



COUNTY OF SANTA CRUZ

PLANNING DEPARTMENT

701 OCEAN STREET, 4TH FLOOR, SANTA CRUZ, CA 95060
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TOM BURNS, PLANNING DIRECTOR

October 17, 2006

Agenda: October **25, 2006**

Item #: 10

Time: After **9 AM**

Planning Commission
County of Santa Cruz
701 Ocean Street
Santa Cruz, CA. 95060

Re: Further Revisions **of** Housing Element

Dear Commissioners:

On September 27, 2006 your Commission reviewed and forwarded to the Board for approval a number of minor revisions to the Housing Element of the General Plan. The Housing Element, including those revisions, will be considered by the Board on October 24. Because those revisions were in part responding to a successful legal challenge to the Housing Element, State law requires that State Housing and Community Development (HCD) be given the opportunity to review and comment on the revised Element a minimum of 45 days prior to final adoption; the document was received by HCD on September 1, which resulted in comments being due back to the County by October 13. The purpose of this letter is to forward additional possible changes to the Housing Element for consideration by your Commission as a result of those recent comments from HCD.

HCD's October 13 letter for the first time recognizes the efforts that have been made by the County through the Housing Element process and commits to certify the Element, if adopted with minor changes (see Attachment 3). Those changes, which are provided in Attachment 2, can be summarized as follows:

- Expanding the acreage that the County commits to rezone to special by-right 20 units/acre designations from 22 to 30-32.
- Including in the Housing Element additional language clarifying the full range of options available for developers seeking to construct mixed-use projects under the County's current land use policies.

Additionally, we are recommending one other change to address an oversight during the last amendment cycle, correcting the figure for the total acres and table heading included in Appendix D, which is the list of candidate sites for the rezoning program.

Under the Court judgment, the County has a very limited timeframe for adopting Housing Element revisions to comply with State law. **As** a result, we are forwarding recommendations

to both your Commission and the Board simultaneously. The Board will consider these items on October 24. If they determine to not accommodate HCD's request, this item will be deleted from your agenda. If, however, the Board wishes to proceed with these additional changes, we wanted the Commission to be poised to rapidly respond to the changes, so that the Board could take final action on the Housing Element on their November 7 agenda.

It is therefore RECOMMENDED that your Commission take the following actions:

1. Consider public comments with regard to the attached Housing Element revisions; and
2. Adopt the attached resolution (Attachment 1) recommending these amendments to the Board.

Sincerely,

Tom Burns
Planning Director

Attachments:

1. Resolution Recommending Amendments to Board of Supervisors
2. Proposed Housing Element Revisions
3. HCD Letter of October 13, 2006

cc. Housing Advisory Commission

BEFORE THE PLANNING COMMISSION
OF THE COUNTY OF SANTA CRUZ, STATE OF CALIFORNIA

RESOLUTION NO. _____

On the motion of Commissioner:
Duly seconded by Commissioner:
The following Resolution is adopted:

**RESOLUTION RECOMMENDING ADOPTION OF AMENDMENTS TO THE HOUSING
ELEMENT OF THE SANTA CRUZ COUNTY GENERAL PLAN**

WHEREAS, the availability of housing is of vital importance in the County of Santa Cruz (the "County"), and the attainment of decent housing and a suitable living environment is a priority of the highest order; and

WHEREAS, the state mandated Regional Housing Needs Determination (RHND) allocation assigned to the unincorporated portion of the County for the 2000-2007 planning period is 3,441 new units, which represents 35% of the entire county's 9,715 unit allocation. Of these 3,441 new units the State requires that 937 units be affordable to very low income households, 502 units be affordable to low income households, 651 units be affordable to moderate income households, and 1,351 units be affordable to above moderate income households; and

WHEREAS, State General Plan guidelines require that the state mandated Housing Element (the "Housing Element") be revised periodically to incorporate new information and reflect changes in community needs and values: and

WHEREAS, Government Code Section 65302(c) requires that localities adopt a Housing Element of their General Plan that complies with the State's standards as set forth in Government Code Section 65580 et seq; and

WHEREAS, a proposed amendment to the Housing Element of the Santa Cruz County General Plan has been prepared pursuant to Government Code Sections 65358 and 65580 et seq., "State Housing *Element Law*"; and

WHEREAS, in June of 2005 the County adopted an amended Housing Element: and

WHEREAS, Attachment 1 to this resolution sets forth the Findings of Consistency with Government Code section 65580 et seq. regarding housing element requirements; and

