

MEMORANDUM

DATE: January, 25, 2024
TO: Pam Eastlick, City Clerk, City of Etna
Rico Tinsman, Contract City Planner, City of Etna
FROM: Michelle Nielsen and Vanessa Blodgett, Planwest Partners
SUBJECT: Revisions to 2023-2031 Housing Element per HCD Input

On November 9, 2023, the City of Etna submitted the 2023-2031 Housing Element to the California Department of Housing and Community Development (HCD) for a required 90-day review. The purpose of this review is for HCD to assess whether the housing element substantially complies with State housing law. All housing elements must undergo this review by the HCD.

In January 2024, HCD provided preliminary findings and comments to the City of Etna. In response to HCD's input, Chapter 2 and Appendix B have been revised. No other chapters or appendices have been revised at this time.

HCD will issue their findings letter on or near February 7, 2024. The City will be able to again address HCD's findings by revising the housing element further as needed to ensure it complies with State housing law.

The revised portions of Chapter 2 and Appendix B are shown with track changes: revisions are shown in ~~strikeout~~ and underline (NOTE: You will notice **RED** and **GREEN** strikethrough/underline text – **RED** indicates deletion/addition of text; **GREEN** indicates movement of text from one location to another location within the document).

Revised Chapter 2 and Appendix B can be read and downloaded on Etna's [Forms & Documents webpage](#). Full copies of the housing element submitted on November 9, are also available on Etna's [Forms & Documents webpage](#):

- https://www.etnaca.com/files/ugd/70436e_71eb23903c4e4a66aed11ed9e67a9a96.pdf
- https://www.etnaca.com/files/ugd/70436e_29de2541b4f940fbb46096dc993c7b96.pdf

Chapter 2 – Goals, Policies, and Housing Programs

This chapter of the Housing Element contains the City’s housing goals and policies, as well as proposed strategies (or programs) to implement these goals and policies.

According to the State General Plan Guidelines (2017), a goal is an ideal future end related to the public health, safety, or general welfare. Because goals are general expressions of a community’s vision for itself, goals may be abstract in nature, and as a result, they are generally not quantifiable or time dependent. Therefore, to aid in reaching the goals, specific statements (i.e., policies) are adopted to guide decision-making and through the implementation of programs that commit the City to specific courses of action.

The objective of the Housing Element goals, policies, and programs is to address those housing needs, constraints to housing production, and contributing factors to fair housing identified in Appendix A. Available funding resources for housing are discussed in Appendix C and are integrated into programs as applicable. Each program contains a description of the intended action, identification of the responsible agency, possible funding sources (if available), the timeline for implementation, and anticipated results. Whenever possible, anticipated results are expressed in quantified terms.

Required Program Components

To address the housing needs of all income levels in compliance with State housing element law, a jurisdiction must, at a minimum, identify a suite of programs that do all of the following:

- Identify adequate sites, with appropriate zoning and development standards and services to accommodate the locality’s share of the regional housing needs for each income level.
- Assist in the development of adequate housing to meet the needs of extremely low-, very low-, low-, and moderate-income households.
- Address and, where possible, remove governmental constraints to the maintenance, improvement, and development of housing, including housing for people at all income levels, as well as housing for people with disabilities.
- Conserve and improve the condition of the existing affordable-housing stock.
- Preserve assisted housing developments at-risk of conversion to market-rate.
- Promote equal housing opportunities for all people, regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.
- Explicitly address, combat, and relieve disparities resulting from past and current patterns of segregation to foster more inclusive communities, address disparities in housing needs and access to opportunity, and foster inclusive communities.

For each program, the jurisdiction must identify a schedule of actions during the planning period, the agencies and officials responsible for implementation, and identification of funding sources to implement the program. Appropriate grant programs that will be applied can be identified as a funding source. The goals of Etna’s 2023-2031 Housing Element are itemized below. Within each goal there are associated policies and programs. Implementation of the policies and programs will facilitate achieving the Goal.

The Goals of the Housing Element and the number of Policies and Programs within each Goal are as follows:

GOAL HE.1: Provide Adequate Sites

GOAL HE.2: Ensure the Availability of a Variety of Housing Types

GOAL HE.3: Conserve, Rehabilitate, and Enhance the Condition of the Existing Housing Stock and Residential Neighborhoods.

GOAL HE.4: Facilitate the Provision of Housing Suited to Persons with Special Needs

GOAL HE.5: Encourage and Support the Development of Affordable Housing

GOAL HE.6: Encourage Sustainable Housing Development and Energy Conservation

GOAL HE.7: Promote Equal and Fair Housing Opportunities for All People



Use of the California icon  below denotes Etna’s policies and programs that fulfill a specific State housing law requirement. Table 2-1 below, lists the 17 programs that are intended to meet a State housing law mandate and is for quick reference. While there are programs that do not have the California icon, these programs are intended to meet one or more of the required program components discussed above. Also, some programs are included in response to public input received during meetings.

Table 2-1 Programs to Meet a Specific State Law Requirement		
Policy HE 1.2	HE.2.3.1	HE.4.2.4
HE.1.3.1	HE.3.2.1	HE.4.2.5
HE.1.3.2	HE.4.2.1	HE.4.2.6
HE.1.3.3	HE.4.2.2	HE.7.1.1
HE.2.1.1	HE.4.2.3	HE.7.1.2
HE.2.2.2		

To affirmatively further fair housing, jurisdictions must establish goals, policies, and actions based on the identified contributing factors, and the priority of those factors. Government Code Section 8899.50 requires “meaningful actions” well beyond combating discrimination to overcome patterns of segregation and foster inclusive communities. These actions, as a whole, must:

- Address significant disparities in housing needs and in access to opportunity;
- Replace segregated living patterns with truly integrated and balanced living patterns;
- Transform racially and ethnically concentrated areas of poverty into areas of opportunity; and
- Foster and maintain compliance with civil rights and fair housing laws, to address Etna’s fair housing issues and the contributing factors.

Contributing factors are prioritized in Section 7.0 of Appendix A. Etna’s Action Plan that will address the identified contributing factors to overcome identified patterns of segregation and affirmatively further fair housing is also found in Section 7.0 of Appendix A. Etna’s housing programs to affirmatively further housing are not confined to Appendix A alone as Chapter 2 also includes programs that affirmatively address fair housing issues. Programs that further fair housing are identified by fair housing icon: 

Goal HE.1 – Provide Adequate Sites

Assist in increasing the affordability of housing in Etna, the City shall provide adequate sites to accommodate the City’s housing needs and regional housing needs, provide a wide range of housing section by location, type, income level, and tenure by always ensuring there is an adequate supply of land for residential development.

Policy HE.1.1

The City shall encourage and facilitate the construction of housing to meet the City’s share of regional housing needs during the 2023-2031 Housing Element planning period of at least one (1) extremely low income unit and one (1) low income unit. In addition to Etna’s share of the regional housing needs, the City shall encourage and facilitate the rehabilitation and construction of the following number of housing units according to the following income levels:

**Table 2-2
City of Etna Quantified Objectives, 2023-2031**

	Extremely Low Income	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
New Construction	1	1	1	0	0	3
Rehabilitation	1	1	1	0	0	3
Preservation*	0	0	0	0	0	0
Totals	2	2	2	0	0	6

* The City has not established an objective for preservation of affordable housing as there are no assisted housing developments or units in the City; therefore, there is no risk of conversion during the planning period.

Policy HE.1.2

Ensure Etna provides adequate sites with appropriate zoning and available public facilities and services to meet the City’s share of regional housing needs for all income groups during the housing element planning period. These lands shall be available at any time with appropriate General Plan and Zoning regulations for residential development to reduce the impact that the lack of available land may have on the cost of single-family and multifamily development.

Policy HE.1.3

The City shall not place any condition of approval that lowers the proposed density of a residential project if the project otherwise conforms to the General Plan, zoning, and/or development policies in effect, unless the requisite findings required by Government Code Section 65589.5 et seq. are made.

Program HE.1.3.1 **Provide Adequate Sites and No Net Loss Compliance**

To ensure at all times during the planning period the City has an adequate inventory to accommodate its designated regional housing need allocation, the City will evaluate and make written findings for entitlement and building permit applications seeking to develop designated inventory sites for decreases in density and affordability of housing units consistent with No Net Loss Law, Government Code Section 65863 et seq. If project approval will result in an inventory deficit, steps will be taken to replace the lost inventory sites by rezoning qualified properties in other areas as needed to meet the City’s remaining RHNA for lower-income households in accordance with Government Code Section 65863 et seq.

Administration: City Council

Funding: Application fee, General Fund

Timing: On a project-by-project basis; the City shall conform with the provisions of Government Code Section 65863 et seq. if an inventory deficit is found

Program HE.1.3.2 Monitor Availability of Sites

- 1) Coinciding with the annual General Plan Progress Report, update and review the inventory of vacant residential land in the city and amend zoning and land use designations, as necessary, to ensure an adequate supply of vacant land to accommodate Etna’s share of regional housing needs, a variety of housing types for all income levels. If a deficiency is projected to occur, the City shall take steps to change the General Plan and zoning as needed to increase the amount of available land. As a part of this process, continue to review the effectiveness of the Zoning Ordinance and make revisions if it is found that provisions of the ordinance are creating unusual constraints on the affordability and availability of housing. The City shall make the inventory available to the public, especially the development community, for their information and use.
- 2) The City will continue to monitor the need for multifamily development (i.e., R 3, High Density Residential) on an annual basis. The City Council and the public will receive a report of the analysis outcome and any necessary actions as part of the General Plan Annual Progress reports. “Needed action” to address the need for multifamily development shall include allowing multifamily development in the commercial districts without a use permit. (was Program HE.1.1.1)

Administration: City Council

Funding: General Fund

Timing: 1) and 2): On an annual basis congruent with the General Plan Annual Progress Report, required pursuant to Government Code Section 65400, for the duration of the 2023-2031 housing element planning period.

Program HE.1.3.3 Procedures for Water and Sewer Connections (was Program HE.1.1.5)

- 1) In compliance with State law, i.e., subparagraph (a) of Government Code Section 65589.7, the City shall deliver the adopt housing element to all public agencies that provide water and sewer service in the City of Etna.
- 2) The City shall grant priority for the provision of water and sewer services to proposed developments that include housing units affordable to lower income households, in compliance with State law, i.e., subparagraph (a) of Government Code Section 65589.7.
- 3) In compliance with State law, i.e., subparagraph (b) of Government Code Section 65589.7, the City shall establish written policies and procedures that grant priority for water and sewer to proposed development that includes housing affordable to lower-income households.

Administration: City Council

Funding: General Fund

Timing: 1) Within thirty (30) days of adoption of the 2023-2031 Housing Element; 2) Immediately and at all times for the duration of the 2023-2031 Housing Element; 3) within one year from adoption of the Housing Element.

Program HE.1.3.4 Monitor Public Infrastructure and Development in Sphere of Influence (was Program HE.1.1.5, HE.5.1.1, and HE.5.1.2)

Continue to maintain adequate sewer and water services, as well as plan for the expansion of these services, as may be necessary to continue adequate services for residents and to accommodate a population changes. The Development proposed with the City's sphere of influence, the City shall coordinate with Siskiyou County to ensure proposed development is consistent with the City's General Plan and adopted long-term goals, policies and objectives for housing and related development.

The City will petition owners of property proposing residential subdivisions in the City's sphere of influence, as well as the Siskiyou County Planning Commission, Board of Supervisors and Local Agency Formation Commission, to annex these properties into the City prior to development.

Administration: City Council

Funding: federal and state grants/loans, general fund

Timing: For the duration of the 2023-2031 Housing Element's planning period.

Goal HE.2 – Ensure the Availability of a Variety of Housing Types

Etna shall remove governmental constraints on the development, maintenance, and improvement of housing to ensure a variety of housing types for all income levels can be developed throughout the City of Etna during the 2023-2031 Housing Element planning period.

Policy HE.2.1

The City will ensure that developers and City residents are made aware of key housing programs and development opportunities.

Program HE.2.1.1 Promote the City's Housing Programs to Residents

The City will improve community awareness and support for the City's housing programs citywide by publicly sharing information on the City's website about zoning ordinances, development standards, fees, exactions, surplus public lands, fair housing resources, reasonable accommodation procedures, and housing affordability requirements, and will use affirmative marketing best practices to prepare and publish housing information.

The City shall also encourage development of Accessory Dwelling Units (ADUs) and Junior ADUs by applying for State funding that could allow awarded funds to be used for ADU development such as CalHOME and by publishing information about ADUs and JADUs on its website. This program will be implemented consistent with the requirements of AB 1483 (2019).

The City will perform proactive public outreach using a variety of methods that may include in-person or virtual participation and may occur outside City offices and regular business hours, e.g., community events, farmer's markets; real estate industry workshops, and direct contact with developers and property owners to improve the dissemination of information about the City's housing programs including affordable housing programs.

Administration: Planning Department, City Manager

Funding: General Fund

Timing: Within one year from adoption of the Housing Element. To improve awareness of the City's affordable housing programs, the City will participate in an industry event, workshop, or similar public event/activity at least once a year beginning in 2025.

Policy HE.2.2

The City shall ensure that the City's land use regulations are consistent with State law, and that planning and building entitlement and permit processes and procedures do not unnecessarily constrain the production of housing. The City shall continue its practice of prioritizing multifamily development entitlement applications. The City shall strive also to ensure that City fees are not a constraint to the development of affordable housing.

In addition to the other uses permitted in the High Density Residential (R-3) zone, the City will facilitate development of housing on properties zoned R-3 by allowing multiple attached and/or detached duplexes and triplexes as principally permitted uses up to the maximum density allowed by the zone (20 units per acre).

Program HE.2.2.1 **Multifamily Development in R-3 Zone** (was Program 2.1.2)

The City shall amend Chapters 17.16.050 and 17.16.070 of the High Density Residential – R-3 zone to remove the conditional use permit requirement for multifamily development, and to expressly permit multifamily development as a by-right permitted use. The amendments to Chapters 17.16.050 and 17.16.070 shall continue to permit housing development configured as duplexes and triplexes as by-right permitted housing types.

Administration: Planning Department, City Manager

Funding: General Fund

Timing: Within two years from adoption of the 2023-2031 cycle housing element.

Program HE.2.2.2

~~The City shall amend the Etna Municipal Code, Title 18, to adopt implementing procedures that are consistent with State Density Bonus Law, Government Code Section 65915 et seq. To reduce the need for future municipal code amendments and updates, the amendments will focus on local procedures for processing density bonus applications, and application documents and information required to be submitted with a density bonus application in order for an application to be deemed complete (Government Code Sections 65915, subparagraph (3)). Consistent with subdivision (n) of Government Code Section 65915, the City's Zoning Ordinance amendments for density bonus may consider allowing the City to grant a density bonus greater than prescribed in State Density Bonus Law (SDBL) for a development that meets the requirements of SDBL.~~

~~**Administration:** City Council~~

~~**Funding:** LEAP, and General Fund~~

~~**Timing:** Initiate amendments within one year from adoption of the 2023-2031 Housing Element and adopt amendments within two years from adoption of 2023-2031 Housing Element.~~

Program HE.2.2.3 **Monitor Existing Fees and Possible Fee Reductions for Affordable Housing** (was Program HE.1.1.3)

The City shall review building and development connection fees and permit fees, and modify, as feasible, those standards and fees deemed to be unnecessary, excessive, or that create unusual constraints on affordability and housing availability. At the time of adoption of any new mitigation fees, the City shall consider the housing needs of low- and moderate- income households. Provisions shall be included for potential fee reductions or other cost reductions for projects where 25 percent or more of the housing would be dedicated to low- and moderate-income persons when a covenant is signed assuring continued use by low- and moderate-income households.

Administration: City Council

Funding: General Fund

Timing:

- A) Beginning in 2025, and biennially thereafter.
- B) Prior to adoption of new ordinances and resolutions for residential development standards and fees.

Program HE.2.2.4 Update Conditional Use Permit Findings (was Program HE.3.1.2)

The City shall amend subsection (A) of 17.36.040 of Chapter 17.36 to strike the word “morals” from the findings as this wording is considered to be ambiguous and as such could be discriminatory.

Administration: City Council

Funding: LEAP, and General Fund

Timing: Initiate amendments within one year from adoption of the 2023-2031 Housing Element and adopt amendments within two years from adoption of 2023-2031 Housing Element.

Policy HE.2.3

The City will facilitate the development of workforce and affordable housing through supporting funding applications, expedited permit review, approval of requests density bonus or development incentives, the availability of ministerial streamlining for qualifying projects, and other incentives. The City will work with market rate and nonprofit housing developers, and community organizations to develop workforce and affordable housing.

Program HE.2.3.1 Establish and Promote Local Density Bonus Procedures 

1) The City shall provide density bonuses to homebuilders proposing to include qualifying dwelling units and/or other qualifying project amenities within residential developments consistent with Government Code Section 65915 et seq.

