectives relates to housing if you consider the Coral St campus/navigation center housing. One relates to RV. Unsanctioned camps should not be part of the objectives, let alone two of them. In the Past Performance document, you indicate the strategic plan All In -Toward A Home For Every County Resident (All In).

3.3a - are there milestones from the three-year action plan? What does it mean to update “periodically”?

3.3c - what type of public data, system and metrics

3.3d - what is “related to homelessness response efforts” - what does it mean to “be a leader”? Is this intended to be on the model of HAP, but statewide?

3.3g - vague - what is benchmark? Is there a number of shelter spaces? What services?

3.3h - can this be more specific given that you have recently developed a team?

3.3i - what are the proactive steps? Why do you have an objective related to unsanctioned camps in HE

3.3k - Why do you have an objective related to unsanctioned camps in HE

3.4a - vague - what is “supporting” and “assistance”?

3.4b - how does the city “locate” PSH in residential setting or other locations

3.5 - check your spelling of UCSC throughout (not USCS) - phrases like “meet to collaborate on facilitating” are vague. Also, what does any of this really mean when you decide to sue the University?

3.5a - what does this mean?

3.5b - funding yes, but when it comes to facilitating construction of new student housing, what does this mean when you opposed SB886?

3.6 - OK - can you include the benchmark of \$IM as approved by council?

### **POLICIES - HOUSING ASSISTANCE**

4.1a - One of the few with a Quantitative metric!!

## Comments on City of Santa Cruz [Housing Plan](#) document

*from Housing Element draft (see [update page](#))*

4.2a - how does helping buyers with homeownership opportunities fit under a policy of financing for construction of new housing and supportive services?

4.2b - what does it mean to Support the continuation of the AHTF

Where is this program from 5th cycle that is supposedly “Continued”: (Program 4.5): The City contracts with California Rural Legal Assistance, Senior Network Services, La Familia Center, Santa Cruz Community Counseling Center, and other organizations to provide services that improve housing opportunities.

### **POLICIES - NEIGHBORHOOD VITALITY**

Why is the phrase “neighborhood character” anywhere in these policies? You have clearly been working to shift to objective standards (multi-family) and it may be better to shift towards a vision of walkable neighborhoods, etc.

5.1a - the 5th cycle had specific areas. What are the goals here.

5.1b - what does it mean to “increase awareness of neighbors” - awareness by neighbors of the clean-up/disposal days? Or just awareness of neighbors so folks can snitch on each other.

5.2a - do you not have any sort of metrics from the years of doing this program that you can provide?

5.2b - how will you expand? Is working with other dept, community groups, etc. the expansion? How do you know you are reaching “people in need of help who are unaware of program or benefits”? Do you have some metric to know success

5.3 - Past performance says that UHRP is not active.

5.3a - do you have a target # of people to serve?

5.3b - this is super hard to parse. What is an example “housing habilitation program”? How do the projects for which you want to “particularly increase energy-efficiency” and low-incomes seniors get on the radar and how are they selected? \

5.4 - The outcomes of this Policy are vague and nearly impossible to understand. The objectives seem not to be limited to housing related items. “Outreach...for policy initiatives and projects that may affect those areas”? Gather input and feedback...regarding residents needs?

5.5 this is all about displacement - YAY!

5.5a - this seems very similar to 2.5

5.5b - yes, there are some key anti-displacement policies that are in the UC Berkeley (see above)



## Comments on City of Santa Cruz [Housing Plan](#) document from *Housing Element draft* (see [update page](#))

### **POLICIES - AFFIRMATIVELY FURTHERING FAIR HOUSING**

Your first policy is about removing barriers to HOUSING CHOICE VOUCHERS? Take a look at how [HCD talks about AFFH](#):

The goal of Affirmatively Furthering Fair Housing (AFFH) is to combat housing discrimination, eliminate racial bias, undo historic patterns of segregation, and lift barriers that restrict access in order to foster inclusive communities and achieve racial equity, fair housing choice, and opportunity for all Californians.

6.1a - this has a metric! This seems not related to housing vouchers at all.

6.1f - ditto, not related to housing vouchers.

6.2a - this has a metric!

6.2f - Good idea, but how does this relate to affordable housing?

6.3 - the preamble to the objectives speaks to communications channels, but the objectives themselves include funding. - for 6.3b is there some benchmark?

6.4 - what is a “sensitive” population?

6.4a - how does this relate to displacement?

### **POLICIES - Resource Conservation and Environmental Stewardship**

7.1 - Should this focus on water goals related to housing?

7.2a & b - can you refer to your Climate Action Plan which has more specific milestones to decarbonize and electrify existing buildings? Or is the point that you want to seek incentives beyond what's in the CAP?

7.3a - what does it mean to “facilitate”? What will change in GP and Zoning ordinance?

7.3b - is the outcome just collaboration - is there a way to identify more specific outcomes that relate to “link land uses and transportation systems” and promote bicycle and pedestrian-friendly neighborhoods?

Here are some ideas:

- Remove mandatory car parking requirements for new housing and allow conversion of existing parking to bike storage
- Replace traffic studies with quantifying Vehicle Miles Traveled (VMT), a more accurate measure of project impact, aiming to reduce the amount of time people have to spend behind the wheel. (learn more: [CalTrans and SB373](#))

## Comments on City of Santa Cruz [Housing Plan](#) document from *Housing Element draft* (see [update page](#))

- Allow condo and apartment rentals to unbundle parking, which makes the cost of a parking space a separate, opt-in item for renters. (learn more: [unbundled parking](#))
- Mitigate traffic and parking impacts and boost pedestrian and bicyclist rights, protections and accommodations, e.g. by requiring transit and bike-share subsidies for residents.

7.4 the last objective is clearly related to housing. The other two are more general city objectives that may not fit in the HE?

## Notes on the Housing Element Update

The following are some notes and comments on the Housing Needs Assessment (appendix C) in the draft Santa Cruz Housing Element Update.

<https://www.cityofsantacruz.com/home/showpublisheddocument/92612>

I found a few details in that section that were potentially inaccurate, or at least might be clarified a little for future versions of the document.

Each comment begins with a screenshot from the draft Update.

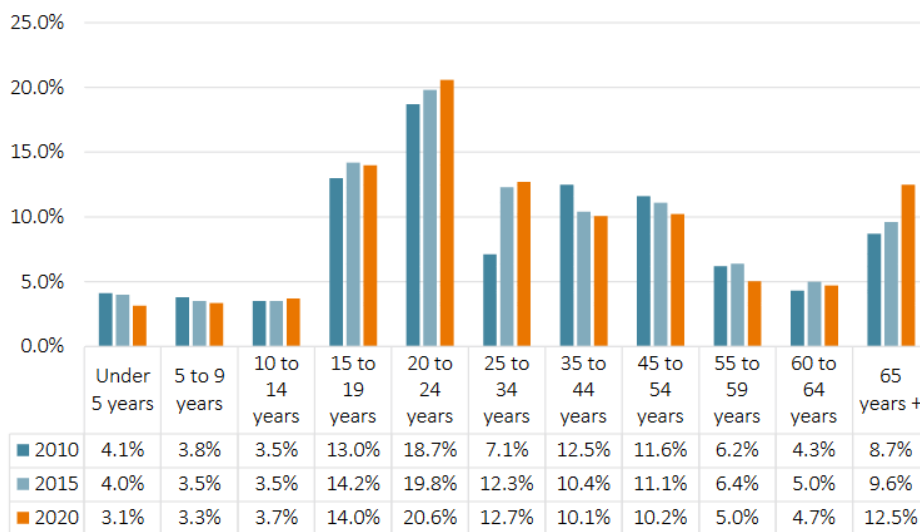
I also extended this analysis to include some demographic elements that were not covered in the draft. I've included a small part of that. The full study is looking at similar statistics over the entire Bay Area. It seems to me that an analysis of the entire region is required to make sense of how this is going to work.

This has been a rainy day project for me. Clearly we've had quite a bit of rain. ;-)

## Changes in the County Age Distribution

Figure C-1 below displays ACS data for age distribution in the City of Santa Cruz. Young adults between 20 and 24 years of age make up the largest age group at 20.6 percent, followed by 15- to 19-year-olds (14 percent) – likely due to the university’s presence in the City. While the young adult population has continued to experience growth since 2010, the adult population between the ages of 35 and 59 has been on the decline. The senior population over the age of 65 experienced the largest increased of all age groups between 2015 and 2020 – pointing towards a potential need for senior-related housing and services. The number of young children continues to shrink within the City.

Figure C-1: Age Distribution in the City of Santa Cruz (2010-2020)



Source: American Community Survey, Table S0101, 5-Year Estimates, 2010, 2015, and 2020

This image is from the Housing Needs Assessment, Appendix C, sec 2 pg C-3.

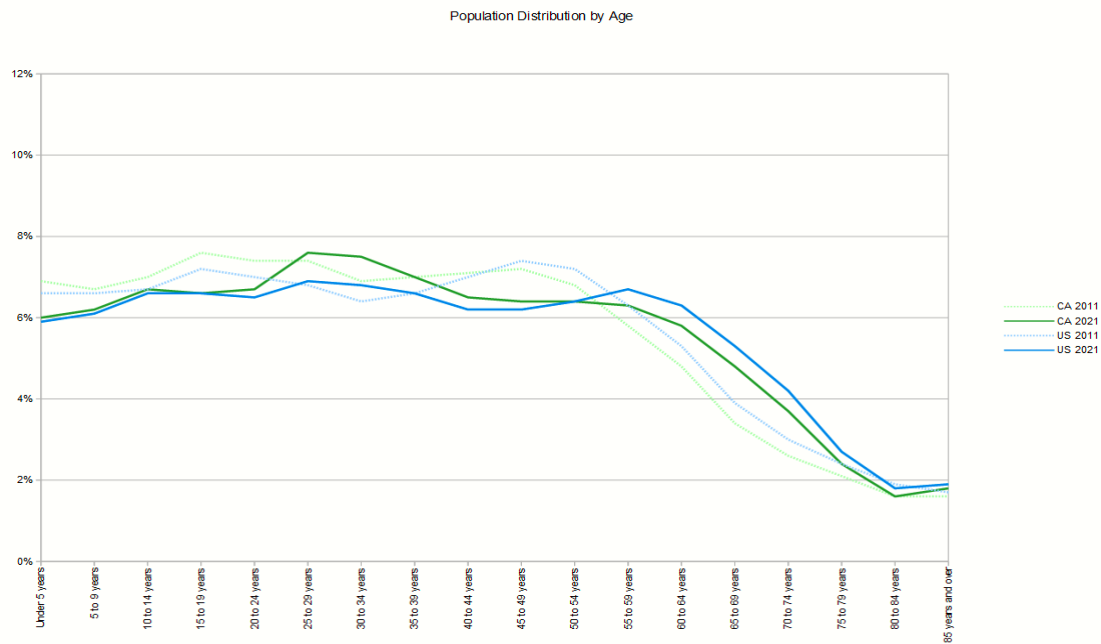
First, a quibble. It is difficult to interpret that chart because the age bracket intervals are not uniform. Most are 5 year intervals but the 25 - 34, 35 - 44, and 45 - 54 brackets are 10 year intervals. Those shares will appear greater because of the longer time interval. It will be difficult to compare the chart visually to the “population pyramid” or a typical population distribution curve. See below for an example and a chart that shows the differences.

I am also not sure if the data used from the ACS S0101 table as was cited. Table DP05 in the ACS survey uses a mix of intervals that match the table above, though it includes separate brackets above the 65 yo bracket with 5 year intervals up to 85+ yo. Those could have been combined of course. See the link below for the original data.

<https://data.census.gov/table?q=Santa+Cruz+City,+California++age&tid=ACSDP5Y2021.DP05>

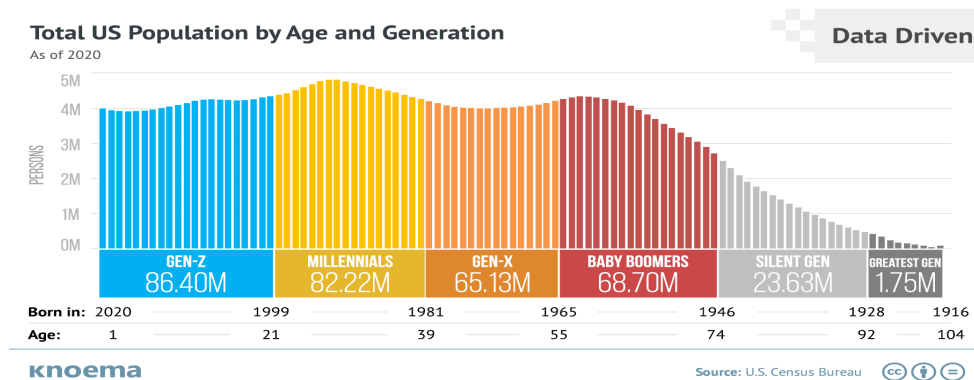
I prepared the following charts using ACS S0101 data from 2011 and 2021 using uniform 5 year increments (margin of error estimates  $\leq \pm 0.3\%$ ). The data are in the link below.