WHEREAS, pursuant to California Government Code section 65585(b), the California Department of Housing and Community Development reviewed the County's draft versions of the Housing Element and reported its findings to the County in letters dated August 8, 2003, June 7, 2004, April 18, 2005, September 20, 2005 and October 13, 2006; and

WHEREAS, the California Department of Housing and Community Development indicated in its October 13, 2006 letter that, once the recommended revisions are completed, the Housing Element will, in its opinion, substantially comply with the requirements of State Housing Element Law: and

WHEREAS, the Planning Commission held a public hearing on October 25, 2006 received and considered all concerns and comments of all segments of the community, staff and prior correspondence of the California Department of Housing and Community Development on the proposed Housing Element, considered the public record as a whole; and

WHEREAS, public hearing notices for the draft 2000-2007 Housing Element regarding document availability and public hearing schedule were published in local newspapers as required by law and provided on the County's website; and

WHEREAS, pursuant to the California Environmental Quality Act, a Negative Declaration has been prepared and circulated for public review concluding that ~~no~~ potentially significant environmental impacts will occur as the result of the adoption of the Housing Element.

NOW THEREFORE BE IT RESOLVED, that the Planning Commission recommends that the Board of Supervisors adopt the attached revisions to the Draft October 2006 Housing Element.

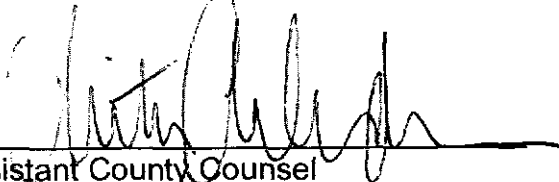
PASSED AND ADOPTED by the Planning Commission of the County of Santa Cruz, State of California, this _____ day of _____, 2006 by the following vote:

AYES:	COMMISSIONERS
NOES:	COMMISSIONERS
ABSENT:	COMMISSIONERS
ABSTAIN:	COMMISSIONERS

Chairperson

ATTEST: _____
Secretary

APPROVED AS TO FORM:



Assistant County Counsel

cc: County Counsel
Planning Department

Proposed Revised Wording Regarding Commercial Mixed Use
(starting on page 131 of the October 24, 2006 Housing Element):

e. Commercial Mixed Use

Mixed use development is allowed in **PA** (Professional and Administrative Office), **C-1** (Neighborhood Commercial) and **C-2** (Community Commercial) zones. In these zones, residential use is allowed in 50% of the square footage of the structure(s) (67% of the square footage for affordable residential units).

The potential for development of residential units as a part of commercial development was analyzed in two ways. The first involved the analysis of vacant/undeveloped commercial properties that were suitably zoned for both commercial and residential development. Appendix C-1 lists vacant/undeveloped commercial properties which were identified that would support both commercial and residential development and were in the correct zone district. Build-out of the properties was assumed at 40% floor area ratio. It was assumed that 50% of the resulting building area for each parcel would be used for housing. That area was divided by 800 square feet to determine the number of potential units that could be built above the first floor commercial use of the property. An 800 square foot unit assumes a mix of 1 and 2 bedroom units.

The second analysis involved already developed non-vacant commercial properties. Instead of looking at all developed properties to identify additional area that could be added to provide residential units, an analysis was prepared of those developed commercial parcels greater than 20,000 square feet in size, that had assessed improvement valuations of \$200,000 or less. The rationale is that these properties are significantly under-developed and/or contained older commercial development likely to be replaced in the near future. Again, a 40% floor area ratio was applied to the redevelopment of these parcels. 50% of the square footage of the structure is attributed to residential use. The residential square footage was divided by 800 square feet to determine the number of potential units. See Appendix C-2.

This analysis resulted in a potential of 1,495 units on non vacant parcels and 310 units on vacant parcels for a total of 1,805 units in conjunction with the development and redevelopment of commercial properties. Not included are any additional units that could be developed under the current ordinances that allow 67% of the floor area to be in residential units if 100% of the units were affordable. As well, this analysis does not evaluate potential development on existing developed sites with greater than \$200,000 assessed value for improvements. Several mixed use projects are in discussion on such sites, several have recently been completed and interest in such development has seen significant growth in recent years.

Utilizing **HCD's** presumption that densities of **20** units per acre result in very low and low income housing, the following analysis can be applied to residential units in a mixed use project:

Applying the criteria described above to a hypothetical one acre parcel (43,560 square feet) would result in a structure with a floor area ratio of **17,424** square feet. Allocating 50% of this structure for residential use would result in **8,712** square feet of residential space. Presuming an average unit size of 800 square feet would result in **10.89** units on this one acre parcel.

