



HOUSING COMMISSION

Agenda

Council Chambers
1200 Carlsbad Village Drive
Carlsbad, CA 92008

Special Meeting, March 4, 2021, 6 p.m.

Welcome to Your Housing Commission Meeting

We welcome your interest and involvement in the city's legislative process. This agenda includes information about topics coming before the Housing Commission and actions recommended by city staff. You can read about each topic in the staff reports, which are available on the city website. The Minutes Clerk is also available to answer any questions you have about Housing Commission meeting procedures.

Virtual Format

Per State of California Executive Order N-29-20, and in the interest of public health and safety, we are temporarily taking actions to prevent and mitigate the effects of the COVID-19 pandemic by holding Housing Commission meetings online only. All public meetings will comply with public noticing requirements in the Brown Act and will be made accessible electronically to all members of the public seeking to observe and address the Housing Commission.

How to Participate

Housing Commission meeting can be watched via livestream or replayed on the city website at <http://www.carlsbadca.gov>. You can participate in the meeting by emailing your comments to the Minutes Clerk at housing@carlsbadca.gov prior to commencement of the agenda item. Your comment will be transmitted to the Housing Commission at the start of the agenda item. If you desire to have your comment read into the record at the Housing Commission Meeting, please indicate so in the first line of your e-mail and limit your email to 500 words or less. These procedures shall remain in place during the period in which state or local health officials have imposed or recommended social distancing measures.

Reasonable Accommodations

Persons with a disability may request an agenda packet in appropriate alternative formats as required by the Americans with Disabilities Act of 1990. Reasonable accommodations and auxiliary aids will be provided to effectively allow participation in the meeting. Please contact the City Manager's Office at 760-434-2821 (voice), 711 (free relay service for TTY users), 760-720-9461 (fax) or manager@carlsbadca.gov by noon on the Tuesday before the meeting to make arrangements.

More information about Housing Commission meeting procedures can be found at the end of this agenda and in the Carlsbad Municipal Code chapter 1.20.

CALL TO ORDER:

ROLL CALL:

APPROVAL OF MINUTES:

Minutes of the Regular Meeting held Jan. 14, 2021

PUBLIC COMMENTS: *In conformance with the Brown Act and California Executive Order No. N-29-20, a total of 15 minutes is provided so members of the public can participate in the meeting by submitting comments as provided on the front page of this agenda. The Minutes Clerk will read comments as requested up to a total of 15 minutes. All other comments requested to be read by the Minutes Clerk will trail until the end of the meeting. In conformance with the Brown Act, no Housing Commission action can occur on these items.*

CONSENT CALENDAR: *The items listed under Consent Calendar are considered routine and will be enacted by one motion as listed below. There will be no separate discussion on these items prior to the time the Housing Commission votes on the motion unless members of the Housing Commission, the Liaison or the public request specific items be discussed and/or removed from the Consent Calendar for separate action. A request from the public to discuss an item must be submitted to the Minutes Clerk in writing prior to Housing Commission consideration of the Consent Calendar.*

PUBLIC HEARINGS:

1. **2021-2029 Housing Element Update (GPA 2019-0003, PUB 2019-0009)** - Request for a recommendation of approval of an amendment to the General Plan Housing Element.

DEPARTMENTAL REPORTS:

PUBLIC COMMENTS: Continuation of the Public Comments

This portion of the agenda is set aside for continuation of public comments, if necessary, due to exceeding the total time allotted in the first public comments section. The remainder of the categories are for reporting purposes. In conformance with the Brown Act, no public testimony and no Commission action can occur on these items.

HOUSING COMMISSIONER COMMENTS:

HOUSING SERVICES MANAGER COMMENTS:

ADJOURNMENT:

ABOUT THE HOUSING COMMISSION AGENDA

Per Carlsbad Municipal Code 2.40.060, the role of the Housing Commission is to advise and make recommendations to the City Council on housing and homelessness policies, programs, regulations, services, and related matters referred to it by the City Council.

The Ralph M. Brown Act (commonly referred to as the “Brown Act”) governs open meetings for local government bodies in the state of California. The Brown Act guarantees the public’s right to attend and participate in meetings of local legislative bodies and is contained in section 54950 et seq. of the Government Code. The Brown Act also includes requirements for the distribution of agendas for these public meetings.

HOUSING COMMISSION PROCEDURE

For each item on the agenda, City of Carlsbad staff will present a report to the Housing Commission. The Housing Commissioners may then ask clarifying questions about the staff report prior to taking public comments on the agenda item. Any member of the public wishing to address the Housing Commission on an agenda item may do so according to the “How to Participate” section above.

The Chair may invite staff to respond to points raised in public comments and ask Commissioners if they have additional questions for staff. Commission discussion of the item would then commence, and action taken as appropriate.



HOUSING COMMISSION

Minutes

MEETING OF: HOUSING COMMISSION (Regular Meeting)
DATE OF MEETING: JANUARY 14, 2021
TIME OF MEETING: 4:00 P.M.
PLACE OF MEETING: VIA ZOOM

CALL TO ORDER: Chairperson John Nguyen-Cleary called the Meeting to order at 4:00 p.m.

ROLL CALL was taken as follows:

Present: Shirley Cole
Marissa Cortes-Torres
Joy Evans
Allen Manzano
John Nguyen-Cleary
Absent: None

APPROVAL OF MINUTES:

On a motion by Commissioner Cole and seconded by Commissioner Evans, the minutes of the following meeting were unanimously approved:

Minutes of the Special Meeting held on December 3, 2020.

On a motion by Commissioner Manzano and seconded by Commissioner Evans, the minutes of the following meeting were unanimously approved with changes proposed by Chairperson Nguyen-Cleary:

Under Item 1:

The presentation continued with Lila Gitestani. After the presentation the Commissioners had more discussion:

- Chairperson Nguyen-Cleary commented ~~there is clear protection for rent~~ that the U.S. Covid stimulus bill converts unpaid rent to personal debt that must be repaid or collected by court action rather than simply overdue unpaid rent, so tenants cannot be evicted for non-payment of back rent when the protections expire.

Under Housing Commissioner Comments:

Chairperson Nguyen-Cleary said he had a meeting with Jeff Murphy, Community Development Director, regarding the Housing Element and it being a non-exclusive guiding document for the city. The city is obligated to follow-up on all items in the Housing Element, but that doesn't preclude the Housing Commission or city from raising other policy proposals in the future that did not appear in the Housing Element.

