



RESPONSE TO HCD FINDINGS LETTER (DATED JUNE 15, 2021)

The City has provided the complete text of HCD comments in *italics* and grey background, followed by an explanation of edits made to the Housing Element in response.

1. *“Affirmatively further(ing) fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2. The program shall include an assessment of fair housing... (Gov. Code, § 65583, subd. (c)(10)(A)).*

Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)”

Affirmatively Furthering Fair Housing: The element includes a variety of information and analysis related to affirmatively furthering fair housing; however, additional information is necessary to address this requirement, as follows:

- *Access to Opportunity: The element should analyze trends and patterns at a local and regional level related to transportation and environmental quality.*

The City has added two new maps to the Fair Housing Assessment section displaying transportation and environmental quality data (Figure X-16 and X-17), and has also added supporting analysis. The new analysis text is shown below.

Access to Transportation

HUD has developed the Low Cost Transportation Index, which estimates the percentage of income that residents use to pay for transportation. The higher an area’s index score, the lower the cost of transportation, which can be influenced by factors such as access to public transportation, housing density, and proximity of employment centers and other services. As a whole, Roseville has an average score of 62, meaning it has lower transportation costs than 62 percent of the nation. In comparison, the average score for California is 66, while the average score for Placer County is 53, meaning Roseville has higher costs than the statewide average, but lower costs than the rest of Placer County. As shown in Figure X-16, the parts of Roseville that are nearest to I-80, the multimodal transit station (which includes Greyhound, local bus, commuter bus, and Amtrak service), and State Highway 65 have higher index scores (59–78) than the rest of the city and therefore lower transportation costs. Costs could also be lower because these areas are in closer proximity to services and employment centers like the Westfield Galleria at Roseville. In contrast, there are lower scores in the western portion of the city (40–58) and southeastern corner (21–39). These areas are further away from employment centers, and the western area of the City is in a newly developing area where transit options and frequency are currently lower.

Environmental Conditions

Lower-income housing and racially segregated communities are disproportionately impacted by a combination of locational factors such as proximity to landfills, freeways, industrial areas, and other

toxins and pollutants. A 2016 report entitled “Poverty Concentration and the Low Income Housing Tax Credit (LIHTC): Effects of Siting and Tenant Composition” studied whether nationally the LIHTC affects the concentration of poverty. The study examined who lives in tax credit developments in different neighborhoods, and how neighborhoods and metropolitan areas change after LIHTC developments are built. The study concluded that the distribution of affordable housing has been disproportionately developed in neighborhoods with predominantly Non-White communities, poor environmental conditions, and high poverty rates which thereby reinforce poverty concentration and racial segregation in low opportunity and low resource areas. The links between health and housing strongly indicate that improved housing and neighborhood environments could lead to reductions in health disparities.

TCAC and HCD measured environmental opportunity using the exposure, pollution burden, and environmental effect indicators used in California’s Office of Environmental Health Hazard Assessment CalEnviroScreen 3.0 tool. CalEnviroScreen 3.0 is a statewide risk assessment tool that measures the cumulative impacts of multiple sources of pollution. As shown in Figure X-17, the City of Roseville has moderately positive environmental scores. The areas in and surrounding the central core of the City, had the lowest environmental scores (less than 0.25) indicating the least positive environmental conditions. This is likely due to the presence of the Union Pacific Railroad tracks and the railyard in this area, which are associated with lowered air quality. Other portions of the City had lower environmental scores of 0.25 to 0.50 and are shown in yellow on the map. This includes the large area to the west of Fiddymont Road, which is home to the Pleasant Grove Waste Water Treatment facility. The highest scoring neighborhoods in the western areas of the City are west of Foothills Boulevard and north of Junction Boulevard. In the eastern City, the areas with the greatest environmental scores are east of Sunrise Avenue.

POTENTIAL EFFECT ON ACCESS TO OPPORTUNITY

The TCAC/HCD Opportunity Area map for 2021 shows that the central area of the City is the area of lowest opportunity, and that areas of high and highest opportunity area found away from the core, on the eastern and western sides of the City. However, when this composite score is broken into its component parts—educational scores, proximity to jobs, access to transportation, and environmental scores—it becomes apparent that some of these factors are at odds. The central area of the City has lower educational scores and more environmental burden, but is also the area of the City with the highest proximity to jobs and the greatest access to transportation. The western edge of the City has higher educational scores and lower environmental burden, but because it is newly developing has lower access to transportation and lower jobs proximity.

Proximity to jobs and access to transportation are critical issues for lower income families, and focusing all lower income development into areas of overall high opportunity will direct development away from these areas. Development in infill areas is also a key environmental and sustainability strategy, because it reduces sprawl and creates more walkable communities.

On the other hand, over time as the western edge of the City develops further and more population is added, additional transit options will be developed consistent with the City’s transit master plan and additional job centers will be developed in the City’s tech and business park land uses in those areas. It is vital to ensure housing affordable to lower income families is an integrated part of those future conditions.

An analysis of the TCAC/HCD Opportunity Area map for 2021 found that more than 90 percent of the City’s existing affordable housing and future inventory, both in total and within each income category, is within areas designated as “high resource” or “highest resource” (see Figure X-26), which means that the vast majority of new housing built in the city will offer future households access to areas of opportunity. A small proportion of the sites in the existing inventory are located in census tracts in the central city, which are mostly categorized as moderate or low resource.

However, recognizing the importance of infill the City's rezone program (Program 14) also includes the Commercial Corridors and Infill strategies. These strategies will focus infill and revitalization strategies within the areas of the City with the greatest proximity to jobs and transportation options. While the City's Housing Element focuses the vast majority of its existing and proposed inventory within areas of high opportunity, it also reflects the need to include housing opportunities in areas of existing jobs proximity and transportation opportunity.

- *Disproportionate Housing Needs: The element should analyze trends and patterns at a local and regional level related to substandard housing and homelessness needs.*

The City has augmented the Disproportionate Housing Needs subsection of the Fair Housing Assessment to include a new Housing Condition analysis. The analysis considers the data from the Housing Condition Survey (Figure X-1) and relates that information to demographic data, the maps of opportunity, and other indicators. The City has also augmented the Homelessness subsection of the Special Needs Group section to include data on the demographics of unsheltered individuals and an analysis of how those demographics compare to the total population and to the demographics of people receiving service at shelters. The edits are shown in **bold, underlined** text below.

Housing Condition

The Housing Condition Survey (see Figure X-1) examined houses within neighborhoods which were developed before 1980, as these homes are more than 40 years old and would require maintenance in order to avoid visible deterioration. The majority of units (72%) were found to be in sound condition, 21% needed minor repairs, 6.5% required moderate repairs, and 0.5% needed substantial rehabilitation. Although the survey identified that 7% of homes need moderate repairs or better, which is relatively low, this need is located in areas with other burden factors. The City's older neighborhoods with homes built prior to 1980 are located in the south central area of the City, which is the area of the City with the highest concentration of poverty, a large concentration of Hispanic households, a high level of housing cost burden (over 58 percent of households in that census tract are burdened), and there are two low resource areas. For these reasons, the City has focused several programs in this area of the City, including the City's Housing Rehabilitation Program, First-Time Homebuyer Program, and Community Block Grant funds.

Homelessness

People struggling with homelessness have complex, multiple needs and require integrated and coordinated services. A lack of affordable housing can make it difficult for families to move from shelters and temporary supportive housing into permanent housing and puts many low-income families at risk of becoming homeless as well. It is difficult to estimate the number of individual households and households with children who are at risk of becoming homeless. It can be assumed that those most at risk are lower-income households with severe cost burden (households pay more than 50% of their income for housing costs).

Each January Placer County and its partners participate in the annual Point in Time Count and interview homeless individuals. A point-in-time count is simply a snapshot reflecting those persons identified as homeless for one night and is not an absolute number. Many people move in and out of homelessness throughout a year. According to the 2020 count, the City of Roseville had 197 homeless persons. Most, 73 percent, said they lived in Placer County at least one year before becoming homeless. The infographic below provides information regarding homeless persons within Placer County. As shown, the number of homeless individuals counted in Roseville has been consistently dropping over the past several years. The 2021 count was not conducted due to safety concerns related to COVID-19, but it is expected there has been an increase in the number of

homeless individuals resulting from COVID-19 impacts. **The analysis below is based on the 2020 count, since that is the most recent complete data set.**

When applying an equity lens to homelessness there are two key questions to ask: whether certain racial or ethnic populations are disproportionately affected by homelessness and whether racial or ethnic populations are receiving shelter services equitably. The evaluation below compares the percentage of a racial or ethnic population as it relates to: the total population, the homeless population, and the homeless population receiving shelter services. If populations were not disproportionately affected and services are evenly distributed, then the percentage of the total population, homeless population, and sheltered population for each racial or ethnic group should closely align¹.