2) The City will prepare and publish materials on the City’s website informing property owners and housing developers of the City’s density bonus program for qualified housing developments consistent with Government Code 65940.1. (was Program HE.1.1.2)

3a) The City shall amend the Etna Municipal Code, Title 18, to adopt implementing procedures that are consistent with State Density Bonus Law, Government Code Section 65915 et seq. To reduce the need for future municipal code amendments and updates, the amendments will focus on local procedures for processing density bonus applications, and application documents and information required to be submitted with a density bonus application in order for an application to be deemed complete (Government Code Sections 65915, subparagraph (3)). Consistent with subdivision (n) of Government Code Section 65915, the City’s Zoning Ordinance amendments for density bonus may consider allowing the City to grant a density bonus greater than prescribed in State Density Bonus Law (SDBL) for a development that meets the requirements of SDBL.

3b) During the Housing Element planning period, the City shall monitor State law for amendments to Government Codes Sections 65915 et seq., to ensure ongoing compliance with State law. If State law is amended such that revisions to the City of Etna’s Zoning Code are necessary for legal compliance, the City will initiate amendments to Title 18 of the Etna Municipal Code.

Administration: City Council, City Administrator

Funding: LEAP and General Fund

Timing: 1) As qualifying prospective projects are submitted; 2) within 30 days of adoption of amendments to the Title 17, of the Etna Municipal Code; 3a) initiate amendments within one year from adoption of the 2023-2031 Housing Element and adopt amendments within two years from adoption of 2023-2031

Housing Element; and 3b) As part of the City’s annual housing element progress report, the City shall report to the City Council any amendments to Government Codes Section 65915.

Program HE.2.3.2 Reduce Parking Requirements for One-Bedroom Units in Multifamily Developments (was Program HE.2.1.4)

Amend the Zoning Ordinance to require a single parking space for each efficiency unit, studio apartment, one-bedroom units in multifamily housing developments, and each single room occupancy unit.

Administration: City Council, City Administrator

Funding: LEAP, and General Fund

Timing: As part of the City’s Zoning Ordinance initiate amendments within one year from adoption of the 2023-2031 Housing Element and adopt amendments within two years from adoption of 2023-2031 Housing Element update which is planned to be adopted in Q4 2024.

Program HE.2.3.3 ADU Ordinance Update

The City shall amend the Etna Zoning Ordinance for Accessory Dwelling Units and Junior Accessory Dwelling Units (J/ADUs), and other sections as applicable, to be consistent with State law. J/ADUs shall continue to be permitted in any residential or mixed-use zone by-right, as a ministerial action without discretionary review or a hearing, subject to objective standards. Residential or mixed-use zones shall be construed broadly to mean any zone where residential uses are permitted by-right or by conditional use. All standards and regulations, including procedures, shall be amended to be consistent with State law, and any written findings issued by HCD in accordance with Government Code Section 65852.2(h)(1).

Administration: Planning Department and City Council

Funding: LEAP and General Fund

Timing: Initiate amendments within one year from adoption of the 2023-2031 Housing Element and adopt amendments within two years from adoption of 2023-2031 Housing Element

Goal HE.3 – Conserve, Rehabilitate, and Enhance the Condition of the Existing Housing Stock and Residential Neighborhoods.

The City shall initiate all reasonable efforts to preserve, conserve, and enhance the quality of existing dwelling units and residential neighborhoods to ensure full utilization of the City’s existing housing resources for as long as physically and economically feasible.

Ensure that the quality, safety, and livability of housing in Etna is continually maintained or upgraded, including measures to improve energy conservation, and that dilapidated units which cannot be improved are replaced.

Policy HE.3.1

The City shall support housing rehabilitation and encourage housing maintenance in order to avoid future need for significant rehabilitation or replacement. Conserve existing housing wherever possible, and ensure existing occupants are provided notice and minimize displacement.

Program HE.3.1.1 Use CDBG Housing Funds for Housing Conservation and Prioritize Funding for Residents with Special Needs

- 1) The City shall continue to encourage the construction of new housing and/or the rehabilitation of existing housing for residents with special needs by granting these persons and/or households priority in the City's CDBG housing rehabilitation program.
- 2) Continue to apply for CDBG funds, and as other appropriate funding becomes available, to assist homeowners with low interest loans and/or grants through the City's Housing Rehabilitation Program. With a goal of assisting 3 households over the next eight years, strive to preserve low- and moderate-income housing through implementation of the Housing Rehabilitation Program. Rehabilitation, energy conservation, and weatherization program information will be periodically updated by staff and disseminated to the public through annual mailings and handouts made available at City Hall. In order to reduce energy consumption in the city, require units to be rehabilitated with CDBG funds to include energy conservation features, such as dual-pane windows, insulation, caulking, and weather stripping. (was Program HE.4.1.1)

Administration: City Administrator

Funding: CDGB/Revolving Loan Fund

Timing: 1) For the duration of the 2023-2031 housing element period. 2) Apply annually as NOFAs are released for the duration of the 2023-2031 housing element planning period.

Program HE.3.1.2 Promote and Encourage Housing Conservation

- 1) The City shall provide free guidance and technical assistance through the Building Department to homeowners who wish to repair and improve the habitability and weatherization of existing housing. The availability of this service will be advertised as part of the City's proactive public outreach for housing to improve community awareness.
- 2) The City shall support third-party and non-profit organizations, such as Great Northern Corporation, that offer zero- and low-cost rehabilitation or weatherization programs, including but not limited to, facilitating notification of owners of homes in need of rehabilitation or weatherization about programs that could help meet rehabilitation needs.
- 3) The City will support and promote the activities of other governmental agencies and non-profits that promote homeowner maintenance and improvement of self-help skills. The City will advertise the availability of these programs and services using the City's website, mailers with utility bills, and display of printed materials in City offices and the City library.
- 4) The City shall continue to perform proactive code enforcement to improve housing units that are substandard and have habitability issues in order to conserve the inventory of housing, encouraging the removal of dilapidated housing, using funding where possible, to offset the cost of replacement housing. (was Program HE.4.1.1)
- 5) The City will implement affirmatively marketing of its housing programs. An affirmative marketing program will include:
 - Advertising the availability of programs in multiple languages, and advertise in various media outlets, such as newspapers, magazines, radio, or online platforms, that reach a wide and varied audience.
 - Provide information about the program to potential applicants in multiple languages.

- Offering reasonable accommodations to persons with disabilities to ensure equal opportunity to apply. This measure includes placing information relating to requests for reasonable accommodations at the main counter at City Hall and on meeting agendas.
- Creating materials that feature images and messages that appeal to a diverse range of potential applicants, including classes protected under fair housing laws.

Administration: City Council, City Administrator

Funding: General Fund

Timing:

- 1) No less than annually
- 2) The City shall contact third-party and non-profit organizations no less than annually about availability of zero- and low-cost rehabilitation or weatherization programs.
- 3) The City shall contact agencies and non-profit organizations no less than annually about planned activities, and coordinate participation.
- 4) Transactionally during the planning period, and as substandard housing conditions are verified by City employees or the Building Department.
- 5) For the duration of the 6th cycle housing element planning period.

Policy HE.3.2

Implement Replacement Housing to Mitigate the Loss of Affordable Housing Units on Housing Element Inventory Sites. Upon City Council adoption of the 6th Cycle Housing Element Update, the City shall immediately begin implementing replacement housing, when applicable, in accordance with Government Code Section 65583.2(g)(3). The replacement housing policy shall require new housing developments on the City's designated Housing Element Inventory Sites to replace all affordable housing units lost due to new development. The City shall also prepare and adopt a local replacement housing policy.

Program HE.3.2.1 **Establish a Replacement Housing Policy**

The City shall prepare and adopt a written replacement housing policy consistent with Government Code Section 65583.2(g)(3). The City will adopt a policy and will require replacement housing units subject to the requirements of Government Code section 65915, subdivision (c)(3) on sites identified in the City's site inventory when any new development (residential, mixed-use or nonresidential) occurs on a site that is identified in the inventory meeting the following conditions:

- currently has residential uses or within the past five years has had residential uses that have been vacated or demolished, and
- was subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low-income, or
- subject to any other form of rent or price control through a public entity's valid exercise of its police power, or
- occupied by low or very low-income households.

The City's policy will also consider how to provide disclosure for properties subject to replacement housing for future property owners.

Administration: City Council

Funding: General Fund

Timeframes: The Replacement Housing requirement shall be implemented immediately and applied as applications on designated Housing Element Inventory Sites are received and processed, and local policy shall be adopted by December 31, 2024.

~~Policy HE.3.3~~

~~Conserve existing housing wherever possible, ensure existing occupants are provided notice and minimize displacement of occupants.~~

Goal HE.4 – Facilitate the Provision of Housing Suited to Persons with Special Needs

The City shall facilitate development of sites for special needs housing, including the housing needs of persons with disabilities and persons experiencing homelessness.

Policy HE.4.1

Continue to promote housing for persons with special needs, including senior households, female-headed households, persons with disabilities, persons with developmental disabilities, farmworkers, and large households. The City shall give high priority to the building permit processing and inspections for individuals with disabilities, including developmental disabilities.

Policy HE.4.2

The City shall amend Title 18, Etna Municipal Code, to ensure the Zoning Regulations comply with state law and are implemented consistent with state law. Specifically:

- Government Code Section 65583 for emergency shelters.
- Government Code Section 65650-65656 for supportive housing developments. The amendments shall permit supportive housing developments by-right in zones that permit multifamily and mixed uses including nonresidential zones permitting multifamily uses when the statutory requirements are met. [Qualifying supportive housing developments shall comply with the objective development standards and policies that apply to other multifamily development within the same zone.](#)
- Government Code Section 65660-65668 for low barrier navigation centers, a type of emergency shelter. The amendments shall permit low barrier navigation centers by-right in the same zones that permit emergency shelters as well as areas zoned for mixed use and nonresidential zones permitting multifamily uses when the statutory requirements are met.
- Employee housing including farmworker housing consistent with Health and Safety Code Sections 17021.5, 17021.6, and 17021.8.

Program HE.4.2.1 [Supportive Housing Developments, Low Barrier Navigation Centers, and Single Room Occupancy Housing](#)

- 1) Consistent with Government Code Section 65650 et seq., the City shall amend the R-2, R-3, M-H, C-1 and C-2 zones to allow by-right supportive housing developments as a by-right use and not subject to a conditional use permit or other discretionary approval if the requirements of Government Code Sections 65651 and 65652 are met.

- 2) Consistent with Government Code 65583(c)(3), the City shall amend the C-1 and C-2 zones to allow low barrier navigation centers as a by-right use and not subject to a conditional use permit or other discretionary approval if the requirements of Government Code Section 65662. For the C-1 zone, the establishment of a low barrier navigation center shall not be qualified on the presence of nonresidential use, and shall be permitted at street level. The Zoning Ordinance amendments to establish definitions, procedures, and standards for low barrier navigation centers be consistent with provisions of Government Code Section 65660 et seq.
- 3) Conditional use permit findings for single room occupancy housing shall be objective and provide for approval certainty for single room occupancy housing in the R-2 and R-3 zones.

Administration: City Council

Funding: General Fund

Timing: Initiate amendments within one year from adoption of the 2023-2031 Housing Element and adopt amendments within two years from adoption of 2023-2031 Housing Element.

Program HE.4.2.2 Emergency Shelters

The City shall continue to permit emergency shelters in the C-2 zone without a conditional use permit or other discretionary permit, subject only to development and management standards that apply to residential or commercial development in the same zone, and that shall not have the effect of precluding emergency shelters. Management standards shall be objective and encourage and facilitate the development of, or conversion to, emergency shelters, and are consistent with Government Code Section 65583(a)(4) et seq. Off-street parking standards shall be consistent with Government Code Section 65583(a)(4)(A). Specifically, the City shall:

- 1) Pursuant to Government Code Section 65583(a)(4)(A), AB 139 (2019), the City shall amend the off-street parking requirements for emergency shelter regulations, section 17.34.280 of the Etna zoning regulations. The parking standard shall be objective, limit the number of required parking spaces to ensure the parking requirements for emergency shelters to the number of spaces needed to accommodate staff working in the shelter, and shall do not exceed those for residential or commercial uses and are objective.
- 2) Amend the definition of emergency shelters, section 17.06.785 of the Etna Zoning Ordinance, to comply with Government Code Section 65583(a)(4)C, and to expressly include other interim housing interventions, including but not limited to a navigation center, bridge housing, and respite or recuperative care.
- 3) The emergency shelter duration of stay standard in section 17.34.280.C of the Etna Zoning Ordinance shall be amended to be consistent with the definition in section 17.06.785 of the Etna Zoning Ordinance.

Administration: City Council

Funding: General Fund

Timing: Initiate amendments within one year from adoption of the 2023-2031 Housing Element and adopt amendments within two years from adoption of 2023-2031 Housing Element.

Program HE.4.2.3 Employee Housing, Including Farmworker Housing

- 1) The City shall amend the Zoning Ordinance to allow employee housing including farmworker housing consistent with Health and Safety Code Section 17021.5. Specifically:
 - A) Consistent Section 17021.5 of the Health and Safety Code, any employee housing providing accommodations for six or fewer employees shall be deemed a single-family structure with a residential land use designation, and shall be a by-right use in the R-1-10, R-1-12, R-2, R-3, and M-H zones. Use of a

family dwelling for purposes of employee housing serving six or fewer persons shall not constitute a change of occupancy per section 17021.5 of the Health and Safety Code,

- B) Employee housing of permanent construction consisting of no more than 36 beds in a group quarters, or 12 units or spaces designed for use by a single family or household, shall be allowed by-right in the R-3 and M-H zones, in the same manner and subject only to development standards that apply to residential development in the same zone, and in C-1 and C-2 zones with a use permit.
- C) For the purpose of all local ordinances, employee housing shall not be included within the definition of a boarding house, rooming house, hotel, dormitory, or other similar term that implies that the employee housing is a business run for profit or differs in any other way from a family dwelling.

2) The City will also explore the possibility of utilizing the Joe Serna Grant program as a means to buy existing housing and convert the housing into farmworker housing.

Administration: City Council

Funding: LEAP and General Fund

Timing: 1) Initiate amendments within one year from adoption of the 2023-2031 Housing Element and adopt amendments within two years from adoption of 2023-2031 Housing Element. 2) Apply annually as NOFAs are released for the duration of the housing element planning period.

Program HE.4.2.4 Amend the Definition of Family  

The City shall either repeal or amend the definition of “family” in Section 17.06.820, Title 17 of the Etna Zoning Regulations, and the amendments shall comply with State law. Should the City elect to amend the definition of family (rather than repealing the definition), the amendments shall not overly scrutinize living arrangements, limit a family to single housekeeping units, require that residents be related by blood, marriage, or adoption, or impose a zoning limit on the number of unrelated people. The City shall consult the Department of Housing and Community Development (HCD) Group Home Technical Advisory published December 2022, or any updates thereto.

Administration: Planning Department

Funding: General Fund

Timing: Initiate amendments within one year from adoption of the 2023-2031 Housing Element and adopt amendments within two years from adoption of 2023-2031 Housing Element.

Program HE.4.2.5 Group Homes  

Group homes, even homes that have more than six residents, that do not provide licensable services shall continue to be allowed in R-1-10, R-1-12, R-2, R-3, M-H zones by-right, treated indistinguishably from other residential uses in the same zone, and subject only to the generally applicable, nondiscriminatory health, safety, and zoning laws that apply to other residential development within the same zone. The City shall amend Title 18 of the Etna Municipal Code for the following, and in preparing the amendments, the City shall consult the Department of Housing and Community Development (HCD) Group Home Technical Advisory published December 2022, or any updates thereto. The amendments to the Etna Municipal Code shall allow:

- ~~1) Group homes, even homes that have more than six residents, that do not provide licensable services shall be allowed in R-1-10, R-1-12, R-2, R-3, M-H zones by right, subject only to the generally applicable, nondiscriminatory health, safety, and zoning laws that apply to other residential development within the same zone.~~

~~2)1) The City shall amend the Zoning Ordinance for Group homes that provide licensable services to six or fewer residents shall be allowed in R-1-10, R-1-12, R-2, R-3, M-H zones by-right to remove the review for overconcentration provision, subject only to the generally applicable, nondiscriminatory health, safety, and zoning laws that apply to residential development within the same zone. Group homes that provide licensable services to six or fewer residents shall continue to be allowed in R-1-10, R-1-12, R-2, R-3, M-H zones by-right, and subject only to the generally applicable, nondiscriminatory health, safety, and zoning laws that apply to residential development within the same zone~~

3)2) Conditional use permit findings shall be objective and provide for approval certainty for groups homes that provide licensable services to more than six residents in the R-2, R-3, M-H , C-1, and C-2 zones.