Minutes of the Regular Meeting held on December 10, 2020.

CONSENT CALENDAR: None.

PUBLIC COMMENT: None

NEW BUSINESS:

1. **CARLSBAD PUBLIC HOUSING AGENCY FISCAL YEAR 2021 ANNUAL PLAN -**
The Housing Services Division administers the federally funded Section 8 Rental Assistance Program for the Carlsbad Public Housing Agency. Under federal law, a Public Housing Agency (PHA) is required to submit a 5-Year and Annual Plan. These plans provide a basic guide to PHA policies, rules and requirements concerning the PHA's operations, programs and services. In addition, the plans advise HUD and members of the public the PHA's mission and strategies for serving the needs of low-income and very low-income families for the next five years.

Ms. Bobbi Nunn, Housing Program Manager, gave a presentation to the Housing Commission on the 2021 Annual PHA Plan.

Ms. Nunn answered Commission questions regarding aspects of the Section 8 rental assistance program, such as rules about participants moving to Carlsbad (porting in), status of the waiting list, Family Self-Sufficiency (FSS), and participant demographics.

Staff Recommendation: Approve.

No public spoke on the item.

ACTION: On a motion by Commissioner Manzano and seconded by Commissioner Evans, the Housing Commission adopted Resolution No. 2021-001, recommending that the Community Development Commission approve the Carlsbad Public Housing Agency (PHA) Annual Plan for Fiscal Year 2021 for submission to the U.S. Department of Housing and Urban Development.

AYES: COLE, CORTES-TORRES, EVANS, MANZANO AND NGUYEN-CLEARY.

NAYS: NONE

ABSENT: NONE

2. HOMELESS RESPONSE ACTIVITIES AND UPDATES - Receive an informational report on the City of Carlsbad's recent activities to address homelessness. No action is requested.

Ms. Holly Nelson, Senior Homeless Program Manager, gave a presentation on the city's homelessness response activities and answered questions concerning:

- 2020 Point-in-Time data and homeless demographics from the City of Carlsbad Police Department and regional resources in North County
- Status update on the Homeless Response Plan and how the city is responding to COVID19 concerns with the homeless community
- Efforts of the North County Ad Hoc Committee and coordinating with neighboring jurisdictions on the issue of homelessness Program.

Staff Recommendation: Receive report.

3. 2020 HOUSING COMMISSION WORK PLAN ANNUAL REPORT AND 2021 HOUSING COMMISSION WORK PLAN – Carlsbad Municipal Code (CMC) Section 2.15.020 (C) requires that each board or commission provide to the City Council for its approval an annual work plan of activities to be undertaken and to provide a subsequent report of its accomplishments.

Mr. David de Cordova, Housing Services Manager, gave a report on the 2020 Annual Work Plan of the Housing Commission. He also presented the Resolution 2021-002 for the 2021 Housing Commission Work Plan.

An email was read into the record from Carlsbad resident Diane Rivera regarding accessibility of affordable housing information. Chairperson Ngyuen-Cleary noted that the draft 2021-2029 Housing Element includes a program to improve access to housing information, and that it overlaps with Goal 4 of the Housing Commission work plan. Commissioner Evans volunteered to meet with Ms. Rivera to discuss her concerns and ideas, and Housing Services Manager de Cordova stated that staff would also reach out to Ms. Rivera regarding points she raised.

ACTION: On a motion by Commissioner Cortes-Torres and seconded by Commissioner Cole, the Housing Commission adopted Resolution No. 2021-002, recommending approval as presented.

AYES: COLE, CORTES-TORRES, EVANS, MANZANO AND NGUYEN-CLEARY

NAYS: NONE

ABSENT: NONE

HOUSING COMMISSIONER COMMENTS:

Chairperson Nguyen-Cleary did not have any announcements.

HOUSING SERVICES MANAGER COMMENTS:

David de Cordova, Housing Services Manager, made the following announcements:

- The Housing Element Update has been submitted to the state for their review. They have 60 days to review the document. Staff posted a strike out version of the latest draft Housing Element on the city's website, which compares the draft document to the currently-adopted Housing Element.
- There will be a special Housing Commission on March 4th for the Housing Element Update.

ADJOURNMENT:

By proper motion, the Regular Meeting of January 14, 2021 was adjourned at 6:40 p.m.

David de Cordova
Housing Services Manager

PATTI CRESCENTI, Minutes Clerk

MINUTES ARE ALSO RECORDED AND KEPT ON FILE UNTIL THE WRITTEN MINUTES ARE APPROVED.



HOUSING COMMISSION

Staff Report

Meeting Date: March 4, 2021
To: Housing Commissioners
From: David de Cordova, Housing Services Manager
Staff Contact: Scott Donnell, Senior Planner
Scott.Donnell@carlsbadca.gov, 760-602-4618
Subject: HOUSING ELEMENT UPDATE 2021-2029

Recommended Action

That the Housing Commission **ADOPT** Housing Commission Resolution No. 2021-003, **RECOMMENDING** that the City Council **APPROVE** an amendment to the General Plan Housing Element (GPA 2019-0003) based on the findings contained therein.

Executive Summary

The city is updating its Housing Element, one of seven state-mandated elements of the General Plan. The current Housing Element was adopted in March 2017. State law requires the city to update its element to provide a new housing plan for an eight-year planning period. This period begins April 15, 2021 and ends April 15, 2029. Housing Element updates are due to the CA Department of Housing and Community Development (HCD) on April 15, 2021, or there is a risk of penalties under state law.

The Housing Element is designed to provide the city with a coordinated and comprehensive strategy for promoting the production of safe, decent, and affordable housing within the community. A priority of both state and local governments, Government Code Section 65580 states the intent of creating housing elements:

The availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian, including farmworkers, is a priority of the highest order.

In addition to Housing Commission review at a public hearing, the Planning Commission must also review the proposed update at a public hearing. Both commissions will provide recommendations to the City Council. Following a City Council action to approve the Housing Element, staff will submit the approved document to the state for final review and certification.

Analysis

A. Background

Among other responsibilities, the California Department of Housing & Community Development (HCD) is accountable for developing state housing production goals. These goals represent the total number of housing units to be built within an eight-year housing cycle for varying income groups. The process of developing and assigning these housing units to local jurisdictions is referred to as the Regional Housing Needs Assessment (RHNA).