Table X-18 | Homeless Population Demographics

Race or Ethnicity	% of Total Population	% of Homeless Population	% of Sheltered ¹ Population
Placer County			
American Indian or Alaska Native	0.3%	4.7%	4.4%
Asian	6.8%	1.2%	1.2%
Black or African American	1.4%	8.5%	12.1%
Hispanic/Latino	13.6%	13.8%	15.9%
Multiple Races	3.7%	2.4%	5.6%
Native Hawaiian or Other Pacific Islander	0.1%	0.4%	0.6%
White	73.8%	80.2%	76.1%
City of Roseville			
American Indian or Alaska Native	0.2%	2.5%	8.1%
Asian	10.0%	1.0%	2.5%
Black or African American	1.7%	8.6%	18.1%
Hispanic/Latino	15.2%	13.7%	13.8%
Multiple Races	4.1%	9.1%	4.4%
Native Hawaiian or Other Pacific Islander	0.2%	1.0%	0%
White	68.5%	65.0%	28.8%

Source: 2020 Point in Time Count and 2013 to 2017 ACS 5-Year Estimates. Total homeless population is 744 people and total sheltered population is 405 people.

1. "Sheltered" means people who are homeless and receiving housing from an emergency, transitional, or safe haven shelter.

At both the county and local level there are variances between population-level demographics and homeless population demographics. Some of these figures seem like small variances—for example the Native Hawaiian or other Pacific Islander community is 0.1 percent of the Placer County population and 0.4 percent of the homeless population, which is only an increase of 0.3 percent. However, this means that this group is overrepresented in the homeless population by a factor of four times. At the County level the most disproportionately impacted communities are the American Indian or Alaskan Native community, which is overrepresented by a factor of sixteen times; the Black or African American community, by a factor of six times; and the Native Hawaiian or other Pacific Islander community, by a factor of four times.

When examining those receiving services at a shelter, there are two populations receiving shelter at disproportionately lower rates, though the disproportionality is relatively low. The American Indian or Alaskan Native community and the white population accessing shelter services are both underrepresented by a factor of one time.

¹ That is if a particular group is 50% of the total population, then that group should make up close to 50% of the homeless population and 50% of the sheltered population.

At the local (Roseville) level homelessness disproportionately impacts the American Indian or Alaskan Native community, by a factor of thirteen times; the Black or African American community, by five times; and the Native Hawaiian or other Pacific Islander community, by five times. The most disproportionately impacted communities at the County level remain the most impacted in Roseville, but the degree of the impact is slightly reduced.

In response to the patterns and trends observed above, the City's Homeless Prevention and Rapid Rehousing program (Program 12 and Program 20) has been amended to include annual monitoring to determine whether the funding is being equitably distributed, and commit to making funding adjustments if not. The Fair Housing Program (Program 27) also includes monitoring of the demographics of the beneficiaries of housing and service programs, and includes meeting monthly with non-profits and local stakeholders to share regional resources and ensure equitable distribution of resources.

While the Hispanic or Latino community is, based on the analysis above, not disproportionately affected by homelessness or underrepresented in accessing shelter services, it is important to consider that this homeless population may be undercounted. The Latino Leadership Council conducts grassroots outreach to the Latino community, which includes outreach and assistance activities for people struggling with homelessness. During Housing Element outreach, the Latino Leadership Council indicated that fear of being questioned about immigration status inhibits people from seeking services, and that many members of the Latino community hide or avoid contact during homelessness surveys. This fear impacts both documented and undocumented individuals, because people struggling with homelessness or other housing insecurity may simply not have access to their documentation.

In response to this feedback, the City invited the Latino Leadership Council to join the monthly coordination meetings for homeless outreach organizations, added the Latino Leadership Council to the City's list of homeless support service organizations, contacted service agencies and provided a confirmed list of support organizations that affirmed they do not ask about immigration status, and provided the Latino Leadership Council with contact information for the City's Social Services Unit to improve coordination in the field. The City's Homeless Outreach program also emphasizes building trust within communities where distrust is widespread and acts as a barrier to accessing services.

- *Goals and Actions: The element must be revised to add or modify goals and actions based on the outcomes of a complete analysis described above. Goals and actions must specifically respond to the analysis and identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have metrics and milestones as appropriate and address housing mobility enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for community preservation and revitalization and displacement protection.*

The City made further revisions to programs throughout the Housing Element. The City also added a new chart at the end of the Fair Housing Assessment section that states the identified fair housing issue and describes the responsive programs. The chart is included below. Programs which were modified to include a fair housing lens include Programs 1, 6, 9, 12, 16, 19, 20, 22, 23, and 27. These programs are included as Attachment 1 to this letter, with the responsive text in blue.

Fair Housing Issue

Responsive Programs

<p>The south central area of the City is a disadvantaged community area, because the area has multiple overlapping fair housing issues. The area has a concentration of poverty, overcrowding, low opportunity, less positive education outcomes, and other disadvantage, combined with a higher concentration of disability, female-headed households, and people of color.</p>	<p>Broadly speaking, the City has undertaken two approaches to this issue: focusing supportive and assistive programs into disadvantaged community areas and increasing housing opportunities within high opportunity areas of the City.</p> <p>The City has included implementation language within various programs which focuses those programs into disadvantaged communities within the City, including the Owner Occupied Rehabilitation Program (a component of Program 1), which provides grants for home improvements to low-income households in disadvantaged community areas; the First Time Home Buyer Program (a component of Program 1), which provides down-payment assistance to low-income households and has an outreach focus in disadvantaged communities; the City’s In-Lieu Fees (Program 9) and gap funding (Program 12), which prioritize disbursement of funds to projects within high opportunity areas or areas at risk of displacement; Community Block Grant funds (a component of Program 19), the outreach for which is directed to disadvantaged communities and provides deferred loans and grants to low income households to use for home improvements; and per the Fair Housing program (Program 27) the City will meet monthly with non-profits and local stakeholders to share regional resources and ensure equitable distribution of resources.</p> <p>The City has included implementation language within various programs to increase housing choice in areas of high opportunity, including the Specific Plan Areas process (Program 6), which requires all new planning area to designate 10% of the total units as affordable and distribute those sites evenly through the new planning area; the City’s In-Lieu Fees (Program 9) and gap funding (Program 12), which prioritize disbursement of funds to projects within high opportunity areas or areas at risk of displacement; the City’s Housing Choice Voucher program (Program 19), which includes outreach to multifamily property owners to ensure vouchers can be used in high opportunity areas of the City; and the City’s Fair Housing program (Program 27) requires developers receiving public subsidies to use affirmative fair housing marketing practices and supports affordable housing in areas of high opportunity.</p>
<p>Homelessness disproportionately impacts certain racial or ethnic groups, and shelter services are not being accessed equitably.</p>	<p>Annual monitoring of Homeless Prevention and Rapid Rehousing Funding (Program 12 and Program 20) disbursement has been added to evaluate whether the funding is being equitably distributed, and commit to making funding adjustments if not. Per the Fair Housing program (Program 27) the City will regularly complete analysis of the characteristics of the beneficiaries of housing and service programs relative to the income-adjusted population and meet monthly with non-profits and local stakeholders to share regional resources and ensure equitable distribution of resources.</p>
<p>The City has multiple areas identified as sensitive to displacement.</p>	<p>The City’s In-Lieu Fees (Program 9) and gap funding (Program 12) prioritize disbursement of funds to projects within high opportunity areas or areas at risk of displacement; the Owner Occupied Rehabilitation Program (a component of Program 1), which provides grants for home improvements to low-income households in disadvantaged community areas, is directed to geographic areas of the community at greatest risk of displacement.</p>
<p>Rates of homeownership are significantly higher within the white population than within other racial and ethnic communities.</p>	<p>The City has directed outreach for its First Time Home Buyer program (Program 1) into the area of the City with a higher proportion of communities of color.</p>
<p>Special needs groups such as seniors and people with disabilities are more likely to struggle with cost burden</p>	<p>The City’s Home Investment Partnership Program (a component of Program 19) includes pursuing funds for affordable multifamily housing projects targeted to special needs groups such as seniors and those with disabilities, the Community Block Grant Funds (a component of Program 19) provides deferred loans and grants to seniors, persons with disabilities, and other special needs populations to use for home improvements; the City will revise the Zoning Ordinance to allow large community care homes with a staff-level Administrative Permit rather than a Use Permit (Program 28); the City has a shared housing policy allowing people with disabilities to use their voucher in housing shared with non-related people; and the City has multiple programs to reduce utility costs for low-income seniors and people with disabilities or medical devices (Program 35).</p>

2. *“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...(Gov. Code, § 65583, subd. (c)(1).)"

Realistic Capacity: The element discusses that a non-residential zone (CMU) does not require residential development, but usually residential is built on site or on another residential site. As a result, the calculation of capacity should account for the likelihood of residential not occurring on non-residentially zoned sites.

Additional analysis was performed for CMU sites, as shown in **bold, underlined** text below.