<https://data.census.gov/table?q=Santa+Cruz+City,+California++age&tid=ACSST5Y2021.S0101>



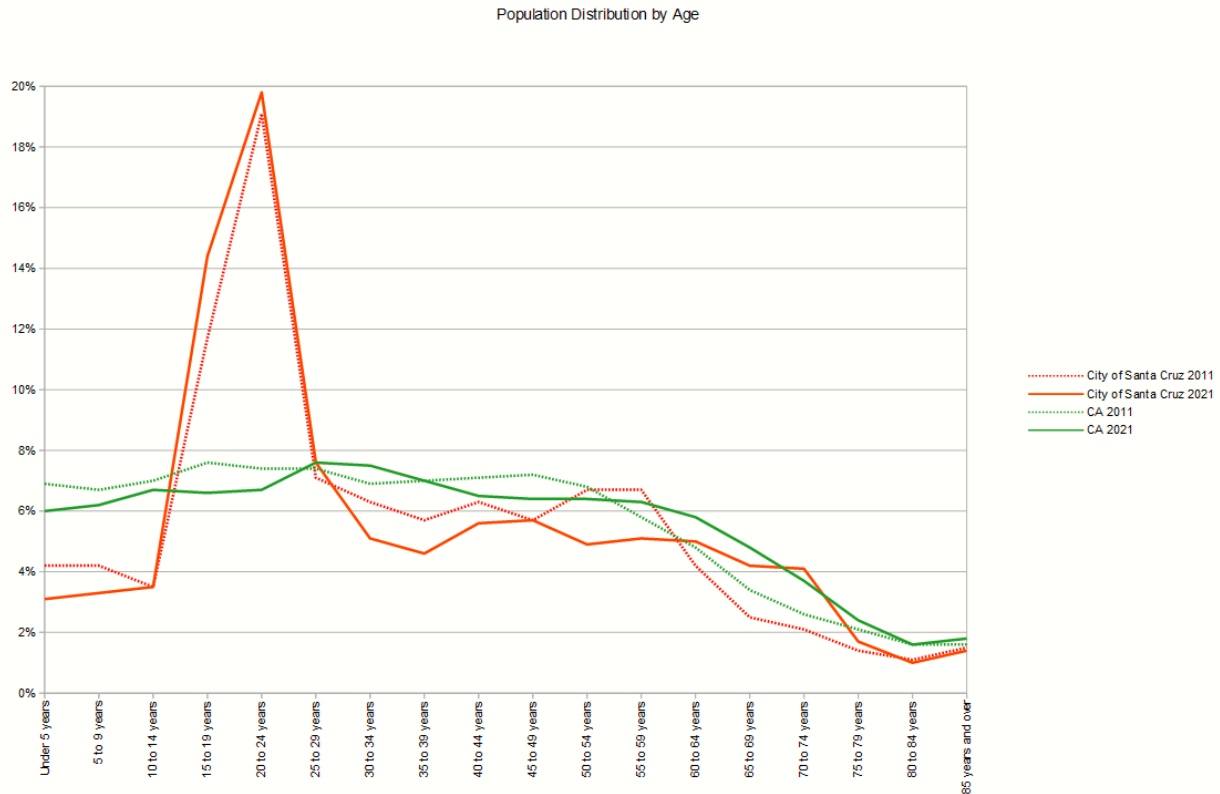
This chart shows the age distribution for CA and the US for 2011 and 2021. It's a good introduction to the basic shape of an Age Distribution graph for a large population and is a useful baseline for comparisons with the age distribution in Santa Cruz. <sup>1</sup>

Also note that CA has more people in the 25 - 45 yo brackets and slightly fewer in the 60+ yo brackets than the US. And the number of people in the <5 yo bracket is quite a bit lower. The reasons for those are obvious and well documented.



This chart above shows the specific ranges for the various age “generations” (baby boom, Gen-X, etc) for 2020.

<sup>1</sup> Nerd note - the “boomer” and “millennial” bumps shift to the right (10 years) during the 2011 to 2021 interval in both of the graphs.



This chart shows a comparison between the age distribution for Santa Cruz County and CA for 2011 and 2021 using the data from ACS S0101. Typically this would be a column chart but I think the line graph is easier to follow.

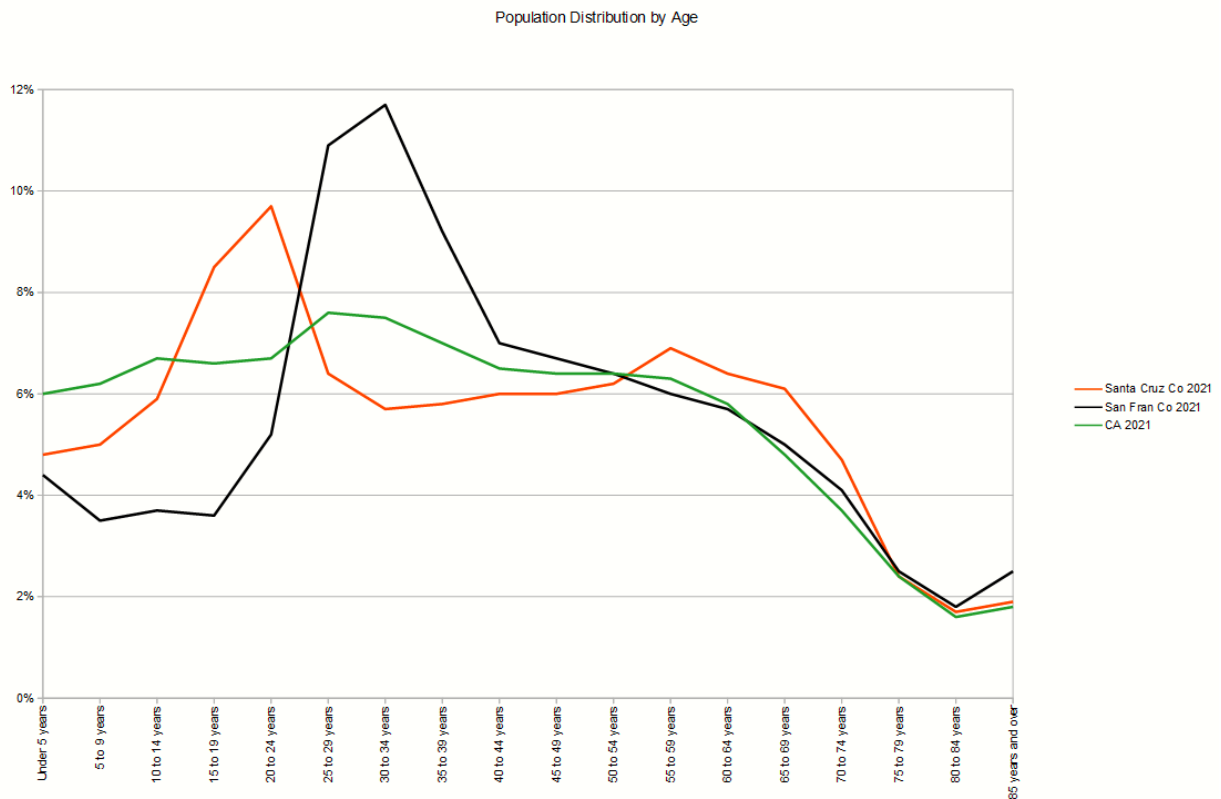
Starting at the left side, the share of younger people in Santa Cruz is quite a bit smaller than the average in the state. That share dropped from 2011 to 2021 due to a change in the birth rate and out-migration of families in the child bearing age groups.

The very large university age population share was relatively constant during that interval.<sup>2</sup>

The chart also shows a relatively large number of county residents in the 45 - 60 yo group in 2011, with a significant decline in that group's population share by 2021. That is likely to be due to out-migration.

The share of city residents in the 60 - 75 yo group is relatively large compared to the state. That was also mentioned in the Housing Element Update, though I think there is a more nuanced understanding of that share than "a need for senior housing".

<sup>2</sup> The total enrollment at UCSC increased about 2.5k between 2011 and 2021 but that doesn't show in these statistics. There are a few possibilities. The non-student population in the same age groups is likely to have declined about the same amount as the age groups above and below it, about 2%. That accounts for about 1.2k. It is also possible that many more students live in the county since the available rental housing supply in the city has been very low.

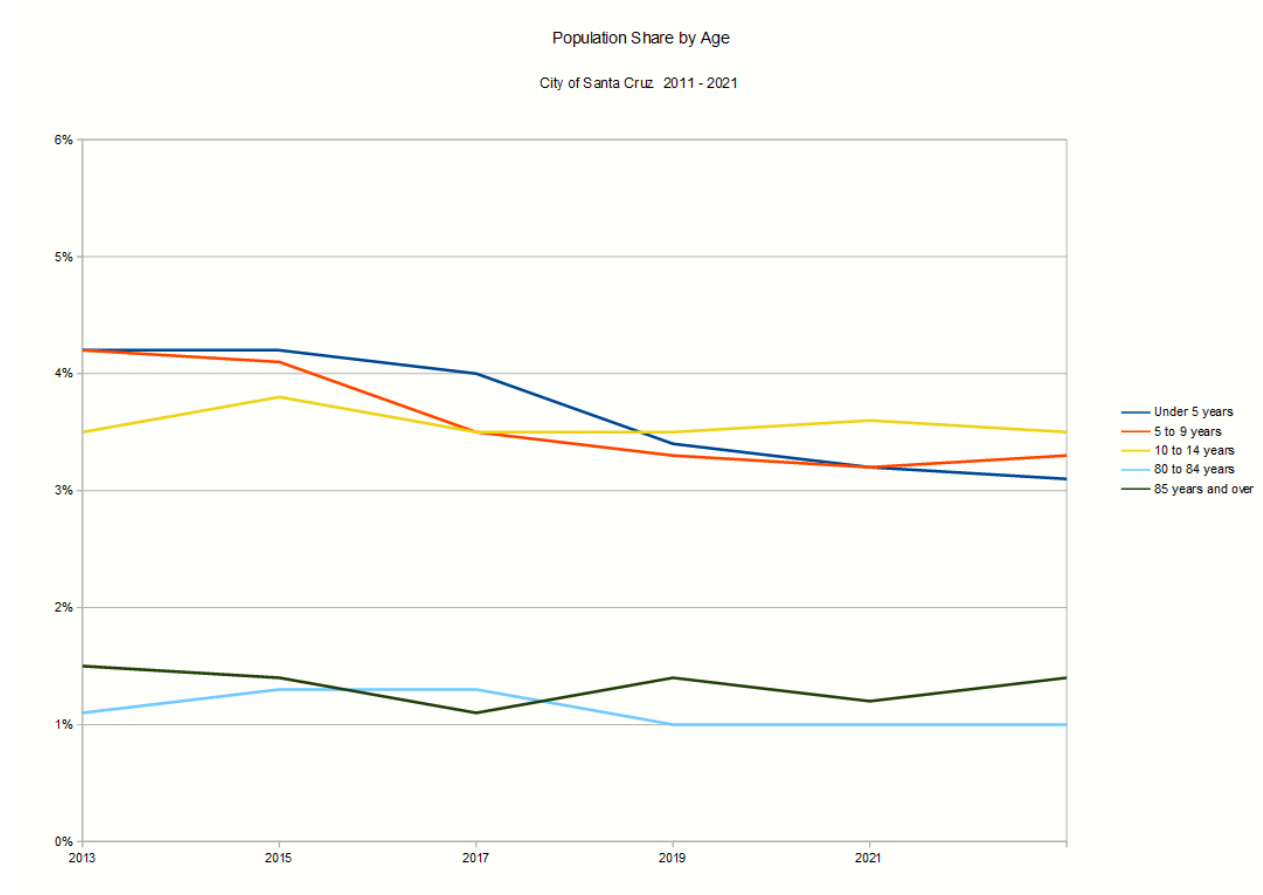


To give you another perspective, this chart shows the age distribution by population shares of Santa Cruz County, San Francisco County, and CA.

Note the large shares in the age brackets that are common in San Francisco, and the very low shares of people in younger age groups. San Francisco is definitely an extreme case.