In addition, HCD is charged with ensuring that a jurisdiction's local housing policy document (Housing Element), complies with state housing laws and requirements. In summary, the Housing Element provides the city with a coordinated and comprehensive strategy for promoting the production of safe, decent and affordable housing for varying income-levels within the community, including policies and programs on how it will accommodate its RHNA. The Housing Element itself is part of the city's General Plan and includes the following components:

- An assessment of the demographics and housing needs in the city;
- Review of accomplishments from the previous housing element;
- An inventory and analysis of possible sites that could accommodate the RHNA;
- Analysis of potential constraints on housing; and,
- A listing of policies and programs to be implemented to meet required housing obligations.

As required under state law, jurisdictions throughout the state have begun updating their respective Housing Elements to show how they intend to accommodate their housing obligations for the upcoming housing cycle. For the San Diego region, the housing cycle is April 2021 through April 2029. For more information on the RHNA process, please refer to the attached informational bulletin (Attachment 3). Under state law, the city must adopt its Housing Element by April 15, 2021.

B. 2013-2021 Housing Element Accomplishments

Despite not meeting its production targets for low and very-low income households, the city achieved much during the past eight-year housing cycle worth mentioning. A complete listing of the accomplishments is provided in Section 10-5 and Appendix A of the draft Housing Element, but some of the more significant highlights are reflected below:

- The RHNA for this planning period totaled 4,999 dwelling units, for which 3,688 dwelling units were constructed or approved for construction, representing approximately 73 percent of the overall RHNA target.
- The city issued building permits for 282 homes required to be affordable through inclusionary requirements. Each year since 2016, the city has contributed

\$25,000 to \$30,000 towards the regional effort by Alliance for Regional Solutions to provide year-round bridge housing/shelter services.

- The city has implemented a home repair program for owner-occupied properties that provides loans which are forgiven after five years. During the past housing cycle, the city aided eight low income households with home repair loans up to \$5,000 each.
- In 2019 and again in 2020, the City Council approved the CDBG Annual Action Plan to authorize the purchase of existing affordable housing units in Carlsbad in an effort to keep them affordable. Through 2020, the city purchased eight units with these funds and will resell them to eligible lower income buyers.
- In January 2020, the city committed \$4.04 million in addition to the \$4.25 million in financial assistance to the 50-unit Windsor Pointe project, which will provide permanent supportive housing to very low and extremely low-income homeless veterans and veteran families, and people experiencing homelessness with a serious mental illness.

C. Housing Element Update

In a nutshell, a Housing Element provides an analysis of a community's housing needs for all income levels, and strategies and programs that will be implemented to respond and provide for those housing needs. Cities within the San Diego region are required under state law to adopt and submit their respective Housing Element to HCD for review and final approval by April 15, 2021. The city is on track to meet this deadline. While many jurisdictions elect to process their Housing Element update concurrently with any required rezoning and Land Use Element map amendments, the city will be bifurcating the process for the reasons discussed in Subsection "D" below. Only the Housing Element update is being considered at this time; any property rezoning and amendments to land use maps are being deferred to a later date.

a. Overview of Significant New State Laws

Since about 1970, California has been experiencing an increasing housing shortage, such that by 2018, California ranked 49th among the United States in housing units per resident. This shortage has been estimated to be 3-4 million housing units (20-30% of California's housing stock, 14 million as of 2017). Experts say that California needs to double its current rate of housing production (85,000 units per year) to keep up with expected population growth and prevent prices from further increasing, and needs to quadruple the current rate of housing production over the next seven years in order for prices and rents to decline.¹

In response, the state legislature has adopted a series of housing related bills over recent years, some of which affect the Housing Element, in an effort to increase housing production. These state changes greatly influence the structure and

¹ [California Housing Shortage, Wikipedia. 2021](#)

requirements that need to be established in the Housing Element. Below is a list of the most impactful bills adopted. A description of these bills, and others is provided in section 10-1 of the draft Housing Element.

- *Housing Development and Financing Act (AB1010)*. Jurisdictions failing to timely adopt a local Housing Element may be fined tens of thousands of dollars per month until HCD determines compliance.
- *Housing Crisis Act (SB330)*. This bill introduced an expedited review process for residential development projects and prohibits cities from imposing growth caps or moratoriums on housing projects or plans. This will directly affect implementation of the city's Growth Management Plan.
- *Building Homes and Jobs Act (SB2)*. Jurisdictions that do not have an approved HCD certified Housing Element are not eligible for grant funding.
- *Residential Density and Affordability Act (SB166)*. A city cannot reduce residential density on a property without concurrently rezoning another property to make up the lost units. Furthermore, if a city approves a project that results in a density lower than the housing plan identified, it must rezone another property to make up the difference.
- *Housing Accountability and Affordability Act (SB35)*. If HCD finds that a jurisdiction's RHNA goals are not being timely satisfied, SB 35 requires cities and counties to streamline review and approval of eligible affordable housing projects by providing a ministerial approval process, exempting such projects from environmental review under CEQA and a public hearing process.

b. Overview of Significant Draft Housing Element Policies and Programs

Given the number of state law changes that have occurred, a comprehensive update to the current Housing Element was required, including a new format, new requirements, and new programs. Some of the more significant changes (programs) are listed below and further discussed in Section 10-6 and 10-7. A track changes version of the update was also prepared (Attachment 4):

- *Rezoning Sites to meet RHNA*. As discussed in Section "D" above, a program has been included in the draft Housing Element to change the General Plan and Zoning designations of properties listed in Appendix B, as needed, to meet the city's RHNA obligations. This includes establishment of new R-35 and R-40 designations. Due date: April 2024.
- *Amendment to the city's Growth Management Plan*. Develop an alternative solution that will replace or modify the city's Growth Management Plan (GMP). Additionally, provide guidance on infrastructure planning and finance as part of the revised GMP that emphasizes infrastructure priorities based on housing location for lower-income households. Also, incorporate changes in the GMP into other appropriate planning documents, including the General Plan, so that these

are consistent with the updated Plan and do not create caps or other limits that constrain the community's ability to meet state housing obligations. Due date: December 2024.