Since the residential component of the development is likely to be on the second floor of a two story development and is only 50% of the square footage it can be presumed that the total square footage of the development would have the same bulk and scale of a residential development of **20** units per acre. Though only half of the structure is utilized for residential use the density and the economics are the same as a development at **20** units per acre. As well, the intensity of the land use as the equivalent of **20** units per acre combined with market forces which dictate that mixed use housing projects tend to serve the lower end of the housing market result in a distribution of mixed use units through the four affordability categories in Table **4.6.3**.

Of the total potential for mixed use residential development (See Table **4.6.3**), and as has been accepted by **HCD** in other communities, 30% of the units were assumed to be feasible for the planning period (**93** on vacant parcels and **448** on non-vacant parcels). Following the analysis above, these units were divided equally among the four affordability categories (**23** vacant units on vacant parcels and **112** units on non-vacant parcels in each category). See also Appendices **C-1** and **C-2**.

This is a conservative analysis of the potential for Mixed Use development. As noted above, the County Code allows affordable projects to use 67% of the square footage of the structure for residential use. This results in the equivalent of 14.6 units per acre located on the second and third floors, since third floor development is also allowed under current regulations. Therefore, the numbers utilized in the inventory are a conservative analysis of what is possible on these sites.

Item: Replacement Housing Element
 (starting on page 135 of the October 24, 2006 Housing Element):

h. Rezoning at 20 units per acre

The Board of Supervisors adopted an ordinance on June 22, 2004 which applies to rezonings of land from non-residential zoning to residential zoning. This ordinance requires that 40% of the residential units proposed and developed as a result of such rezoning be affordable (20% to low income households). This ordinance was approved by a 5-0 vote. In expanding on this concept, sites will be rezoned at 20 units per acre to address the short fall of units in the very low and low income categories.

This rezoning strategy shall designate a minimum of ~~22~~ 30-32 acres of land within the urban services line¹ where sewer and water service is available for high density affordable housing development at 20 units per acre and a minimum site area of 2 acres per site.² On these sites, a minimum of 40% of the units developed must be deed-restricted with long-term affordability covenants, predominantly for low and very low income households. As a part of reaching this goal, incentives will be implemented as part of the rezoning to facilitate development, such as alternative site development standards similar to those offered under State Density Bonus Law (i.e. increased height and decreased parking standards), significant financial incentives (discussed below), and priority processing. Considerations in choosing sites to rezone will include proximity to transit corridors and the feasibility and likelihood of development or redevelopment during the planning period. A list of potential parcels which would be candidates for this rezoning strategy is included in Appendix D.

Densities for the parcels designated under the rezoning strategy will be 20 units per acre. The number of units for each designated site will be determined based on multiplying 20 units times the number of developable acres on the site. Therefore, under the new zoning, the use and density shall be allowed by right. However, the County will continue to apply appropriate review standards as required by law to development proposals on these sites. These projects will be subject to public hearing within the confines of those regulatory limitations. Development of the rezoned sites will not be allowed lower than the designated number of units for each site.

Implementation of the rezoning strategy as it applies to specific sites will occur in two phases. The first phase will be the processing of appropriate ordinance and/or General Plan amendments. These amendments will delineate the criteria, review process, incentives, development standards such as 20 units per acre, and all other criteria as specified in Program 1.1 of Chapter 4.7. The ordinance and/or General Plan amendments must go through environmental review, review by the Planning Commission and adoption by the Board of Supervisors. The date of implementation of Program 1.1 is based on the

¹ Within the planning areas of Live Oak, Soquel, Aptos and Pajaro Valley. See Appendix I

² For the purposes of the rezoning strategy a "site" could be one parcel, or two or more parcels combined.

amount of time necessary to process and implement these amendments. The second phase of implementation will be rezoning the specific sites. This process will involve evaluating each site in Appendix D to prioritize sites for development at 20 units per acre. Once each site is evaluated, a minimum of ~~22 30-32~~ acres ~~(20 units per acre x 22 acres yields 440 units)~~ will be rezoned. The rezoning process will require environmental review, review by the Planning Commission and adoption by the Board of Supervisors. The date of the implementation of Program 1.2 which rezones the sites is based on the amount of time necessary to process the rezoning of the sites. Once the amendments are in place and the sites are rezoned, the development process may begin.