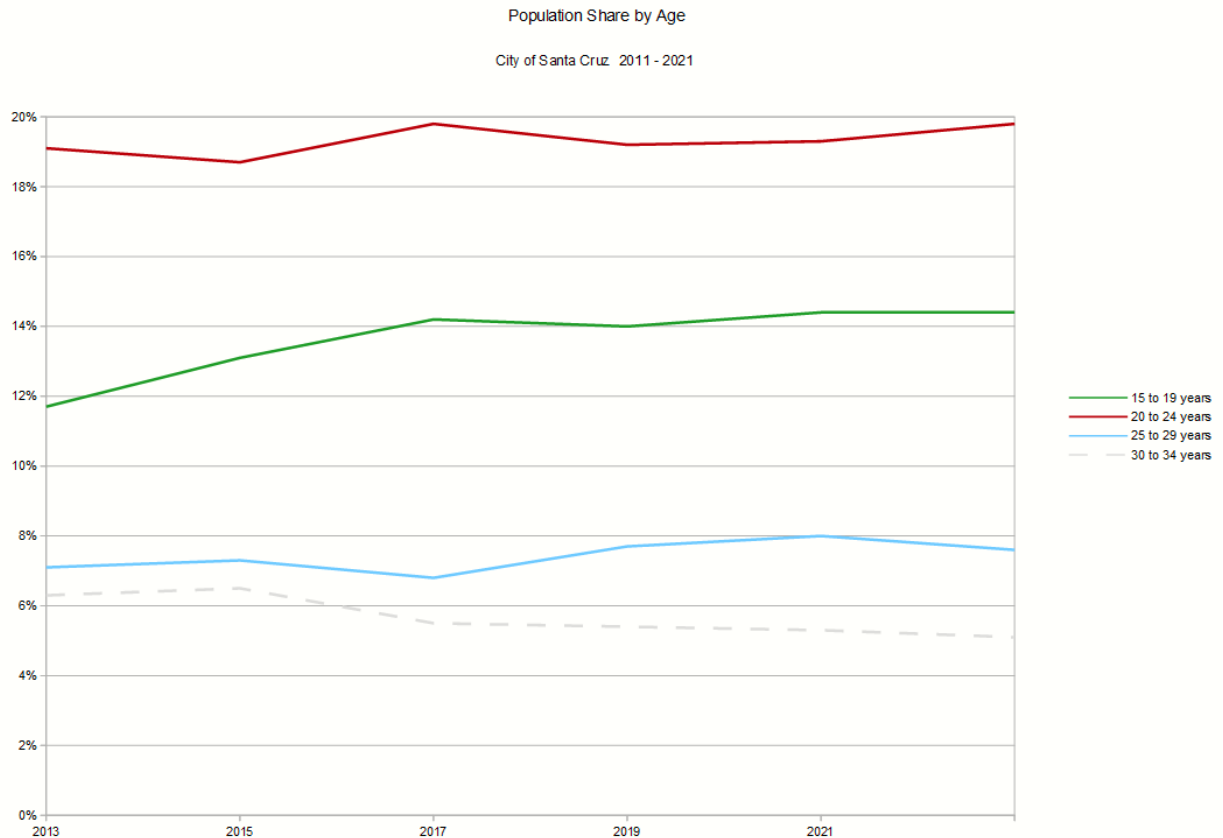


Transposing the data to track the year over year changes in each age group's share is useful. I've let the vertical scale vary on the following graphs to show detail. Keep that in mind when comparing them.



The <5 and 5-9 yo age group shares are declining over the 2011 - 2021 interval.

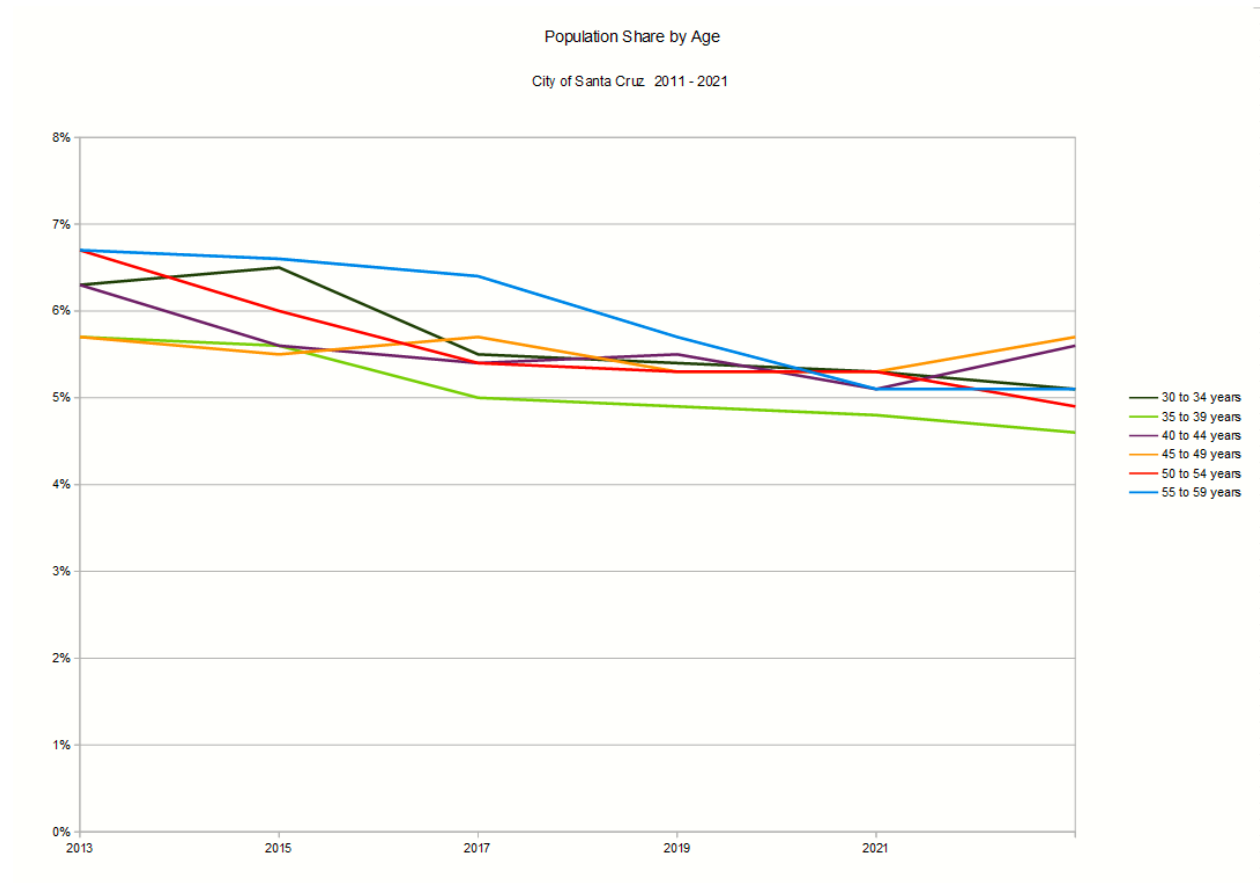
The 10 - 14 yo age group and the 80+ yo group shares are relatively flat.



The 15 - 19 and 20 - 24 yo groups include university students so they are a relatively large share of the city's population.

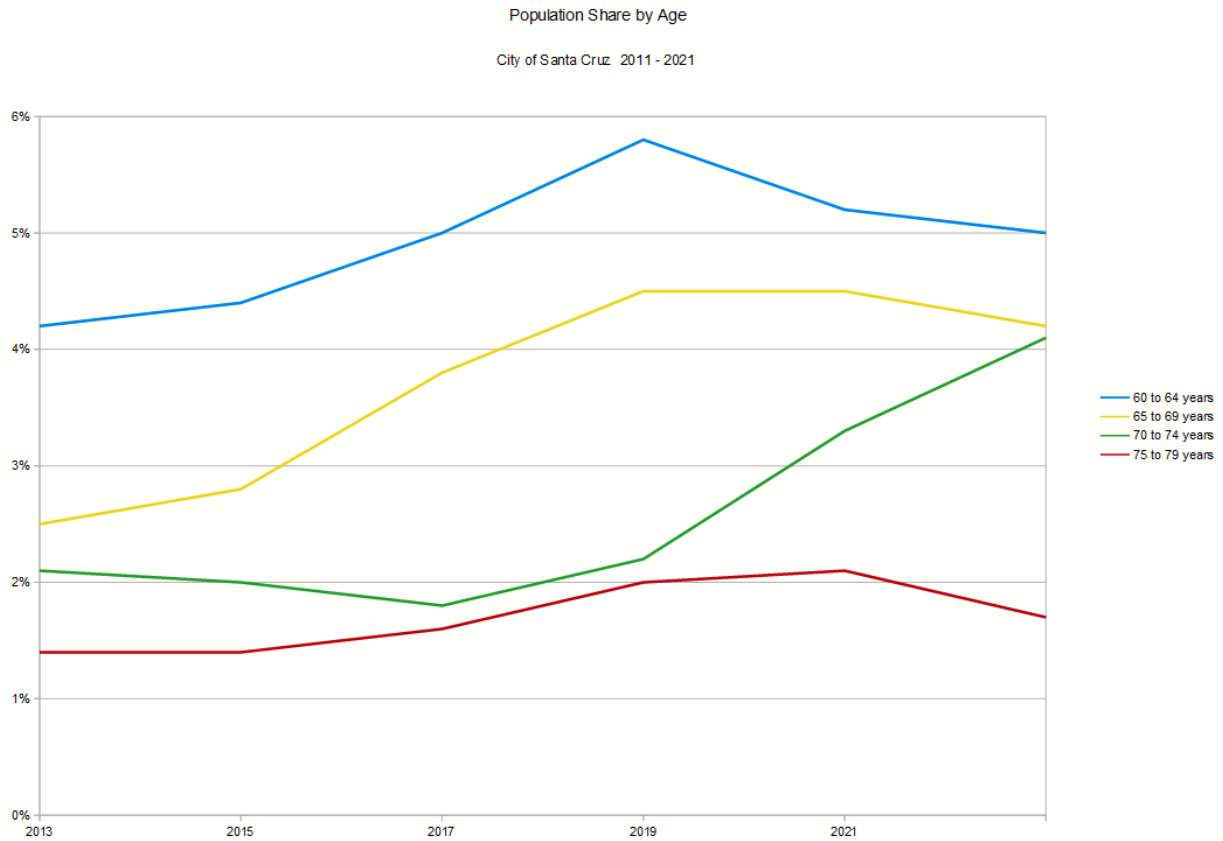
The 25 - 29 yo group includes some of the university population and the share is relatively flat.

I left in the shares for the 30 - 34 yo age group to help read the scale in this graph. The rest of the brackets are in the same area.



This chart shows a significant decline in the 30 - 59 yo brackets with the exception of the 45 - 49 yo group's share, which is fairly flat.

These are significant. The age groups in the lower half of that range are more likely to have children. People in the 30 - 59 yo age brackets also typically contribute significantly to the local GDP.



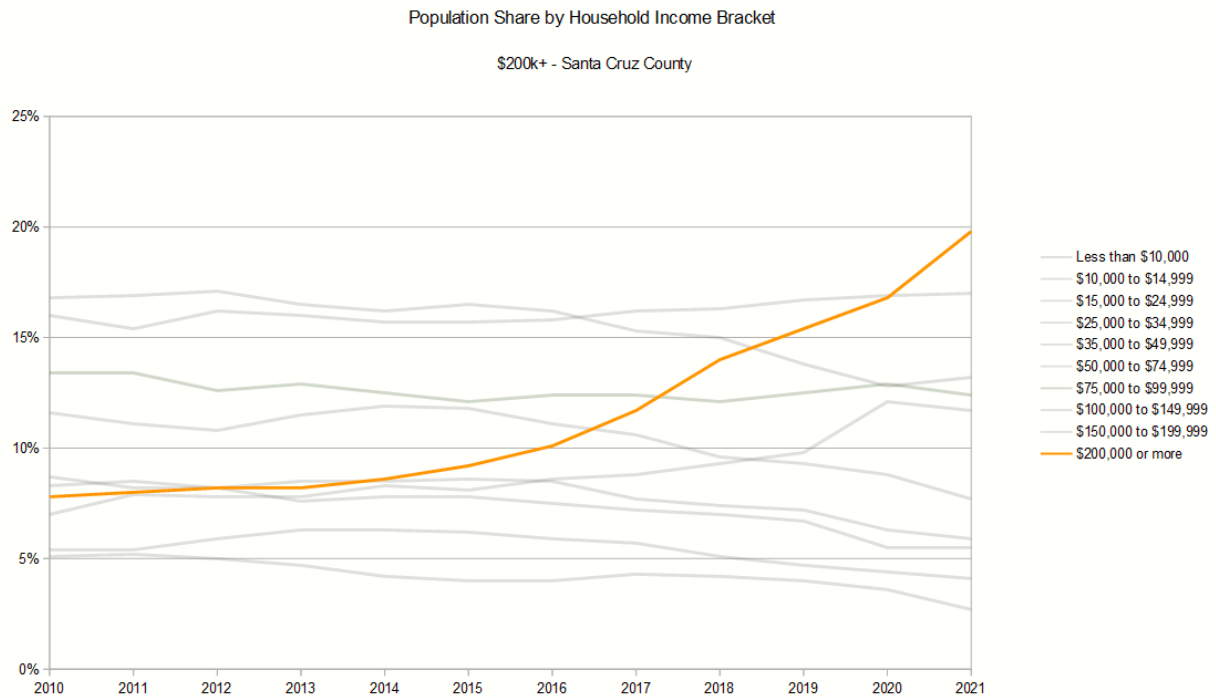
The 60 - 74 yo group shares increased substantially between 2011 and 2021. This was also noted in the Housing Element Update.

There was a small increase in the 75 - 79 yo group share.

These year over year charts show that, other than residents in the university age groups, the share of people in all of the age categories below 60 yo are declining. I did not include the charts but I can show that the decline is monotonic year over year - e.g. each group's share dropped a little every year.

The increase in the 60 - 74 yo groups are very likely due to migration into the city.

A study of the county shows similar patterns.