- *Streamline Accessory Dwelling Unit Permit Review.* This program tasks the city to develop at least four pre-approved ADU plans that provide a variety in terms of size, type, and style in order to shorten plan check review. Due: December 2022.
- *Reduced Parking Standards.* Update city parking requirements to allow parking reductions based on a survey of higher density housing development in the city. Also, consider reductions for mixed-use projects, projects near transit facilities, and projects that are able to demonstrate a reduced parking need. Due April 2023.
- *Objective Design Standards.* The City shall establish and adopt clear objective design standards for mixed use and multi-family housing projects. Due date: September 2023.
- *Inclusionary Housing Ordinance Update.* Amend the city's inclusionary housing ordinance to reflect the updated in-lieu fee, or linkage fee, and revise the ordinance as necessary to maximize production of affordable units without adversely affecting market-rate development. Due date: April 2023.
- *Fair Housing Practices.* Establish a method of measuring the progress of fair housing practices, which can include the index of dissimilarity, the Regional Opportunity Index, and percentage of residents experiencing extreme housing cost burdens. Due date: June 2022.

D. Land Use Element Map Amendments

One of the most labor intensive and controversial components of the Housing Element update process is the inventory and analysis of sites that could be considered for meeting a city's RHNA requirements. The RHNA allocation for San Diego County calls for 3,873 housing units to be created in Carlsbad during this upcoming eight-year housing period, of which 2,195 must be reserved for households in the low- and very low-income category. Per state law, the city must demonstrate to HCD that it has adequate land available to accommodate the construction of these housing units, while also meeting HCD's minimum density requirements and strict site selection criteria. A detailed breakdown of the city's RHNA allocation and site identification process was provided to the City Council on Aug. 27, 2020 (Attachment 7).

However, the inventory that is included in the draft Housing Element Update only needs to reflect a list of possible sites that could be considered for future housing opportunities. If the sites listed in the inventory need to be rezoned to accommodate the state's minimum density requirements, then a corresponding amendment to the jurisdiction's Land Use Element map of the General Plan is required along with the zoning amendment. Under state law, a jurisdiction is not required to have the rezonings

completed at the time the Housing Element is due to HCD --- the state gives cities up to three years to complete the necessary changes to their Land Use Element map.

The properties listed in Appendix B of the draft Housing Element Update intentionally include more sites than are needed to accommodate the city's share of RHNA. This allows staff to develop a series of varying mapping options that can be considered to meet the city's housing obligations. Over the next year, staff intends to use the properties identified in this list to develop a series of land use maps that will be presented to the community for input, and eventually the Planning Commission and City Council for recommendation and decision.

While most cities elect to process updates to their Housing Element and Land Use Element map concurrently to save time and avoid certain state implications, the city was unable to do this concurrent processing. There have been several factors affecting the processing schedule for amending the land use map. Some of the challenges that staff has experienced over the past year include delays in SANDAG traffic modeling, difficulty confirming property owner interest in rezoning their property for housing, and compliance with new state housing laws, particularly those affecting the eligibility of housing sites. Additionally, as with many city functions and services, the pandemic has hindered our ability to utilize the more traditional "face-to-face" public engagement exercises and meetings that our community members have grown accustomed to over the years. While we have had a certain level of success with video conferencing, surveys and YouTube videos, the inability to talk to people and physically show maps impacted public participation. Also, COVID related city priorities and needs have pulled staff away from this effort over the past year, which also adversely impacted the processing schedule.

The city, in collaboration with other jurisdictions in similar situations, SANDAG and the League of California Cities, has petitioned the state to extend the Housing Element deadline by six months to solicit this needed public engagement and input and provide agencies adequate time for element preparation in light of COVID. Unfortunately, HCD and the Governor's Office has not been supportive of any extension.

As referenced above, while state law allows the rezoning to be completed three years after the official filing of the Housing Element, there are certain state implications that will affect the city's later processing of projects on the rezoned sites. All the sites to be rezoned, such as nonvacant sites identified in the prior Housing Element, vacant sites identified in the prior two Housing Elements, and all of the sites to be upzoned, must allow residential use "by right" at specified densities for housing developments in which at least twenty percent of the units are affordable to lower income households. "By right" means that, with certain exceptions (e.g. a subdivision map application), the city cannot require a discretionary permit as part of the housing project application or require review under the California Environmental Quality Act (CEQA). Design review is still permitted. Accordingly, it is important the city conduct detailed environmental

review of each site before the rezoning is completed and adopt “objective” design standards and applicable mitigation measures.

E. Public Participation

A critical component of the Housing Element Update process is public participation. On Sept. 10, 2019 (Attachment 5) the City Council considered the work program and created the Housing Element Advisory Committee to oversee and guide review of the update, consider staff and expert advice, and solicit public input in formulating its recommendations to the City Council. On Dec. 17, 2019 (Attachment 6) the City Council appointed members to the HEAC. Furthermore, on Aug. 27, 2020 (Attachment 7) the City Council held a hearing on proposed methodologies for choosing locations for future housing in the city. The City Council authorized additional funding for outside legal counsel and provided comments on the proposed methodology.

Despite the impacts of COVID and the limitations placed on in-person gatherings, the city launched an extensive engagement campaign that included video conferencing, surveys and YouTube videos. Some of the highlights of these efforts are listed below. A more detailed description is provided under Section 10-1 of the draft Housing Element:

- *Housing Element Overview Video.* To help inform the community about the Housing Element update process and purpose, the city created a three-minute video that provided an overview of the Housing Element and why the city was updating this important planning document. This video was offered in English and Spanish.
- *Housing Element Public Input Survey.* To help develop a plan that best reflects the community's needs, values, and priorities when it comes to new housing, the city gathered input through an online survey. The survey was available from Aug. 7 to Aug. 24, 2020 and obtained 4,252 confirmed responses from participants located throughout the community and beyond – a record response rate for the city.
- *Housing Element Brochures and Fact Sheets.* The City produced a four-page brochure on the Housing Element that was available on the City website. The brochure provided information on why the housing plan is important, what are the community's housing needs, a discussion on housing site identification, how the Housing Element interacts with the rest of the General Plan, and a schedule for the Update. The City also developed a series of fact sheets on relevant and important housing laws, including the Housing Accountability and Affordability Act and accessory dwelling unit allowances.
- *Carlsbad Housing Commission.* The Housing Commission played a key advisory role in the development of the Housing Element relative to the city's affordable housing policies and programs.

F. Housing Element Advisory Committee & Housing Commission Recommendations

The HEAC held a total of 14 public meetings in 2020 where they and the public were educated on housing element law and HCD requirements, varying programs and policies that promote and encourage housing production, minimum requirements of housing elements, and approaches and methodologies for site selection.