Typical mixed use developments in the City include either ground-floor retail with second and third floor apartments, or a small apartment building connected to or adjacent to retail. Typical density calculations do not apply in these instances, since the acreage is mixed between commercial and residential. However, in order to accommodate the allocated units plus commercial building area, the apartment sizes and designs are of necessity compact and correspond to apartments constructed at densities of 30 units to the acre and higher. While the City's CMU zone does not require construction of the allocated residential units, it is uncommon for these units to remain unbuilt, for financial reasons. There is a loss of potential revenue and in some Specific Plans there are implications for the financing plans when allocated units are simply unbuilt. **An evaluation of the City's developed/built sites which had been vacant sites zoned to permit both residential and commercial uses (CMU, Village Center, etc) finds that 100% of these sites have been developed with the allocated units. As a current example, a prospective applicant is currently discussing building housing on vacant CMU sites KT-40A and B in the Sierra Vista Specific Plan; the application is expected by the end of summer. The housing is anticipated to be market rate, so these sites have been included in the moderate income category of the City's inventory. In fact, the analysis found that the land use trend during the last housing cycle—a trend which is continuing—is for applicants to apply to rezone commercial property to residential uses.**

Large Sites: Sites larger than 10 acres in size are deemed inadequate to accommodate housing for lower-income households unless analysis demonstrates their suitability. To address this requirement, the City conferred with affordable developers and ultimately identified challenges in developing larger sites. To address these challenges, the element includes Program 16 to prioritize affordable housing, including streamlining lot line adjustments.

However, the program should clearly commit to non-discretionary and over-the-counter lot line adjustments, and given the importance of these sites, the program should include regular evaluation of the effectiveness of the program and commitment to additional actions such as identifying other sites by a date certain.

The City has further modified Program 16 (Prioritize Affordable Housing) to explicitly state that the streamlining program will include ministerial lot line adjustments. The program has also been augmented to include ongoing monitoring of program effectiveness, with a commitment to make program improvements based on the recommendations of affordable housing developers if the program is failing to meet the stated goal. Edits to the program are shown in **bold, underlined** text below.

Program 16. Prioritize Affordable Housing

The City will prioritize the timely and efficient processing of affordable housing projects through various means, including via the City's ministerial approval process, prioritizing utility services for affordable projects, and providing support and assistance in securing grants and other financial subsidies. The City will also develop a phasing program for affordable housing sites, which will include streamlined processes for lot line adjustments, parcel maps, and similar entitlements which may be necessary to support construction and financing of affordable housing. **At minimum, the phasing program will provide for ministerial processing of lot line adjustments, voluntary mergers, and parcel maps.** The City will also investigate the development of fee reductions for

affordable housing projects. **The City will annually track the use of Program 16 to determine its effectiveness, which will be evaluated based on the percent of affordable housing projects using the program, as well as the percent of large site property owners/developers using the program. The City will annually meet with affordable housing developers to discuss constraints to the production of affordable housing, and based on this feedback, commits to implementing program improvements to ensure the City meets its goal of 100% of affordable housing projects using the program.**

Nonvacant Sites: The element identifies nonvacant or underutilized sites and includes various strategies to promote their development, including catalyst sites with conceptual plans, parking and land use strategies and various improvements to enhance redevelopment. However, the element should expand the discussion of the extent existing uses impede additional development. For example, the element could discuss past experience converting existing uses to higher density residential development; current market demand for the existing use; analysis of existing leases or other contracts that would perpetuate the existing use or prevent additional residential development; development trends and market conditions.

The Underutilized Land Inventory section and Table X-30 have been updated as shown below, with text changes shown in **bold, underlined** and ~~strike through~~ text and table changes shown in **bold**.

Underutilized Land Inventory

Over the last two decades the City of Roseville renewed its focus on revitalization of our older neighborhoods and commercial corridors, as well as encouraging the development of mixed use and High Density Residential (HDR) units in both the Riverside Gateway Specific Plan and the Downtown Specific Plan. [Previous discussion which used to be located here has been moved to a new Realistic Capacity subsection within the Underutilized Land Realistic Capacity section which follows Table X-30.] **Table X-30 displays all of the opportunity sites within the City's Downtown and Riverside Gateway Specific Plan with the highest potential capacity for residential development. Refer to the Underutilized Land Realistic Capacity discussion following the table for further details.**

[Table X-30 occurs here, but is included as Attachment 1 of this response to comments because it is in landscape view].

Realistic Capacity

The approach **described above** has resulted in significant success, with three 100% affordable apartment projects approved in **the planning area** ~~this area~~ in the last five years, **plus two market rate townhomes projects**. Two of **the affordable projects** ~~which~~ have been constructed (on Table X-20, Lohse Apartments and Main Street Apartments). **The three affordable apartment projects are all at densities in excess of 50 units per acre. The third affordable apartment project and the market rate townhomes are** ~~and the third of which is~~ expected to begin construction in 2021 **or 2022**. **The sites and their previous site constraints are described in the following:**

- **Lohse Apartments (623 Vernon Street): This site was under one acre and included multiple parcels, one of which contained a building housing an auto repair and paint shop, and another of which contained a U-Haul rental and building, along with associated parking areas. All of the existing uses (totaling 6,500 square feet of space) were demolished and the parcels were consolidated through a Voluntary Merger. The Lohse Apartments project is four stories and includes, one-, two-, and three-bedroom units as well as ground-floor non-residential space. Construction was completed in 2019.**
- **Main Street Apartments (300 Washington Boulevard): This site is approximately 1.5 acres and was minimally improved, with gravel and a few other small site improvements. The project included a Parcel Map and the abandonment of right-of-**

way on Pleasant Street. The Main Street Apartments project is a mix of three and four stories with one-, two-, and three-bedroom units, and includes ground-floor retail. Construction was completed this year.

- Junction Crossing Apartments (120 Pacific Street): This site is approximately 1.5 acres and included multiple parcels with a parking lot and mature landscaping. The project included a Parcel Map to merge and resubdivide the parcels. This is an 80-unit 100% affordable project, with construction anticipated to begin this year.
- Belvedere Townhomes (510 Lincoln): This site included multiple parcels containing a single-family home on one parcel and the 4,000 square-foot Belvedere Hotel on another. The project included a Tentative Subdivision Map and the demolition of both existing buildings. The approved project includes 18 townhomes and construction is anticipated to begin this year (demolition has been completed).
- Nevada Street Lofts (1007 Douglas Boulevard): This site includes multiple parcels and existing development includes a large chain link fence and one single-family home. The approved project included a General Plan Amendment from Business Professional to a High Density Residential land use designation, a Tentative Subdivision Map, a Design Review Permit, and a Tree Permit to build 22 townhomes. Construction is anticipated to begin next year.

All of the sites listed above are within the same market area as the sites listed in Table X-30, below. All but one of the sites were non-vacant, and required the demolition of parking lots, commercial buildings, and/or residential buildings or order to enable their construction. All of these sites also required parcel consolidation, and all of these projects have occurred within the past five years, showing significant market forces at work in these areas. The three affordable apartment projects are all at densities in excess of 50 units per acre. The success of these sites, three of which were identified in the City's 2013 Housing Element underutilized sites inventory, demonstrates the feasibility of development for the similar, nearby sites which are listed in Table X-30. In the past eight years, a total of six new private development projects have been approved in the City's downtown, and of those, five were housing projects. Therefore, there is an 80% calculated likelihood of a site redeveloping with housing, as opposed to a non-residential use.

The sites in the Riverside Gateway Specific Plan are all in the Commercial Mixed Use zone, which means density cannot be calculated by a simple division of units per acre; a portion of the site is expected to be non-residential. Density also cannot be expressed as a "maximum" or "minimum," because the plan has instead simply allocated a certain number of units to each property. For the purposes of planning, density has been expressed as the number of units realistically assumed divided by the total site acreage, but it is expected actual density would be higher, because some portion of the site may remain commercial. Based on this estimated land use density, the City's underutilized land supply provides capacity for 357 lower-income units and 42 moderate-income units.

In identifying the list of sites in Table X-30, the City has already gone through a process of evaluating sites in both plan areas and has included only those with the highest likelihood of developing with residential uses. The list is a conservative estimate of development potential in these planning areas, and it is expected that sites excluded from the list could also redevelop with housing. As an example, the Lohse Apartments site was not included in the 2013 Housing Element inventory but nonetheless it redeveloped with housing. The Downtown Specific Plan includes approximately 77 acres of land with a zoning designation that allows high density residential uses, but the table only assumes 5 acres (6%) of this area will be developed with housing. The Riverside Gateway Specific Plan includes approximately 29 acres of land with a Commercial Mixed Use zoning designation and approximately 8 acres of land with a multi-family residential zoning designation, while the table list below assumes only 6 acres (16%) of this area will be developed with housing. A higher proportion is

assumed in Riverside Gateway than in the Downtown Specific Plan, because the Riverside Gateway planning area contains a much lower FAR—that is, there is far more undeveloped space in the planning area. As explained in the description of the Riverside Gateway Specific Plan, the existing average FAR is 0.20, which means that only 20% of the land area (or 0.2 acres to every acre) is developed with buildings.