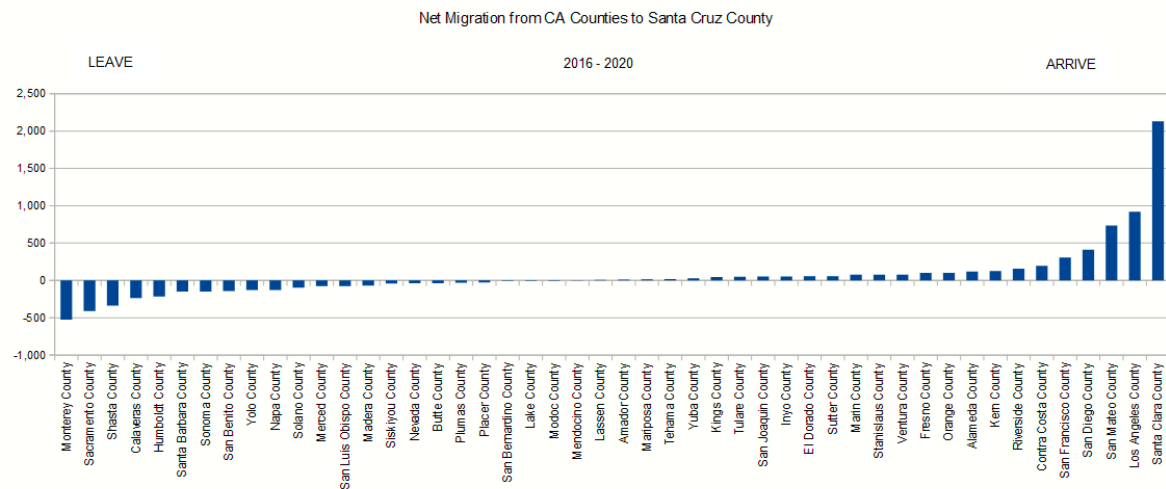
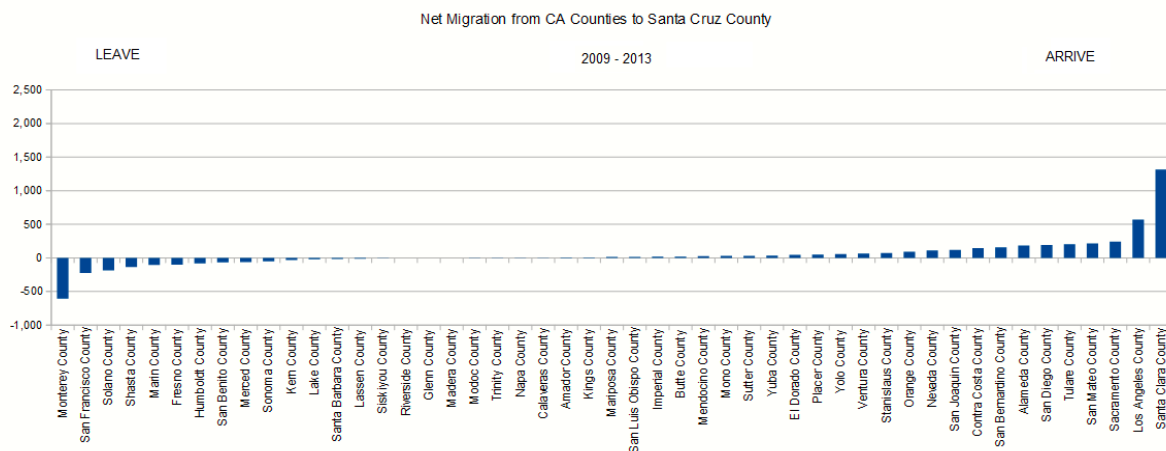
This chart from that study, with the year over year change in the highest income bracket's share highlighted, gives a very clear idea of what is happening.

County to county domestic migration data is available here:

<https://dof.ca.gov/forecasting/demographics/estimates/>

I have not studied this at the city level and I am not sure if the data is available.

The following charts show the year over year migration patterns between Bay Area counties.



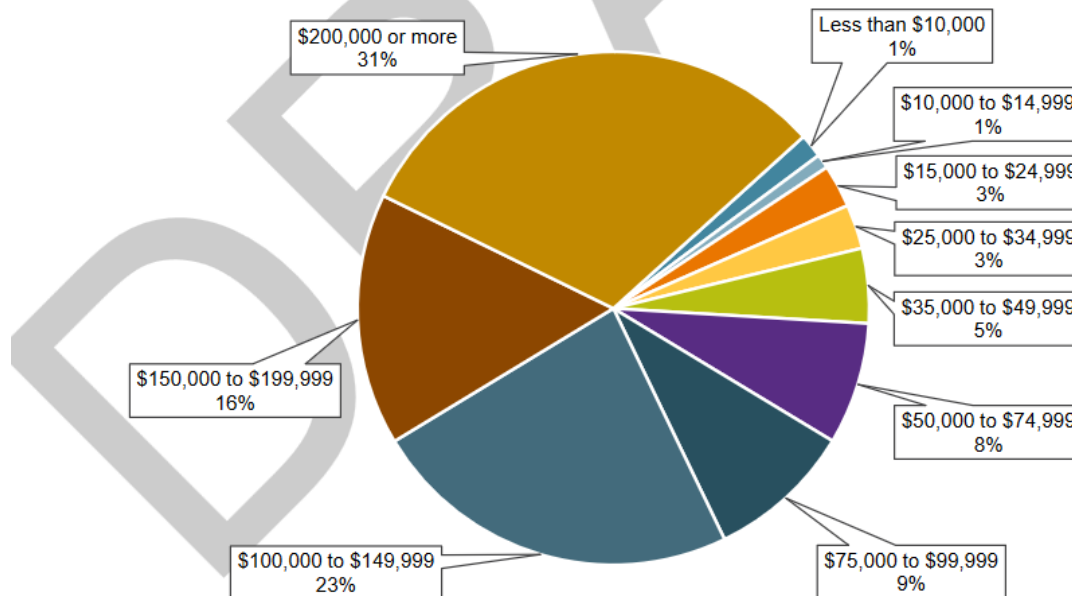
There has been a fairly large migration from Santa Clara County (and, to a lesser extent, other Bay Area Counties) into Santa Cruz County over the last decade. The charts above indicate that the migration rate is accelerating. That has been happening in the other counties surrounding Santa Clara, San Mateo and San Francisco Counties as well.

Aside from university students coming from other counties, the increase in the 60 - 74 yo age group is likely to be accounted for by the in-migration noted above.

## Household Income

Figure C-4 below outlines income levels in the City of Santa Cruz. According to this data, 53% of the City's households earn an income below \$150,000, with 13% earning less than \$50,000, and 1% earning less than \$10,000. Approximately 31% of the City's households earn \$200,000 or more annually. This data supports the need for a variety of housing types and a range of prices to meet the needs of the residents of the City.

Figure C-4: The City of Santa Cruz Household Income Breakdown by Category



This image is from the Housing Needs Assessment, Appendix C, sec 3 pg C-13. It uses data from the City.

The chart is a snapshot of household income in the city. It shows the number of households with income at various levels.

The source of the data is not cited but it seems to be from the ACS S0190 2020 table cited elsewhere in the Housing Element Update.

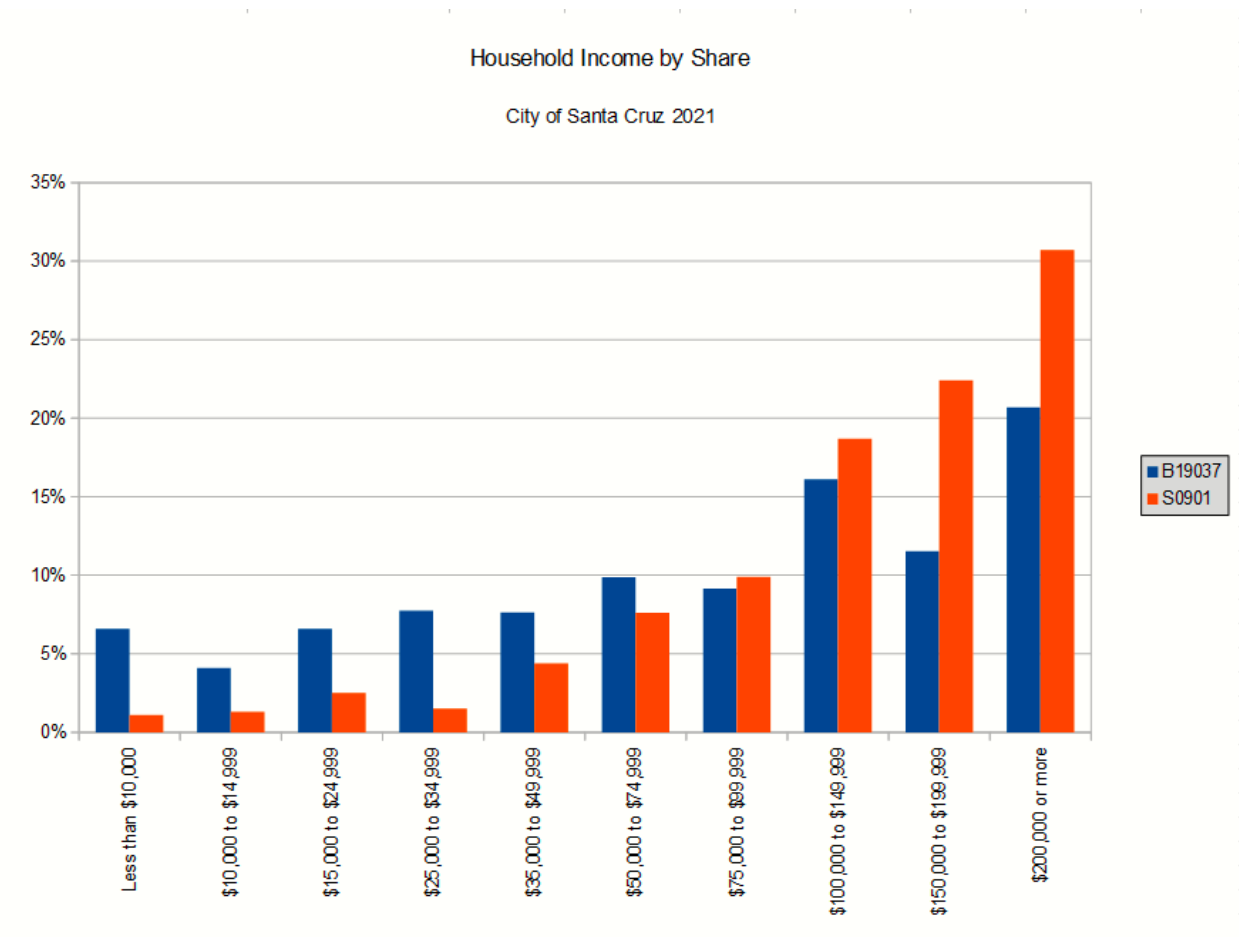
<https://data.census.gov/table?q=Santa+Cruz+City,+California++household+income&tid=ACST5Y2021.S1901>



	A	B	C	D	E	F	G	H	I
1		Santa Cruz city, California							
2		Households		Families		Married-couple families		Nonfamily households	
3	Label	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
4	Total	22,644	±773	10,694	±653	8,006	±635	11,950	±779
5	Less than \$10,000	7.9%	±1.5	2.1%	±0.9	1.1%	±0.7	13.2%	±2.8
6	\$10,000 to \$14,999	4.8%	±1.2	1.9%	±0.9	1.3%	±0.8	7.7%	±1.9
7	\$15,000 to \$24,999	7.7%	±1.6	4.9%	±1.8	2.5%	±1.6	10.7%	±2.6
8	\$25,000 to \$34,999	6.1%	±1.4	3.2%	±1.1	1.5%	±0.9	8.7%	±2.5
9	\$35,000 to \$49,999	9.3%	±2.0	6.8%	±2.2	4.4%	±1.7	12.5%	±3.5
10	\$50,000 to \$74,999	8.7%	±1.3	8.4%	±1.9	7.6%	±2.2	10.4%	±2.2
11	\$75,000 to \$99,999	10.8%	±1.3	10.1%	±1.6	9.9%	±2.0	10.6%	±2.2
12	\$100,000 to \$149,999	14.8%	±2.2	18.0%	±2.6	18.7%	±3.2	12.6%	±3.3
13	\$150,000 to \$199,999	13.4%	±2.0	19.4%	±3.1	22.4%	±4.0	7.0%	±2.6
14	\$200,000 or more	16.5%	±2.0	25.1%	±3.0	30.7%	±3.8	6.5%	±2.4
15	Median income (dollars)	86,618	±6,781	135,117	±11,490	156,806	±10,502	43,899	±7,494
16	Mean income (dollars)	117,992	±6,689	157,252	±8,118	N	N	76,804	±9,012
17	PERCENT ALLOCATED								
18	Household income in the past 12 months	33.5%	(X)	(X)	(X)	(X)	(X)	(X)	(X)
19	Family income in the past 12 months	(X)	(X)	30.2%	(X)	(X)	(X)	(X)	(X)
20	Nonfamily income in the past 12 months	(X)	(X)	(X)	(X)	(X)	(X)	34.5%	(X)

I tried to reproduce the chart from that data and found that the chart above applies only to “married couple families”.