As a further incentive to development under the on these rezoned sites, the Redevelopment Agency will commit \$15 million in Redevelopment Agency Low and Moderate Income Housing Fund resources to be allocated to assist such projects. This funding will be available even before the rezonings have taken place to ensure the availability of funds for site acquisition. The funding will be distributed by the Redevelopment Agency Board of Directors based on adopted criteria (see below) and consistent with the Agency's Five Year Implementation Plan which was approved in December 2004. The Redevelopment Agency has a well established history of working with developers to create quality affordable housing projects throughout the County. The rezoning strategy provides a further avenue for the Redevelopment Agency to assist in the production of affordable housing developments which benefit the community.

The Redevelopment Agency already has established criteria under which a development will qualify for funding, such as the track record of developer; the leveraging of other funding sources; level of affordability provided in the project, the quality of the architectural and site design and commitment to a public outreach process. Based on this criteria, funding awards can be made to assist development as needed, including up front site acquisition costs. Redevelopment funds can also be used for predevelopment expenses, construction and permanent financing. Funding terms (e.g. loan, grant, residual receipts, etc) are negotiable and structured to enhance project feasibility. The Redevelopment Agency is able to use Redevelopment funds outside the project area because RDA Board of Directors adopted a resolution (Resolution no. 236-87) which allows Housing Funds to be used both within and outside the project area.

As past history **shows**, the \$15 million in Redevelopment Agency funds is more than sufficient to assist in the development of the 440 low and very low income units necessary to meet the regional housing need. Since 1989, the Redevelopment Agency has used \$22 million to assist 1,141 units. This represents an average subsidy of approximately \$20,000 per unit. However, increasing land costs have driven the cost of development upward such that the subsidy for the recently completed Corrolitos Creek project resulted in a subsidy of \$32,000 per unit. The \$15 million in Redevelopment Agency funding **would** result in an average subsidy of \$34,000 per unit for the 440 units to be constructed under the Combining District. This subsidy is designed to keep up with rising land and construction costs. In the event that funding is inadequate to adequately assist development under the rezoning strategy, further augmentation from the Agency will be requested. Therefore, there are

substantial financial incentives for developers under the rezoning strategy. Development on the rezoned sites will be an attractive option for developers because the density level is certain. The reliability of density at 20 units to the acre under the rezoning strategy is an incentive to developers.

The 40%affordable requirement will not be a deterrent to development because the reliability of the density would outweigh the affordability component. The reliability of the density under the rezoning strategy, through reducing uncertainty, outweighs the burden of integrating the 40%affordable requirement. Additionally, developers will be able to seek funding assistance from the Redevelopment Agency to offset at least a portion of the financial burden.

Proposed Revised Policy 1.2

(starting on page 160 of the October 24, 2006 Housing Element):

1.2 Selection and Rezoning of Sites

Program Description: Addressing the shortfall of suitably zoned sites will require the rezoning of a minimum of 30-32 acres of land to 20 units per acre housing sites. Because of the uncertainty that can be encountered during the rezoning process (CEQA and other issues), the Board may designate a larger acreage as part of selecting the short list of sites. The planning period ends in June 2008, therefore, priority will be given during the rezoning process to those sites that can be rezoned within the timeframe specified below. The site selection process will include an analysis of a number of factors including: availability of services; proximity to transit corridors; and the feasibility and likelihood of development occurring during the planning period. The number of units that can be accommodated on each site will be established as part of the feasibility review process. The final General Plan and zoning regulations for each site will establish the number of units that will be allowed by-right for each site, based on the findings of the feasibility analysis. The selected short list of sites will be subject to CEQA review prior to completing the rezoning process. (Appendix D provides a list of potential candidate sites for such designations)

Timeframe: Site selection (short list) - December 2006; rezonings projected for June 2007, upon completion of the necessary environmental review.

Responsible Party: Planning Department, Planning Commission, Board of Supervisors

Proposed Revised Policy 1.2.2

(starting on page 161 of the October 24, 2006 Housing Element):

1.2.2 Monitoring Development under the Rezoning Strategy

Program Description: The purpose of the rezoning strategy programs is to provide opportunities for ~~the 440 additional~~ low and very low income units, at 20 units per acre, to fulfill the Regional Housing Need. The goal of these policies is to facilitate development of ~~the 22~~ 30-32 acres of land necessary to meet this purpose (22 acres x 20 units per acre yields 440 units plus an additional 8-10 acres to augment the mixed use commercial goals).

