

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

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February 19, 2021

Laura Webster, Director
Office of Long-Range Planning
City of Rocklin
3970 Rocklin Road
Rocklin, CA 95677

Dear Laura Webster:

RE: Review of Rocklin's 6th Cycle (2021-2029) Draft Housing Element

Thank you for submitting the City of Rocklin's (City) draft housing element received for review on December 23, 2020, along with revisions on February 2, 17 and 18, 2021. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. Our review was facilitated by various communication with you and your consultant Cynthia Walsh. In addition, HCD considered comments from the Sacramento Housing Alliance pursuant to Government Code Section 65585, subdivision (c).

The draft element addresses many statutory requirements; however, the following revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code).

1. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites (Gov. Code, § 65583, subd. (a)(3).*

Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing (Gov. Code, § 65583, subd. (c)(1).

Unaccommodated Need from the Prior Planning Period: As noted in HCD's December 16, 2013 review letter of the 5th cycle housing element, Rocklin had a shortfall of sites to accommodate the housing need of 1,769 lower-income households. To address this shortfall, the element contained Program 11 to rezone sites at appropriate densities and permitting multifamily housing by-right pursuant to Government Code sections 65583, subdivision (c)(1), and 65583.2, subdivision (h) and (i). The element (page 7-144) mentions these requirements and some actions were taken but does not demonstrate whether the statutory requirements were met. Pursuant to Government Code section 65584.09, a jurisdiction that failed to identify or make available adequate sites to accommodate the previous cycle's housing need must zone or rezone adequate sites to accommodate the previous cycle's unaccommodated housing need within the first year of the 6th housing element cycle. As a result, the element must either demonstrate adequate sites were made available in the prior planning period or include a program to address the unaccommodated housing need in the first year of the planning period.

Accessory Dwelling Units (ADU): The element notes approximately 3 ADUs were permitted per year in 2019 and 2020, mentions some recent applications and proposed incentives such as prototype plans and then assumes 35 ADUs per year over the entire planning period. While HCD is fully supportive of the City's efforts and goals to encourage ADUs, the analysis and programs do not support an over ten-fold increase from recent production. As a result, the element should reduce the number of ADUs assumed per year. In future years and upon demonstrating an increase in ADUs, the City may submit the housing element to recalculate the number of ADUs utilized to accommodate the regional housing need.

Programs: Based on the results of complete analyses, the City may need to add or revise programs to address any unaccommodated need from the prior planning period.

2. *Affirmatively further fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2. (Gov. Code, § 65583, subd. (c)(10)(A)).*

Based on the outcome of the analysis, the element should include actions to enhance housing mobility strategies and encourage development of new affordable housing in areas of opportunity, as well as place-based strategies to encourage community revitalization, including preservation of existing affordable housing, and protect existing residents from displacement. While the element includes many meaningful actions such as expanding opportunities for housing choice vouchers in areas of high opportunity, it should include additional actions to enhance housing mobility and protect existing residents from displacement. HCD welcomes the opportunity to discuss additional actions with the City.

The element will meet the statutory requirements of State Housing Element Law once it has been revised to comply with the above requirements.

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City must continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available while considering and incorporating comments where appropriate.

To remain on an eight-year planning cycle, the City must adopt its housing element within 120 calendar days from the statutory due date of May 15, 2021 for Sacramento Area Council of Governments localities. If adopted after this date, Government Code section 65588, subdivision (e)(4), requires the housing element be revised every four years until adopting at least two consecutive revisions by the statutory deadline. For more information on housing element adoption requirements, please visit our website at: http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sb375_final100413.pdf.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

HCD appreciates your hard work and dedication provided in preparation of the City's housing element and looks forward to receiving the City's adopted housing element. If you have any questions or need additional technical assistance, please contact Irvin Saldana, of our staff, at Irvin.Saldana@hcd.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Shannan West". The signature is fluid and cursive, with the first name "Shannan" and the last name "West" clearly distinguishable.

Shannan West
Land Use & Planning Unit Chief