

City of Carmel HE Preliminary Review Matrix

Received 03/20/2024

Prior Review: 01/24/2024

Prior HCD Finding	Page #	Prelim Review	Notes	Revisions Tracking Note
Sites Inventory, Analysis and Adequate Sites				
<p>Progress in Meeting the RHNA: The element now incorporates pipeline units, affordability metrics, and development barriers. However, the revised element now has data inconsistencies across Tables C-2 through C-4. For example, Table C-3 states that ten Low Income (LI) AADUs are projected alongside seven pipeline units, while Table C-4 lists seven LI ADUs and zero LI units. Similar inconsistencies exist across all three tables. Revisions are necessary to correct these potential inconsistencies while ensuring that no units, including ADUs, are double-counted across site categories. Please note that depending on the data verification results, housing opportunities or sites for very low-income (VLI) households may need to be identified and evaluated to accommodate the VLI RHNA. Based on outcomes of this analysis, the element should add or modify programs, as appropriate.</p>	C-3, C-8		Table C-2 math subtraction corrected. Table C-3 additional text to explain the status of ADUs was added. Units were not doubled counted.	Edits to address this comment were made on page C-3, Table C-2 and on page C-8, Table C-3.
Zoning for a Variety of Housing Types				

<p>Employee Housing: The element indicates the City does not have agriculturally designated land and therefore is not required to identify any zones to provide farmworker housing. However, the Employee Housing Act (Health and Safety Code § 17000 et seq.) is not limited to farmworkers. Specifically, Section 17021.5 requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. The element must either demonstrate consistency with these requirements or include programs to amend zoning as appropriate.</p>	<p>2-15, 2-16</p>			<p>Edits to address this comment were made on pages 2-15 and 2-16 to Program 1.3.F to correctly cite compliance with Section 17021.5 of the Employee Housing Act.</p>
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<p>Governmental Constraints</p>				
<p>Land Use Controls: The element has been revised to incorporate some analysis of land use control impacts as potential constraints on a variety of housing types. However, the analysis must address the cumulative impacts of all relevant land use controls on the cost and supply of housing, feasibility, and ability to achieve minimum densities. Specifically, the analysis should still address open space and interior courtyard requirements for impacts on housing supply (number of units) and costs and the ability to achieve maximum densities. The element may use sample or recent projects to demonstrate cumulative impact of land use controls. Lastly, the element should add or modify programs to address identified constraints.</p>	<p>B-25</p>		<p>Analyze impacts of open space and courtyard land-use controls (using recent projects)</p>	<p>Edits to address this comment were made on page B-25.</p>

Constraints on Housing for Persons with Disabilities				
<p>Reasonable Accommodation: The element now describes the City's reasonable accommodation procedure but should clarify whether the definition of aggrieved parties allows a third-party to request an appeal hearing and , if so, evaluate the impacts on housing for persons with disabilities and add or modify programs to address identified constraints. For example, a program could be added to allow only the applicant or potential beneficiary of the reasonable accommodation request to request an appeal hearing.</p>	B-36, 2-34			Edits to address this comment were made on pages B-36 and 2-34.

AFFH Programs				
<p>Housing mobility removes barriers to higher opportunity areas and strategically enhances access to housing choices and affordability to promote more inclusive neighborhoods, cities and regions. Among other factors, the City is wholly the highest resource community in contrast to the rest of the region. As a result, the element should include significant and robust actions with numerical targets (not limited to the RHNA) to promote housing mobility and increase housing choices and affordability throughout the City. While the element has been revised to include Program 3.2.B (and associated programs) that outline several actions and strategies to promote housing mobility, it should be modified to enhance housing mobility strategies. Program 3.2.B includes a list of housing mobility actions the City will pursue such as encouraging missing middle zoning under the condition that the City produce 187 housing opportunities (the City's lower-income RHNA) affordable to lower income households by 2027. However, actions to affirmatively further fair housing (AFFH) should not be limited by the RHNA. The City should commit to</p>	2-34 – 2-36			Edits to address this comment were made on pages 2-26 & 2-34 through 2-36.

employing the outlined midcycle alternative actions as primary program actions to remove barriers to higher opportunities areas irrespective of RHNA progress.				
Other Revisions				

Other (HCD use only)			
Public comments		FYI	
Document availability		FYI	
Rezone timing			
Resolution Received?		FYI	
50% nonvacant resolution		FYI	

Electronic sites inventory		FYI	
AB 2339		FYI	
Overlay		FYI	
Modification Authority		FYI	