Programs: As noted in the findings above, the element requires a complete analysis of the sites inventory. Depending upon the results of that analysis, the City may need to revise or add programs to demonstrate adequate sites to accommodate the regional housing need allocation.

Programs have been revised to reflect the adjusted lower income deficit.

3. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income level...including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures. (Gov. Code, § 65583, subd. (a)(5).)*
Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities... (Gov. Code, § 65583, subd. (c)(3).)

Housing for Persons with Disabilities: The element notes that larger group homes for seven or more persons are subject to a conditional use permit. While the element states larger group homes have different needs and that the use permit allows the City to work with applicants, it must also identify and analyze decision-making criteria for impacts on approval certainty and objectivity and include programs as appropriate.

The City has modified Program 28 (Support for Housing for Persons with Developmental Disabilities). This is a new program, which the City has modified based on HCD’s comments, as shown in **bold, underlined** text below. The program now commits the City to streamlining the approval process, requiring approval by the Planning Manager via an Administrative Permit instead of a public hearing for a Use Permit heard by the Planning Commission.

Program 28. Support for Housing for Persons with Disabilities

Work with the Alta California Regional center to implement an outreach program that informs families and housing developers within the City on housing and services available for persons with developmental disabilities. The program could include the development of an informational brochure, including information on services on the City’s website. **The City will also revise the Zoning Ordinance to require an Administrative Permit for large Community Care homes (7 to 12 persons) instead of a Use Permit. Standards for approval of an Administrative Permit for large Community Care homes will be developed, to facilitate objectivity and certainty in review.**

4. *“Establish the number of housing units, by income level, that can be constructed, rehabilitated, and conserved over a five-year time frame. (Gov. Code, § 65583, subd. (b)(1 & 2).)”*
The element includes quantified objectives by income group and activity, including conservation objectives (Table X-1). However, these objectives could be expanded. For example, the quantified objectives could be supplemented by objectives described on page X-63 regarding housing choice vouchers, energy conservation programs, and the shared housing program.

The City has modified Table X-1 (below, new text in **bold**) to include information from the Unit Conservation section of the Housing Element, which more specifically enumerates programs which will ensure affordable housing is maintained/conserved during the 8-year planning period.

Table X-1 | Quantified Objectives By Income Group

	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
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New Construction	1,320	1,660	2,260	1,636	4,150	11,026
Rental Assistance	610	205				815
First Time Homebuyer/Affordable Purchase			10	130		140
Housing Rehabilitation		60	60			120
Unit Conservation						
Housing Agreements¹	28	831	1,913			2,772
Purchase Agreements²				45		45
Homebuyer Assistance³		10				10
Housing Voucher⁴	551	184				735
Other programs⁵	20	50	50	35		155
Total Quantified Objectives	2,529	3,000	4,293	1,846	4,150	15,818

1. The City's affordable housing agreements will maintain the affordability of 2,000 units during the 8-year housing cycle; details are provided in Table X-20.
2. The City's affordable purchase housing agreements create and secure the affordability of purchase housing for moderate income households. The program will assist a minimum of 45 households during the 8-year housing cycle.
3. The First Time Homebuyer Down Payment Assistance Program targeted to low-income households will assist at least 10 households to secure and maintain affordable housing during the eight-year housing cycle.
4. The City's Housing Choice Voucher Program (HCV) provides rental assistance to extremely and very low income households, to ensure their housing remains affordable. At least 75% of the 735 vouchers are required to target extremely low income households.
5. The City offers multiple other conservation programs, including programs aimed at ensuring housing remains affordable and habitable; utility rate discounts which target extremely low and low income households, as well as households with medical devices in their homes; and allowing shared housing to enable persons with disabilities to use their voucher in housing shared with non-related persons.

5. "Analyze any special housing needs such as elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. (Gov. Code, § 65583, subd. (a)(7).)"

While the element includes a general discussion of large households, including housing stock with larger bedrooms, it must also analyze large households by tenure (i.e., renters and owners). In addition, the element should analyze county level housing needs for permanent and seasonal farmworkers. The element should utilize this information to better inform policies and programs.

City Response: The City has updated the Large Families and Farmworkers sections as shown in **bold, underlined** and ~~strikethrough~~ text below.

Large Families

Large families are defined by HUD as family households with five or more persons. The 2014–18 ACS reports that 9.2% of the total households (4,528 households) in Roseville are large families, **and of those 33% are renters and 67% are homeowners**. Data from the City's 2020 Consolidated Plan found that of the large families, 70.1% have an AMI greater than 100% and 5.4% are moderate income. Low-income large families make up 7.5% of the total of large families in the City; and fewer than 300 or 6.5% of the large families are extremely low-income.

For renters, the Consolidated Plan data showed that 625 large families were cost burdened and 310 large family renters were extremely-cost burdened. There were 335 large family homeowners that were cost burdened, and 215 that were extremely cost-burdened.

There are approximately 23,395 units (47.5%) in the city with three or more bedrooms, indicating that the City of Roseville has a sufficient supply of large housing units for the ~~number of~~ **4,528** large households residing in the city. Of the total number of all sizes of units, for homeowners, 85% of the

housing stock have 3 or more bedrooms and 37% of the rental units have 3 or more bedrooms. **Since the proportion of for-sale and rental housing closely aligns with the number of large households which are owners versus renters, the City's housing stock provides sufficient supply by tenure type.**

The City's housing supply includes sufficient units in total and by tenure type to support large families, and other than living space the needs of lower income large families are similar to those of other lower income households. Therefore, the City's programs ~~The City offers multiple programs to help close affordability gaps, including the Housing Choice Voucher program (in combination with the Shared Housing program), the Owner Occupied Rehabilitation Program, and the City's affordable housing goal to provide 10% of all new units as affordable~~ **provides the needed support for this special needs group.** ~~The City also offers the Electric Rate Assistance program, which offers a discount to residential customers whose income is very low or lower, and also offers a Medical Support Rate Reduction for customers with medical devices in their homes. The City's programs have been highly effective, with the Roseville Housing Authority designated by HUD as a "High Performing Housing Authority" for the past fifteen years.~~

Farmworkers

Farmworkers tend to have low incomes due to the lower-paying nature of their work. **The Employment and Earnings of California Farmworkers in 2015 by U.C. Davis and the California Employment Development Department reveals that the average annual earnings of persons with at least one farm job in California was \$20,500, which is below the extremely low income limit for a family of four.** Farmworkers who are permanent residents, particularly those who are part of large family households, face many of the same difficulties in obtaining suitable affordable housing as other extremely low-income families. Farmworkers who migrate on a seasonal basis face the issue of finding suitable, short-term housing.

The City of Roseville does not contain any farmlands, **nor does the City have agricultural or farmland zoning or land use designations.** The 2013 – 2017 ACS indicates that 0.2% of the working population (persons 16 years and older) are employed in the broader agriculture, mining, oil, and gas extraction industries (50 jobs total). **In the greater County, the U.S. Census of Agriculture (2017) indicates there are 277 hired farm labor positions (farms) and a further 1,386 farm labor positions (workers). Of the farm labor workers, 67% work fewer than 150 days, which generally means these are seasonal jobs.**

In some cases farmworker housing is provided on or adjacent to farms and agricultural facilities in rural County areas, but there are benefits to farmworker households living in cities, because there is greater access to services. Farmworker households share many factors in common with other extremely low income housing, as they need very low cost housing combined with larger units, so that multiple households can share accommodations—and therefore costs. As evaluated in the Large Families section of the Housing Element, above, nearly half of the City's housing units have three or more bedrooms, making them suitable for shared households. The City also has many programs which support extremely low income households. For example, the City's Housing Choice Voucher Rental Assistance program requires that 75% of vouchers serve extremely low income families. Because the number of farmworkers in the City and within Placer County is very low and the needs of this group are shared by other extremely low income households, the City's programs serving extremely low income households and the City's capacity of large units will provide support for this special needs group. ~~The City does not have plans for providing farmworker housing; since there is no demand for migrant housing within the city, it is anticipated that any farmworkers who are permanent residents will obtain housing through affordable housing programs targeted to all lower income families.~~

6. *"The housing element shall contain programs which assist in the development of adequate housing to meet the needs of extremely low-, very low-, low-, and moderate-income households. (Gov. Code, § 65583, subd. (c)(2).)"*

The element must include programs with proactive and specific efforts to assist in the development of housing for extremely low-income households and households with special needs; persons experiencing homelessness; farmworkers; persons with disabilities, including developmental; and elderly. Efforts should involve proactive and regular outreach to developers of affordable housing and should utilize incentives including financial and other resources. This requirement could potentially be addressed by expanding on the existing Program 19 (Federal and State Programs).