The screenshot above shows the different Household type columns in the ACS S0190 table. Note the median income differences in each bracket as well. The median income cited in the Update is \$86,618 which aligns with the “family” category. The median income of the “married couple families” group is much higher at \$156,806. It is a much wealthier cohort.

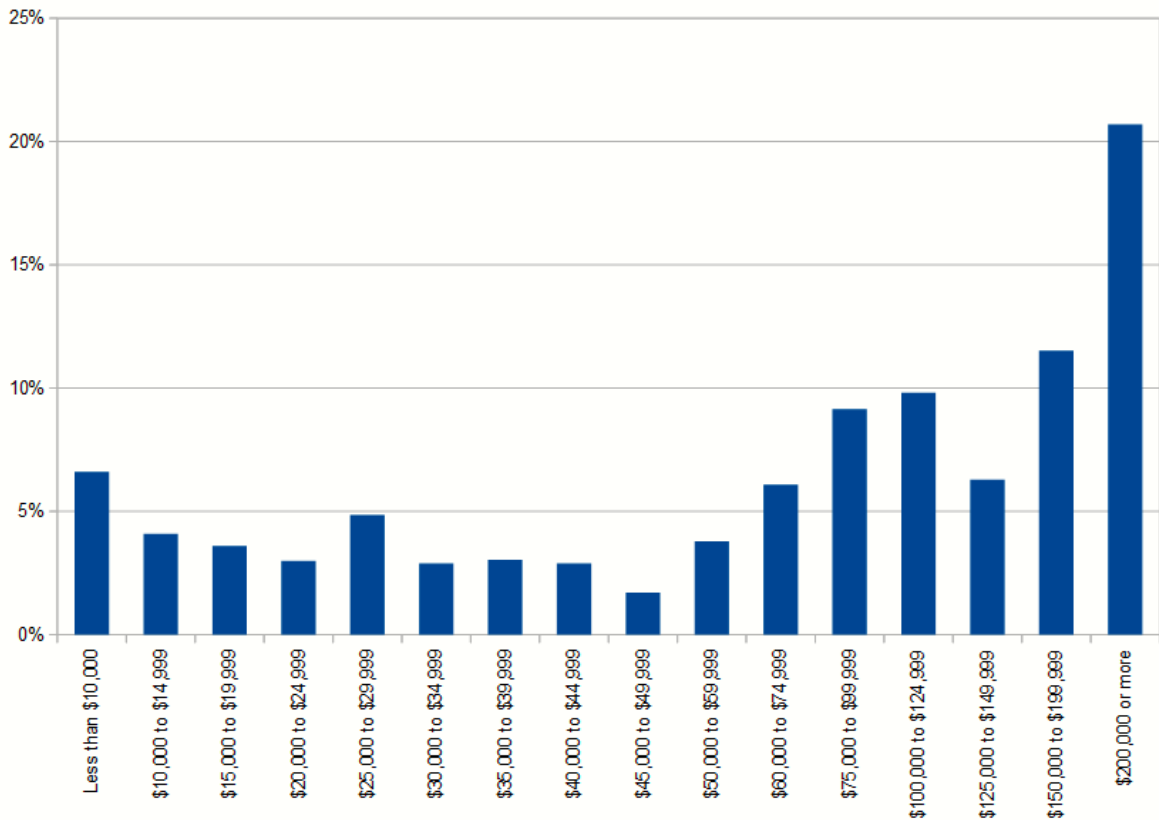


The chart above shows the difference in the distribution using the two household types.

The distribution of household incomes is still heavily weighted to the higher income brackets, though the \$200k+ share is now a little over 20% instead of 31%. The share of lower income households is substantially larger than the chart included in the update. This is likely to be due, in part, to the large number of university students with no or small income. But a close look at the table shows that the number of families in the lower income brackets is often about twice as large as the chart in the update indicates. And the “non-family” households have much higher shares than those shown in the update chart.

## Household Income by Share

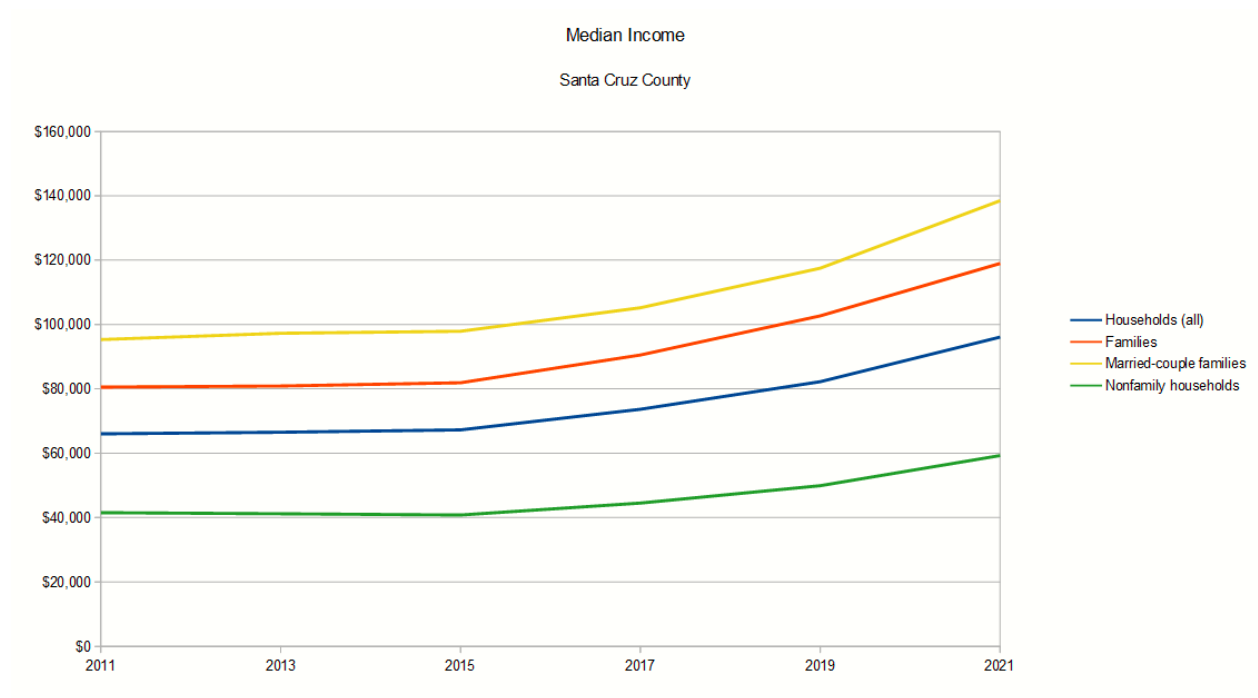
City of Santa Cruz 2021



The chart above shows the city's Household Income Distribution using all household types in the city using the income brackets in the 2021 ACS B19037 table.

<https://data.census.gov/table?q=Santa+Cruz+City,+California++household+income+by+age&tid=ACSDT5Y2021.B19037>

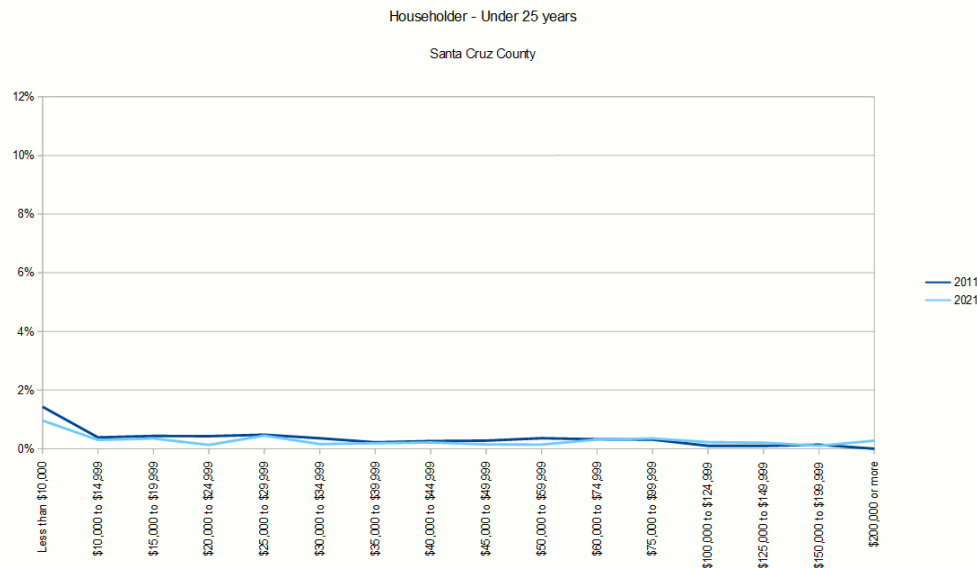
I think it is a good idea to include the entire range of households in the chart and explain the complexity of the household types.



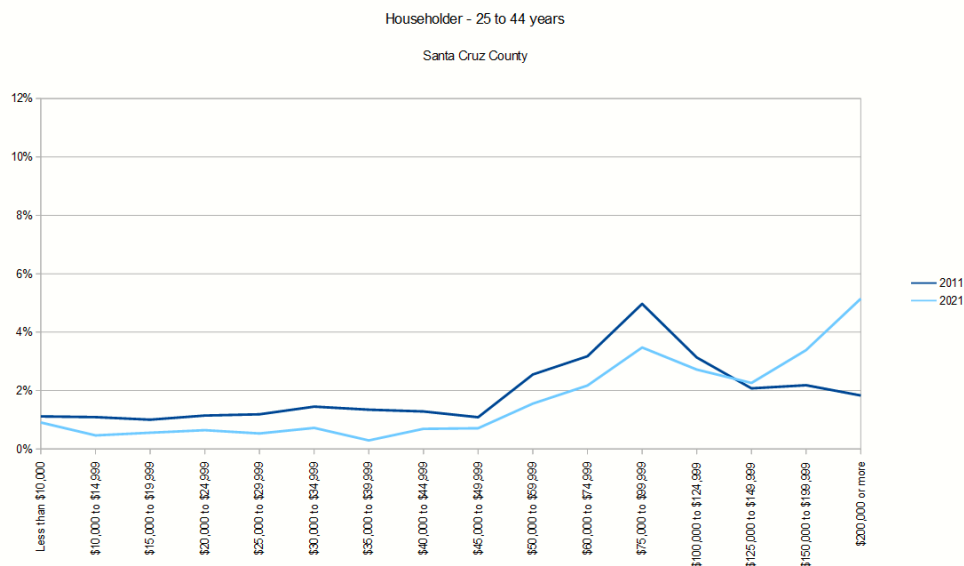
The median income varies based on the household type as well (this is county data - the city statistics are similar). And it is increasing year over year.

The charts below show a demographic explanation for that increase.

I think it is useful to consider the year over year change in the Household Income by Age distribution in this analysis. I've studied that for the county. I can extend this to the city easily.

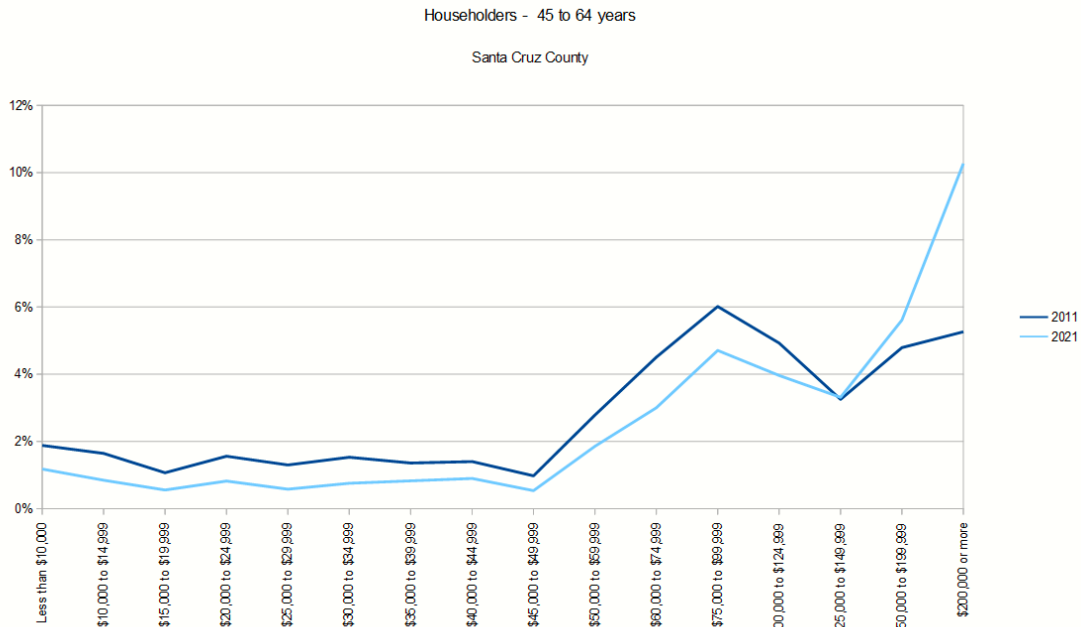


The youngest group is relatively flat, which is not a surprise.