The County is aware of the need to continue to ensure that sufficient land is available to meet the goal. Therefore, the County will monitor progress of this program through an annual analysis of the sites designated under the rezoning strategy. This analysis will include an evaluation of the number of sites developed or are in the development process; the number of sites secured for future development; and the number of sites with no activity.

The analysis will show the number of units developed or in process. Therefore, the residual need, in terms of the number of units outstanding, will be clear.

Time Frame: Annually, beginning the January following the rezoning

Responsible Party: Planning Department

Revisions to Correct Appendix D

Appendix D

Candidate Housing Overlay Rezoning Sites

Name	APN	Zoning	Acres	Number of Parcels	Number of Owners	Current Use	Supervisory District
Carbonera							
Sims Road	067-202-21	R-1-20	6.62	1	1	vacant	1
	Subtotal		6.62				
Live Oak							
7 th Avenue	026-211-19 026-211-20 026-211-22 026-211-25 026-211-43	RM-4	9.73	5	4	Older small houses	3
Johnson	026-311-11 026-311-12 026-311-13	RM-6	3.59	3	1	2 n/c residences, light industry	1
Nigh Lumber	029-021-42 029-021-46 029-021-47 029-021-45 029-021-44	M-1	10.84	5	4	Vacant, Lumber yard, retail nursery, n/c residence, light industry	1
Rittenhouse	025-351-19 025-091-49 025-091-36 025-091-50	PA C-1 RM-4	7.90	4	4	Vacant, single residence, single duplex, single residence	1
	Subtotal		32.06				
Soquel							
Erlach	037-101-02 037-061-66 (037-061-04)	RM-4, R-1-6, (R-1-6, R-1-10, RA)	5.00	3	1	Vacant; 2 houses	1
Seliskar	037-191-13	R-1-6	5.83	1	1	1 house, secondary use	1
	Subtotal		10.83				
Aptos							
Par 3	039-201-36 039-201-37	PR	13.67	2	2	Abandoned Golf Course	2
Miller	039-471-05	RM-4-L, C-1	5.80	1	1	5-10 units	2
Poor Clares	042-011-06	SU	13.53	1	1	Church	2
	Subtotal		49.47 33.0				
Pajaro Valley							
Atkinson	048-211-25	R-1-6	16.52	2	2	Orchard, vacant	4

Revisions to Correct Appendix D

	048-221-09						
Minto	051-511-35	R-1-10	6.91	1	1	vacant	4
Name	APN	Zone	Acres	Number of Parcels	Number of Owners	Current Use	Supervisory District
Paulsen Road	051-521-11 051-521-13	R-1-10	6.29	2	2	vacant, wholesale nursery	4
Melody Lane	051-341-14 051-341-13	R-1-10	7.51	2	2	Vacant, misc. improvements	4
Bradford Road	049-331-17 049-331-18 049-331-19 049-331-38 049-331-12 049-331-11 049-331-10	R-1-6	9.51	7	4	Vacant, wholesale nursery, two houses	2
	Subtotal		46.74				
TOTAL			115.72 129.25				

STATE OF CALIFORNIA - BUSINESS, TRANSPORTATION AND HOUSING AGENCY

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT

Division of Housing Policy Development

1800 Third Street, Room 430
 P. O. Box 952053
 Sacramento, CA 94252-2053
 (916) 323-3176
 FAX (916) 327-2643



October 13, 2006

Mr. Tom Bums, Planning Director
 County of Santa Cruz
 701 Ocean Street, 4th Floor
 Santa Cruz, CA 95060

Dear Mr. Bums:

RE: Review of **the County of Santa Cruz's** Draft Housing Element

Thank you for submitting revisions to Santa Cruz County's housing element, received for review on September 1, 2006, along with additional revisions received via e-mail on October 6, 2006. Pursuant to Government Code Section 65585(b), the Department is required to review draft housing elements and report the findings to the locality. Pursuant to Government Code Section 65585(c), the Department has also received and considered third party comments from the California Rural Legal Assistance Inc., and the California Affordable Housing Law Project. Telephone calls, e-mail exchanges, and an October 5, 2006 meeting with you, Ms. Julianne Ward, Planner IV, and Mr. Erik Shapiro, Housing Program Manager, helped facilitate the review. Pursuant to Government Code Section 65754, due to a court mandated order, the Department is expediting this review.