On Nov. 19, 2020, a joint meeting of the HEAC and Housing Commission was held where a draft of the Housing Element Update was introduced. To provide additional time to review the document, meetings were then held on Nov. 30, 2020 and Dec. 3, 2020 to solicit input and comments from the HEAC and Housing Commission, respectively. On Dec. 14, 2020, the HEAC made their final comments/amendments to the draft plan, endorsed the document and directed staff to submit the draft Housing Element to HCD for preliminary review.

On Dec. 24, 2020, after revising the document to address comments from the HEAC, Housing Commission, City Attorney's Office, and outside legal counsel who specializes in Housing Element law, staff officially sent HCD the draft Housing Element. HCD has 60 days to review the document and provide preliminary feedback to the city on any deficiencies. City staff has been informally working with HCD staff over the past several months to get early input on the more complex and critical sections of the draft document. The outcome of these meetings is provided in the section below.

G. HCD Preliminary Review

City staff has been informally working with HCD staff over the past several months to get feedback and corrections on various sections of the draft Housing Element to address issues and shortcomings before HCD issued their official comment letter (expected Feb. 22, 2021). HCD's suggested corrections (approximately 70) were received after the document was posted for public input on Jan. 12, 2021. Those changes are reflected in the document in strikeout and underline format, as well as with yellow highlight, with the most notable changes reflected below.

- Section 10.1.7, Public Participation – Provided more detail on the Housing Element Public Input Survey conducted in August 2020, including Spanish-speaking outreach and feedback

- Section 10.2.4, Housing Characteristics – Provided Code Enforcement data on housing code violations over the past several years to supplement already provided 2018 American Community Survey figures on housing age in Carlsbad

- Section 10.2.6, Affirmatively Furthering Fair Housing
 - Added additional analysis regarding segregation

 - Supplemented text to discuss programs proposed in Section 10.7 (e.g., Program 2.9) that address improving housing access for special needs populations (e.g., seniors, persons with disabilities)

- Added a summary of issues that people may face in accessing opportunities or community or regional assets, such as employment, education, and housing information
- Section 10.3.3, Sites Inventory
 - Clarified applicability of airport safety zone, noise, and height restrictions and fire safety zones on potential housing sites
 - Explained city approach to increase potential residential development at shopping center sites
 - Clarified that water and sewer capacity is adequate to provide for the city's full RHNA
- Section 10.4.1, Market Constraints
 - Added discussion regarding short term rentals as a non-governmental constraint inside the city's Coastal Zone
 - Provided new text on past and present city efforts to assist extremely low-income households
- Section 10.4.2, Government Constraints – Prepared analysis of processing time between application approval and building permit issuance
- Section 10.7, Housing Plan Goals, Policies, and Programs
 - Program 1.1, Provide adequate sites to accommodate RHNA
 - Throughout, added emphasis to make clear underutilized sites are not counted toward the city's RHNA obligation
 - For candidate sites proposed for redesignation (e.g., from low to high density, from industrial to residential), increased site details and added references to Appendix C fact sheets
 - Expanded list of objectives to clarify program contents, requirements and due dates; for example, new objective "b." specifies April 2024 as the completion date for rezonings necessary to meet the city's RHNA obligations and clarifies that, pursuant to state law, residential development on these rezoned sites will be allowed by right if developed with a minimum 20 percent affordable units
 - Added objectives "f." and "g." to promote residential development of city-owned sites (upon amendment of the city's Real Estate Strategic Plan) and to work collaboratively with the North County Transit District on redevelopment of the Carlsbad Village Station

- Program 1.2, Promote the development of accessory dwelling units (ADUs) – Added objective to require annual monitor of ADUs (as part of the Annual Housing Element Progress Report) to ensure they satisfy lower- and moderate-income housing targets included to meet RHNA obligations
- Program 1.3, Alternative Housing – Clarified that rezoning of underutilized commercial, office and industrial space, as appropriate, to facilitate use for alternative housing types (e.g., “micro-unit” housing for extremely low-income households) will occur by April 2024
- Program 2.4, City-initiated Development – Added several program objectives to pursue residential development of city-owned properties following their designation for such under Program 1.1
- Program 2.11, Housing for Persons with Disabilities – Added a component to objective “c.” to encourage developers, through the city’s inclusionary housing program, to provide affordable housing that accommodates persons with disabilities
- Program 2.13, Housing for Persons Experiencing Homelessness – Included new objective “j.” to evaluate temporary housing on properties owned by religious institutions
- Program 4.3, Anti-segregation in Housing Implementation – Added this new program that would, among other things, implement placemaking in the Village and Barrio through access improvements and best practices in design and architecture to ensure building types promote cohesion across neighborhoods
- Section 10-8, Quantified Objectives – Added this new section to summarize the unit construction (“quantified objectives”) anticipated by all programs in Section 10.7.
- Appendix B
 - Identified and highlighted existing property uses (e.g., parking lot, building) on sites classified either as underutilized (see Table B-2) or as potential candidates for rezoning (see tables B-5 to B-8)
 - Added columns to identify underutilized and vacant sites counted in prior housing cycles (see tables B-1, B-2, and B-5 through B-8). Such sites may be counted again in a housing element only if the sites are subject to a program that allows affordable housing by right; see Program 1.7 for more information.

H. Public Review

The draft Housing Element was put out for Public Review from Jan. 12 to Feb. 11, 2021. Public Comments are included in this staff report as Attachment 8. Prior to, during, and

after this comment period there were approximately 280 comments received in the following general categories and topics. “Prior to” comments include public comments received after the last Housing Element Advisory Committee meeting on December 14, 2020, as well as comments received from agencies in 2020. Comments received after the comment period are as of Feb. 23, 2021.