Program 19 has been modified as shown below in bold, underlined text.

PROGRAM 19 FEDERAL AND STATE PROGRAMS

The City shall pursue the following state and federal sources that will assist the City in addressing the housing and supportive needs of special needs populations. **The City shall meet a minimum of once annually with affordable housing developers to discuss barriers to the production of affordable housing, with a particular emphasis on the production of extremely low income housing and housing for special needs groups. Consistent with this program and other housing programs (such as Program 8, 9, 10, 12, and 16) the City shall prioritize, incentivize, and facilitate the construction of housing for extremely low income and special needs households, including by using financial resources to provide gap funding.**

Section 8 Housing Choice Voucher Program (Federal)

The Department of Housing and Urban Development (HUD) provides funding for rental subsidy payments for households earning 50% or less of the area median income. Special vouchers have also been made available for veterans, called Veterans Administration Supportive Housing (VASH), as well as Mainstream Vouchers which serve those with mental illness and are homeless or near homelessness. The HCV programs serve households who are extremely low income and/or disabled and are administered by the Roseville Housing Authority. **The Roseville Housing Authority (RHA) shall provide Housing Choice Vouchers (HCVs) to very low- and extremely low-income households in order to provide affordable housing options to those most in need; 75% of new households receiving vouchers shall be extremely low income. RHA shall offer Small Area Fair Market Rents and provide landlord education on the benefits of participating in the program. RHA shall also consider implementing a Landlord Incentive Program based on available federal funding and other best practices to incentivize new landlords to participate in the program. RHA will provide outreach materials to multifamily property owners and managers in areas of high opportunity on the benefits of accepting HCVs and will work to increase the number of properties accepting HCVs in high opportunity areas.**

Section 202 (Federal)

HUD provides long-term, direct loans to private, non-profit sponsors to finance new construction of elderly and disabled housing affordable to households earning 50% or less of the median income. The City will support applications by non-profit housing developers for Section 202 funding.

HOME Investment Partnership Program (State)

The Housing Division utilizes State-administered federal HOME funds for the First Time Homebuyer Program, which provides down payment assistance to low-income first time homebuyers. The City's First Time Home Buyer Down Payment Assistance Program allows displaced homemakers to qualify as first time home buyers. The City also uses HOME funds to leverage Community Development Block Grant funds for the Housing Rehabilitation Program described below. The City will pursue HOME funds for financing of affordable multi-family rental projects targeted to special needs groups such as seniors and those with disabilities.

Community Development Block Grant (CDBG) (Federal)

The City will continue to set aside CDBG funds for the following programs that address the needs of special needs populations, including elderly, disabled, and homeless individuals and families. Deferred loans up to \$100,000 are available to low-income homeowners for health and safety repairs and general home

improvements. Elderly and disabled homeowners can also receive a \$5,000 grant for health and safety repairs.

Outreach for this program will be directed to disadvantaged geographic areas of the City, where there are overlapping factors such as poverty, overcrowding, cost burden, and poor housing conditions and where there is a higher proportion of communities of color.

Public Service Funds

The City has made CDBG Public Service funds available to non-profit agencies and organizations that provide supportive services to special needs populations. The City will continue to consider applications for funding for special needs activities under the Public Service category during the Annual Action Plan process.



CITY RESPONSE TO HCD JUNE LETTER, ATTACHMENT 1

Program 1 Housing Choice Vouchers (Federal)

The Housing Choice Voucher (HCV) Program is administered by the Roseville Housing Authority (RHA) and provides rental assistance to extremely and very low-income households through direct payments to the property owner. The Housing Authority currently has 785 vouchers which includes separate vouchers for the following special needs groups:

- 75 vouchers for households with a head-of-household or spouse that are non-elderly and disabled (NED)
- 65 vouchers for veteran households that come by referral from the Veterans Affairs Department (VASH)
- 33 vouchers that assist households who have a non-elderly adult with a disability and are transitioning out of institutional and other segregated settings, or are currently homeless or at risk of becoming homeless (Mainstream – new program in 2018)
- 30 vouchers that are attached to specific units at the Main Street Plaza affordable project (Project Based Vouchers – new program in 2020). Of the 30 PBV vouchers:
 - 1 is a regular HCV voucher
 - 10 are regular vouchers layered with Placer County Mental Health Services Act funding, 3 of which much come from homelessness
 - 19 are VASH vouchers
- 50 new Emergency Housing Vouchers for those who are homeless or at risk of homelessness, fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, recently homeless, or having high risk of housing instability (new program in 2021)

All of the HCV programs listed above support Roseville households that are extremely low-income. The Housing Choice Voucher Rental Assistance Program requires that 75% of new households admitted to the program each year fall under the extremely low-income category. Between 2013 and 2020, RHA issued 525 vouchers to new households. Over the last 8 years, RHA has assisted 49 extremely low-income households per year, at the minimum. The HCV rental assistance program is promoted on the City's website, and through program brochures and through service providers throughout the region.

- **Community Development Block Grant (Federal)**

The City is an entitlement jurisdiction for Community Development Block Grant (CDBG) funds and sets aside a portion of its annual allocation of CDBG funds for the following housing activities:

- **Owner Occupied Housing Rehabilitation Program**

The City began the Owner Occupied Housing Rehabilitation Program in 1980. The program is considered a key component in the City's affordable housing strategy as a means of preserving Roseville's housing stock affordable to lower-income households. The program, targeted to low-income homeowners, offers grants to elderly and disabled homeowners and deferred loans to all low-income households for health and safety repairs and energy efficient upgrades. Deferred loans become due and payable upon sale, change of title, change of use or 30 years. Any program income received as a result of a loan payoff is used to fund new loans and grants. The Housing Rehabilitation Program is promoted on the City's website and through the use of program brochures. [Implementation of this program will be directed to disadvantaged](#)

geographic areas of the City, where there are overlapping factors such as poverty, overcrowding, cost burden, and poor housing conditions.

- **Home Investment Partnership Program (HOME) (State)**
The City began its participation in the State-administered HOME Program in 1994 for the creation and maintenance of affordable housing. The City utilizes HOME funds for the following programs:
- **Housing Rehabilitation Program**
The CDBG funds are leveraged with HOME funds to provide loans and CDBG grants to low-income homeowners. The Housing Rehabilitation Program is described above.
- **First Time Home Buyer (FTHB) – Down Payment Assistance (DAP) Program**
The City sets aside a portion of its HOME grant for down payment assistance in the form of deferred, shared appreciation loans (second mortgages). The FTHB-DAP Program is targeted to low-income households. The homebuyer must qualify under the City’s definition of a first-time home buyer, be able to provide at least a 1% down payment, and have attended a Home Buyer’s Seminar. The buyer must also comply with the City’s criteria with regard to home selection. Outreach for this program will be directed to disadvantaged geographic areas of the City, where there are overlapping factors such as poverty, overcrowding, cost burden, and poor housing conditions and where there is a higher proportion of communities of color.
- **Multi-Family New Construction**
The City also pursues HOME funds for construction of multi-family affordable units. HOME funds are leveraged with other funding sources such as Section 202 funds, Low Income Housing Tax Credits, Tax Exempt Housing Bonds, etc., to provide affordable rental housing targeted to extremely low- and very low-income households.

(Policies H1.1, H1.2, H1.5, H1.6)

Time Frame: Annual Applications, 2021–2029

Objectives: To support low income households that need assistance in order to stay housed by issuing a minimum of 65 Housing Choice Vouchers per year, 49 of them to extremely low income households, and assisting 6 low income homeowners per year.

Implementing Agency: Housing Division and Roseville Housing Authority

Funding Source: HUD, HOME, CDBG

PROGRAM 6 SPECIFIC PLAN AREAS (SPA)

The provision of affordable housing is a societal goal, one that should be achieved through the efforts of the entire community. The City shall ensure that Specific Plans are consistent with the goals and policies of the General Plan. The primary purpose of the Specific Plan Area process is to guide the comprehensive urbanization of land use in a mix of residential neighborhoods, schools, parks, open spaces, supporting retail and public facilities, office employment uses, and an affordable housing component. The Specific Plan Areas are the first step in implementing programs such as the 10% Affordable Housing Goal policy.

The City’s General Plan Land Use Element contains a section called Growth Management, which establishes the policy framework the City uses when considering new growth and annexation. Land Use Policy LU8.5 states “The City shall use the specific plan process to ensure a comprehensive, logical growth process for new development areas (e.g. annexations) or any areas where significant land use changes are considered.” The City’s General Plan establishes that the City does not grow in a piece-meal fashion. Instead, the City considers all annexations or significant land use plans inside the context of a detailed Specific Plan process. Additional

Land Use Element policies describe the minimum standards, information, and benchmarks which must be met by new Specific Plans, which includes demonstration of compliance with the City's 10% affordable housing policy.