As you know, the Department's September 20, 2005 housing element review found that additional information, analysis, and stronger programmatic commitment was necessary to identify adequate sites. The County was considering a strategy to adopt an Affordable Housing Combining District (AHCD) (and apply it to a minimum of 44 acres) to address the adequate sites shortfall as described in Chapter 4.6 of the housing element (specifically Table 4.6.3).

However, rather than pursue the overlay strategy, the draft revisions would commit the County to rezoning a minimum of 22 acres to a base residential zoning designation that will allow "by right" multifamily development at 20 dwelling units per acre (Programs 1.1 and 1.2). The sites being analyzed and evaluated for rezoning are the same sites once considered as possible AHCD candidate sites. These fifteen (15) sites totaling over 129 acres, are listed in Appendix D of the revised element. As provided for in Program Action 1.2, the County will select those sites that are most suitable and viable for rezoning (infrastructure availability being a major criterion), and submit a "shortlist" of recommendations to the planning commission by December 2006. The shortlist of sites, or other suitable sites of equivalent acreage, will be rezoned by June 2007.

Mr. Tom Burns, Planning Director
Page 2

As discussed during the October 5, 2006 meeting with you and your staff, the final year of the planning period for AMBAG member jurisdictions is fast approaching. The shortage of appropriately zoned land is a major factor in the region's high land and housing costs. Providing a sufficient supply of appropriately zoned land is critical to meaningfully addressing the County's housing need. Given the need to accommodate Santa Cruz County's share of the regional housing need for lower-income households in such a short span of time, it is necessary and prudent for the County to expand its rezone program objective of 22 acres to at least 30-32 acres.

The County's buildout projections (in Table 4.6.3) identify residential development capacity on vacant and underutilized commercially zoned sites. However, this development strategy is essentially untested (in recent years) in unincorporated Santa Cruz County. Unconstrained sites with appropriate residential zoning increase development feasibility and viability, and will assist the County in facilitating residential development, particularly development affordable to moderate- and lower-income households. The additional 8-10 acres of higher density zoned land would increase the potential development capacity by 160-200 units (at maximum density), and provide greater assurance the County could accommodate its new construction need, particularly for lower-income households. Rezoning 30-32 acres represents approximately 25 percent of candidate rezone sites listed in Appendix 'D'. This conservative figure is consistent with the methodology used by the County in calculating the buildout potential of the vacant and underutilized commercially zoned sites.

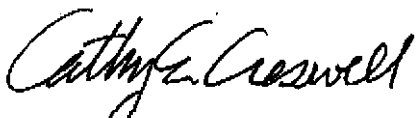
While the revisions to Program 1.2 (submitted on October 6, 2006) indicate the shortlist of rezone sites will identify 30 acres, it appears it would commit the County to completing the rezone of only 22 acres. Therefore, if the housing element is adopted with a revised program action to rezone at least 30-32 acres to a zoning designation allowing projects to be developed "by right" at 20 dwelling units per acre, the Department would find that Santa Cruz County has adequately addressed the adequate sites requirement and the element would comply with State housing element law. The County must be diligent in meeting the June 2007 deadline as this would leave just one year in the planning period for development to actually occur. Also, to effectively address the housing needs of lower-income housing it is important the County implement its residential and mixed-use development standards and incentives such that all new rental multifamily projects can be built out at the maximum density.

As you know, the regional housing need allocation (RHNA) is, for planning purposes, a minimum estimate of need. It does not represent a maximum need or a building cap. As discussed, using the momentum of the current rezone efforts would be a judicious use of staff time and resources. For example, any of those sites rezoned to address the adequate sites requirement, but not developed this planning period, could be included as part of the County's sites inventory in the next planning period.

Mr. Tom Burns, Planning Director
Page 3

The County's efforts to address the adequate sites requirement (for lower-income households), ~~as~~ well as all other statutory requirements is a critical ~~step~~ in accommodating the ~~overall~~ and long-standing housing ~~needs in~~ Santa Cruz County. The Department appreciates the continuing ~~efforts~~ by you, ~~Ms.~~ Ward, and Mr. Shapiro ~~in~~ developing programs that, ~~if~~ successfully implemented, will help in ~~addressing~~ the local housing need. The Department also looks forward to receiving the County's element when the revised draft is adopted. If you have any questions or would like additional assistance, please contact Don Thomas, of our ~~staff~~, at (916) 445-5854.

Sincerely,



Cathy E. Creswell
Deputy Director

cc: Gretchen Regenhart, California Rural Legal Assistance
Craig Castellano, Public Interest Law Center