- *Agency Comments.* Five comments were received from other agencies.
 - *Non-Smoking Policies:* The County of San Diego, Health and Human Services Agency provided comments supporting inclusion of a program to adopt a comprehensive smoke-free ordinance for multifamily housing properties that covers all exclusive use areas (interior and exterior). The Vista Community Clinic’s Tobacco Control Program submitted a comment letter in support of a program.
 - The *San Diego Housing Federation* provided a comment letter supporting implementation of State Legislation, providing local funding for affordable housing, Affirmatively Furthering fair housing and equity, and addressing the relationship of Housing and Climate Change.
 - *McClellan-Palomar Airport:* The San Diego Regional Airport Authority as the Airport Land Use Commission (ALUC) provided a comment letter stating that the draft Housing Element is consistent with the Airport Land Use Compatibility Plan (ALUCP) for McClellan-Palomar Airport. The County of San Diego, Department of Public Works submitted a comment letter requesting coordination on future residential development projects and requests that plans ensure consistency with the ALUCP.
- *General Public Comments.* Most comments (approximately 270) were received from members of the public.
 - *Site Number 13 – Zone 20:* Approximately 95 percent of the public comments received were from residents in the vicinity of the “Potential Housing Site” designated Site Number 13 – Zone 20 in Appendix C. While no rezones are proposed as part of the proposed draft Housing Element action, there are a number of sites listed as “Potential Housing Sites” that would be examined. The draft Housing Element proposes Program 1.1 that would evaluate the list of “Potential Housing Sites” as a separate project to comply with the RHNA allocation to the city. The Potential Housing Element sites cannot be adopted until the city conducts environmental review under the California Environmental Quality Act, and completes a public outreach process required for any amendment to the General Plan and/or Zoning Ordinance designations; this will include outreach, public review of proposed changes and environmental documents, and separate hearings at the Planning Commission and City Council. During this process sites could be removed, added, or modified.

- *Ponto Property*: Two comments were received during public review from residents regarding the Ponto Property (APN 216-140-43). The comments either provide past comments on the property questioning whether the subject site is zoned at the density reflected in our Fifth Cycle Housing Element or express a desire for a park in Ponto. Additional comments have been received over the last year and have been sent to the HEAC and Housing Commission prior to public review of the draft Housing Element and related to the Local Coastal Program Update.
- **Other Comments**: Other comments were made about the Housing Element Update, traffic, water supply, and/or contained questions about process and future development within the city.

I. Consistency Determination

The 2021-2029 Housing Element is consistent with state housing law and all Carlsbad regulatory and policy documents, including the other elements of the General Plan, the Growth Management Program, and Local Coastal Program. A summary of the consistency analysis, contained in detail in the attached Housing Commission resolution, is provided below in Table 1.

TABLE 1 – COMPLIANCE WITH REGULATORY AND POLICY DOCUMENTS

STATE HOUSING LAW
<p>The 2021-2029 Housing Element:</p> <ul style="list-style-type: none"> a. Is necessary to ensure consistency with state housing law. b. Ensures the city will continue to provide all required and necessary affordable housing programs, policies and regulations. c. Maintains compliance with RHNA growth projections. <p>Further, the city has submitted the 2021-2029 Housing Element Update document to the State Department of Housing and Community Development for initial review as required by state law and will continue to work with the state to ensure full statutory compliance with Housing Element law.</p>
GENERAL PLAN
<p>The 2021-2029 Housing Element maintains consistency with the land use program approved as part of the General Plan on Sept. 22, 2015, and by extension does not conflict with the goals and policies of the elements that have bearing on or are impacted by residential land uses, such as the Mobility Element, Open Space, Conservation, and Recreation Element, Public Safety Element, and Sustainability Element.</p>

GROWTH MANAGEMENT

The 2021-2029 Housing Element includes analysis related to the Growth Management Program and the consistency of the program with California laws relating to housing production and limitations. Specifically with the passage of SB 330 in 2019, a “city shall not enact a development policy, standard, or condition that would...[act] as a cap on the number of housing units that can be approved or constructed either annually or for some other time period.” While Housing Element programs and policies to comply with RHNA do not exceed the overall growth cap, it is likely their implementation will exceed quadrant caps. To ensure consistency with California laws, including SB330 and the laws requiring compliance with the RHNA, Program 2.2 is proposed to Propose Replacement or Modification to the Growth Management Plan (GMP).

LOCAL COASTAL PROGRAM

The 2021-2029 Housing Element is consistent with the City's Local Coastal Program in that none of the proposed policies or programs allow for degradation of sensitive coastal resources, agriculture, or public views or access. The update also maintains a program intending to preserve and/or replace affordable housing within the Coastal Zone, as required by state law.

Next Steps

In addition to Housing Commission review at a public hearing, the Planning Commission must also review the proposed update at a public hearing. Both commissions will provide recommendations to the City Council. Following a City Council action to approve the Housing Element, staff will submit the approved document to the state for final review and certification.

After City Council approval, staff also will initiate implementation of the programs outlined in Section 10.7, particularly the rezoning of properties as described in Program 1.1. Property rezonings will require noticed public hearings before the Planning Commission and City Council. For properties in the city’s Coastal Zone, California Coastal Commission approval of any land use changes will also be required. The rezoning process will stretch into 2022. Implementation of other programs as well will occur according to the timetables outlined in each.

Environmental Review

As part of its approval of the Comprehensive General Plan Update on Sept. 22, 2015, the City Council adopted City Council Resolution 2015-242, certifying Environmental Impact Report (EIR) 13-02 and adopting Findings of Fact, a Statement of Overriding Considerations, and a Mitigation Monitoring and Reporting Program. As described in CEQA Guidelines Section 15164(a), “the lead agency...shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.”

As demonstrated in the addendum, which is provided for the commission's information and available at www.carlsbadca.gov/housingplan, staff has reviewed the changes to the General Plan Housing Element proposed as part of this update and found that EIR 13-02 is of continuing informational value, only minor changes or additions to it are necessary, and none of the conditions described in CEQA Guidelines Section 15162 calling for preparation of subsequent or supplemental environmental review has occurred. Therefore, the 2021-2029 Housing Element is within the scope of the certified EIR and use of an addendum to document the project changes is appropriate. CEQA Guidelines Section 15164 also notes an addendum need not be circulated for public review but may simply be attached to the Final EIR.

Attachments

(Attachments 1a. through 8c. are available at www.carlsbadca.gov/housingplan)

1. Housing Commission Resolution
 - a. 2021-2029 Housing Element HCD Review Draft – Revised Feb. 8, 2021
2. City of Carlsbad 2021 Housing Element Update Addendum, February 2021
3. Information Bulletin – Carlsbad Housing Plan
4. 2021-2029 Housing Element HCD Review Draft, Revised Feb. 8, 2021 (track changes version)
5. Sept. 10, 2019 – City Council Staff Report – Creation of HEAC (on file with the City Clerk)
6. Dec. 17, 2019 – City Council Staff Report – Appointment of HEAC (on file with the City Clerk)
7. Aug. 27, 2020 – City Council Staff Report – Proposed Methodologies for choosing locations for Future Housing Element in Carlsbad (on file with the City Clerk)
8. Public Comments
 - a. Comments received prior to public review
 - b. Comments received during public review (Jan. 12 through Feb. 11)
 - c. Comments received after public review

RESOLUTION NO. 2021-003

A RESOLUTION OF THE HOUSING COMMISSION OF THE CITY OF CARLSBAD, CALIFORNIA, RECOMMENDING APPROVAL OF AN AMENDMENT TO THE GENERAL PLAN TO ADOPT AN UPDATE OF THE HOUSING ELEMENT FOR THE 2021-2029 HOUSING CYCLE AS REQUIRED BY THE CALIFORNIA GOVERNMENT CODE.