The City's 10% affordable housing policy has produced over 3,000 units since program inception, which is an average of 100 units per year. Furthermore, over the last decade the City's average overall housing production has been approximately 950 units per year, which means that on average 10% of the City's growth during the prior Housing Element cycle has been affordable housing. The 10% goal is applied within each Specific Plan as well, not just for the City as a whole. For example, the Stoneridge Specific Plan included capacity for 2,861 total units, 286 units of which were required to be affordable. At the time the Specific Plan was adopted in 1998 the City's policy did not require a 40/40/20 split of very low/low/moderate income units, so the Specific Plan called for a split of 75% very low and low (combined) and 25% moderate income units. The Specific Plan is nearly fully built with a total of 2,745 total units constructed, of which 251 are affordable, with 116 mixed income units remaining, of which 29 are lower income¹. Of the constructed affordable units, 73 were moderate income purchase, 150 were low and very low income rental (for seniors), and 28 were low income purchase.

Compliance with the City's General Plan growth management policies results in a robust and detailed Specific Plan. The City's Specific Plans are divided into large lots, and each of these, if residential, is assigned a specific number of allocated units. This is evident in the City's residential capacity inventory in Table X-29 (page 77), where each Specific Plan includes a list of numbered large lots (e.g. AR-1 for Amoruso Ranch Specific Plan Large Lot 1) and these are assigned a land use designation, zoning designation, density, and specific number of allocated units. In turn, this allows the City's infrastructure planning for roads, drainage, sewer, and water, as well as service planning for parks, schools, fire services, and transit to be extremely robust and detailed. Each plan specifically defines the size and location of infrastructure and services, including lift stations, electric substations, wells, and fire stations. The detailed planning process enables the California Environmental Quality Act (CEQA) process to be likewise detailed and specific, resulting in the ability of future subdivision or multifamily projects consistent with the Specific Plan to use CEQA exemptions.

As part of assigning each large lot a specific unit allocation and density, a new Specific Plan must designate at least 10% of the total units as affordable. The affordable housing section or chapter of each Specific Plan includes a table or list of all large lots with an affordable housing obligation, along with the type of units and targeted income categories. Strategies, including City and landowner obligations, are described. A provision for the payment of in-lieu fees for affordable housing may be included, if appropriate. The City works with the Specific Plan applicant(s) to ensure an appropriate mix and type of residential and non-residential uses, and to ensure that affordable housing sites are distributed through the planning area in order to avoid the creation of concentrated affluence. The City does not meet its affordable housing policy in a piece-meal or project-by-project fashion; the affordable housing plan is established at the time the Specific Plan is approved. Additional discussion regarding the City's Specific Plan Areas is provided under the 10% Affordable Housing Goal in the Housing Constraints section of this Housing Element.

(Policies H1.1, H1.2, H1.3, H1.4, H1.8, and H1.10)

Time Frame: Ongoing, as SPAs are approved

¹ These affordable units are located on Parcel 17 (4 purchase units), Parcel 54 (69 purchase units), Parcel 21 (150 rental units), and Parcel 23 (28 purchase units), which are distributed through the Specific Plan. The map is located here:
https://www.roseville.ca.us/UserFiles/Servers/Server_7964838/File/Government/Departments/Development%20Services/Planning/Specific%20Plans%20&%20Planning%20Areas/Stoneridge%20Specific%20Plan/Stoneridge%20Tables%20and%20Map.pdf

Objectives: Ensure affordable units are integrated throughout the SPA and provide 10% of total SPA units as affordable units, consistent with Land Use Element Policy LU5.5.

Implementing Agency: Housing Division and Planning Division

Funding Source: General Fund

PROGRAM 9 IN-LIEU FEES

The City prefers affordable housing be developed as specified under the 10% Affordable Housing Goal within each of the Specific Plan Areas. The collection of in-lieu fees presents a challenge to the City, since the City does not control or own land to ensure the development of the affordable units. Therefore, the City has not established a formal in-lieu fee program and encourages the development of affordable housing. In-lieu fees may be considered on a case-by-case basis. In all cases where in-lieu fees are considered as an alternative to producing affordable units, Housing Division staff will review the project based on: (1) a good faith effort by the owner to secure and use available subsidies; (2) the type of project and its ability to absorb the affordable units; and (3) the ability to use the in-lieu fees within the same Specific Plan or infill areas. [Projects in areas of high opportunity or in areas at risk of displacement will be prioritized to receive any funds collected.](#)

Development Agreements shall be the mechanism used to secure implementation of the affordable housing program.

(Policies H1.1, H1.2, and H1.3)

Time Frame: Ongoing, as SPAs are approved.

Objectives: Provide 10% of total SPA units as affordable units, consistent with Land Use Element Policy LU5.5.

Implementing Agency: Housing Division

Funding Source: General Fund

PROGRAM 12 HOUSING SUCCESSOR AGENCY

All redevelopment agencies were dissolved in California effective February 1, 2012. The City of Roseville elected to function as the successor to the former Redevelopment Agency (“Successor Agency”) and to form a Housing Successor to serve as the governing body for the former agency’s low and moderate income housing assets. Housing Successors receive the non-cash housing assets of the former Redevelopment Agencies and are charged with monitoring and maintaining existing low-and moderate income housing assets and meeting outstanding requirements for former redevelopment agencies.

Beginning in 2015, agreements were made to spend the remaining \$5.9 million in bond proceeds on an affordable housing development constructed by Mercy Housing. That project was completed in 2018 and the total distributed to Mercy in the form of a loan was \$5.76 million. After the expenditure of those funds, there are no longer any significant funding sources available.

The Housing Successor receives 20% of loan repayment revenues, approximately \$240,000 annually, until all loans are paid back, which is projected to be 2036. As of October 2020 there are current projects, planned for yet unencumbered, totaling approximately \$1.2 million. The Housing Successor may spend up to \$250,000 for Homeless Prevention and Rapid Rehousing (HPRR) each year, the maximum allowed in the law. [The City will annually track the demographics of the people benefiting from these funds to ensure they are equitably distributed, and make adjustments to funding if they are not; this assessment shall use the best available data, including updated Census, ACS, Point in Time counts, and other data.](#) Going forward the fund’s revenues will be only from loan payment funds. Surplus funds may provide small gap funding for future

affordable development projects. [Projects in areas of high opportunity or in areas at risk of displacement will be prioritized to receive any funds collected.](#)

Time Frame: 2021–2029

Objectives: Gap financing for future developments and Homeless Prevention and Rapid Rehousing Program

Implementing Agency: Housing Division

Funding Source: City loan payoffs

PROGRAM 16 PRIORITIZE AFFORDABLE HOUSING

The City will prioritize the timely and efficient processing of affordable housing projects through various means, including via the City’s ministerial approval process, prioritizing utility services for affordable projects, and providing support and assistance in securing grants and other financial subsidies. The City will also develop a phasing program for affordable housing sites, which will include streamlined processes for lot line adjustments, parcel maps, and similar entitlements which may be necessary to support construction and financing of affordable housing. At minimum, the phasing program will provide for ministerial processing of lot line adjustments, voluntary mergers, and parcel maps. The City will also investigate the development of fee reductions for affordable housing projects. The City will [annually](#) track the use of Program 16 to determine its effectiveness, which will be evaluated based on the percent of affordable housing projects using the program, as well as the percent of large site property owners/developers using the program. [The City will annually meet with affordable housing developers to discuss constraints to the production of affordable housing, and based on this feedback, commits to implementing program improvements to ensure the City meets its goal of 100% of affordable housing projects using the program.](#)

(Policy H6.1)

Time Frame: 2024 and ongoing

Objectives: To facilitate and incentivize the construction of affordable housing. The goal is for 100% of affordable housing projects to leverage this program.

Implementing Agency: Housing Division and Planning Division

Funding Source: General Fund

PROGRAM 19 FEDERAL AND STATE PROGRAMS

The City shall pursue the following state and federal sources that will assist the City in addressing the housing and supportive needs of special needs populations. [The City shall meet a minimum of once annually with affordable housing developers to discuss barriers to the production of affordable housing, with a particular emphasis on the production of extremely low income housing and housing for special needs groups. Consistent with this program and other housing programs \(such as Program 8, 9, 10, 12, and 16\) the City shall prioritize, incentivize, and facilitate the construction of housing for extremely low income and special needs households, including by using financial resources to provide gap funding.](#)

Section 8 Housing Choice Voucher Program (Federal)

The Department of Housing and Urban Development (HUD) provides funding for rental subsidy payments for households earning 50% or less of the area median income. Special vouchers have also been made available for veterans, called Veterans Administration Supportive Housing (VASH), as well as Mainstream Vouchers which serve those with mental illness and are homeless or near homelessness. The HCV programs serve households who are extremely low income and/or disabled and are administered by the Roseville Housing Authority. [The Roseville Housing Authority \(RHA\) shall provide Housing Choice Vouchers \(HCVs\) to](#)

very low- and extremely low-income households in order to provide affordable housing options to those most in need; 75% of new households receiving vouchers shall be extremely low income. RHA shall offer Small Area Fair Market Rents and provide landlord education on the benefits of participating in the program. RHA shall also consider implementing a Landlord Incentive Program based on available federal funding and other best practices to incentivize new landlords to participate in the program. RHA will provide outreach materials to multifamily property owners and managers in areas of high opportunity on the benefits of accepting HCVs and will work to increase the number of properties accepting HCVs in high opportunity areas.