~~4) Amend the definition of group home shall be consistent State law, including the City’s obligation to affirmatively further fair housing, and HCD’s Group Home Technical Advisory published December 2022.~~

Administration: Planning Department

Funding: General Fund

Timing: Initiate amendments within one year from adoption of the 2023-2031 Housing Element and adopt amendments within two years from adoption of 2023-2031 Housing Element.

Program HE.4.2.6 Reasonable Accommodation Ordinance Updates 

The City shall amend the reasonable accommodation procedures, Chapter Title 17.50, to conform with federal and state law. Specifically, the amendments shall make the following updates:

- 1) Repeal the findings and decision language in section 17.050.070(A) of “potential impact on surrounding land uses” and the “physical attributes of the property and structure”.
- 2) ~~The conditions of approval in subsection (B) of Finding (7) of~~ 17.050.070 shall be amended to require engagement of the interactive process to determine if another reasonable accommodation may provide an equivalent level of benefit when a reasonable accommodation request would impose an undue financial burden and administrative burden on the City and/or would require a fundamental alteration to the zoning laws, policies, or procedures of the City.
- 3) The written procedures shall allow a provider or developer of housing for individuals with disabilities to also request reasonable accommodation.

Administration: City Council and Planning Department

Funding: General Fund

Timing: Initiate amendments within one year from adoption of the 2023-2031 Housing Element and adopt amendments within two years from adoption of 2023-2031 Housing Element.

Program HE.4.2.7 Senior Care Facilities 

The City shall amend the Zoning Ordinance to allow senior care facilities by right in the High Density Residential (R-3) and Mobile Home Residential (M-H)) districts and with a use permit in the Community Commercial (C-1) and General Commercial (C-2) districts.

Administration: City Council and Planning Department

Funding: General Fund

Timing: Initiate amendments within one year from adoption of the 2023-2031 Housing Element and adopt amendments within two years from adoption of 2023-2031 Housing Element.

Policy HE.4.3

The City shall encourage and support organizations and programs, including housing providers, to address the housing needs of special needs groups (seniors, female headed households, single-parent households with children, persons with disabilities, persons with developmental disabilities, farmworkers, individuals and families experiencing homelessness, and persons with extremely low incomes). The City shall seek to assist in meeting these special housing needs through a combination of regulatory amendments and incentives, and identifying and applying for funding with qualified housing developers to develop needed housing in the City.

Program HE.4.3.1 Inter-Jurisdiction Coordination and Planning to Address Homelessness (was Program HE.1.2.6)

- 1) The City will support the implementation of the Siskiyou County 10 Year Plan to End Homelessness, specifically goals for increasing the supply of permanent supportive housing and affordable housing, expanding the capacity for housing providers, and expanding options for low barrier emergency shelter and housing. The City will consult with the NorCal Continuum of Care Coordinator on strategies to provide services, shelter, and housing for those experiencing homelessness in the City.
- 2) The City shall assist appropriate public and/or non-profit entities as feasible to develop a shelter, navigation center, or other recognized type of emergency housing for persons experiencing homelessness in the city by pursuing grant opportunities and providing technical assistance in grant applications for State and Federal funding.
- 3) The City shall support agencies and organizations providing services to those experiencing homelessness by annually updating referral information.
- 4) The City will continue to support the efforts of the housing authorities in administering the Housing Choice Voucher program.
- 5) The City will meet with representatives from the Housing Authorities, the NorCal continuum of care, and other nonprofit organizations to provide information on potential sites and housing development proposals that would be appropriate for the use of housing vouchers in conjunction with state or federal new construction or rehabilitation subsidies.
- 6) The City will partner with area social services agencies and non-profit organizations to assess the housing needs for seniors, people with disabilities (including developmental disabilities), extremely low-income residents, and identify funding sources to develop needed services in the City.
- 7) The City shall maintain a list of non-profit organizations interested in the construction of affordable housing in the City and the region, and meet with and assist organizations desiring to maintain affordable housing in the City.

Administration: City Administrator

Funding: CDBG/Revolving Loan Account

Timing: Coordination will occur at least annually from 2024 to 2031; the City will apply for funding annually.

Goal HE.5 – Encourage and Support the Development of Affordable Housing

The City will encourage the construction of new or dedication of existing housing that is affordable to extremely low, very low, low, and moderate income households.

Policy HE.5.1

The City shall encourage and support the development of housing affordable to extremely low, very low, low, and moderate income households.

Program HE.5.1.1 Support the Development of Housing for Extremely Low Income Households and Remove Barriers (was Program HE.1.1.4)

The City shall encourage and support plans that include extremely low, very low, and low income housing in R-2, R-3, and M-H zones when located within a distance a person can reasonably walk to services (e.g., quarter mile) or an existing or new transit stop is within a quarter mile of the development. The phrase “encourage and support” as used herein, may include, but is not limited to:

- Site identification;
- Local, state, and federal permit assistance.
- Give priority to processing of affordable housing projects, taking the applications out of submittal sequence if necessary to receive an early hearing date;
- Allow phasing of infrastructure whenever possible at time of project review;
- Facilitate the provision of public transportation services to serve residential areas, including services for people with handicaps and the installation of bus stops at safe and convenient locations;
- Maintenance of relationships with funding and facilitating agencies and organizations; and
- Any other action on the part of the City that will reduce development costs.

Administration: City Council

Funding: General Fund

Timing: As residential project applications are considered.

Program HE.5.1.2 Monitor State and Federal Funding for Housing

To support the development of housing affordable to low, very low, and extremely low-income households, the City will continue to review and pursue potential state and federal funding that can be used in support of affordable housing (e.g., CDBG and HOME) annually, or as funding becomes available; submit funding applications as appropriate, and grant priority to projects that include units affordable to extremely low-income households.

Administration: City Council, City Administrator

Funding: General Fund

Timing: Apply for funding annually, or as funding becomes available, for the duration of the 2023-2031 housing element planning period.

Program HE.5.1.3 Promote the City's Housing Programs to Affordable Housing Developers

The City will improve awareness and support for the City's workforce and affordable housing programs by preparing, publishing, and distributing an affordable housing information brochure/newsletter that will be a local resource for persons interested in developing low-cost housing. The City will encourage the participation of agencies and organizations that operate rental and mortgage subsidy and self-help housing programs. This program will be implemented consistent with the requirements of AB 1483 (2019). To improve the dissemination of the City's affordable housing programs, the City will provide information, printed and as web content. The City will perform proactive public outreach using a variety of methods that may include in-person or virtual participation, e.g., development industry events or workshops, and direct contact with developers and property owners to improve the dissemination of information about the City's affordable housing programs. The City will refer persons interested in developing low-cost housing to appropriate government and non-profit organizations for assistance.

Administration: City Council, City Administrator

Funding: General Fund

Timing: Within two years from adoption of the Housing Element. To improve awareness of the City's affordable housing programs, the City will participate in an industry event, workshop, or similar public event/activity at least once a year beginning in 2025.

~~Program HE.5.1.4~~

~~The City will continue to review potential funding sources (e.g., CDBG and HOME) that can be used in support of affordable housing and submit funding applications as appropriate.~~

~~**Administration:** City Council, City Administrator~~

~~**Funding:** General Fund~~

~~**Timing:** Apply for funding annually, or as funding becomes available, for the duration of the 2023-2031 housing element planning period.~~

Goal HE.6 – Encourage Sustainable Housing Development and Energy Conservation

Etna will encourage sustainable housing development and energy conservation shall pursue sustainable development for the new development and existing housing stock in the City.

Policy HE.6.1

The City shall promote the use of energy conservation measures in all housing through the use of public and private weatherization programs. The City will be receptive to encouraging new alternative energy systems, such as solar and wind, and water conservation measures.

Program HE.6.1.1 Promote Energy Efficiency and Conservation via Weatherization

Promote the use of energy conservation measures in all housing through the use of public and private weatherization programs. Provide information on currently available weatherization and energy conservation programs to residents. The City will have information available for the public at the front counter of City Hall and will distribute information through an annual mailing. The City will provide referrals and participate in informing households that would potentially benefit from these programs as appropriate. The City shall facilitate the weatherization of an average of 10 homes per year during the 6th cycle planning period by providing information

Administration: Building Department, City Manager

Funding: Private, and government funds. The City will apply for funds to assist residents with energy conservation retrofits and weatherization resources.

Timing: Initiate no later than December 2025.

Program HE.6.1.2 Title 24 for Energy Efficiency and Conservation

The City shall continue to enforce State requirements, including Title 24 of the California Code of Regulations, for energy conservation in new residential projects and encourage residential developers to employ additional energy conservation measures for the siting of buildings, landscaping, and solar access through development standards contained in the Zoning Ordinance, Building Code, and Specific Plans, as appropriate.

Administration: Building Department

Funding: Private and government funds

Timing: Because this is a current building code requirement, the City will implement it as part of the building permit application and review process.

Goal HE.7 – Promote Equal and Fair Housing Opportunities for All People

The City shall promote opportunities for persons from all economic segments of the community regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.

Policy HE.7.1

Eliminate housing discrimination based on race, color, religion, sex, national origin, ancestry, marital status, age, household composition or size, disability, or any other arbitrary factor by removing constraints within control of the City.

Program HE.7.1.1 Disseminate Fair Housing Information and Respond to Fair Housing

Complaints (was Implementation Measures HO-7.1.1, HO-7.1.2, and HO-7.1.3)  

- 1) The City shall support designated regulatory agencies in the prevention and correction of any reported discrimination in housing.
- 2) City staff shall refer all complaints regarding housing discrimination of any kind to the State Department of Fair Employment and Housing. The City shall monitor such complaints by checking with the affected agency and the complainant, and consider the need for future action if a trend develops, or if the complaint is not resolved.
- 3) The City shall provide information concerning discrimination compliant procedures to the public at social service centers, the senior center, City Hall, the library, housing projects participating in HUD Section 8 Programs, and other semi- public places. The information will provide locations and phone numbers of agencies to contact for assistance. This outreach effort will be made to include groups likely to experience discrimination in housing including minority, elderly, disabilities, and lower-income households. The City will support and participate in efforts by local government and non-profits to develop a renters’ resource program.
 - A) The information and content of this program shall be incorporated into the community awareness improvement program, Program HE-2.1.1 herein, sharing information on the City's website, and by

performing proactive public outreach using a variety of methods that may include in-person or virtual participation and may occur outside City offices and regular business hours.

- 4) Conduct at least bi-annual training for the City Council on fair housing, affirmatively furthering fair housing, and the Housing Accountability Act.

Administration: City Manager

Funding: General fund

Timing:

A)–C) At all times during the 2023-2031 Housing Element cycle.

D) The City shall provide training at least bi-annually, with the first training held by 12/31/24.

Program HE.7.1.2 Implementation of the AFFH Action Plan

Appendix A analyzes fair housing conditions in the City of Etna, and provides a regional comparison. Table a-XX in Section 7.0 of Appendix A identifies the City’s fair housing issues and contributing factors, and the contributing factors are prioritized in Table A- 37 of Appendix A.

The City’s Affirmatively Furthering Fair Housing action plan is identified as Table A-37, section 7.0, Appendix A, and hereby incorporated by reference. The City’s AFFH Action Plan addresses the identified fair housing issue and contributing factors.

The City shall implement the Affirmatively Furthering Fair Housing action plan and take meaningful actions citywide to address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming areas of concentrated poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair-housing laws for all persons in accordance with state and federal law.

Administration: City Council

Funding: General fund

Timing: At all times for the duration of the 2023-2031 Housing Element planning period. As part of the housing element annual progress report (APR) process the City will review progress made towards achieving the desired outcomes of its AFFH Action Plan, and to make adjustments as needed to increase goal obtainment. The first AFFH progress review will be conducted in 2025 for the calendar year 2024.

Appendix B – Housing Constraints and Needs

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1.0 Introduction

Various interrelated factors may constrain the ability of the private and public sectors to provide adequate housing that meets the needs of all economic segments of the community. These constraints can be divided into two categories: governmental and non-governmental. Governmental constraints consist of land use controls, development standards, processing fees, development impact fees, code enforcement, site improvement costs, development permit and approval processing, and provision of a variety of housing. Non-governmental constraints include land availability, land cost, construction costs, and availability of financing. The final section in this Appendix describes the City’s share of the projected Regional Housing Need for the region.

2.0 Governmental Constraints

2.1 Land Use Controls

The City of Etna General Plan establishes policies that guide all new development, including residential land uses. They are designed to protect and promote the health, safety, and general welfare of residents and to preserve the character and integrity of existing neighborhoods. These policies, along with zoning regulations, control the amount and distribution of land allocated for different land uses in the city. Table B-1 shows the residential land use designations established by the General Plan.

**Table B-1
Residential Land Use Designations**

Designation	Maximum Units/Acre	Max. Lot Coverage	Typical Uses
Residential Agriculture (R-A)	1 – 5 units/acre	35%	Single-family residential dwellings.
Low Density Residential (LDR)	1 - 5 units/acre	35%	Single-family residential dwellings.
Medium Density Residential (MDR)	1-10 units/acre	50%	Duplex, Triplex or low-density apartments.
High Density Residential (HDR)	1-17 units/acre	75%	Multi-family housing.

Source: City of Etna General Plan 2004.

2.2 Residential Development Standards in Residential Zones

Zoning regulations are designed to protect and promote the health, safety, and general welfare of residents as well as implement the policies of the General Plan. The Zoning Ordinance also serves to preserve the character and integrity of existing neighborhoods.

The 1984 Zoning Ordinance was revised several times, most recently in 2022 with adoption of Ordinance 223. The below analysis analyzes potential constraints of the proposed zoning regulations on housing development.

The zoning regulations allow a variety of housing types including multifamily uses in the R-2 and R-3 zoning districts as principally permitted uses. As shown in the tables below, the proposed development standards facilitate multifamily development at a density of up to 20 dwelling units per acre which will help the City meet its projected housing needs by stimulating production of housing, particularly housing at higher densities which tends to be more affordable to lower income households.

**Table B-2
Residential Zone Districts and Development Standards**

	One Family (R-1)	Medium Density (R-2)	High Density (R-3)
Housing Types Principally Permitted	Single Family, Accessory Dwelling Units (ADUs), Junior ADUs (JADUs), Small Group Care Homes, Small Agricultural Employee Housing, Supportive Housing, Transitional Housing	Single Family, ADUs & JADU’s, Duplexes or Triplexes Small Group Care Homes, Small Agricultural Employee Housing, Supportive Housing, Transitional Housing	Single Family, ADUs & JADU’s, Duplexes and Triplexes, Small Group Care Homes, Small Agricultural Employee Housing, Supportive Housing, Transitional Housing
Max. Units Per Acre	R-1-10 – 4 R-1-12 – 3	10	20
Minimum Lot Size (sf)	R-1-10 – 10,000 sf R-1-12 – 12,000 sf	7,200	7,200
Minimum Lot Width (ft)	R-1-10 – 60 R-1-12 – 70	60	60
Front Yard Setback (ft)	20	20	20
Side Yard Setback (ft)	10	10	10
Rear Yard Setback (ft)	R-1-10 – 10 R-1-12 – 15	10	10
Max. Building Height:			
Primary Use (ft):	35	35	45
Accessory Use (ft):	20	20	20
Max. Lot Coverage	40%	50%	75%
Minimum Parking Spaces Per Unit: Single family: 2 spaces Duplexes: 2 spaces Triplexes: 2 spaces Multifamily: 2 spaces/unit + 1 space for every 2 dwelling units over 3 units One-bedroom Units: 1 space/unit + 1/2 space for every 2 dwelling units over 3 units			

Note: Translation of abbreviations used in the table are “Max” = maximum, “sf” = square feet, and “ft” = linear feet

**Table B-3
Residential Zone Districts and Development Standards (continued)**

	Mobile Home Residential (M-H)
Housing Types Principally Permitted	Single Family, ADUs & JADU's, Duplexes or Triplexes, Small Group Care Homes, Small Agricultural Employee Housing, Supportive Housing, Transitional Housing Mobile home parks
Max. Units Per Acre	20
Minimum Lot Size (sf)	8,000 (interior lot) 9,000 (corner lot) 4,000 (interior lot – townhouses) 5,000 (corner lot – townhouses)
Minimum Lot Width (ft)	80
Front Yard Setback (ft)	20
Side Yard Setback (ft)	10
Rear Yard Setback (ft)	10
Max. Building Height:	
Primary Use (ft):	45
Accessory Use (ft):	15
Max. Lot Coverage	65%
Minimum Parking Spaces Per Unit:	
Single family:	2 spaces
Duplexes:	2 spaces
Triplexes:	2 spaces
Mobile Homes:	2 spaces
Multifamily:	2 spaces/unit + 1 space for every 2 dwelling units over 3 units
	One-bedroom Units:
	1 space/unit + 1/2 space for every 2 dwelling units over 3 units

Note: Translation of abbreviations used in the table are "Max" = maximum, "sf" = square feet, and "ft" = linear feet

**Table B-4
Mixed Use Zone Development Standards**

	Central Commercial (C-1)
Housing Types Principally Permitted when the commercial use is located at street level and the residential use is located above or below street level	Single Family, ADUs & JADU’s, Duplexes or Triplexes, Multiple-family apartments, Small Group Care Homes, Small Agricultural Employee Housing, Supportive Housing, Transitional Housing
Max. Units Per Acre	20
Minimum Lot Size (sf)	5,000 (new parcels) 2,500 (existing parcels)
Minimum Lot Width (ft)	50 (new parcels) n/a (existing parcels)
Front Yard Setback (ft)	0
Side Yard Setback (ft)	0 (Adjacent to commercial or vertical mixed-use development, otherwise 10)
Rear Yard Setback (ft)	0 (Adjacent to commercial or vertical mixed-use development, otherwise 10)
Max. Building Height: Primary Use (ft): Accessory Use (ft):	45 n/a
Max. Lot Coverage	75% (new parcels) 100% (existing parcels)
Minimum Parking Spaces Per Unit <u>for Vertical Mixed Use:</u>	
Single family:	1 space
Duplexes:	1 space
Triplexes:	1 space
Multifamily:	1 space

Note: Translation of abbreviations used in the table are “Max” = maximum, “sf” = square feet, and “ft” = linear feet

2.2.1 Constraints Analysis of Development Standards

The tables show Etna’s Zoning Ordinance allows minimum residential lot sizes ranging from 4,000 square feet to two units per 5 acres. The maximum height limit for residential units is-ranges from 35 to - 45 feet. Etna’s Zoning Ordinance does not establish a minimum unit size for any of the forms of housing.