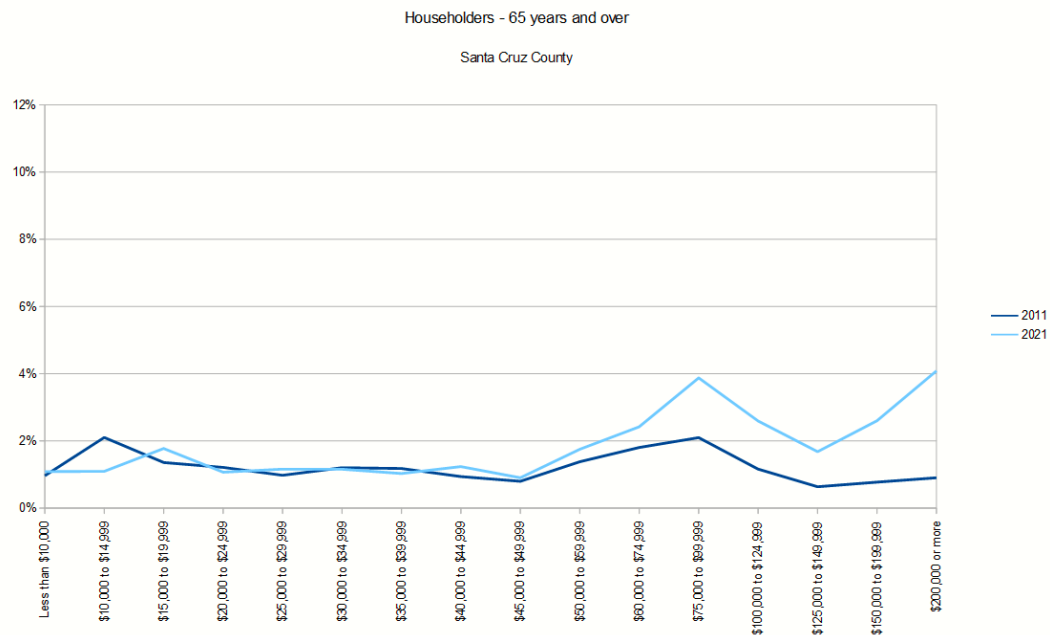


The 25 - 44 yo group shows a decline in the number of households below the housing income<sup>3</sup>. And there is a significant increase in the number of households above that income.

<sup>3</sup> The income necessary to buy or rent a house. That is difficult to define precisely but it is at least a little higher than the median income in the area.



The 45 to 64 yo group shows the same year over year changes. There are fewer households with income below the housing income and quite a few more above that income.



The 65+ yo group was relatively flat at lower household income levels but increased significantly at the higher levels.

My (informal) thought is that it is very likely the increases in the share of households with higher income is due to the in-migration of older people at or near retirement age.

**Galmiche, Ines**

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**From:** Matthew VanHua <mvanhua@santacruzca.gov>  
**Sent:** Thursday, April 6, 2023 10:42 AM  
**To:** Galmiche, Ines  
**Subject:** FW: Housing Element; 336 , 337 and vacant parcel on Golf Club Drive  
  
**Categories:** External

Specific comments on our sites inventory regarding a few parcels. We will talk with this development team next week.

**Matthew VanHua**, AICP  
Principal Planner – Advance Planning  
Planning and Community Development Department  
809 Center Street, Room 107 | Santa Cruz, CA 95060  
Main: 831-420-5110 | Direct: 831-420-5216



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**From:** John Swift <john@swiftconsultingservice.com>  
**Sent:** Wednesday, April 5, 2023 8:23 AM  
**To:** Matthew VanHua <mvanhua@santacruzca.gov>  
**Cc:** David Cury <davidcury@yahoo.com>  
**Subject:** RE: Housing Element; 336 , 337 and vacant parcel on Golf Club Drive

Mathew,

Good morning. I enjoyed the Housing Element Workshop last night. Lots of good information and well done!!!

My partner and I, Dave Cury, would like to meet with you at your earliest convenience to discuss these properties in relation to the Housing Element. We had prior discussions with Katherine Donovan, but it appears that those may not have been communicated to you when she retired.

Have a good day.

John Swift  
[John@swiftconsultingservice.com](mailto:John@swiftconsultingservice.com)

**Swift Consulting Services, Inc.**  
500 Chestnut Street, Suite 100

**From:** John Swift

**Sent:** Tuesday, April 4, 2023 8:10 AM

**To:** Katherine Donovan <[kdonovan@cityofsantacruz.com](mailto:kdonovan@cityofsantacruz.com)>; Matthew VanHua <[mvanhua@cityofsantacruz.com](mailto:mvanhua@cityofsantacruz.com)>

**Cc:** David Cury <[davidcury@yahoo.com](mailto:davidcury@yahoo.com)>

**Subject:** Housing Element

Katherine, Mathew,

We spoke several months ago about our properties on Golf Club Drive in the context of the Housing Element update. Upon reviewing the staff report for tonight's workshop I was surprised to see that no recognition of our properties, 336 Golf Club, APN 001-172-02 ; 337 Golf Club, APN 001-171-10 and APN 001-172-11 are shown as having infill development potential. Section 4.5 Other Infill Sites, Table B-17 includes two properties that are in the Golf Club Drive area and are immediately adjacent to our properties. These two properties are identified as 210 Golf Club ,APN 001-172-01 and 209 Golf Club, APN 001-172-03. Why were our three properties adjacent to these two properties not included in this inventory?

Additionally, there seems to be an omission of a very pertinent General Plan Policy regarding the infill development potential of this 20 acre Golf Club Drive Area. This policy is quoted below:

## 2030 General Plan

1.1.5 Any future land divisions within the Golf Club Drive shall be limited to three lots and a remainder per existing parcel. These limited land divisions may be approved prior to adoption of an Area Plan. Proposed parcels shall be clustered and the area of the parcels shall be in the higher range (R-1-7) of the Low Density Residential designation (1.1-10 DU/ acre) with a remainder that may be larger than the minimum parcel area allowed by the Low Density Residential designation. Any land division application processed prior to adoption of an Area Plan shall not impede or detract from the future development potential of the remainder property.



- Prior to allowing any subdivision for the creation of lots less than 7,000 square feet in area, an Area City of Santa Cruz 44 Chapter 4 Plan for the 20-acre Golf Club Drive Area shall be approved by the City. All new construction proposed prior to the adoption of the Area Plan shall be subject to a design permit.
- The Area Plan shall provide housing within developable areas of the site at 10.1-20 DU/acre. Upon adoption of the Area Plan the Golf Club Drive Area shall be designated Low Medium Density Residential on the General Plan Land Use Map.
- The Area Plan shall preserve up to five acres of open space. Urban wildlife interface zones, community gardens and riparian corridor areas could be included in the open space requirement.
- Pedestrian and bicycle access to Pogonip and nearby employment areas are to be incorporated into the plan.
- The evaluation of a future rail transit stop is to be included in the Area Plan analysis.

The impacts of the potential development of these Golf Club Drive properties at 20 units per acre was analyzed in the General Plan EIR. There is a long history of the City recognizing the development potential of these properties. The potential for these properties to be developed with housing at 20 units per acre or more and make a significant addition to the housing supply should be acknowledged in the current housing element update.

Please give me a call to discuss further.

John Swift

[John@swiftconsultingservice.com](mailto:John@swiftconsultingservice.com)

**Swift Consulting Services, Inc.**

500 Chestnut Street, Suite 100

Santa Cruz, CA 95060

(831) 459-9992

(831) 459-9998 fax

**From:** Garrett <garrettphilipp@aol.com>  
**Sent:** Friday, April 21, 2023 10:56 AM  
**To:** City Council  
**Subject:** 4.25.23 Agenda Item #36 Housing Element

#### 4.25.23 Agenda Item #36 Housing Element

Dear Council,

While it's not the first time **the government has bold faced lied** to justify its agenda, this time it's really obvious.

The idea Santa Cruz must build 3736 new housing units in various categories of low income rental cost over the next 8 years **to meet population growth** needs :

1) is a **big fat lie**. Population growth peaked in California in the 80's and has trended down ever since, and has now crossed over to negative. Santa Cruz county crossed over to negative (declining population) for the LAST 5 YEARS, and the city itself negative for a few years. There is no evidence this trend won't continue.

There are plenty of reasons for declining population. Trends include an aging population, the boomer generation dying off, increasing age of first births among women, delayed child rearing generally, Covid deaths, a stubborn excess mortality co-incident with the mandated mRNA vaccinations, declining male fertility, and a realization California is anti-business, high tax no return state with an odious politic that make people want to leave and they are, in droves now.

2) **is stupid beyond words**. The building of new units in that quantity without actual population growth will result in massive vacancies in the worst case 3% range. There will be mass financial casualties. Mass building into a pending housing bust is near insanity. Rising interest rates are starting, but only just begun, to crush housing prices. Think Stockton in 2009.

3) **Is racist**. A good chunk of the housing allocation is because Santa Cruz is "too white" which is as racist as can be. Good thing we are also not "too affluent" (the state thinks affluent communities need lots more poor people because they have some sort of magic that rubs off and are discriminating) or we would have been assigned even more low income housing. It is classic leftist drivelt SJW logic, but that is California today headed for the trash bin of states.

4) **Interferes with the free market in communist style central planning mandates**. Especially when government incentives are used like permanently giving away public assets like parking lots to the benefit/partnership with developers and VERY FEW citizens

it is not playing on a level playing field of capitalism and stealing public assets from the rest.

It pretends "governments know best" but they don't. Every serious problem we face like inflation which is the real issue here is caused by the corruption partnership of the Federal government, banks, Federal Reserve massive debt bubble creation. This doesn't solve that or even acknowledge it.

**5) Is a dodge for a very different agenda.** Both "affordable housing" and "climate change" are the vehicles being used to imprison the population in ultra dense urban cores without the freedom of mobility (no cars) creating 15 minutes cities where everyone works and lives out their entire lives within a 15 minute radius. It is totalitarian, it is about control. It is not America. There is lots of open land in the US, but the government doesn't want us living there, no matter what we want.

**6) Does NOT reduce overcrowding.** I suppose it depends on your definition of overcrowding, but using the Food Bin example, building 59 288 sq foot units "designed for singles and couples" packs more people into an acre lot than ever before. There may be walls between the people, but they are in solitary confinement and cannot even own cars? Jail isn't much worse and even serve free food.

Economically, it is just the shrinking cereal box and is not more affordable per sq foot (we will see, but 288 sq feet isn't a lot). It is you pay for what you get.

It is possible this or a different mix of housing is desirable, but only as replacements for any existing housing that is not appropriate given a lack of population growth.

**If there is any cost/affordability advantage to building density, you could allow such structures, but also demand open space so the people/acre doesn't change that much (quality of life issue).** But you won't because you are part of the agenda, Agenda 21.

As with the climate change energy starvation mass hysteria, the consequences are not considered. The risks not considered.

**7) Catering to, subsidizing, and attracting a mass of poor people by offering them less and less for whatever money they have is not the road to prosperity.** It is the road to the cesspool of government dependence.

**8) The University doesn't pay property taxes, and they can house their own students many of which are out of state or foreign because they pay higher tuition.** Do an analysis of city resources

the University sucks up they don't pay for, how they impact density and then quality of life and let me know the balance.

This place will turn into a \_\_\_\_hole and you're all giddy with glee and beaming with virtuosity without facing realities.

Garrett Philipp  
342 Plateau  
Santa Cruz, CA 95060



July 5, 2023

To: Jose Jauregui, Housing Policy Analyst,  
California Housing and Community Development

CC: Matt VanHua, Principal Planner, Advance Planning,  
City of Santa Cruz Planning and Community Development

RE: [City of Santa Cruz Draft Housing Element \(May 2023\)](#)

Santa Cruz YIMBY has the following comments on the City of Santa Cruz's 6th cycle Housing Element draft submitted to Housing and Community Development for review on May 10, 2023<sup>1</sup>. We submitted feedback to the City during the public review and comment period, and would like to highlight the issues that remain in the amended Housing Element.

In response to the ever-increasing cost of living, Santa Cruz YIMBY advocates for abundant housing at all levels of affordability to meet the needs of a growing population in Santa Cruz County. The Housing Element is an opportunity for the City of Santa Cruz to address the housing crisis on its own terms. We support sustainable growth, including along transportation corridors and activity centers and a commitment to lower Vehicle Miles Traveled by housing people near services and jobs.

### ***Policy 1 - Housing Production***

We are thrilled that the City has met their 5th cycle goals, however, with no rezoning taking place to meet the 6th cycle production goals, policies to increase housing production will be of huge importance.

It is stated under Policy 1.2, and more fully in Appendix D: Fair Housing Assessment, that most new housing will be concentrated in the central core of the City, meaning along major commercial corridors and on major opportunity sites. With this area receiving over 45% of the new housing, including over 40% of the Very Low and Low-Income sites, we believe that the City should be looking towards additional opportunities to meet AFFH goals, including in majority single-family neighborhoods of other districts.