Section 202 (Federal)

HUD provides long-term, direct loans to private, non-profit sponsors to finance new construction of elderly and disabled housing affordable to households earning 50% or less of the median income. The City will support applications by non-profit housing developers for Section 202 funding.

HOME Investment Partnership Program (State)

The Housing Division utilizes State-administered federal HOME funds for the First Time Homebuyer Program, which provides down payment assistance to low-income first time homebuyers. The City's First Time Home Buyer Down Payment Assistance Program allows displaced homemakers to qualify as first time home buyers. The City also uses HOME funds to leverage Community Development Block Grant funds for the Housing Rehabilitation Program described below. The City will pursue HOME funds for financing of affordable multi-family rental projects targeted to special needs groups such as seniors and those with disabilities.

Community Development Block Grant (CDBG) (Federal)

The City will continue to set aside CDBG funds for the following programs that address the needs of special needs populations, including elderly, disabled, and homeless individuals and families.

Housing Rehabilitation Program

Deferred loans up to \$100,000 are available to low-income homeowners for health and safety repairs and general home improvements. Elderly and disabled homeowners can also receive a \$5,000 grant for health and safety repairs. Outreach for this program will be directed to disadvantaged geographic areas of the City, where there are overlapping factors such as poverty, overcrowding, cost burden, and poor housing conditions and where there is a higher proportion of communities of color based on the most current census data.

Public Service Funds

The City has made CDBG Public Service funds available to non-profit agencies and organizations that provide supportive services to special needs populations. The City will continue to consider applications for funding for special needs activities under the Public Service category during the Annual Action Plan process.

(Policies H7.1, H7.2, H7.3, H7.4 and H7.5)

Time Frame: Ongoing, as funding is available, and at least annually.

Objectives: Effectively implement federal and state programs and leverage funding opportunities, increase the number of participating properties in high resource areas of the City, and obtain funding for affordable housing projects serving special needs populations.

Implementing Agency: Housing Division

Funding Source: Housing Choice Voucher, CDBG, HOME, Section 202

PROGRAM 20 HOMELESS PREVENTION AND RAPID REHOUSING PROGRAM

The City Council has approved Roseville Homeless Prevention Rapid Rehousing (HPRR) funds consisting of Permanent Local Housing Allocation funds and up to \$250,000 in Low and Moderate Income Funds to assist Roseville homeless and those about to be homeless with grants for payment of past due rent, security deposits, first month's rent, past due utility bills, and emergency motel vouchers. Non-profits apply for program funds annually. On average, the HPRR program serves the community by providing over 37,000 bed nights for the homeless annually, providing rental assistance to maintain permanent housing for approximately 500 households, placing 50 individuals into transitional or treatment facilities, and permanently housing 15 people from homelessness per year. [The City will annually track the demographics of the people benefiting from these funds to ensure they are equitably distributed, and make adjustments to funding if they are not.](#)

(Policy H7.5)

Time Frame: Ongoing, as funding is available, and at least annually.

Objectives: Fund non-profits to implement homeless prevention and rapid rehousing programs such as rent, utilities and deposit payments, homeless hotel vouchers, and ready-to-rent programs.

Implementing Agency: Housing Division & Non-profits that apply for funding

Funding Source: Permanent Local Housing Allocation and Low and Moderate Income Fund

PROGRAM 22 ADDRESS SIGNIFICANT DISPARITIES AND INCREASE OPPORTUNITIES

To Achieve Getting People and Families off the Street, the City will:

- Create opportunities for development of permanent supportive housing for people experiencing homelessness, including families, by identifying sites and properties and prioritize local funding and incentives for that use. Current activities include consideration of a Project Homekey development which would create new permanent supportive housing units for people experiencing homelessness.
- Create and fund rehousing plans to move people from emergency COVID sheltering to permanent affordable housing, and in the future, respond similarly to major health or housing displacement emergencies. In its COVID response, the City has partnered with Placer County on a COVID rehousing program.

To Achieve Keeping People in their Homes, the City will:

- Provide Rental Assistance: fund rental assistance and work with tenants, nonprofit housing providers, advocates and the state to find solutions on rent that keeps tenants out of debt, prevents displacement, and sustains financial security of nonprofit housing providers. City's CDBG-CV3 funds are supporting a COVID rental assistance program. The City is partnering with Placer County on rental assistance for low-income households who are facing hardships due to the COVID-19 pandemic.
- Continue and adopt policies to prevent displacement including strategies to protect senior and low-income homeowners such as targeting home repair programs and no-net loss policies for existing affordable housing and condo conversion ordinances. The City will continue its income-qualified Owner-Occupied Housing Rehabilitation deferred loan and grant program. Applications and outreach materials are posted in English and Spanish. [The City will direct implementation of these policies and](#)

programs into geographic areas of the community at greatest sensitivity or risk of displacement.

To Increase and Preserve the Affordable Housing Supply, the City will:

- Undertake all preservation programs outlined in the preservation section of the HE which includes continuing to **annually** monitor and support preservation of existing regulated affordable homes at risk of converting to market rates. The City currently monitors such developments and will enhance its program by naming a Preservation Coordinator.
- Provide outreach on targeted first-time homebuyer programs in neighborhoods that have suffered from historic disinvestment to increase awareness and access to such programs like HUD Section 8 Homebuyer assistance. Outreach will be in English and Spanish.
- Strengthen its local housing trust fund with local revenue sources. Currently the City's revenue sources include in lieu fees and pay offs from affordable purchase loans. Actions to include re-applying for state Local Housing Trust Fund (LHTF) Program as they are released.

Metrics: Number of households assisted with rental assistance; owner occupied rehab; number of permanent supportive housing projects the City explores.

(Policy H7.10)

Time Frame: Ongoing, and at least annually

Objectives: To ensure that direct and indirect government activities and influence is equitable and supports access to housing opportunists for all groups. Metrics for success include 700 **low, very low and extremely low income** households assisted with rental assistance; 15 owner-occupied rehab projects (based on current funding levels) **within a disadvantaged community area or area at risk of displacement**; at least 1 permanent supportive housing project explored annually.

Implementing Agency: Housing Division

Funding Source: Community Development Block Grant, General Fund

PROGRAM 23 HOMELESS OUTREACH

The Roseville Police Department uses a Social Services Unit consisting of two full-time Problem-Oriented Policing Officers and two Homeless Outreach Workers from Placer County Health and Human Services to link homeless individuals to services throughout the County and to build trust with unsheltered individuals, **particularly among communities where distrust is widespread and acts as a barrier to accessing services.**

(Policy H7.5)

Time Frame: Ongoing, and at least annually

Objectives: Contact 50 high-risk community members per month.

Implementing Agency: Roseville Police Department Social Services Unit

Funding Source: Community Development Block Grant, Downtown Roseville Partnership, General Fund

PROGRAM 27 FAIR HOUSING AND HOUSING DISCRIMINATION LEGAL SERVICES

In 2019, the City completed a regional effort that updated the 2000 Analysis of Impediments to Fair Housing Choice (AI) pursuant to the 2015 AFFH Final Rule. Relevant sections are incorporated into the Housing Element.

The City shall continue to actively participate in the ongoing region-wide collaborative effort to improve fair housing choice and affirmatively further fair housing.

The City's 19 fair housing indicators for zoning codes analysis for ideal outcomes to prevent fair housing barriers included in the AI based on a checklist developed by the Region IX HUD office found that all of the 19 indicators supported fair housing and that none of the City's zoning codes create barriers to fair housing or impact housing choice. The City will work to ensure that it does not create barriers in its future actions to fair housing or impact housing choice by:

- Regularly complete analysis of the characteristics of the beneficiaries of housing and service programs relative to the income-adjusted resident population
- Require that developers receiving public subsidies (monetary or in the form of density bonuses and fast track review) use affirmative fair housing marketing practices
- Monitor how public sector investments can contribute to economic changes in neighborhoods, possibly accelerating displacement of low-income residents
- Conduct robust and meaningful public engagement activities and events when considering adoption of policies to ensure all voices in the community are heard.
- In making planning decisions, be aware of how the built environment communicates inclusiveness or exclusiveness to different types of residents
- Holding monthly housing meetings for non-profit organizations and local stakeholders, including the Latino Leadership Council, to share regional resources [and ensure equitable distribution of resources](#).
- Encourage and support affordable housing across the City in all neighborhoods, with a focus on areas of high opportunity.