~~Parking standards in all Residential zones require a minimum of two parking spaces per unit single family home, and fewer parking spaces for duplexes and multifamily housing, particularly for those with one bedroom apartments. Parking requirements are reduced in the Mixed Use zone to one space per unit.~~

The City's high-density multifamily zones that meet the default density of 15 dwelling (i.e., at least 10 units per acre) as provided by Government Code section 65583.2(c)3(B) are the following:

- ~~Medium Density Residential (R-2),~~
- High Density Residential (R-3),
- Mobile Home Residential (M-H)
- Central Commercial (C-1)

~~Parking standards in all for Residential zones permitting housing configured as single family, duplex, triplex, or townhouse unit require a minimum of two parking spaces per unit single family home, and fewer parking spaces for duplexes and multifamily housing. The Zoning Ordinance requires two spaces per unit plus one space for every two dwelling unit over three units. , particularly for those with For one-bedroom one-bedroom apartments units, one space per unit plus one-half space for every two one-bedroom unit over three units. . Parking requirements are reduced in the Mixed Use zone to one space per unit. The current parking requirements for one-bedroom or studio units are a constraint, exceeding HCD's recommended ratio of one space per unit for efficiency units, studio apartments, one-bedroom units, and single room occupancy units. Reducing the existing parking requirement will reduce this housing cost. Program HE.2.3.2 commits the City to amending the Zoning Ordinance to reduce the number of required parking spaces consistent with this analysis.~~

In accordance with State ADU law, Etna's parking requirements do not apply to qualifying ADUs and JADUs. Etna's parking requirements incorporate a local incentive for residences being constructed or substantially rehabilitated using CDBG funds: the requirement for a garage or carport is expressly modified without requiring a ministerial or discretionary permit. Rather, two off-street parking spaces can be installed in-lieu of a garage or carport (Reference 17.34.260).

Enactment of AB 1308 (2023) prohibits cities from increasing the minimum parking requirement that applies to a single-family residence as a condition of approval of a project to remodel, renovate, or add to a single-family residence provided that the project does not cause the single-family residence to exceed any maximum size limit imposed by the applicable zoning regulations, including, but not limited to, height, lot coverage, and floor-to-area ratio. To ensure compliance with this new requirement, Program 5.1.5 also commits the City to reviewing Chapter 17.64, and adopting any needed amendments for compliance.

The R-3 zone could potentially constrain multifamily housing because "Multiple-family apartments" are listed as a conditionally permitted use and those additional permit requirements increase the cost and time necessary to obtain the required permits. Also, Conditional Use Permits (CUP's) are discretionary, so there is less certainty a multifamily apartment would even be allowed in the zone.

At the same time, development of multiple duplexes and triplexes up to the maximum allowed density appears to be principally permitted in the R-3 zone since "Duplex or triplex units" are included in the list of principally permitted uses.

Policy 2.2 in this Element removes the potential constraint to multifamily development in the R-3 zone by clarifying that multiple duplexes and triplexes either attached or detached are allowed as principally permitted uses on properties zoned R-3:

“Policy 2.2 (part). In addition to the other uses permitted in the High Density Residential (R-3) zone, the City will facilitate development of housing on properties zoned R-3 by allowing multiple attached and/or detached duplexes and triplexes as principally permitted uses up to the maximum density allowed by the zone (20 units per acre).”

Also, ~~an implementation program 2.1.2 from Etna’s 5th cycle housing element~~ has been ~~added~~ carried forward as part of Etna’s 2023-2031 Housing Element. The intent of Program HE.2.2.1 to Chapter 2 of this Housing Element is to remove the existing regulatory barrier and provide more options to developers of affordable housing in the R-3 zone by listing multiple-family apartments as a principally permitted use:

“Program HE.2.2.1 (was Program 2.1.2)

The City shall amend Chapters 17.16.050 and 17.16.070 of the High Density Residential – R-3 zone to remove the conditional use permit requirement for multifamily development, and to expressly permit multifamily development as a by-right permitted use. The amendments to Chapters 17.16.050 and 17.16.070 shall continue to permit housing development configured as duplexes and triplexes as by-right permitted housing types.

Administration: Planning Department, City Manager

Funding: General Fund

Timing: Within two years from adoption of the 2023-2031 cycle housing element.”

2.2.2 Discretionary Permitting Process for Housing Development

A conditional use permit for residential development entails the property owner submitting an application and site plan for review, along with the appropriate processing fee. These applications are reviewed by staff for consistency with the City’s General Plan and Zoning Ordinance, including setbacks, building height, lot coverage, density, and parking requirements. Staff then conducts an environmental review pursuant to the California Environmental Quality Act (CEQA) (typically a mitigated negative declaration), schedules a public hearing before the City Council, and notifies property owners within 300 feet of the project. No design standards, architectural review, or other criteria are applied except normal setbacks, building height, lot coverage, density, and parking requirements. The City Council primarily considers potential environmental impacts, as well as public improvements that may be necessary to support the project. The entire process from submittal to public hearing and project approval is typically about four to six months. Conditions of approval vary from project-to-project, but most likely they will contain provisions for landscaping, type of fencing, driveway locations, compatible lighting, and recreational facilities.

In accordance with the Permit Streamlining Act (PSA) and the California Environmental Quality Act (CEQA), all applications for discretionary housing projects are reviewed for completeness and applicability of CEQA within thirty (30) days of submittal to the City. The application cannot be officially accepted if the submittal is incomplete. Applications reviewed and found to be complete will be prepared for submittal to the City Council.

All conditional use permit requests are subject to CEQA, and this process is performed concurrently with processing the use permit. Depending on the details of the project and its location, a document such as a Notice of Exemption, a negative declaration or a mitigated negative declaration, or at times an environmental impact report (EIR), will be prepared and circulated for agency and public review. In the case of a negative declaration or mitigated negative declaration, it may take 180 days for this report to be prepared and circulated for review and comment. If an EIR, this may take 365 days.

In deciding whether to grant a use permit, legal precedent and statute require the City Council to make the following findings:

- A. Find the project qualifies for a CEQA exemption; or adopt a negative declaration or mitigated negative declaration only if the city council finds there is no substantial evidence that the project will have a significant effect on the environment and that the negative declaration or mitigated negative declaration.
- B. The use is consistent with the General Plan;
- C. The use is consistent with the zoning ordinance;
- D. That the establishment, maintenance, or operation of the use or building applied for will not, under the circumstances of the particular case, be materially detrimental to the health, safety, peace, morals, comfort, and general welfare of persons residing or working in the neighborhood of such proposed use or be materially detrimental to property or improvements in the neighborhood or to the general welfare of the City.

Although finding D is typical, residing in many localities zoning regulations, it is rather broad and does not provide specific guidance to an applicant as to what conditions must be met to receive a use permit. Inclusion of the “morals” further exacerbates the ambiguity and could be considered discriminatory. This lack of specificity might create a potential constraint to residential uses that require a use permit. Zoning regulations are based on protecting health, safety and welfare, and it is under “welfare” where most of zoning’s subjective issues like aesthetics and compatibility are captured.¹ The Housing Accountability Act (Government Code Section 65589.5) specifically does not allow housing projects that comply with local objective standards to be denied or reduced in size based on issues of public welfare except in very limited circumstances. The Legislature purposely changed the law to limit local control with the purpose of allowing more housing construction in the California. The best defenses are a professional planning staff that is working knowledge of State housing law and who can advise applicants and hearing bodies appropriately, and incorporate policy language and standards that are objective to increase approval certainty. With respect to inclusion of “morals”, Program HE.3.1.2 of Etna’s 5th cycle housing element called for the City to remove this word. As Program HE.3.1.2 has not been completed, this measure is carried forward as Program HE.2.2.4.

However, the City Council can designate conditions of approval as necessary to ensure the use will meet the required findings while compliant with the requirements of the Housing Accountability Act. It is important to note that the City does not make a practice of applying the use permit process to disallow residential uses. Rather, the City seeks to provide a process whereby residential uses that are not allowed by right can be facilitated in a manner which will result in projects that are compatible with surrounding uses. The entire process from submittal to public hearing and project approval is typically about six to eight months. The process is the same for all uses requiring a use permit.

2.2-22.2.3 On- and Off-Site Improvements

To maintain the quality of its neighborhoods and safeguard the health and safety of the community, the City requires curbs, gutters, and sidewalks in all new subdivisions. In addition, developers must provide those facilities

¹ City of Ventura, Appeal of the Planning Commission’s approval of the Haley Point Project (PROJ 14778), <https://www.cityofventura.ca.gov/DocumentCenter/View/28219/12A-Staff-Report>, accessed December 27, 2023.

necessary to serve the development, including roads, sewer lines, drainage systems, water lines, fire hydrants, and streetlights.

Among the required on- and off-site improvements associated with new subdivisions, roadways typically have the greatest impact on the cost of housing. In Etna, local streets typically include a right-of-way of 60 feet and a pavement width of 40 feet. This is fairly typical of local roadways throughout the region. While all development-related improvements add to the cost of housing, the City's standards are similar to other communities in the region and do not overly constrain the development of affordable housing.

2.3 Adequacy of Zoning Standards to Facilitate Affordable Housing

When combined with implementation of the above Policy 2.2, Etna's zoning ordinance encourages affordable housing. In addition to allowances for ADU's and JADU's, the City also updated its zoning regulations to identify zoning districts where multifamily housing is allowed at a density of 20 units per acre. State law recognizes that in rural areas such as Etna, housing constructed at densities of 15 units per acre or more is presumed to be affordable to lower income households and Etna's R-3 and C-1 zones allow housing densities of up to 20 units per acre as principally permitted uses. The zoning map shows these zones are applied to large parts of the City near commercial uses and connected with existing sidewalks which will meet the needs of households that require non-motorized transportation. The new zoning regulations provide the density and development standards that will facilitate the production of housing affordable to very low- and low-income households.

2.4 Provision for a Variety of Housing

The Housing Element must identify adequate sites that are available for the development of housing types for all economic segments of the population. Part of this entails evaluating the City's Zoning Ordinance and its provision for a variety of housing types. Housing types include single-family dwellings, duplexes, second units, mobile homes, group care facilities, multifamily dwellings, supportive housing, and single-room occupancy units.

Tables B-2 through B-4 above identify the principally permitted housing types in the City's zoning ordinance. Following is a discussion of those housing types that may be most appropriate to meet the needs of extremely low-, very low-, and low-income households, as well as an analysis of governmental constraints that may serve as a barrier to the development of these particular housing types.

2.4.1 Accessory Dwelling Units

ADU's and JADU's are types of housing that may be more affordable by design that could be a good fit for Etna. An ADU is an accessory dwelling unit with complete independent living facilities for one or more persons and may be configured as detached or attached from the primary unit, be converted from existing space or structure such as a garage or pool house. A JADU is a specific type of conversion of existing space that is contained entirely within an existing or new single-family residence and cannot be more than 500 square feet. A JADU may share central systems, contain a basic kitchen utilizing small plug-in appliances, may share a bathroom with the primary dwelling, all to reduce development costs. An ADU may be rented for more than 30 days; JADUs may also be rented for more than 30 days but either the JADU or the primary unit must be occupied by the property owner.

The 2017 Legislative Housing Package brought sweeping amendments to State accessory dwelling law to remove regulatory barriers at both the state and local level. State law requires jurisdictions including Etna to permit ADUs and JADUs by-right in all areas that are zoned to allow single-family and multifamily residential uses. Jurisdictions must allow conversion of existing accessory structures to ADUs. State law limits [local regulation of J/ADUs. These limits extend to development and parking standards, requirements for sprinklers, imposition of connection and impact fees that can be imposed.](#) such as setbacks and lot coverage that a jurisdiction may impose, along with

limiting local parking requirements and the imposition of impact fees. Development and design standards that may be adopted by local government must be objective.

Further, ADUs and JADUs that conform with the Zoning Ordinance shall not be considered to exceed the allowable density for a lot, and they are deemed a residential use that is consistent with the existing general plan and zoning designations for the lot. Etna's ADU/JADU ordinance is subject to HCD review for compliance with State law. Specific to Housing Element updates, a jurisdiction's housing element must include a plan that incentivizes and promotes creation of ADUs that can offer affordable rents for very low, low- or moderate-income households (see Program 2.1.1).

Etna's ADU Ordinance establishes a range of zones where ADUs and JADUs are allowed by-right; reduces requirements for setbacks, parking, and expressly prohibits using ADUs and JADUs as short-term rentals (also known as vacation home rentals). Below are some other highlights of the City's Ordinance:

- ADUs and JADUs are allowed by-right in all zones where single-family residences are allowed.
- The unit may be rented for periods of no less than 30 days.
- There are no connection fees charged to ADUs and JADUs.
- The ADU is not intended for sale separate from the primary, although passage of AB 345 (2021) allows an ADU to be sold separately when the accessory dwelling unit or the primary dwelling was built or developed by a qualified nonprofit corporation and the other requirements are met (chaptered at Government Code Section 65852.26).
- The lot needs to contain an existing or proposed single-family or multifamily dwelling. When the ADU or JADU is proposed a new single- or multifamily the primary dwelling shall be approved for occupancy prior to occupancy of the ADU/JADU.
- Owner-occupancy of the parcel is not a requirement to apply for the construction of an ADU or JADU. In the case of a JADU, however, owner occupancy of the single-family residence in which a JADU will be permitted is required. The owner may occupy either the remaining area of the primary dwelling or the JADU. Disclosure of the JADU occupancy requirement is to be recorded on the property deed.
- The ADU may either be attached or detached from the existing or proposed dwelling and located on the same lot. Junior ADUs, however, must be attached to the existing dwelling and located within the living area of the proposed or existing dwelling.

While Etna adopted a local J/ADU implementing ordinance in 2021, it appears that several provisions are inconsistent with State law. The Architecture Conditions in 17.52.030(E.4) applies citywide is not objective due to the language of "Accessory dwelling units shall be substantially compatible with the principal dwelling and the neighborhood." Further the second Architecture Condition seems to exceed the statutory limits for local regulation for J/ADUs by imposing a citywide window placement standard for J/ADUs located within the within the required setbacks of the primary residence. A city may only impose architecture review standards (that are objective) on J/ADUs that is located on real property located in the California Register of Historic Resources. Other apparent inconsistencies noted are:

- Because an ADU can be created out of space of existing residence, the setback requirement that ADUs attached to the primary residence shall be the same setbacks as the minimum side, front, and rear setback

requirements as the primary residence appears to be inconsistent with State law (Reference 17.52.030(E.5)).

- The Condition that manufactured homes used as an ADU be “substantially compatible with the principal unit” is not objective, and appears to exceed the statutory limits for local regulation of ADUs (Reference 17.52.030(E.6)).
- Owner-occupant requirement (17.52.030(C) needs to be updated due to passage of AB 976 (2023). Passage of AB 976 means cities and counties cannot impose owner-occupancy conditions on ADU projects permitted after Jan. 1, 2025. Local agencies are still required to impose owner-occupancy requirements on Junior ADUs (JADU)).

Conflicting local J/ADU ordinances are superseded by State law, pursuant to subdivision (g) of Government Code Section 65852.2. Program HE.2.3.3 commits the City to amending the Zoning Ordinance to address the existing inconsistencies with State law.