CASE NAME: HOUSING ELEMENT UPDATE 2021-2029

CASE NO: GPA 2019-0003 (PUB 2019-0009)

WHEREAS, **the City of Carlsbad**, “Applicant,” has filed a verified application with the City of Carlsbad to adopt a General Plan Amendment for Housing Element Update 2021-2029 (GPA 2019-0003), a document that provides a citywide housing plan for the sixth housing cycle; and

WHEREAS, the city submitted the Housing Element Update 2021-2029 document to the California Department of Housing and Community Development (HCD) for initial review as required by state law, and will continue to work with the state to ensure full statutory compliance with housing element law; and

WHEREAS, the public outreach for the sixth cycle Housing Element update process occurred during the COVID-19 pandemic and restrictions on public gatherings prevented the city from holding traditional public workshops; instead, the city conducted outreach through a number of methods. The city utilized online engagement tools, including a community survey, newsletters, live streamed citizen advisory committee meetings and online documents to provide opportunities for the community to share their feedback on housing in general and the Housing Element Update 2021-2029; and

WHEREAS, public outreach efforts included (1) a City Council-appointed citizens advisory committee (Housing Element Advisory Committee, or HEAC) to guide Housing Element

preparation efforts, which it did over 14 public meetings throughout 2020; the HEAC concluded its work with a Dec. 14, 2020, recommendation to submit the draft Housing Element Update document to HCD for its initial review; (2) development of a Housing Element project webpage, with informational brochures and bulletins, an introductory video (in English and Spanish), and links to relevant documents and HEAC meeting material; outreach to the Spanish-speaking community on the survey also included phone calls to community members to provide survey assistance or to gather feedback directly; (3) an Aug. 27, 2020, City Council special meeting to discuss proposed methods for selecting Housing Element sites; (4) an online Housing Element public input survey (in English and Spanish) conducted in August 2020 that generated 4,252 confirmed responses; (5) information mailers sent in November 2020 to approximately 2,700 people including Section 8 program participants and residents at low-income apartments throughout the city informing people of opportunities to provide input on housing in Carlsbad and the Housing Element; (6) joint and separate Housing Commission and HEAC meetings in November and December 2020 to receive public input and provide comments on the Housing Element, initial drafts of which were released to coincide with the meetings; (7) online release of the draft Housing Element Update document submitted to the state for formal public review from Jan. 12, 2021 to Feb. 11, 2021, including the availability of paper copies in the city's libraries; (8) numerous social media posts, new releases as well as 15 e-newsletters sent since June 2020 to more than 2,300 interested parties; and (9) informational presentations to the Housing Commission (October 2020), Planning Commission (October 2020 and January 2021), and Traffic and Mobility Commission (September 2020); and

WHEREAS, additional opportunities for public review and input will occur as part of the Housing Commission, Planning Commission, and City Council public hearings to consider adopting the Housing Element Update 2021-2029; and

WHEREAS, implementation of the City of Carlsbad's housing programs has significantly contributed to the production of affordable housing as over 2,300 housing units affordable to low, very low, and extremely low-income families have been developed in the city since passage of the Inclusionary Housing Ordinance in 1993;

WHEREAS, said verified application constitutes a request for a General Plan Amendment as shown on Exhibit **A** dated **Feb. 8, 2021**, available on the city's website at www.carlsbadca.gov/housingplan as "2021-2029 Housing Element HCD Review Draft, Revised – Feb. 8, 2021," and on file in the Carlsbad Planning Division, **HOUSING ELEMENT UPDATE 2021-2029 – GPA 2019-0003**, as provided in Government Code Section 65350 et. seq. and Section 21.52.150 of the Carlsbad Municipal Code; and

WHEREAS, the Housing Commission did, at a special meeting on **March 4, 2021**, hold a duly noticed public hearing as prescribed by law to consider said request; and

WHEREAS, at said public hearing, upon hearing and considering all testimony and arguments, if any, of all persons desiring to be heard, said Commission considered all factors relating to the General Plan Amendment.

NOW, THEREFORE, BE IT HEREBY RESOLVED by the Housing Commission of the City of Carlsbad, as follows:

- A) That the above recitations are true and correct.

B) That based on the information provided within the Housing Commission staff report, the Housing Commission ADOPTS Resolution No. 2021-003, recommending to the City Council APPROVAL of an amendment to the General Plan **HOUSING ELEMENT UPDATE 2021-2029 – GPA 2019-0003**, based on the following findings:

1. Housing Element Update 2021-2029, revised according to California Department of Housing and Community Development comments, is necessary to ensure the General Plan Housing Element remains consistent with state housing law as found in the California Government Code, commencing with Section 65580.
2. Through its Housing Plan, Housing Element Update 2021-2029 ensures the city will continue to provide all required and necessary affordable housing programs, policies and regulations to successfully meet a priority of Government Code Section 65580(a), which states "the availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian, including farmworkers, is a priority of the highest order."
3. Housing Element Update 2021-2029 complies with growth projections as determined by the State Department of Housing and Community Development and as allocated by the San Diego Association of Governments through the Regional Housing Needs Assessment process.
4. Housing Element Update 2021-2029 is consistent with the applicable elements of the General Plan as demonstrated by analysis of the project with the following General Plan goals:

Land Use and Community Design Element

- a. Goal 2-G.1 - *Maintain a land use program with amount, design and arrangement of varied uses that serve to protect and enhance the character and image of the city as expressed in the Carlsbad Community Vision, and balance development with preservation and enhancement of open space.* Housing Element Update 2021-2029, while it makes no changes to land use or land use regulations and does not result in any development, analyzes environmental constraints as required by state housing law to determine, broadly, areas potentially suitable for residential development, and those, such as open space lands, hillsides, and properties constrained by airport safety zones, that are not. Further, the Housing Element Update contains policies and programs that encourage and seek to protect the city's character and image (e.g., policies 10-P.7, 10-P.8, 10-P.10; programs 1.3, 1.8, 1.11, 2.2 and 6.1). Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to scenic vistas, scenic resources, or

visual character, and would not create new sources of substantial light or glare which adversely affects views. In addition, the housing units proposed under the update are within the growth envisioned and assessed in EIR 13-02 (the environmental document prepared and certified for the city's General Plan) and therefore, the same findings in the EIR apply to the updated Housing Element.