The City will continue to provide assistance regarding equal housing opportunities through its Housing Division and Housing Authority in addition to funding a program which will provide the services of legal counsel to persons experiencing housing discrimination.

The City of Roseville will continue its collaborative Housing Education Campaign to provide fair housing counseling workshops and one-on-one counseling for Roseville residents, landlords/property owners, and tenants, with counseling provided by Project Sentinel or similar HUD qualified fair housing provider, through the City's Fair Housing Education Program. Under contract with the City, fair housing provider will also offer fair housing workshops, respond to inquiries and provide wide-ranging fair housing information. Its website is a rich resource with information in six languages.

In addition to the provision of workshops and one-on-one counseling, the City's website includes fair housing information and referral service data with links to other Fair Housing resources.

(Policies H7.6, H7.7, H7.8)

Time Frame: Ongoing, and at least annually.

Objectives: To ensure residents are informed of their housing rights and are provided with support on fair housing issues, and that City actions do not create barriers to fair housing or impact choice. Annually, 50 responses to

inquiries; at least 1 Fair Housing Workshop; Adequate annual funding, \$12,000 for 2022, future years amount responsive to resources/needs.

Implementing Agency: Housing Division and Roseville Housing Authority

Funding Source: Housing Choice Voucher Rental Assistance, Community Development Block Grant Funding, City's Low- and Moderate-Income Fund, General Fund

Table X-30 | Downtown & Riverside Gateway Specific Plan High Density Residential Opportunity Sites

Map #	Address	Total Units	Residential Density (units/acre)	Floor Area Ratio	Acres	Zoning*	Existing Use	Permitted Use	Previous Inventory Y/N
Historic Old Town									
1	725-845 Lincoln	63	30	0.9	2.0	CMU/SA-DT	Vacant lot	Commercial/Residential	Y
This is a vacant triangular lot with roadway frontage on Lincoln Street and Washington Boulevard. It is also identified in the Downtown Specific Plan as a catalyst site, with pre-design plans for residential development. There are no easements or other such constraints to development, and the City has received inquiries about residential development on this site within the past year.									
2	400-412 Washington, 209-211 Pleasant, 210 Grove	34	37.8	--	0.7	CMU/SA-DT	Auto Sales / Office / Residential	Commercial/Residential	Y
This site consists of five parcels with frontage on Washington Boulevard, Grove Street, and Pleasant Street, as well as an alley access. One parcel contains an older home, a second is a parking lot used by the small auto dealership on the adjacent parcel, another is a small office with a parking lot, and the last parcel is also a small office with parking. Approximately 19% (5,826 square feet) of building area occupies these properties. Existing improvements are minimal and aging, with chain link fencing, minimal or absent landscaping, and small 50-year-old buildings which have not been updated or improved by reinvestment. The City has had recent, positive experiences with affordable housing projects and other housing projects redeveloping sites such as this, within the nearby area (see evaluation preceding this table). There are no easements or other such constraints to development.									
3	400-426 Lincoln	80	58.1	0.37	1.4	HD/SA-DT	Parking lot	Commercial/Residential	Y
This site is multiple parcels under a single private ownership. The site is a parking lot which was constructed by and at the expense of the City to alleviate parking concerns expressed by surrounding businesses. The City has since completed two parking garages. There are no land use restrictions or other restrictions which would preclude or impede redevelopment of this site. Per the evaluation preceding this table, there has been significant market investment in housing in the general area, including multiple affordable housing projects. Site 4, below, is also a parking lot and an application to develop it as affordable apartments was received and approved by the City, at the same density provided for this site. Site 4 included more access and site design constraints, due to its location and the presence of a neighboring building siting directly on the property line.									
4	120 Pacific	80	60	1.57	1.4	HD/SA-DT	City Parking lot	Approved 4-story apartments, lower income	Y
This site is an existing parking lot, and a permit for a 4-story affordable housing apartment project has been approved on this site. Construction is anticipated to begin within the next year.									
Subtotal		257			5.3				

Riverside Gateway									
5	108–110 Douglas, 119– 125 Riverside	39	40.45	1.29	1.0	CMU/SA-RG	Used Auto Sales	Commercial/Residential	Y
<p>This site contains a used car dealership with a 9,500-square-foot older building, with the remaining 0.7 acres of the site paved with unmarked asphalt where vehicles are displayed. All of the parcels are under single ownership, and the site has roadway frontage on Riverside Avenue and Douglas Avenue. An alley separates the site from a single-family residential area. The Riverside Avenue, Vernon Street, and Douglas Boulevard intersection is a prime gateway intersection, where the City has invested streetscape improvements and monuments. There is a high potential for this corner to be redeveloped with a mixed use project similar to projects approved nearby on Vernon Street, due to its visibility and location, and due to the fact that the majority of the site is undeveloped paved area. This site is near the Lohse Apartments site, where two existing auto business and buildings were purchased and demolished to make way for housing. There are no easements or other such constraints to development.</p>									
6	201–227 Riverside	12	18.3	1	0.7	CMU/SA	Auto/Retail/Residential	Commercial/Residential	Y
<p>This site includes three parcels, two of which are under the same ownership. The site has frontage on Riverside Avenue and Bonita Street. An alley separates the site from a single-family residential area. The 201 Riverside parcel includes a 1,800-square-foot building housing multiple small spaces for offices, which include a psychic, a maid service, a pool service, a loan service, and car sales office. The remainder of that parcel, about 13,000 square feet, is paved with unmarked asphalt and is used for vehicle display. The building is over 100 years old but has had some cosmetic exterior updates. The adjacent parcel at 225 Riverside contains a single-family home, and the parcel at 227 Riverside contains a 1,700 square foot building which is currently a spa. The uses in these commercial buildings have changed multiple times in the past several years. Only 12 units have been assumed, as that would enable units to be built on the site in addition to the existing uses, rather than requiring replacement. Units could be constructed above the existing building, within the current asphalt area, and/or on the parcel with the single-family home. There are no easements or other such constraints to development.</p>									
7	401–415 Riverside, 110 Cherry	20	19.4	0.9	0.8	CMU/SA	Used Auto Sales	Commercial/Residential	Y
<p>This site includes four parcels, all under the same ownership. The site has frontage on Riverside Avenue and Cherry Street. An alley separates the site from a single-family residential area. There are three commercial buildings on the site, totaling approximately 7,000 square feet. One of the structures is a portable building, another is an old building that has not been updated, and the third is also old but has been updated with glass storefront windows. The site is a used car dealership. Most of the site is unmarked asphalt used for displaying vehicles. Only 20 units have been assumed on this site, as that would enable units to be constructed while leaving the more updated commercial building in place. However, as has been seen elsewhere where existing auto businesses have been sold and demolished for mixed use housing, development pressures are sufficient that the entire site could be redeveloped. There are no easements or other such constraints to development.</p>									
8	440 Riverside	10	14.5	0.8	1.0	CMU/SA	Used Auto Sales	Commercial/Residential	Y
<p>This site is two parcels under the same ownership. The site has frontage on Riverside Avenue and Fifth Street. An alley separates the site from a single-family residential area. One parcel contains an approximately 9,000-square-foot building and the second parcel is unmarked pavement and dirt used for vehicle display. The building is old but has updated glass display windows. Only 10 units have been assumed on this site, as that would enable units to be constructed in addition to the existing commercial use, rather than requiring elimination of all commercial use of the site. Utilities in the adjacent roadways have capacity to serve development of this site and there are no easements or other such constraints to development.</p>									
9	527 Riverside, 424 Clinton, 109–115 Darling	61	29	1.31	2.1	CMU/SA	Auto Sales, Auto Repair, Small Retail Strip Mall	Commercial/Residential	Y

This site includes three parcels under the same ownership. The site has frontage on Riverside Avenue, Darling Way, and Clinton Avenue. The largest parcel includes three commercial buildings, totaling 3,960 square feet, one of which is auto repair, the other auto rental (Hertz), and the other is a small brick accessory building to Hertz. The second parcel includes unmarked asphalt where vehicles are displayed for sale (also Hertz), and the third parcel includes a small in-line strip mall occupied by a liquor store (4,000 square feet). All of the buildings on the site are old and have not been updated. The potential of this site is similar to Site 5. This is a key gateway with good visibility, and the City has made public improvements in this area, such as installing gateway monuments and features. Given the market pressures in the area, there is a high likelihood that this site could be redeveloped with a more intensive mixed use project like Lohse or Main Street Apartments, with ground-floor commercial space and upper floor housing. Utilities in the adjacent roadways have capacity to serve development of this site and there are no easements or other such constraints to development.

Subtotal	142			5.6				
Total	399							

*Zoning Designations: CMU = Commercial Mixed Use, HD = Historical District, CBD = Central Business District, SA = Special Area, DT = Downtown Specific Plan area, RG = Riverside Gateway Specific Plan Area

** Refers to the Roseville Specific Plan area; DT = Downtown Specific Plan, RG = Riverside Gateway Specific Plan