ADUs and JADUs can be less costly to develop and have less impact on the environment as they are generally infill development. Securing building permit approval to develop an ADU or JADU in residential zones is nearly assured because of State mandates and oversight that include a 60-day shock clock (AB 3182 (2020)). ADUs and JADUs give homeowners the flexibility to share independent living areas with family members and others, including accommodating intergeneration living arrangements while maintaining privacy. ADUs or JADUs can provide housing for professionals who may prefer to live closer to jobs and amenities rather than spending hours commuting. Ultimately spurring ADU and JADU development can positively contribute more affordable housing to the community’s inventory.

Increasing the number of ADUs and JADUs heavily relies on property owners developing the units. While ADUs and JADUs present an opportunity for property owners, the prospect of adding a dwelling may be daunting for property owners. The process of constructing a dwelling or converting a structure to a dwelling from start to finish may be a barrier for lay-property owners who may have questions about where to put the unit, how much will it cost and how to pay for it, how long it will take to build, who will live it, expected return on investment, etc. Program 2.1.1 seeks to reduce and remove these barriers by promoting and encouraging ADU and JADU development in Etna by homeowners by launching an outreach campaign.

There are also state programs that could help incentivize ADU construction locally. Summer 2022, Freddie Mac began offering financing for development of ADUs. The new product is the Freddie Mac Choice Renovation loan, a “for a no-cash-out refinance...to pay off the temporary funding source for ADU construction”. Also, more homeowners will qualify because the anticipated rental income from the ADU can be part of the qualifying income, according to the press release <https://sf.freddiemac.com/docs/pdf/fact-sheet/adu-fact-sheet.pdf>, accessed June 29, 2022).

In 2022 the State of California Housing Finance Agency (CalHFA) launched an ADU grant program that provides up to \$40,000 to reimburse pre-development and non-recurring closing costs associated with the construction of the ADU for eligible homeowners. According to the CalHFA website, “Predevelopment costs include site prep, architectural designs, permits, soil tests, impact fees, property survey, and energy reports” (<https://www.calhfa.ca.gov/adu/index.htm>, accessed June 29, 2022). Homeowners must be low or moderate income to be eligible to apply for the CalHFA program. The income limit for Siskiyou county is \$159,000. The Freddie Mac and CalHFA programs offer loans and financial assistance directly to the customer and the

educational toolkit will include information about these financial resources. Program 2.1.1 commits the City to applying for State funding that could allow awarded funds to be used for ADU development such as CalHOME.

2.4.2 Constraints to Housing for Persons with Disabilities

As part of a governmental constraints analysis, housing elements must analyze constraints on the development, maintenance and improvement of housing for persons with disabilities as both the Federal Fair Housing Act and the California Fair Employment and Housing Act direct local governments to make reasonable accommodations (i.e., modifications or exceptions) in their land use regulations, in particular the zoning regulations, and procedures when such accommodations may be necessary to afford persons with a disability an equal opportunity to use and enjoy a dwelling. Also, the Anti-Discrimination in Land Use Law Act prohibits actions by localities that deny an individual or group of individuals residence, land ownership, tenancy, or any other land use due to discrimination. Discrimination based on a protected characteristic, method of financing of any residential development, or that the any of the development is intended for occupancy by persons of very low, low, moderate, or middle income. See Appendix A, section 7.0 for an assessment of affirmatively furthering fair housing. This includes a review of zoning and land use policies and practices to ensure compliance with fair housing laws. A provision for group homes which can provide care for six or more persons with disabilities is contained in the Zoning Ordinance as Large group care homes which are conditionally permitted in the Residential zones.

Below is a review of Etna's existing regulations for group homes, including the definition of family, Table B-5, and reasonable accommodation procedures, Table B-6. In accordance with state law, the City must allow licensed community care facilities for six or fewer persons in any area zoned for residential use and may not require licensed care facilities serving six or fewer individuals to obtain conditional use permits or variances that are not required of other family dwellings.

The City's Zoning Ordinance complies with fair housing law because it does not restrict occupancy based on relationship. A restrictive definition of "family" that overly scrutinizes a living arrangements and/or limits the number of unrelated people residing in a home differentiates between related and unrelated individuals living together, and may be discriminatory by illegally limiting the development and siting of group homes for persons with disabilities, but not for housing families that are similarly sized or situated. Section 17.06.820 of the Etna Zoning Ordinance defines a family

as a group of individuals living together as a housekeeping unit sharing a dwelling unit. Clients of a group home subject to Health and Safety Code Section 1501 are not deemed a family for purposes of this title.

Etna's definition of family appears to not be a constraint to group homes not subject to State licensing because it does not include language that differentiates related and unrelated people living together. The definition does not include requirements for shared-housekeeping units, nor does the definition limit the number. The definition of "Family" in Section 17.08.820 is defined as "a group of individuals living together as a housekeeping unit sharing a dwelling unit". For group homes subject to State licensing, however, the definition appears create a distinction that applies to persons with disabilities that does not apply to persons without disabilities. Program HE.4.2.4 commits the City to amending the Zoning Ordinance to address the inconsistency with State law or repealing the language concerning clients of a group home that is subject to State licensing.

State law requires cities allow group homes that provide services for six or fewer clients and are subject to State licensing in any area zoned for residential use. Further cities cannot require these licensed group homes to obtain conditional use permits or variances that are not required of other residential uses in the same zone. Group homes

are defined in section 17.06.930 of the Etna Zoning Ordinance (below), which are further categorized as “small group care home” and “large group care home”:

17.06.930 Group care home. “Group care home” means a facility licensed by the state pursuant to California Health and Safety Code Section 1501 et seq.

A. “Small group care home” means a residential facility for the care and housing of six or fewer persons which may be developmentally disabled, seniors, or alcoholics in recovery, and other similar facilities licensed by the state. The state has determined that six or fewer is considered to be a residential use.

B. “Large group care home” means a residential facility for the care and housing of seven or more persons which may be developmentally disabled, seniors, or alcoholics in recovery, and other similar facilities licensed by the state.

Etna’s definitions of group home encompass only those that are subject to State licensing. Therefore, when Etna’s definitions for family and group homes are evaluated together, the Zoning Ordinance treats group homes that are not subject to State licensing, even those serving six or more clients, indistinguishably from other residential uses in the same zone. **Table B-5** is a checklist for the City of Etna analyzing potential constraints for group homes applying on housing for persons with disabilities pursuant to standards of SB 520 (2002) and HCD’s Group Home Technical Advisory of December 2022. Table B-6 below reviews Etna’s reasonable accommodation procedures.:

Table B-5

~~Constraints on Housing for Persons with Disabilities~~ Review of Regulations for Group Homes

Potential Constraints and Analysis	
Does the City of Etna have a process for persons with disabilities to make requests for reasonable accommodation?	The City’s Zoning Ordinance describes the request process and how those requests are handled in Section 17.50.
Has the City made efforts to remove constraints on housing for persons with disabilities?	The City enforces the Building Code. Otherwise, the City has not identified any constraints to housing for persons with disabilities over which the City has discretionary control.
Does the City make information available about requesting reasonable accommodations?	A program in this Element commits the City to placing information relating to requests for reasonable accommodations at the main counter at City Hall and on meeting agendas, and implementing affirmative marketing to improve content and distribution.
ZONING AND LAND USE	
Topic	City’s Existing Regulations
Has the City reviewed all of its zoning laws, policies, and practices for compliance with fair housing law?	The Zoning Ordinance has been reviewed and found to be largely in compliance with fair housing law. However, some updates are needed. More specifically, some of the current findings to approve grant a reasonable accommodation, provision for imposing conditions of approval and appeal of determination need to be updated to include a requirement for the interactive process. Program HE.4.2.6 specifies the amendments that are necessary for compliance with state and federal disability law.

Potential Constraints and Analysis	
<u>Does the City’s land use element regulate the siting of special housing in relationship to one another?</u>	<u>No. The Land Use Element does not require a minimum distance between two or more special needs housing.</u>
<u>Does the City allow group homes with six or fewer clients by right in single-family zones?</u>	<u>Yes. Etna’s Zoning Ordinance specifically allows group homes that provide services to six or fewer clients and are subject to State licensing as principally permitted uses in all the residential zone districts.</u>
<u>Does the City’s zoning regulations require all group homes of more than six clients obtain permits to locate in single family zones?</u>	<p><u>No. As discussed above, group homes not subject State licensing, even those with seven or more clients, are treated indistinguishably from other residential uses in the same zone.</u></p> <p><u>Group homes that are subject to State licensing and serve seven or more clients are categorized as large group care homes and require a use permit in all Residential and Commercial zone districts. Program HE.4.2.5 commits the City to amending the conditional use permit findings to be objective and provide approval certainty.</u></p>
<u>Are residential parking standards for persons with disabilities group homes different from other parking standards? Does the City have a policy or program for the reduction of parking requirements for special needs housing if a proponent can demonstrate a reduced parking need?</u>	<u>For group homes providing services subject to State licensing for six or fewer clients and group homes providing services that are not subject State licensing are to be regulated in the same manner as other residential types in the same zone. This equal treatment extends to parking. The City has reasonable accommodation procedures as discussed below. For group homes that require a use permit, an applicant could seek a parking reduction concurrently with the use permit. In the Zoning Ordinance, the parking space requirements for Residential Care Facilities are the same as for multifamily residential uses the R-3 zone.</u>
<u>Does the locality restrict the siting of group homes? Does the City’s zoning regulations have spacing requirements for group homes or other developments standards that restrict the siting of group homes?</u>	<p><u>As discussed above, group homes not subject to State licensing, including those with more than six clients, are treated comparably to other residential uses in the same zone.</u></p> <p><u>The Zoning Ordinance allows group homes with less than six or fewer clients and subject to State licensing in all Residential zone districts, as discussed above. While principally permitted, these group homes are subject to review for overconcentration. This provision is a qualification that applies to housing for people with disabilities but does not apply to housing for people without disabilities. This qualification is inconsistent with the State law requirement for these group homes to be treated in the same as other residential uses in the same zone. Moreover, data from the California Department of Social Services (CDSS) indicates there is not an overconcentration issue occurring in Etna.² According to CDSS’s December 2023 data, there are no adult residential facility, residential care facilities for the elderly, or home care organizations (all types of group homes subject to licensing) operating in Etna. Program HE.4.2.5 commits the City to amending the Zoning Ordinance to remove the review for</u></p>

² State of California Department of Social Services, <https://www.ccl.dss.ca.gov/carefacilitysearch/DownloadData>, accessed January 24, 2024.

Potential Constraints and Analysis	
	<p><u>overconcentration to ensure small group homes are treated in the same manner as any other residence. Aside from the overconcentration provision, Etna’s Zoning Ordinance does not specify other development standards or other land use regulations that uniquely apply to small group homes. Program HE.4.2.5 facilitates providing housing suited for persons with special needs, and the AFFH objective to accommodate and integrate persons with disabilities in the community.</u></p> <p>For group homes <u>that are subject to State licensing and</u> with more than six clients (depending on the size of the facility and other proposed services), siting could be a factor in consideration of a conditional use permit. <u>It is noted that the preamble for conditional use permits includes language the following language, “setbacks and development criteria may be amended during the conditional use permit process”. While this language applies to all conditionally permitted uses it has the potential to increase subjectivity and uncertainty to the entitlement process to permit a large group home. Program HE.4.2.5, commits the City to amending its zoning regulations-Ordinance to add language stipulating that conditional use permit findings shall be objective and shall provide for approval certainty for large to permit group homes, even those that have more than six residents that do not provide licensable services to be allowed in all zones that permit residential uses and in the same manner as other residential uses.</u></p>
<p><u>What zones allow group homes other than those allowed by state law? Are group homes for over six persons allowed?</u></p>	<p><u>In the Zoning Ordinance group homes with over six clients are permitted as a conditional use in all Residential and Commercial zone districts. Program HE.4.2.5, commits the City to amending its zoning regulations to permit group homes, even those that have more than six residents that do not provide licensable services to be allowed in all zones that permit residential uses and in the same manner as other residential uses. Additionally, while group homes that service more than six clients and provide licensable services are subject to a conditional use permit, Program HE.4.2.5 adds language stipulating that conditional use permit findings shall be objective and shall provide for approval certainty.</u></p>
<p><u>Does the City’s zoning regulations have occupancy standards in the zoning code that apply specifically to unrelated adults and not to families?</u></p>	<p><u>See above review of tThe definition of family in Etna’s Zoning Ordinance. _makes no distinction between households comprised of related or unrelated persons. The definition, however, infers that families must be a single housekeeping units due to the language of, “Family” means a group of individuals living together as a housekeeping unit sharing a dwelling unit.” (section 17.06.820). This definition creates uncertainty that may constrain siting of group homes in the City. Program HE.4.2.4 commits the City to amending its zoning regulations to address the identified issue with the definition. Otherwise, the Zoning Ordinance does not contain occupancy standards that apply specifically to unrelated adults and not to familiesremove this ambiguity.</u></p>

Potential Constraints and Analysis	
<u>Does the City’s zoning regulations impose additional building, fire, or other health and safety code requirements?</u>	<u>No. The same general building, fire, and other health and safety codes that apply to other residences, subject to state health and safety code provisions specific to certain types of residential facilities, apply to group homes.</u>
<u>Do the City’s zoning regulations include standards or requirements for group home operators and residents concerning management practices or specific services, or otherwise are beyond those for other land use regulations?³</u>	<u>No. Etna’s zoning regulations do not impose requirements for group home operators or clients, nor do the regulations venture into the management practices.</u>
<u>Does the land use element regulate the siting of special housing in relationship to one another? Does the City’s zoning code for legal non-conforming uses apply in the same manner to group homes as other uses?</u>	<u>Yes. Etna’s zoning regulations do not contain provisions requiring different treatment of a legal nonconforming group home relative other legal nonconforming uses. No. The Land Use Element does not require a minimum distance between two or more special needs housing units.</u>
PERMITS AND PROCESSING	
<u>How does the City process a request to retrofit homes for accessibility?</u>	<u>An application is made to the City Building Department. The City has adopted the Uniform Building Code. There are no local amendments of the code that affect accessibility.</u>
<u>Does the City allow group homes with fewer than six persons by right in single-family zones?</u>	<u>Yes, the Zoning Ordinance specifically allows group homes (“Small group care homes”) of six or fewer individuals as principally permitted uses in all the Residential zone districts.</u>
<u>Does the City have a set of particular conditions or use restrictions for group homes with greater than six persons?</u>	<u>Facilities <u>subject to State licensing and</u> serving more than six persons are considered “Large group care homes” which are allowed as conditionally permitted uses in all Residential and Commercial zone districts. Aside from the Use Permit requirement, no unique development or performance standards apply to <u>that</u> use.</u>
<u>What kind of community input does the City allow for approval of group homes?</u>	<u>No public input is solicited for licensed group homes serving six or fewer since they are treated as single-family dwellings. <u>Nor is public input solicited for group homes not subject to State licensing.</u> For facilities serving more than six <u>and subject to State licensing</u> (i.e., assisted housing), the conditional use permit process would require a public hearing by the City Council.</u>
<u>Does For group homes requiring a use permit, does the City have particular conditions for group homes that will be providing services on-site?</u>	<u>No. A use permit is required for facilities that have more than six persons. Other restrictions do not apply.</u>
BUILDING CODES	
<u>Has the City adopted the Uniform Building Code?</u>	<u>Yes, but local amendments do not affect disabled access.</u>
<u>Has the City adopted any universal design element into the code?</u>	<u>The City encourages the incorporation of universal design in new construction.</u>

³ Consult HCD’s December 2022 Group Home Technical Advisory, section F, for details.