- b. Goal 2-G.4 - *Provide balanced neighborhoods with a variety of housing types and density ranges to meet the diverse demographic, economic and social needs of residents, while ensuring a cohesive urban form with careful regard for compatibility.* Through multiple policies and programs (e.g., Goals 10-G.1 to 10-G.6, Programs 1.1, 1.3, 1.8 and 2.9), Housing Element Update 2021-2029 promotes housing for all economic segments at various densities, in different forms, and in locations throughout the city.
- c. Goal 2-G.14 - *Participate with other cities in the county, through the San Diego Association of Governments, in working towards solution of regional issues.* Housing Element Update 2021-2029 Goal 10.1 and Program 1.1 identify the need to maintain compliance with Carlsbad's share of the RHNA for the 2021-2029 housing cycle. RHNA, an estimate of housing needed to accommodate forecasted growth, is allocated by SANDAG across the San Diego region to address regional housing issues.

Noise Element

- a. Goal 5-G.1 - *Ensure that new development is compatible with the noise environment, by continuing to use potential noise exposure as a criterion in land use planning.* Housing on sites available or potentially available to meet RNHA obligations may be subject to noise sources such as Interstate 5 and the railroad. The Housing Element Update 2021-2029 does not conflict with Noise Element policies that require appropriate noise abatement measures to mitigate noise to allowable levels. Further, Housing Element Update Policy 10-P.44 states "reduce negative impacts associated with environmental hazards, including but not limited to industrial operations and roadway, railway, and airplane generated air and noise pollution through the enforcement of additional project specific mitigations for all development."
- b. Goal 5-G.2 - *Ensure long-term compatibility between the airport and surrounding land use.* As no housing sites included in meeting the city's RHNA obligation are inside the 65 dB Ldn contour of the airport, no sites are impacted by airport noise. Further, the San Diego Regional Airport Authority as the Airport Land Use Commission (ALUC) has found the Housing Element Update 2021-2029 consistent with the Airport Land Use Compatibility Plan (ALUCP) for McClellan-Palomar Airport.

Public Safety Element

- a. Goals 6-G.1 – *Minimize injury, loss of life, and damage to property resulting from fire, flood, hazardous material release, or seismic disasters.* Constraints (e.g., slope, flood, fire hazards) that may occur on sites available or potentially available

to meet RHNA obligations were considered as part of the analysis conducted by Housing Element Update 2021-2029, as noted in appendices B and C. Further, Program 2.13 prohibits facilities for persons experiencing homelessness, such as an emergency shelters, from locating in environments not suitable for single-family housing; further, the purpose of the objectives of Program 6.1, Environmental Justice, is to “seek to reduce the unique or compounded health risks in disadvantaged communities through strategies such as reducing pollution exposure, improving air quality, and promoting better access to public facilities, healthy food, and safe and sanitary homes.”

- b. Goal 6-G.2 – *Minimize safety hazards related to aircraft operations in areas around the McClellan-Palomar Airport.* Except for one site, housing on sites available or potentially available are located outside airport safety zones or are within Safety Zone 6, where residential at any density is a compatible use. The exception site is partially within Safety Zone 5 but is otherwise unrestrained and able to accommodate residential development (see Appendix C, Site Number: 10). The San Diego Regional Airport Authority as the Airport Land Use Commission (ALUC) has found the Housing Element Update 2021-2029 consistent with the Airport Land Use Compatibility Plan (ALUCP) for McClellan-Palomar Airport.

Sustainability Element

- a. Goal 9-G.1 - *Through implementation of the policies and programs in the General Plan, maintain a long-term balance among the three dimensions of sustainability—environmental, economic, and social—to ensure a vibrant, healthy, and prosperous community.* Housing Element Update 2021-2029 policies 10-P.3 and 10-P.4 encourage adaptive reuse of older commercial or industrial buildings and integration of housing with nonresidential development, which puts housing close to goods and services; policies 10-P.9 through 10-P.11 encourage energy conservation; Policy 10-P.7 encourages the distribution of affordable housing throughout Carlsbad; programs 4.1 through 4.3 foster a housing environment in which housing opportunities are available to all.
5. Housing Element Update 2021-2029 is consistent with the City's Local Coastal Program in that none of its policies or programs allow for degradation of agricultural or scenic resources, encroachment into environmentally sensitive areas, restriction of coastal access, or creation of geologic instability or erosion. The update also maintains a program intending to preserve and/or replace affordable housing within the Coastal Zone, as required by state law.
 6. Housing Element Update 2021-2029 is consistent with a purpose and intent of the Growth Management Program, which is to provide quality housing opportunities for all economic segments of the community and to balance the housing needs of the region against the public service needs of Carlsbad's residents and available fiscal and environmental resources. Additionally, the project does not conflict with Growth Management performance standards to ensure public facilities and services keep pace with development. The project includes analysis related to the Growth Management Program

and the consistency of the program with California laws relating to housing production and limitations. Specifically with the passage of SB 330 in 2019, a “city shall not enact a development policy, standard, or condition that would...[act] as a cap on the number of housing units that can be approved or constructed either annually or for some other time period.” While Housing Element programs and policies to comply with RHNA do not exceed the overall growth cap, it is likely their implementation will exceed quadrant caps. To ensure consistency with California laws, including SB330 and the laws requiring compliance with the RHNA, Program 2.2 is proposed to propose replacement or modification of the Growth Management Program.

PASSED, APPROVED AND ADOPTED at a special Meeting of the Housing Commission of the City of Carlsbad, California, California on the 4th day of March, 2021, by the following vote, to wit:

AYES:

NAYS:

ABSENT:

JOHN NGUYEN-CLEARY, CHAIRPERSON
CARLSBAD HOUSING COMMISSION

ATTEST:

DAVID DE CORDOVA
Housing Services Manager