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<sup>1</sup> <https://www.cityofsantacruz.com/home/showpublisheddocument/93344/638194110391470000>

We believe the City can and should go further to enable more housing types in its most resource rich neighborhoods. Objective 1.3e intends to utilize SB 10 to increase residential density in transit rich areas, which in Santa Cruz are not high resource. The SB 10 scope should be expanded to include urban infill sites in high resource districts outside of transit rich areas to allow for more affordable housing throughout the City.

### Pipeline Projects

A large source of new units for the City during the 6th cycle will be from pipeline projects. For jurisdictions relying heavily on pipeline projects, HCD recommends<sup>2</sup> that "...the element should include programs with actions that commit to facilitating development and monitoring approvals of the projects, including the number of units and affordability (e.g., coordination with applicants to approve remaining entitlements, supporting funding applications, expediting approvals and monitoring of project progress, including rezoning or identification of additional sites, if necessary)." We suggest that the city commit to implementing such a recommendation to facilitate development, such as by proactively monitoring and facilitating post-entitlement developments with technical and/or financial assistance.

### Mid-cycle Review

Under Policy 1.1, the City commits to providing new housing through adoption of the Housing Element (1.1a) and review and annual publication of sites inventory (1.1b). The City can make a stronger commitment to appropriate progress towards its 6th cycle goals. We would like to see an objective with a more active mid-cycle review and adjustment. Tying this review to commitments to increase housing production such as rezoning, ADU incentives, or removing development constraints would allow the City to minimize impacts of falling behind in the 6th cycle. Making these commitments specific now would reduce the staff time required to implement mid-cycle.

As part of the mid-cycle review, the City should create objectives that monitor the progress of pipeline projects. This should include automatic entitlement extensions until midway through the 6th cycle, a commitment to advocate for city-entitled projects to be approved by the Coastal Commission, and proactively reaching out to all pipeline projects to confirm that there is still development interest.

### Objective Standards

The City should expand Objective 1.2b to include a policy that any project found consistent with Objective Standards is placed on the consent agenda for all hearing bodies. Such projects should only be appealable to council if denied by the planning commission, or if the appeal is related to consistency with objective standards. This would greatly increase the incentive for developers to design projects compliant with the standards.

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<sup>2</sup> [HCD response to Brisbane Draft Housing Element, January 2023](#)

### Parking

We are pleased to see that elimination of parking minimums is intended as a policy objective, however it is not stated as a commitment in objective 1.3c. In the City's work to achieve this, we believe the elimination of such requirements within a mile walking area of five or more amenities (pharmacies, grocery stores, transit stops, etc), and in very low vehicle travel areas, would be a good intermediate policy stepping stone.

### FAR and Density

A significant constraint to development of 2+ bedroom units is the units/ acre density requirement, something that does not apply to smaller units such as SROs. In order to increase the number of family sized (2+ bed) units built, this constraint should be removed or significantly modified. This should also be addressed by increasing the FAR for projects consisting of 50% or more 2+ bedroom units. This increase should allow the same net number of units as if they were proposed as SROs or a similar unlimited density unit.

## ***Policy 2 - Affordable Housing***

The ordinance options allowing 100 percent affordable residential development to be considered a "by-right" use would greatly speed along much needed affordable housing. As such, we urge expedited approval of Objective 2.2g to 2024 or earlier rather than a quarter of the way through the 6th cycle. A commitment to developing or declaring city parking lots downtown surplus by a certain date with the goal of providing affordable housing would also be a valuable policy.

As part of objective 2.4c, we support establishing a Community Opportunity to Purchase<sup>3</sup> program to give qualified non-profit organizations the right of first offer or refusal to purchase certain properties offered for sale in the City. We also support establishing a Tenant Opportunity to Purchase<sup>4</sup> program to help prevent displacement, empower tenants, and preserve affordable housing when the owner decides to sell.

## ***Policy 3 - Special Needs and Homelessness***

Permanent supportive housing is a key solution towards solving homelessness. Policy 3.4 should explicitly indicate equitable distribution (and development potential) of such housing across all districts.

Persons with disabilities benefit from the development of extremely low- and very low-income housing. Objective 3.1c falls short of any commitment to develop housing, only to "publicize housing accessible to persons with disabilities". The City should increase incentives for extremely low housing in objectives under Policy 2 - Affordable Housing, such as additional density bonus (Policy 2.3) or modification of the inclusionary ordinance (objective 2.1a) or by-right approval (objective 2.2g) to favor more extremely-low homes.

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<sup>3</sup> [Community Opportunity to Purchase Act \(COPA\) | San Francisco](#)

<sup>4</sup> [EBCLC's Tenant Opportunity to Purchase Act \(TOPA\) - East Bay Community Law Center](#)

## The University

The two objectives related to the University of California, Santa Cruz (UCSC), 3.5a and 3.5b, are vaguely worded to “Continue to collaborate...” and “Support state legislation...” which are repeats from the 5th cycle. Note that as recently as 2022, the City formally expressed opposition to proposed legislation intended to facilitate more housing at UCSC.<sup>5</sup>

The City has been and continues to be a significant barrier to development at UCSC, as evidenced by past and ongoing litigation<sup>6</sup>. This is not acknowledged in the constraints portion of the City’s housing element. The city should make a good faith effort to analyze the barriers it presents to housing construction and planning with regards to UCSC and propose programs to mitigate these impacts. The city should commit to providing municipal services to new housing at UCSC and a policy to not sue over housing production on campus or to obstruct UCSC housing projects through other means such as withholding water access via the Local Agency Formation Commission process.

## ***Policy 5 - Neighborhood Vitality***

Policy 5 opens with the following context: “Quality of life is shaped, in part, by neighborhood conditions in Santa Cruz. As an older, established community, Santa Cruz requires a concerted effort to encourage the maintenance, rehabilitation, and improvement of housing and to promote sustainable, livable neighborhoods in the face of increasing density.” We wholly reject the framing that density and sustainable, livable neighborhoods are incompatible. The city should update this language.

## ***Policy 6 - Affirmatively Furthering Fair Housing***

As discussed in our Housing Production section, a majority of new housing is being planned along major corridors. This leaves out many exclusive and high opportunity neighborhoods from producing their fair share of housing.

Creation of missing middle housing isn’t mentioned within the policy plan - the City should adapt zoning regulations that would incentivize this form of housing. Examples include reducing minimum lot size, lot width, and parking requirements (kudos to the latter already being included!)

We believe the City can and should go further to enable more housing types in its most resource rich neighborhoods. Objective 6.2d should use SB 10 to increase density in R1 districts, not just to allow construction of Flexible Density Units (FDUs). FDUs are a housing type, not a zoning district. The time frame for zoning amendments to expand housing opportunities in single family zones should be sooner than 2029 as proposed in Objective 6.2c. Similarly, the City’s deadline for updating the local SB9 ordinance consistent with State Law should be earlier than 2027.

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<sup>5</sup> [Minutes from City Council meeting, 4-26-2022](#)

<sup>6</sup> [City of Santa Cruz, UCSC in talks to possibly end lawsuits over enrollment and housing plans](#)



Policy 6.4 recognizes that displacement may follow new development. Improvements of community assets, as proposed in Objective 6.4a may also result in displacement. This objective should include applicable anti-displacement strategies.

### ***Sites Inventory - Small Sites Program***

The site inventory identifies a significant number of small parcels for development, many of which are projected to accommodate low income units. Per HCD's Site Inventory Guidebook<sup>7</sup> "A parcel smaller than one half acre is considered inadequate to accommodate housing affordable to lower income households, unless the housing element demonstrates development of housing affordable to lower income households on these sites is realistic or feasible." The City claims that many of these parcels have development opportunities due to common ownership with adjacent parcels; the Housing Element includes no objectives in the Policy Plan with specific incentives to facilitate consolidation. We recommend an incentive program such as a FAR density bonus for projects which involve small lot consolidation.

### ***Upzoning Near Potential Light Rail Stations***

The RTC has multiple scenarios for a passenger light rail route. In most scenarios stations would be located on the Westside, Bay/California, Downtown, and Seabright<sup>8</sup>. We encourage a program to look at additional density along the Coastal Rail Trail, with a focus on these station locations.

### ***Tenant Protections***

As a majority-renter city, it is important that we have strong tenant protections. There are a number of programs we would like to see implemented or expanded in the City including:

- Elimination of or cap on rental application fees
- Creation of a rental registry. This was recently passed by both Salinas<sup>9</sup> and Monterey<sup>10</sup>
- Local preference for people employed in the county
- COPA and TOPA programs (see Policy 2 - Affordable Housing)
- Conduct a disparate impact analysis of non-high(est) resource areas<sup>11</sup> and apply a live-work preference if it matches county demographics

### ***Need for Active Language, Dates and Measurable Metrics***

Objectives/Time frames lack active language, dates, and measurable metrics to determine the success of the objective. Time frames are often a recitation of the process, not a commitment to an outcome. Some examples:

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<sup>7</sup> [Housing Element Sites Inventory Guidebook](#)

<sup>8</sup> [SCCRTC Rail Study - Service Scenario Map](#)

<sup>9</sup> [Salinas passes rental registry, first in Monterey County](#)

<sup>10</sup> [Monterey City Council moves ahead with rental registry](#)

<sup>11</sup> [2023 CTCAC HCD Opportunity Map](#)

#### Policy 1 - Housing Production

- 1.2d - Time frame should be tightened to the action phrase “Adopt rezonings for the Ocean Street Area plan by the end of 2024, and submit to Coastal Commission as Local Coastal Program Amendment by [date]”
- 1.3b - Time frame is to “Meet annually with the development community to consider process improvements.” Also, 1.4b time frame is to “Meet annually with the development community”. These are commitments to meetings; they should include development of an action or improvement plan based on input.
- 1.3c time frame should be tightened to the action phrase “Eliminate minimum parking requirements citywide by January 2028”
- 1.5a and 1.5b are focused on important facilitation of ADU development, and both commit to “consider” amendments or modifications, with no dates. 1.5e Time frame should be tightened to “Amend ADU owner occupancy regulations by May 2024”

#### Policy 2 - Affordable Housing

- 2.1a and 2.1b and 2.2a Time frames all are “Review...and present...” related to the Inclusionary Ordinance. The language should be tightened to the outcomes:
  - 2.1a “Amend Inclusionary Ordinance to ensure requirements provide maximum number of affordable units or deeper levels of affordability without behind a barrier to housing development by [DATE]”
  - 2.1b “Amend Inclusionary Ordinance with programs and incentives to increase rental and home ownership opportunities for workforce housing by [DATE]”
  - 2.2a “Amend Inclusionary Ordinance to update affordable housing options such as provided offsite or incentivizing land dedication by [DATE]”
- 2.2g - Time frame should be tightened to the action phrase “Allow 100 percent affordable residential development to be considered a “by-right” use by December 2024” (new date suggested).
- 2.3a and 2.3b lack specific commitments and action language related to Density Bonus Ordinance as it exceeds State Density Bonus law.
- 2.4b, 2.4c and 2.6 include the vague language of “on an ongoing basis” and “whenever possible” which are difficult to ascertain for success.
- 2.4a, 2.4b and 2.5a “coordinate” or “partner” with others to an unspecified outcome or milestone with date.

#### Policy 3 - Special Needs and Homelessness

- 3.1a, 3.1c, 3.2a, 3.2b, 3.2c, 3.3a, 3.3g, 3.3h, 3.3i, include the vague language of “on an ongoing basis” and “when possible” which are difficult to ascertain for success.
- 3.1c, 3.2a, 3.3c, 3.3e, 3.4a 3.5a “Work with”, “Assist”, “coordinate with”, “actively seek partnerships”, “continue support for”, “continue to collaborate” to unspecified outcomes or milestones with date.

#### Policy 4 - Housing Assistance

- 4.1a, 4.2b “Continue to contract...”, “Continue to support....” with unspecified outcomes or milestones with date.

#### Policy 5 - Neighborhood Vitality

- 5.5b - Time frame should be tightened to the action phrase “Implement new anti-displacement measures by September 2025”

- 5.3a, 5.3b includes the vague language of “Explore...” and “Seek out...” which are difficult to ascertain for success.
- 5.1a, 5.2a, 5.4c, 5.5a “Continue to implement”, “Continue to administer....”, “Continue to support....”with unspecified outcomes or milestones with date.
- Time frame should be tightened to the action phrase “Amend Zoning Ordinance to increase base zoning consistent with SB10 by December 2026.”
- 6.2c - Time frame should be tightened to the action phrase “Amend Zoning Ordinance to expand housing opportunities in single-family zones by December 2026.” (proposed new date)
- 6.2d - Time frame should be tightened to the action phrase “Amend Zoning Ordinance to increase base zoning consistent with SB10 by December 2026.”
- 6.1e, 6.2f, 6.4a, 6.4c, 6.4e include the vague language of “on an ongoing basis” which is difficult to ascertain for success.
- 6.1a, 6.1b “Coordinate”, “Support...”, “Provide support”, “Continue to administer....”, “Continue to support....”with unspecified outcomes or milestones with date.
- 6.2c and 6.2d - these similar initiatives for single-family and high resource areas should have synchronized dates of 2026.
- 6.2e - local SB 9 ordinance to align with state law should be sooner than 2027
- 6.4a - investment in “areas of highest need” can spur displacement, this objective should include anti-displacement efforts
- 6.4b - Time frame should be tightened to the action phrase “Amend the City’s Relocation Ordinance by September 2025”

#### Policy 7 - Resource Conservation and Environmental Stewardship

- 7.1a, 7.1b, 7.1c, 7.2b, 7.3a, 7.3b, 7.4b, include the vague language of “on an ongoing basis” with unspecified milestones with date.
- We appreciate the reference to the Climate Action Plan in 7.2a, which has specific measures and actions.