Potential Constraints and Analysis	
<p><u>Does the City provide reasonable accommodation for persons with disabilities in the enforcement of building codes and the issuance of building permits?</u></p>	<p><u>Yes. Building permit applications and other building code matters can be accommodated at the front counter of City Hall. If additional assistance is needed (e.g., sign language), the City is committed to providing such assistance as addressed above.</u></p>

**Table B-6
Review of Etna’s Procedures and Regulations for Reasonable Accommodation**

<p><u>Does the City of Etna have a process for persons with disabilities to make requests for reasonable accommodation to access City services?</u></p>	<p><u>Yes; the City has a process and makes information available on its agendas and at the main counter of City Hall concerning the process for making reasonable accommodation (RA) requests.</u></p>
<p><u>Has the City made efforts to remove constraints on housing for persons with disabilities?</u></p>	<p><u>The City enforces the Building Code. Otherwise, the City has not identified any constraints to housing for persons with disabilities over which the City has discretionary control.</u></p>
<p><u>Does the City make information available about requesting reasonable accommodations?</u></p>	<p><u>As noted above, the City places information relating to requests for RA at the main counter at City Hall and on meeting agendas.</u></p>
<p><u>Does the City of Etna have a reasonable accommodation procedures for persons with disabilities to request reasonable accommodation from City’s land use, zoning, and building regulations, policies, practices, and procedures?</u></p>	<p><u>Yes, the City’s adopted procedures are Chapter 17.50 of the Zoning Ordinance. While the RA adopted procedures do not expressly indicate they extend to the building regulations, it is the City’s practice to manage RA requests related to the Building Code in the same manner.</u></p>
<p><u>What are the procedures for persons with disabilities to request reasonable accommodation?</u></p>	<p><u>The City has RA requests forms available at City Hall. RA applicants are to provide standard contact information, a description of the requested accommodation and the regulation(s), policy, or procedure for which accommodation is sought; and the reason that the requested accommodation may be necessary for the applicant to enjoy the dwelling. The information that RA applicants are to provide is consistent with the requirements of federal and state law.</u></p> <p><u>The reviewing authority has 30 days to issue a written decision, or to request further information if necessary to reach a determination on the RA request. The City’s written procedures limit requests for new information to that that is consistent with fair housing laws.</u></p> <p><u>Consistent with federal and state law, the City does not charge applicants a fee for filing an RA request, or for assisting an RA applicant who requests assistance with completing a request.</u></p>
<p><u>Who is the reviewing authorizing of reasonable accommodation requests and what are the findings?</u></p>	<p><u>The City Clerk or their designee is the designated reviewing authority of RA requests, unless another discretionary permit is also required. In the latter case, the reviewing authority of discretionary permit will also take action on the RA request concurrently.</u></p>

The City’s procedures stipulate that the decisions shall be consistent with fair housing laws. The following findings are consistent with State and federal laws:

- 1. Whether the housing, which is the subject of the request for reasonable accommodation, will be used by an individual with disabilities protected under fair housing laws;
- 2. Whether the requested accommodation is necessary to make housing available to an individual with disabilities protected under the fair housing laws;
- 3. Whether the requested accommodation would impose an undue financial or administrative burden on the city; and
- 4. Whether the requested accommodation would require a fundamental alteration in the nature of the city’s land use and zoning or building program.

Two of the current findings do not appear to be consistent with federal and state law for reasonable accommodation, and Program HE.4.2.6 commits the City to repealing findings in 17.50.070:

- 5. Potential impact on surrounding uses.
- 6. Physical attributes of the property and structures.

In the case of Finding 7, “Alternative reasonable accommodations which may provide an equivalent level of benefit”, the Zoning Ordinance is unclear whether the required interactive process will be employed to determine an alternative reasonable accommodation that equally effective. “The purpose of the interactive process is for the person considering the request and the requestor to exchange information to identify, evaluate, and implement a reasonable accommodation that allows the individual with a disability equal opportunity to use and enjoy a dwelling or housing opportunity.” Cal. Code Regs. tit. 2 § 12177. Essentially, a decision for an alternative reasonable accommodation cannot be made unilaterally by the person considering the request. Further, an alternative accommodation needs be equally effective in meeting the needs of the individual with a disability.

The City’s adopted RA appeal procedures provide the RA applicant 30 days to appeal the reviewing authority’s decision.

Are residential parking standards for persons with disabilities different from other parking standards? Does the City have a policy or program for the reduction of parking requirements for special needs housing if a

The City has adopted the Uniform Building Code which includes Section 1129B of Title 24, California Code of Regulations (“Section 1129B”). Section 1129B regulates parking lots or parking structures where parking is provided for the public as clients, guests or employees, shall provide

<u>proponent can demonstrate a reduced parking need?</u>	<u>accessible parking. Regulations include ratio of accessible spaces to total number of spaces, parking space size, etc.</u> <u>The City's reasonable accommodation procedures extend to the parking requirements.</u>
<u>Has the City adopted the Uniform Building Code?</u>	<u>Yes, and there are no local amendments do not affect disabled access.</u>
<u>Has the City adopted any universal design element into the code?</u>	<u>The City encourages the incorporation of universal design in new construction.</u>
<u>Does the City provide reasonable accommodation for persons with disabilities in the enforcement of building codes and the issuance of building permits?</u>	<u>Yes. Building permit applications and other building code matters can be accommodated at the front counter of City Hall. If additional assistance is needed (e.g., sign language), a request can be made as addressed above.</u>

2.4.3 Senior Housing and Group Homes

According to the US Census, 62 percent of those who own homes in Etna are 60 years of age or older. Given the number of seniors in the City, the lack of senior care facilities in and adjacent to the City is a concern. The nearest facilities are about thirty miles away in the City of Yreka. Program HE.4.2.6 commits the City to amending the zoning regulations to permit group homes consist with affirmatively further fair housing. More specifically, The new Zoning Ordinance allows “Senior Care Facilities” and Large group homes occupied by more than six persons in the Residential zones with a CUP which could accommodate the need for an assisted living facility for seniors. Additionally, group homes for six or fewer persons are allowed in the Residential zones so the City’s regulations would allow senior care facilities if a person or organization proposed one.

2.4.4 Supportive Housing and Supportive Housing Developments

Supportive housing is defined by Section 65582 of the Government Code 50675.14 of the Health and Safety Code as housing with linked on- or off-site services with no limit on the length of stay that is occupied by a target population as defined in Health and Safety Code Section 53260 (i.e., low-income person with mental disabilities, AIDS, substance abuse or chronic health conditions, or persons whose disabilities originated before the age of 18). Services that are linked to supportive housing usually focus on retaining housing, living, and working in the community, and/or health improvement. Pursuant to Government Code Section 65583(c)(3), supportive housing shall be considered a residential use of property and shall only be subject to those restrictions that apply to other residential dwellings of the same type in the same zone.

The City’s Zoning Ordinance defines supportive housing consistent with the sState law’s definition and allows it as a principally permitted use in the Residential and Mixed Use zones. Generally, the City’s supportive housing regulations are consistent with State law; however, an amendment is needed to comply with AB 2160 (2018). Passage of AB 2160 in 2018 added Article 11 “Supportive Housing” [Developments], commencing at Section 65650, to Chapter 3, Division 1, Title 7 of the Government Code. AB 2160 applies to a narrowly defined group of housing developments, and complements existing law for supportive housing discussed above. AB 2160 mandates jurisdictions allow qualifying supportive housing developments by-right. More specifically, the new law obligates jurisdictions to permit qualifying supportive housing developments as by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses, when the proposed housing development meets all the requirements. As indicated in Table B-2, Table B-3, and Table B-4 above, supportive housing is principally permitted in all Residential Zones and Mixed Use Zones. In the C-2 zone supportive housing is a conditional use in the C-2 zone. The C-2 zone is a nonresidential zones that permits multifamily uses. In order to comply with AB 2160, it is necessary to amend the Zoning Ordinance to allow supportive housing developments,

as qualified, as a by-right use in the C-2 zone permit. Program HE.4.2.1(1) commits the City to amending the C-2 zone to be consistent with Government Code Section 65650 et seq.

Aside from the identified amendment and corresponding program, Etna's ~~The City's~~ land use regulations would allow supportive housing if a project were proposed.

2.4.5 Emergency Shelters and Transitional Housing

California Health and Safety Code (Section 50801) defines an emergency shelter as "housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less by a homeless person. No individual or households may be denied emergency shelter because of an inability to pay."

Legislation (Senate Bill 2 (Cedillo, 2007)) requires jurisdictions to identify a zone where emergency shelters will be allowed as a permitted use without first obtaining a conditional use permit or other discretionary approval. Further, the zone(s) identified must have land available to accommodate an emergency shelter. Effective January 1, 2023, the definition of emergency shelter was expanded pursuant to Assembly Bill 2339 to include other interim housing interventions, including, but not limited to, a navigation center, bridge housing, and respite or recuperative care [Reference Government Code Section 65583(a)(4)(C)].

While ~~t~~The City's Zoning Ordinance definition of defines emergency shelters is consistent with the statutory definition from SB 2 (2007), it does not reflect the AB 2339 amendments discussed above. state's definition Program HE.4.2.2(1) in Chapter 2 commits the City to amend the definition of emergency shelter in section 17.06.785 of Etna's Zoning Ordinance to include other interim housing interventions consistent with subdivision (a)(4)(C) of Government Code Section 65583.

Paragraph (4)(A) of Government Code Section 65583(a) outlines the requirements of the zone designated by a city or county to accommodate emergency shelter: the zone (or zones) must have land available to accommodate at least one full-time emergency shelter, and the zone must allow other residential uses either by-right or with a conditional use permit. If the city designates a nonresidential zone, the zone (and lands) must be suitable for residential uses. Etna's General Commercial (C-2) is Etna's zone designated for emergency shelters, and section 17.22.050.E. enumerates emergency shelters and allows it as a principally permitted use in the ~~General Commercial (C-2)~~ zone. Etna's C-2 zone is a nonresidential zone, however, residential uses that are allowed in the R-3 zone are conditionally permitted in the C-2 pursuant to section 17.22.070.A. Therefore, the C-2 zone meets this component of the statutory requirement of the cited section of the Government Code. As discussed in detail in Appendix C, section 3.0, the City's C-2 zone is suitable for residential uses.

There are a total of ~~Out of the 49 44~~ parcels in Etna that are zoned C-2, 19 of which are vacant. The vacant C-2 zoned parcels are generally located in north Etna, the neighborhood fronting and near State Route 3 and portion of Howell Avenue. These 19 parcels range in size from 0.33 acres to 5.63 acres, with average and median sizes of 0.94 acres and 0.50 acres, respectively. Public water and sewer is either available at the site or within 100 feet of all 19 sites. Additionally, ~~The~~ most frequently occurring environmental constraints limiting development relate to the presence of wetlands, and parcels being subject to 100-year flooding, and ~~being~~ located within a very high fire hazard severity rated area. When the environmental constraints are applied, ~~fourteen~~ there are 12 vacant C-2 properties without the environmental constraints, and two additional sites where being located in a very high fire hazard severity rated area is the only known environmental constraint. The parcels have frontage on paved roadways, along with sidewalks and streetlights. All 14 properties are located within a ¼ mile of a grocery store, and Etna City Hall is within a ½ mile. , Six of the properties are within a ¼ mile of a STAGE bus stop. This subset of 14 vacant C-2 parcels range in size from 0.33 acres to 5.70 acres, with average and median sizes of 0.91 acres and 0.38 acres, respectively. Although these 14 parcels are zoned C-2, the physical attributes of these parcels as

reviewed here indicate they are suitable for residential uses; therefore, Etna's C-2 zoning and lands meet the requirements of Government Code Section 65583(a)(4)(A). See **Error! Reference source not found.** Table B-7 for a listing of the parcels, and Figure B- 1 for a map of the location of the parcels-are shown in Figure B-1. where an emergency shelter could be developed because:

they are allowed by right,

the lots have no physical or governmental constraints, and are served by public water and sewer and a paved road along the frontage with sidewalks and streetlights,

other services are available nearby (within ½ mile) such as a grocery store, a bus stop and city hall.

Government Code Section 65583(a)(4)(B) itemizes the allowed objective development standards that a city may require emergency shelters comply with. Sections 17.34.280 of Etna's Zoning Ordinance establishes the following development standards for emergency shelters:

- A. The maximum number of beds for emergency shelters shall be 15.
- B. A written management plan is required for all emergency shelters that includes provisions for staff training, neighborhood outreach, transportation, security, client services, and food services.
- C. The maximum term of staying at an emergency shelter is six months in a consecutive 12-month period.
- D. Parking; the same as the R-3 zone, which is 2 spaces/unit + 1 space for every 2 dwelling units over 3 units. For one-bedroom units, 1 space/unit + 1/2 space for every 2 dwelling units over 3 units

Development standards A through C above are objective and do not exceed the statutory limits for local regulation per Government Code Section 65583(a)(4)(B).

The parking standard (standard D above), however, appears to be ambiguous and implementation may result in potentially excessive parking requirements. Pursuant to Government Code section 65583, subdivision a)(4)(A), parking for emergency shelters should only be the number of spaces necessary for staff working in the shelter and no more than other uses in the same zones. The lack of equivalency between shelter beds and dwelling units creates potential ambiguity. For example, should shelter beds be interpreted to be equivalent to a one-bedroom unit, then an 15-bed emergency shelter would be required to provide 21 parking spaces. Further, the R-3 zone parking standard assumes each shelter client has a personal vehicle, and does not account for household formation, families, and minors experiencing homelessness. While the 2020 and 2022 Point In Time counts (PIT) did not report year over year counts of the number of families or children (see Appendix A, section 4.6 and Table A-26), there were 24 families in 2020, and 61 children (under 18) in 2022. The PIT data indicates the population of people experiencing homelessness in Siskiyou county includes families and minors. Program HE.4.2.2(1) commits the City to amending the Zoning Ordinance's parking standard for emergency shelters to be only the number of spaces necessary for staff working in a shelter and no more than other uses in the same zones.

Additionally, it is noted that the duration of stay standard of "six months in a consecutive 12-month period" in section 17.34.280 is more restrictive than the definition in section 17.06.785 which allows for:

"Emergency shelter" means housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less by a homeless person. No individual or households may be denied emergency shelter because of an inability to pay. (emphasis added)

Program HE.4.2.2(3) commits the City to amending the Zoning Ordinance to address the internal inconsistency regarding the duration of stay between sections 17.06.785 and 17.34.280 and to incorporate the language of the less restrict standard in 17.06.785 for "...six months or less...".

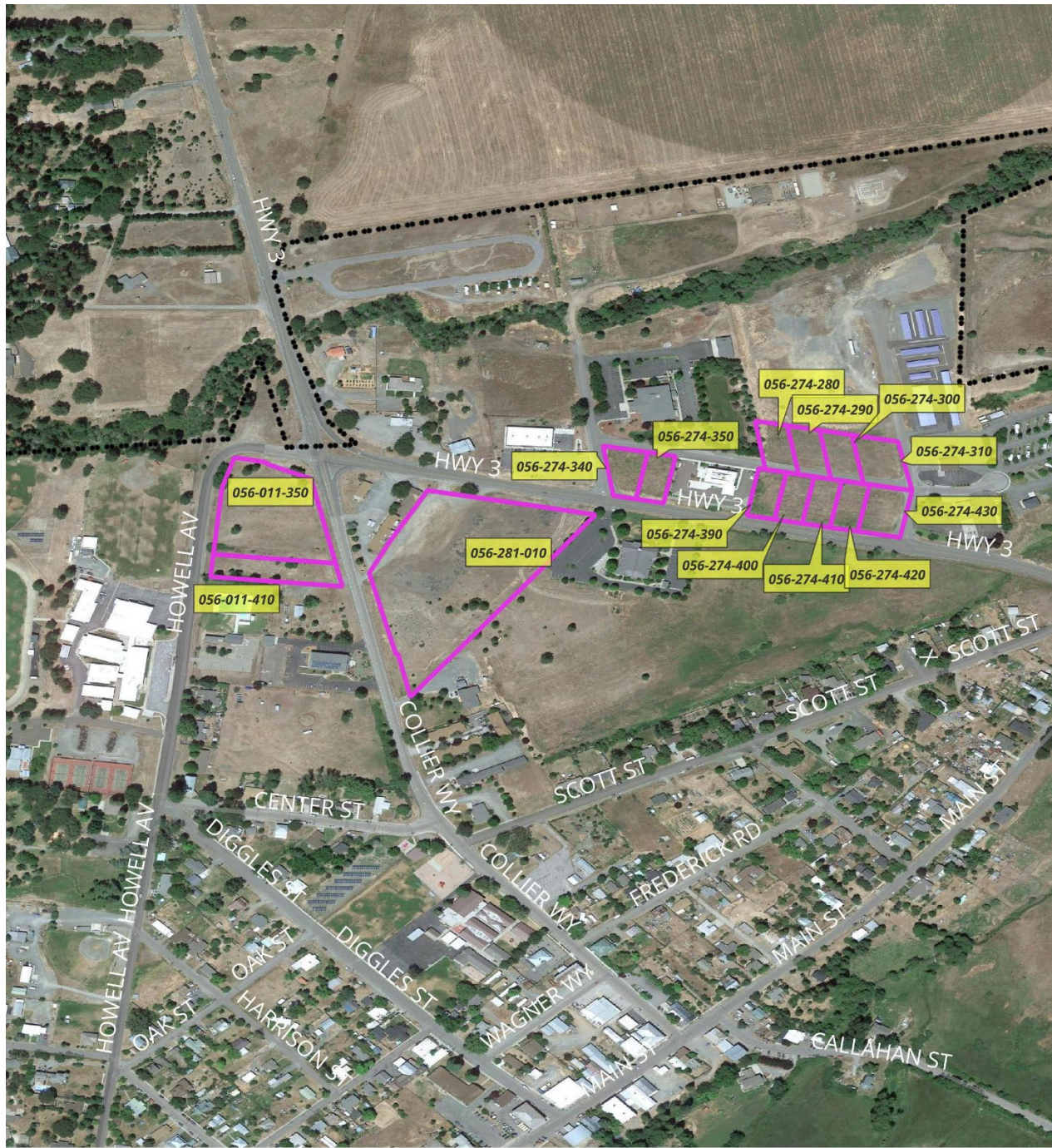
Table B-7
City of Etna Emergency Shelter Land Inventory

APN	Vacant	General Plan & Zoning	Parcel Acres	Are Wetlands present†?	W/in FEMA 100-Year Flood Zone?	Located w/ VHFHSZ*?	Stream &/or Waterbody on Site?	W/in Alquist-Priolo Fault Zone?	Slopes >30%	Grocery: w/in 1/4 Mile?	Water & Sewer Service w/in 100 ft?	Bus Stop w/in 1/4 Mile?
056-011-350	Yes	CC; C-2	2.3	<u>no</u>	<u>no</u>	<u>yes</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>yes</u>	<u>yes</u>	<u>yes</u>
056-011-410	Yes	CC; C-2	0.7	<u>no</u>	<u>no</u>	<u>yes</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>yes</u>	<u>yes</u>	<u>yes</u>
056-274-280	Yes	CC; C-2	0.4	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>yes</u>	<u>yes</u>	<u>no</u>
056-274-290	Yes	CC; C-2	0.4	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>yes</u>	<u>yes</u>	<u>no</u>
056-274-300	Yes	CC; C-2	0.4	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>yes</u>	<u>yes</u>	<u>no</u>
056-274-310	Yes	CC; C-2	0.5	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>yes</u>	<u>yes</u>	<u>no</u>
056-274-340	Yes	CC; C-2	0.4	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>yes</u>	<u>yes</u>	<u>yes</u>
056-274-350	Yes	CC; C-2	0.3	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>yes</u>	<u>yes</u>	<u>yes</u>
056-274-390	Yes	CC; C-2	0.3	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>yes</u>	<u>yes</u>	<u>yes</u>
056-274-400	Yes	CC; C-2	0.3	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>yes</u>	<u>yes</u>	<u>no</u>
056-274-410	Yes	CC; C-2	0.3	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>yes</u>	<u>yes</u>	<u>no</u>
056-274-420	Yes	CC; C-2	0.3	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>yes</u>	<u>yes</u>	<u>no</u>
056-274-430	Yes	CC; C-2	0.5	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>yes</u>	<u>yes</u>	<u>no</u>
056-281-010	Yes	CC; C-2	5.6	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>yes</u>	<u>yes</u>	<u>yes</u>

† = Wetlands per USFWS NWI

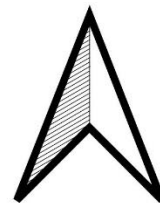
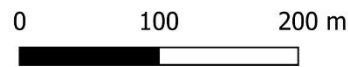
* VHFHSZ = Very High Fire Severity Zone

Figure B-1



Legend

- City Boundary
- Etna Emergency Shelter Inventory



Source: Planwest Partners, 2023

2.4.6 Low Barrier Navigation Centers

Assembly Bill 101 was enacted in 2019 and requires cities and counties allow low barrier navigation centers (LBNC) a use allowed by-right in mixed-use zones and nonresidential zones permitting multifamily uses if a navigation center proposal meets requirements of Government Code Section 65662 et seq. A LBNC is statutorily defined in Government Code Section 65660(a), and is a Housing First shelter focused on moving individuals experiencing homelessness to services and housing. Cities and counties are to expedite navigation center applications in accordance with the statute. Although AB 101 is scheduled to sunset January 1, 2027, given the extent of California’s crisis of housing and homelessness, it would not be unexpected if the Legislature extended the sunset date.

Etna’s C-1 zone is a mixed-use zone because it allows for vertical mixed-use developments by right.⁴ Etna’s C-2 zone is a nonresidential zone that permits residential uses with a conditional use permit. Etna’s Zoning Ordinance has not been amended to allow for LBNC consistent with Government Code Section 65660 et seq. Program HE.4.2.1(2) commits the City to amending the Zoning Ordinance to permit LBNC by-right (as a ministerial action, without discretionary review or a hearing) in the C-1 and C-2 zones. For the C-1 zone, LBNC shall not be qualified on the presence of nonresidential use, and shall be permitted at street level. Program HE.4.2.1(2) also directs the Zoning Ordinance amendments to establish definitions, procedures, and standards for low barrier navigation centers be consistent with provisions of Government Code Section 65660 et seq.

2.4.7 Transitional Housing

SB 2 (2007) further requires that transitional housing be considered a residential use subject only to the same restrictions that apply to similar housing types in the same zone. Transitional housing is defined in Section 50675.2 of the Health and Safety Code as rental housing for stays of at least six months, but where the units are recirculated to another program recipient after a set period. It may be designated for a homeless individual or family transitioning to permanent housing. This housing can take many structural forms such as group housing and multi-family units and may include supportive services to allow individuals to gain necessary life skills in support of independent living.

The City’s Zoning Ordinance provides a definition for transitional housing consistent with the state’s definition and it identifies zones where this type of use is permitted. As shown in Tables B-2 through B-4, transitional housing is principally permitted in the Residential zones.

2.4.52.4.8 Single Room Occupancy Units

Housing elements must identify zoning to encourage and facilitate single-room occupancy units (SROs), which are often the most appropriate type of housing for extremely low-income persons. The City’s Zoning Ordinance defines SRO’s and explicitly allows them as conditionally permitted uses in the R-2 and R-3 zones. There are no additional development standards beyond those that apply to other residential uses in the same zone, although the preamble language for conditional use permits applies, “setbacks and development criteria may be amended during the conditional use permit process”. While this language applies to all conditionally permitted uses it has the potential to increase subjectivity and uncertainty to the entitlement process to permit a SRO housing development. Program HE.4.2.1(3), commits the City to amending its Zoning Ordinance to add language stipulating that conditional use permit findings shall be objective and shall provide for approval certainty for SRO housing development. Program HE.2.3.2 commits the City to amending the parking requirements to require a

⁴ A vertical mixed-use includes one or more of the principally permitted commercial uses enumerated in the C-1 zone, when the commercial use is located at street level, and the residential use is located above or below street level, Etna Zoning Ordinance section 17.20.050.D.

single parking space for each efficiency unit, studio apartment, and one-bedroom unit, in multifamily housing developments, and each single room occupancy unit.

2.4.62.4.9 Housing for Farmworkers

The City of Etna Zoning Ordinance addresses farmworker housing by distinguishing between “Small agricultural employee housing” for six or fewer tenants, and “Large agricultural employee housing” for up to 36 tenants in one or more buildings. Small agricultural employee housing is allowed in all Residential zones by-right. Large Employee Housing is a conditionally permitted use in the R-1 zone.

AB 1783 amended the Employee Housing Act (EHA) in 2019. One of the highlights of the enacted legislation is to require jurisdictions provide streamlined, ministerial approval for qualifying agricultural employee housing developments. For an employee housing development to exercise the streamline, ministerial approval process, the site must meet a list of criteria, and one criterium is the development is located on land designated as agricultural in the applicable city or county general plan. The Land Use Element of Etna’s General Plan includes a the Residential-Agricultural (R-A) land use designation. This land use designation enumerates “small acreage farming” as a typical use (Table 4, page 19). According to the Land Use Element, the City is to establish a R-A zone to implement the R-A land use designation. To date, however, an R-A zone has not been established in Etna’s zoning regulations. Moreover, at this time there is no land in the City designated R-A. Should lands be designated and/or zoned R-A in the future, then the provisions of AB 1783 will apply. On this basis, the City has determined it does not have lands designated as agricultural; therefore, the provisions of AB 1783 do not apply at this time.

2.5 Other Mandatory State Housing Laws

Below is a summary of recently enacted legislation that provide additional regulatory incentives for the development of housing.

Senate Bill 9 (2021): The California HOME Act—otherwise known as Senate Bill 9—took effect on January 1, 2022 and makes it possible for homeowners to split their home’s lot and build up to four homes on a single-family parcel. For a property to exercise SB 9’s incentives it must be located within a city, the boundaries of which include some portion of either an urbanized area or urban cluster, as designated by the United States Census Bureau.⁵ According to the 2020 U.S Census, the City of Etna does not contain any portion of Urban Area; the cities of Yreka and Mount Shasta are the only cities in Siskiyou county that have U.S. Census Urban Area.⁶ This means although SB 9 can be implemented without a locality adopting an implementing ordinance, lands in the City of Etna do not meet the eligibility requirements for property owners to exercise SB 9.

SB 10 (2021): This enacted legislation provides cities with an easier path for "up-zoning" residential neighborhoods close to job centers, public transit, and existing urban areas. Under SB 10, cities can upzone qualifying properties to allow construction of up to ten units on a single parcel without requiring an environmental review, which is otherwise mandated under the California Environmental Quality Act. Some jurisdictions have leveraged SB 10’s provisions to offer interested property owners no- or low-cost voluntary upzoning of their property. For a city to exercise SB 10, lands must meet defined criteria of two pathways: 1) as urban infill site, and 2) as a transit-rich area. One mandatory criteria for lands to qualify under the urban infill pathway is for some lands within a city to be designated as Urban Area by the U.S. Census. This is the same standard reviewed in SB 9 (2021) above. Because

⁵ With the 2020 Census, the Census Bureau no longer identifies an individual urban area as either an "urbanized area" or an "urban cluster", but refers to all qualified areas as “urban areas” (https://www2.census.gov/geo/pdfs/reference/ua/Census_UA_2020FAQs.pdf, page 4, accessed November 8, 2023).

⁶ <https://www.federalregister.gov/documents/2022/12/29/2022-28286/2020-census-qualifying-urban-areas-and-final-criteria-clarifications>, accessed November 8, 2023

Etna is not an U.S. Census Urban Area, the urban infill is not an available qualifying pathway. The transit-rich thresholds are defined, and means a parcel within one-half mile of a major transit stop, as defined in Section 21064.3 of the Public Resources Code, or a parcel on a high-quality bus corridor.

- A major transit stop means a bus stop served by public mass transit service with features that include full-time dedicated bus lanes or operation in a separate right-of-way dedicated for public transportation with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.
- A high-quality bus corridor means a corridor with fixed route bus service, and average service intervals, Monday through Friday, of no more than 15 minutes during peak morning, late afternoon, and evening commute times, and no more than 20 minutes between the 6:00 am to 10:00 pm. On the weekends, the average service interval is no more than 30 minutes.

As reviewed in Appendix A, section 2.6, Siskiyou county's STAGE provides service to Etna. The availability of STAGE improves access to opportunities for education, employment, and services that is affordable. However, a review of the July 2023 STAGE schedule, indicates the major transit stop or high-quality bus corridors thresholds are not met; therefore, lands in Etna cannot qualify using the transit-rich pathway either.⁷

Housing Crisis Act of 2019, Government Code 66300-66301: The Housing Crisis Act (HCA) requires the HCD to develop a list of cities ("affected cities") and census designated places (CDPs) within the unincorporated county ("affected counties"). An affected City includes all cities in urbanized areas and all cities with a population greater than 5,000 in an urban cluster. In accordance with the provisions of the HCA, in April 2023, HCD released the updated listing of affected cities and affected counties based on new data obtained from the 2020 Census. Although nearly 94 percent of California cities are affected cities, Etna is not identified as an affected city [in HCD's April 2023 updated listing of affected cities](#); therefore, the provisions of HCA prohibiting affected localities from taking certain zoning-related actions does not [extend-apply](#) to Etna.

Ministerial Streamlining (SB 35): California Senate Bill 35 (SB 35) was enacted in 2017. SB 35 applies in cities and counties that are not meeting their RHNA goal for construction of above-moderate income housing and/or housing for households below 80 percent area median income (AMI). SB 35 requires local government to streamline the approval of certain housing projects located on a qualify property by providing a ministerial approval process. Developers of qualifying projects may opt in and exercise the incentives provided by SB 35 in cities and counties that are subject to SB 35. HCD annually determines which cities and counties are subject to SB 35.

According to the SB 35 Statewide Determination Summary released by HCD on June 30, 2023, the City of Etna is subject to SB 35 when proposed developments include at least 10 percent affordability. For a site, located within city boundaries, to be eligible for SB 35 the site must be a legal parcel, or parcels, and located in a city where the city boundaries include some portion of either an urbanized area or urban cluster, as designated by the United States Census Bureau. According to the 2020 U.S. Census, the cities of Yreka and Mt. Shasta are the only two cities in Siskiyou county that are designated as urban areas; therefore, there are no sites in the City of Etna that would be eligible for SB 35.

⁷ https://www.co.siskiyou.ca.us/sites/default/files/fileattachments/general_services/page/5581/stage_20230406_schedules.pdf, accessed November 8, 2023

Although the above statutes do not extend to Etna because the City does not include an urban area as defined by the U.S. Census, the draft Zoning regulations remove current procedural and regulatory barriers and will allow a greater variety of housing types, in more zoning districts, and at greater density in the City.

2.6 Development and Processing Fees

The City requires developers to construct improvements and/or pay fees to help deter the costs of providing infrastructure, public facilities, and services. Impact fees that apply to new residential single-family and multi-family construction are listed in Table B-8. The City also collects fees from developers to help cover the costs of planning and processing permits. Processing fees are calculated based on average staff time and material costs required to process a particular type of application. Planning and processing fees are summarized in Table B-9. It is important to note that these fees are provided for informational purposes only and are subject to change.

As shown in Table B-10, the City’s fees are similar to or less than other cities in the region. While these costs will likely be passed on to the ultimate product consumer, thus impacting housing prices, these requirements are deemed necessary to maintain the quality of life desired by City residents.

**Table B-8
Development Impact Fees**

Facility	Fee Per Dwelling Unit	
	Single-Family	Multi-Family
Sewer Connection Fee	\$1,966	\$1,966
Water Connection Fee	\$2,044	\$2,044
Water Capital Improvement Fee	n/a	n/a
Sewer Capital Improvement Fee	\$1,400	\$952
School Impact Fees	\$3.36/sq. ft.	\$2.90/sq. ft.
Total ⁽²⁾	\$9,442	\$6,978

Source: City of Etna 2021

Notes: (1) Fees are for informational purposes only and are subject to change. (2) Total is based on a school impact fee of \$4,032 for a 1,200 square foot single family dwelling and \$2,016 for a 600 square foot multifamily unit.

**Table B-9
Planning Permit Fees**

Fee Type	Fee
Annexation	\$3,050 + LAFCo fees
Conditional Use Permit	\$1,550
Lot Line Adjustment	\$880
Variance	\$1,160
Rezone	\$2,250
Subdivision (5 or more lots)	\$4,600
Parcel Map (4 or less lots)	\$2,850

Fee Type	Fee
Negative Declaration	At cost + 10% + County fees
Environmental Impact Report	At cost + 10% + County fees
General Plan Amendment	\$2,650

Source: City of Etna, 2021

Notes: (1) Fees are for informational purposes only and are subject to change.

**Table B-10
City of Etna Total Fees for Typical Single- Multi-Family Units**

Housing Type	Total Fees	Estimated Development Cost per Unit	Estimated Proportion of Fees to Development Costs per Unit
Single-Family Unit	\$10,942	\$176,900	6%
Multi-Family Unit	\$8,478	\$124,700	7%

Source: www.homeguide.com 2023, City of Etna 2023

Notes: Typical single-family unit estimated at 1,200 square feet and multifamily at 900 square feet.

Including the cost of building permits and planning fees, which are roughly \$3,000 per unit for a 1,200 square foot single-family or 900 square foot multifamily dwelling, development fees average \$10,942 for a typical 1,200-square-foot single-family dwelling and \$8,478 per 900 square foot multifamily unit. Depending on housing unit size and type, City and school district fees amount to between six and seven percent of the total cost of each new housing unit. While these costs will likely be passed on to the ultimate product consumer, thus impacting housing prices, these fees are on par with other cities in the region, are deemed necessary to maintain the quality of life desired by City residents, and do not constrain the development of affordable housing.

2.7 Permit Processing Times

The time involved in processing development applications can become a constraint to affordable housing development. However, because Etna is a small community that receives few applications and almost no complicated applications, the processing of a residential application occurs expeditiously. In Etna, most development applications for single-family and multi-family developments take approximately two to four weeks to process as long as no discretionary approvals are needed. If an applicant proposes a development that requires discretionary review, such as one that requires a use permit, the processing time can extend to two months regardless of whether it’s a single-family or multi-family project. Table B-11 lists the typical review times for each type of permit or approval process in the City in 2014 which are applicable to current projects as well.