Galmiche, Ines

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**From:** Karen Dawson <karendawson@comcast.net>  
**Sent:** Tuesday, October 17, 2023 2:22 PM  
**To:** Clara Stanger  
**Subject:** Re: Housing Element revised draft document available for public review

Hello Clara. I did my best to read this and I am confused 🤔.

I live in Deanza and I am a strong proponent for mobile homes for seniors.. as both rental and home ownership. since there are only 3 mobile home parks in city of Santa Cruz, and only for for seniors.. over 55, how is this housing "preserved and sustained without rent control in the city?  
I have been trying to advocate for this issue for last 1.5 years without a lot of interest but no movement.

can you assist to strengthen the language in element to preserve mobile homes in city for more than moderate plus income persons?

I have a list of recc. That I sent mayor that I can send you too. hopefully it's a document in process!  
Thsnks Karen Scott

Sent from my iPhone

On Oct 12, 2023, at 6:23 PM, Clara Stanger <cstanger@santacruzca.gov> wrote:

Good Evening,

The City has revised the HCD Submittal Draft (6<sup>th</sup> Cycle) Housing Element that was submitted to HCD on August 30, 2023, based on preliminary comments provided by HCD. The revised document is available for public review at [www.cityofsantacruz.com/housingelement](http://www.cityofsantacruz.com/housingelement). The public comment period runs from October 12, 2023 through October 19, 2023. Please email any comments directly to me.

Sincerely,

**Clara Stanger**

Senior Planner

City of Santa Cruz | Planning and Community Development

809 Center Street, Room 101, Santa Cruz, CA 95060

Main: 831-420-5110 | Direct: 831-420-5247

Email: [cstanger@santacruzca.gov](mailto:cstanger@santacruzca.gov)

Web: [www.cityofsantacruz.com](http://www.cityofsantacruz.com)

<image001.png>

<image002.png>


<image003.png>

<image004.png>

**From:** kathleen duncan <kathy.duncan@pacbell.net>  
**Sent:** Tuesday, October 17, 2023 6:15 PM  
**To:** Clara Stanger  
**Cc:** Matthew VanHua; Samantha Haschert  
**Subject:** Re: Housing Element revised draft document available for public review  
**Attachments:** end game santa cruz.xlsx

Hi Clara,

Thanks for your reply.

I'm sorry to be bugging you some more, i'm sure i must have a frequent flyer sticker on my folder :-)

How many additional potential units were created in the City as a result of the General Plan change to use GROSS rather than NET for density calculations ?

Which parcels besides our lot at 190 westview court were affected ? For instance, 5 additional potential HU's were added to ours.

How many potential HU's IN TOTAL did the city get from this change ?

I haven't come across a discussion of how this change to the General Plan came about. Scrounging for HU's ? imitating another jurisdiction ? or something else?

I can look harder for a discussion in city docs. Just thought one of you guys might remember the rationale.

I know the City and County struggle to control the growth of UCSC campus.

fyi: I've discussed my concerns about the University's displacement of Santa Cruz City residents, with Ian Klein at LAO. He asked me to send my end-game-santacruz spreadsheet. It will be interesting to get his fact-checking and feedback. Maybe i'm exaggerating the effect.

I asked Ian if the State/Regents have considered adding a sister campus in Watsonville, and he said this had "come up" but is complex and far future.

And of course that decision should be made in Watsonville.

thanks again,  
Kathy

On 10/16/2023 12:39 PM, Clara Stanger wrote:

Hi Kathy,

While the gross lot area density calculation allows for more potential units than would one based on net lot area, it doesn't require a property to develop at that increased density. The development would need to meet at least the minimum end of the density range.

With regard to your question about the State and UC campus growth, the state goes through a process that's separate from our local process when they determine the growth targets for different campuses, and then the campus conducts a public process for their Long Range Development Plan, in which they identify how they will accommodate the growth targets.

Sincerely,



**Clara Stanger**

Senior Planner

City of Santa Cruz | Planning and Community Development

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Web: [www.cityofsantacruz.com](http://www.cityofsantacruz.com)



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**From:** kathleen duncan <[kathy.duncan@pacbell.net](mailto:kathy.duncan@pacbell.net)>

**Sent:** Friday, October 13, 2023 1:38 PM

**To:** Clara Stanger <[cstanger@santacruzca.gov](mailto:cstanger@santacruzca.gov)>

**Subject:** Re: Housing Element revised draft document available for public review

Hi Clara,

Do you happen to know how many additional "potential" housing units resulted from the change in the General Plan to use Gross rather than Net Lot Area for density calculations ?

I guess Katherine Donovan would be more likely to know, if anyone did this analysis prior to modifying the General Plan.

I'm still wondering why with all these new housing laws passed by State, there seem to be no California laws restricting the growth of UC campuses as a function of local population, holding capacity, service capacity, overcrowding, vacancy and replacement rates, AFFH etc ?

<https://lao.ca.gov/Publications/Report/3532/1>

*"No Agreed Upon Optimal Campus Size. Little consensus exists on the ideal enrollment level and physical size of a campus.....*

*Though external constraints (such as environmental and community factors) exist for all campuses, these constraints typically can be overcome with creativity, compromise, and monetary contributions."*

..new library...new bus station hmmm

The LAO assessment fails to mention lost \$\$\$ from expensive legal actions and courts.

thanks,  
Kathy

p.s. here's some tables you might find interesting.



				TOTAL State HU's	AMBAG HU's	% AMBAG/ State	santa cruz county HU's	% Cr Co AM
	1st cycle	1984-1992?		?	?		?	
	2nd Cycle	1992-2000?		1,475,675	38,000	2.6%	17,679	4
	3rd Cycle	2000-2008		1,309,841	23,000	1.8%	9,715	4
	4th Cycle:	2008-2015		1,483,581	15,130	1.0%	3,215	2
population	5th Cycle:	2015-2023		1,156,955	10,430	0.9%	3,217	3
overcrowding, vacancy, AFFH	6th Cycle:	2023-2031		2,500,284	33,274	1.3%	12,979	3
	7th Cycle	2031-2040						

Table 2: E-5 City/County Population and Housing Estimates, 1								
	POPULATION			HOUSING UNITS				
County / City	Total	Househo Id	Group Quarters	Total	Single Detached	Single Attached	Two to Four	Five
Monterey County								
Carmel-By-The-Sea	3,033	3,033	0	3,067	2,501	171	186	2
Del Rey Oaks	1,540	1,540	0	746	584	28	23	1
Gonzales	8,300	8,294	6	2,091	1,532	139	24	3
Greenfield	19,917	19,886	31	4,724	3,432	140	313	7
King City	13,817	13,592	225	3,691	2,137	310	320	6
Marina	22,068	20,997	1,071	8,444	4,267	733	1,094	2
Monterey	26,845	24,237	2,608	13,825	5,951	875	2,623	4
Pacific Grove	14,741	14,359	382	8,232	4,758	524	1,104	1
Salinas	159,475	157,083	2,392	44,939	24,600	2,916	4,257	11
Sand City	376	330	46	197	82	10	36	6
Seaside	29,790	28,020	1,770	10,847	6,763	1,310	874	1
Soledad	26,230	18,648	7,582	4,633	3,578	141	341	3
Balance Of County	104,236	100,292	3,944	40,529	31,924	2,192	1,588	2
Incorporated	326,132	310,019	16,113	105,436	60,185	7,297	11,195	23
County Total	430,368	410,311	20,057	145,965	92,109	9,489	12,783	26
Santa Cruz County								
Capitola	9,625	9,450	175	5,507	1,655	628	1,378	1
Santa Cruz	63,224	50,283	12,941	24,415	13,389	2,743	2,597	5
Scotts Valley	11,859	11,537	322	4,994	2,768	666	403	3
Watsonville	49,876	49,251	625	14,699	7,688	1,410	1,697	2
Balance Of County	127,467	125,339	2,128	57,550	41,956	4,604	3,579	3
Incorporated	134,584	120,521	14,063	49,615	25,500	5,447	6,075	9
County Total	262,051	245,860	16,191	107,165	67,456	10,051	9,654	13
AMBAG Totals	692,419	656,171	36,248	253,130	159,565	19,540	22,437	39
State Total	39,286,510	38,495,580	790,930	14,471,218	8,316,114	1,038,730	1,131,821	3,44

On 10/12/2023 6:22 PM, Clara Stanger wrote:

Good Evening,

The City has revised the HCD Submittal Draft (6<sup>th</sup> Cycle) Housing Element that was submitted to HCD on August 30, 2023, based on preliminary comments provided by HCD. The revised document is available for public review at [www.cityofsantacruz.com/housingelement](http://www.cityofsantacruz.com/housingelement). The public comment period runs from October 12, 2023 through October 19, 2023. Please email any comments directly to me.

Sincerely,



**Clara Stanger**

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October 19, 2023

Ms. Clara Stanger  
Senior Planner  
City of Santa Cruz Planning and Community Development  
809 Center St. Rm 101  
Santa Cruz, CA 95060

Dear Ms. Stanger,

COPA appreciates the efforts of city staff, Mayor and Councilmembers in drafting the 6th Cycle Housing Element. We are most pleased with the creativity and commitment to identify viable parcels for development of new housing, along with policies to incentivize the development of housing of all types throughout the city. In time, we expect these policy choices will yield the creation of more housing and likely success at meeting the RHNA goals for our city. We look forward to the days when more units are available, particularly for the many families with children and local service and hospitality workers who desperately need below market rate homes if we are to continue to be a functioning community.

It will take years to see the results in new housing units, which is why COPA recommended policy ideas to support tenants who face the immediate pressures and threats of becoming homeless. Given the severity of the housing crisis, we would expect the City would be open to seriously explore multiple strategies, especially those that are rooted in hundreds of conversations that COPA has had with our members over the last 3 years.

In the early community meetings, COPA leaders asked if it was appropriate to propose tenant support policies in the Housing Element. We were encouraged by your consultants to contribute our ideas. We held a COPA civic academy attended by 81 residents in February attended by Mayor Keeley and Councilmember Brown. We submitted our suggestions and received your responses, some of which were rejected

without any explanation (community or tenant purchase opportunity programs, in effect in some cities) while you explained that some already existed (local preference) which was instructive. You did incorporate two concepts we proposed, to provide “culturally responsive outreach” and increase the goal for the number of people served by the existing security deposit program.

However, we do want to state on the record that overall, we notice a lack of urgency and ambition to stem the tide of homelessness and displacement that faces most Santa Cruz tenants every single day. As the least affordable community in the nation, we expect more can be done to keep families housed through the policy options we proposed and expected more willingness to seriously consider community-generated solutions.

To be specific, regarding Policy 4.1a, we shared how the existing security deposit program is cumbersome, not well marketed, with language barriers and therefore, underutilized. Based on our comments in April, you increased your initial goal from assisting 50 households to 100 over the life of the planning cycle, justified by the “recent assistance trends.” Based on the stories our members have shared, the low number of “recent assistance trends” is more than likely due to the barriers to access the program and its poor design to meet the real-world situation facing tenants in a tight rental market. It is not sufficient to point to a program and check that box if the program itself needs to be evaluated and improved to have real impact for renters to stay housed. Given the large number of rent-burdened tenants, (over 3000 pay more than half their income on rent), COPA expected to see more commitment to examine and improve this program.

Another opportunity to take immediate action to prevent tenants from losing their homes, is to provide a more robust system of legal assistance to teach both tenants and landlords the law, their rights and their respective responsibilities. Policy 6.3b states the City will continue to fund bi-lingual assistance, and let service providers know about funding opportunities, but the goal of reaching 50 households is unambitious and woefully disproportionate to the need. Given that more than 3000 households are rent burdened and housing insecure and the high degree of fear of retaliation or eviction inevitable in a tight rental market, a proactive and larger scale effort to ensure tenant and landlord education is necessary if we are serious about preventing homelessness.

These are just two of what could be a suite of strategies to assist renters who are facing the immediate and everyday pressure to stay housed, while at the same time, you pursue the longer-term goals of construction of new housing. As stated earlier, we commend the City for a robust plan and set of policies that we expect will lead to

reaching the 6th cycle RHNA targets. At the same time, COPA expects our city staff and elected officials can do so much more to reduce the pressure on tenants, retain our local workforce and prevent families from losing their existing homes. We have a housing emergency. We stand ready to work together with you to seriously consider action on multiple fronts.

Sincerely,

Barbara Meister

On behalf of the COPA Housing Strategy Team