**Table B-11
Planning Processing Times**

Type of Approval or Permit	Typical Processing Time
Ministerial Review	2-3 weeks
Conditional Use Permit (CUP)	1-2 months
Zone Change	3 months
General Plan Amendment	3 months
Parcel Maps	2-3 months
Initial Study (CEQA)	2-3 months

Type of Approval or Permit	Typical Processing Time
Environmental Impact Report (CEQA)	8+ months

Source: City of Etna, 2014

These review periods do not present constraints to development as some review is needed to ensure the maintenance of health and safety standards. Further, the City encourages developers to submit applications concurrently whenever possible to minimize the total processing time and related project costs.

2.7.1 Building Codes and Enforcement

The City has adopted the current California Building Code for its code requirements and has not adopted additional standards beyond those contained in the CBC. Therefore, because the California Building Code serves to protect public health and safety, it does not pose a significant constraint to the production or improvement of housing in Etna.

Code enforcement typically occurs when the building inspector is processing other permits on the site or when complaints are filed. City staff works with the Siskiyou County Health Department when the complaint appears to be a matter of both health and safety.

3.0 Actual and Potential Non-Governmental Constraints to Housing

3.1 Land Costs

The cost of raw, developable land creates a direct impact on the cost of a new home and is considered a possible constraint. A higher cost of land raises the price of a new home. Therefore, developers sometimes seek to obtain City approvals for the largest number of lots allowable on a parcel of land. Residential land costs in Etna as of December 2022 are shown in Table B-12. Land prices ranged from \$2,638 per acre to \$12,937 per acre. The largest lot for sale was 132.5 acres priced at \$349,500 coming out to \$2,638 per acre. The smallest lot of land was 10.01 acres at \$129,500 coming out to \$12,937 per acre.

**Table B-12
Vacant Land Costs for Etna and Surrounding Area, December 2022**

Price	Acres	Price per Acre
\$349,500	132	\$2,638
\$129,500	10	\$12,937
\$129,000	10	\$12,368
\$125,000	40	\$3,125
\$89,500	10	\$8,826
Average	40	\$7,979
Median	10	\$8,826

Source: Zillow.com, December 2022

Notes: Surrounding Area is 8 miles north and 5.5 miles south of Etna

Table B-13 shows the average land costs throughout the County according to the Siskiyou County Draft Housing Element. In comparison to the rest of the County, land costs in Etna are less than a third of the cost of land in other nearby areas.

**Table B-13
Average Vacant Land Costs, Siskiyou County**

City	Lot Size (acres)	Price	Price per acre
Mt. Shasta	0.83	\$106,500	\$128,066.40
Weed	0.41	\$11,119	\$27,442.80
Montague	1.13	\$28,500	\$25,264.80
Seiad Valley	1.50	\$80,000	\$53,143.20
Hornbrook	1.00	\$37,000	\$37,026.00
Dorris	0.15	\$11,000	\$75,358.80
Etna (average)	10	n/a	\$7,979

Source: Siskiyou County Draft Housing Element, 2023

3.2 Construction and Labor Costs

Factors that affect the cost of building a house include the type of construction, materials, site conditions, finishing details, amenities, and structural configuration. Table B-14 summarizes the affordable multi-family construction costs for Siskiyou and Shasta Counties in 2021. The only project located in Siskiyou County is the Siskiyou Crossroads in Yreka. The project is for 49 units and is a total of 36,317 square feet (SF). The construction costs are \$12,820,045, per unit they are \$216,634, and per SF they are \$353. The most expensive project is in Redding, CA in Shasta County. The project is for 60 units and is a total of 56,091 SF. The total construction costs are \$16,266,436 at \$271,107 per unit and \$290 per SF. Construction and labor costs in Etna are assumed to be higher than in other parts of the County because of the higher transportation costs of getting materials and labor to the City from nearby commercial centers.

**Table B-14
Affordable Multi-Family Construction Costs, Siskiyou and Shasta Counties 2021**

Project	Address	Total Units	Total Sq. Ft.	Construction Costs	Construction Cost Per Unit	Construction Cost Per Sq. Ft.
Siskiyou Crossroads	510 N. Foothill Dr., Yreka	49	36,317	\$12,820,045	\$216,634	\$353
Burney Commons	Bainbridge Dr., Burney	29	28,428	\$8,642,000	\$298,000	\$304
Lowden Lane Senior Apts.	2775 Lowden Lane, Redding	60	56,091	\$16,266,436	\$271,107	\$290
Center of Hope Apts.	1201 Industrial St., Redding	47	43,819	\$14,942,373	\$317,923	\$341
Live Oak Redding	1320 & 1358 Old Arturas Rd., Redding	38	65,203	\$11,215,000	\$295,132	\$172
				Average	\$288,759	\$292

Source: Siskiyou County Housing Element Draft

3.3 Availability of Financing

The cost of borrowing money to finance the construction of housing or to purchase a house affects the amount of affordably priced housing in the City. Fluctuating interest rates can eliminate many potential homebuyers from the housing market or render as infeasible a housing project that could have been developed at lower interest rates. When interest rates decline, sales increase. The reverse has been true when interest rates increase.

Over the past decade, there has been a dramatic growth in alternative mortgage products, including graduated mortgages and variable rate mortgages. These types of loans allow homeowners to take advantage of lower initial interest rates and to qualify for larger home loans. However, variable rate mortgages are not ideal for low- and moderate- income households that live on tight budgets. Variable rate mortgages may allow lower-income households to enter into homeownership, but there is a definite risk of monthly housing costs rising above the financial means of that household. Therefore, the fixed interest rate mortgage remains the preferred type of loan, especially during periods of low, stable interest rates.

Table B-15 illustrates interest rates as of August 2023. The current average 30-year fixed mortgage interest rate is 7.55%. The table presents both the interest rate and annual percentage rate (APR) for different types of home loans. The interest rate is the percentage of an amount of money that is paid for its use for a specified time, and the APR is the yearly percentage rate that expresses the total finance charge on a loan over its entire term. The APR includes the interest rate, fees, points, and mortgage insurance and is therefore a more complete measure of a loan’s cost than the interest rate alone. However, the loan’s interest rate, not its APR, is used to calculate the monthly principal and interest payment.

**Table B-15
Interest Rates**

	Interest	APR
Conforming Loan		
30-year fixed	7.55%	7.75%
15-year fixed	6.00%	6.30%
Jumbo Loan		
30-year fixed	7.00%	7.01%
5-year ARM	7.63%	7.62%

Source: www.bankrate.com, August 2023

Notes: A conforming loan is for no more than \$729,750. A jumbo loan is greater than \$729,750.

3.4 Adequate Infrastructure

The City provides collection, treatment, and disposal of wastewater within the City limits. Public sewer and water service is readily available within 100 feet of most of the vacant lands identified in Appendix C, Table C-1. Further, sewage treatment is more than adequate to serve the projected growth for the next five years and beyond. The wastewater treatment plant has a potential reserve of 0.11 million gallons per day, sufficient to handle an additional 400 households. The City’s water system has been designed to accommodate a population of 1,100, which is approximately 350 persons more than the present population. Therefore, the City’s basic infrastructure is adequate to handle growth for many years to come.

Senate Bill 1087 requires cities to immediately forward its adopted Housing Element to its water and wastewater providers so they can grant priority for service allocations to proposed developments that include units affordable to lower-income households. However, in this case, the City is the provider of water and sewer, and the City does not have policies or procedures, written or otherwise, that would prevent any level of income unit from connecting to sewer and water services. In accordance with this State law requirement, within thirty (30) days of adoption of its 2023-2031 Housing Element, the Planning Department will be internally distributed to the City’s Department of Public Works, along with a summary of its Regional Housing Needs Allocation. In compliance with subparagraph (b) of Government Code Section 65589.7, this Housing Element includes program 1.3.3 that commits the City to establishing written policies and procedures to prioritize water and sewer connections for

housing development that include lower income units within one year of adoption of the 2023-2031 Housing Element.

4.0 At-Risk Housing and Housing Resources

4.1 Affordable Housing Units At-Risk of Conversion

California Government Code Section 65583(a)(9) et seq. requires that the Housing Element include an analysis of the assisted low-income housing units in the City that may be lost from the inventory of affordable housing within the next ten years as a result of the expiration of some type of affordability restriction.

The City of Etna currently has no multifamily housing projects that receive federal subsidies in order to maintain affordability of the units. Additionally, the City has no locally subsidized units and has not issued any mortgage revenue bonds for this type of activity. Further, the City has not approved any density bonuses with financial assistance, does not have an in-lieu fee program, and has not assisted multifamily housing with redevelopment or CDBG funds. Consequently, there are no multifamily housing projects that are considered to be “at risk”.

4.2 Rehabilitation Program

The 2014 Housing Element documented the City’s rehabilitation loan program is currently funded by a revolving loan account. The City applied for CDBG funds in the past that were used to give rehabilitation loans. As repayments of these loans are received, the money is put back into a loan account to give to new applicants. Loans are made to households in target income groups and can be used for structural rehabilitation, room additions to relieve overcrowding, and total reconstructions. The actual amount of funds available to loan fluctuates and depends on the rate of repayment from existing loans. Interest rates for owner-occupied units are usually set at 3 percent but can be as low as 0 percent for very low-income households, and the life of the loan can be up to 30 years. Seven households were assisted in the past. Currently, the program is temporarily suspended until additional funding can be obtained or repayments are of a sufficient amount to offer rehabilitation loans. Program HE-3.1.1 in this Housing Element seeks additional grant funding for the rehabilitation loan program.

4.3 Housing Authority

The state of California does not own or operate public housing; public housing is administered directly through local public housing authorities. However, for those jurisdictions that do not have a local public housing authority, HCD has a Housing Assistance Program that administers the Section 8 program in those counties.

The Shasta County Housing Authority administers the Housing Choice Voucher (Section 8) program for Siskiyou County and its jurisdictions. The program provides a voucher to recipients to use to help pay their rent for any rental unit that accepts the voucher. The recipients pay part of the rent based on 30 percent of their income and the Section 8 program pays the remaining amount. The previous Housing Element reported a total of 195 vouchers throughout Siskiyou County and one within the city. According to the Shasta County Housing Authority the Housing Choice Voucher waiting list was open and accepting applications in 2023⁸

5.0 Regional Housing Needs

Pursuant to the California Government Code Section 65584, HCD has developed a Regional Housing Need Allocation (RHNA) Plan for the Siskiyou county region. The RHNA Plan identifies a need for 20 new residential units

⁸ <https://www.shastacounty.gov/housing-community-action-programs>, accessed August 16, 2023

in Siskiyou county region over an eight-year period (February 2023 to November 2031). The regional housing need for 20 units is evenly shared and distributed among the County and each of the nine cities.

Each jurisdiction has been allocated two housing units. As part of the RHNA Plan, HCD designates the affordability targets for the housing units. For the two housing units, the RHNA Plan identifies affordability targets of one low-income unit and one very-low income unit for each jurisdiction in the Siskiyou region. Thus, the City of Etna's share of regional housing needs is two units over the eight-year period with one unit affordable to very low-income households and the other unit designated as affordable to low-income households.

Based on the requirements of State law, jurisdictions must also address the projected need of extremely low-income (ELI) households, defined as households earning less than 30 percent of the median income, and at least 50 percent of a jurisdiction's very low income RHNA must be categorized as ELI. The City has assigned the one very low-income unit to the extremely low-income category for its 6th cycle RHNA. Thus, the City of Etna's share of regional housing needs is two units over the eight-year period with one unit affordable to extremely low-income households and the other unit designated as affordable to low-income households. The City's RHNA is presented in Table B-16.

The City and the community recognize that the City's RHNA values underestimate the actual local housing need. Etna is not immune from the housing crisis facing most communities in California and residents are confronted with price and rent increases often exceeding the buying power of local wages, increasing construction costs, and the historic and present pace of home construction not keeping up with pace population growth-change and other socioeconomic changes.

As shown in Appendix C, the City's inventory of vacant property zoned to allow by-right multifamily is sufficient to meet the City's 2023-2031 RHNA of two housing units: one extremely low income housing unit and one low income housing unit, making it is unnecessary for the City to undertake a rezoning program in order to have adequate sites for new housing development.

Nonetheless, in recognition that the community housing need is greater than the City's RHNA obligation, a critical objective of the Housing Element's Goals, Policies and Programs City is to increase the variety and affordability of housing during the Element's eight-year planning period. The sites identified in Appendix C can support the development of housing in excess of the City's share of the 2023-2031 regional housing needs as estimated and allocated by HCD. Therefore, it can be conclusively stated that the City has an adequate inventory of sites to its with supporting public services and facilities, to accommodate its housing needs over the current planning period.

**Table B-16
Regional Housing Needs Allocation City of Etna, 2023-2031**

Income Category	Projected Housing Needs	Percentage of Total
Extremely Low*	1	50%
Very Low	0	0%
Low	1	50%
Moderate	0	0%
Above Moderate	0	0%
Total	2	100%

* For Extremely Low-Income jurisdictions may either use available Census data to calculate the number of projected extremely low-income households or presume 50 percent of the very low-income households qualify as extremely low-income households.

Source: Siskiyou County 6th Cycle Housing Element Data Packet, December 21, 2021; Siskiyou County Final RHNA, HCD, December 2021.

6.0 Opportunities for Energy Conservation

Opportunities for energy conservation can be found for both existing and future housing developments. Conservation can be achieved through a variety of approaches including reducing the use of energy-consuming appliances and features in a home, physical modification of existing structures or land uses, and reducing reliance on automobiles by encouraging more mixed-use and infill development and providing pedestrian access to commercial and recreational facilities.

Some energy conservation features are incorporated into the design of residential structures in the City of Etna due to the requirements of Title 24 of the California Code of Regulations (also known as the California Building Standards Code), which outlines measures to reduce energy consumption. These measures include low-flow plumbing fixtures, efficient heating and cooling opportunities, dual-pane windows, and adequate insulation and weatherstripping. Incorporating new technology in residential development offers developers a chance to design projects that allow for maximum energy conservation opportunities.

Although energy regulations establish a uniform standard of energy efficiency, they do not ensure that all available conservation features are incorporated into building design. Additional measures may further reduce heating, cooling, and lighting loads and overall energy consumption. While it is not feasible that all possible conservation features be included in every development, a number of economically feasible measures may result in savings in excess of the minimum required by Title 24.

Constructing new homes with energy-conserving features, in addition to retrofitting existing structures, will result in a reduction in monthly utility costs. There are many ways to determine how energy efficient an existing building is and, if needed, what improvements can be made. Many modern building design methods are used to reduce residential energy consumption and are based on proven techniques. These methods can be categorized in three ways:

1. Building design that keeps natural heat in during the winter and keeps natural heat out during the summer. Such design features reduce air conditioning and heating demands. Proven building techniques in this category include:
 - Location of windows and openings in relation to the path of the sun to minimize solar gain in the summer and maximize solar gain in the winter;
 - Use of “thermal mass,” earthen materials such as stone, brick, concrete, and tiles that absorb heat during the day and release heat at night;
 - Use of window coverings, insulation, and other materials to reduce heat exchange between the interior of a home and the exterior;
 - Location of openings and the use of ventilating devices that take advantage of natural air flow;
 - Use of eaves and overhangs that block direct solar gain through window openings during the summer but allow solar gain during the winter; and
 - Zone heating and cooling systems, which reduce heating and cooling in the unused areas of a home.
2. Building orientation that uses natural forces to maintain a comfortable interior temperature. Examples include:
 - North-south orientation of the long axis of a dwelling;
 - Minimizing the southern and western exposure of exterior surfaces; and
 - Location of dwellings to take advantage of natural air circulation and evening breezes.
3. Use of landscaping features to moderate interior temperatures. Such techniques include:
 - Use of deciduous shade trees and other plants to protect the home;
 - Use of natural or artificial flowing water; and
 - Use of trees and hedges as windbreaks.

In addition to these naturally based techniques, modern methods include:

- Use of solar energy to heat water;
- Use of radiant barriers on roofs to keep attics cool;
- Use of solar panels and other devices to generate electricity;
- High-efficiency coating on windows to repel summer heat and trap winter warmth;
- Weather stripping and other insulation to reduce heat gain and loss;
- Use of heat pumps for heating and cooling of living areas;
- Use of energy-efficient home appliances; and
- Use of low-flow showerheads and faucet aerators to reduce hot water use.

Major opportunities for residential energy conservation in the City will include insulation and weatherproofing, landscaping, optimum orientation of structures, lowering appliance consumption, and maximization of solar energy technology. The following programs relate to the City’s opportunities for energy conservation:

- Program HE.6.1.1: The City will promote and publicize the availability of funding for housing rehabilitation, energy conservation, and weatherization programs by providing handouts available at public locations and through an annual mailing.
- Program HE.~~3.36~~.1.2: The City will continue to enforce State requirements that units rehabilitated under the rehabilitation program funded with CDBG funds comply with California’s Title 24 energy standards, including retrofit improvements such as dual-pane windows, ceiling and floor insulation, caulking, and weather stripping to reduce energy costs.