Chapter 3 – Analysis of Previous Housing Element

Housing elements must report the progress and effectiveness of the previous housing element. Section 65588, subdivision (a), of the Government Code requires:

- Progress in implementation A description of the actual results or outcomes of the previous element's goals, objectives, policies, and programs (e.g., what happened).
- Effectiveness of the element For each program, include an analysis comparing the differences between what was projected or planned in the element and what was achieved.
- Appropriateness of goals, objectives, policies, and programs –A description of how the goals, objectives, policies, and programs in the updated element are being changed or adjusted to incorporate what has been learned from the results of the previous element. (e.g., continued, modified, or deleted.)
- Special needs populations Provide a description of how past programs were effective in addressing the housing needs of the special populations. This analysis can be done as part of describing the effectiveness of the program pursuant to Government Code Section 65588, subparagraph (a)(2) if the jurisdiction has multiple programs to specifically address housing needs of special needs populations or if specific programs were not included, provide a summary of the cumulative results of the programs in addressing the housing need terms of units or services by special need group.

2014-2019 Housing Element Programs

An important aspect of the Housing Element is an evaluation of achievements under the implementation programs included in the previously adopted Housing Element. The evaluation provides valuable information on the extent to which programs have been successful in achieving stated objectives and addressing local needs and to which these programs continue to be relevant in addressing current and future housing needs in Mt. Shasta. The evaluation also provides the basis for recommended modifications to programs and the establishment of new objectives in the Housing Element. While many of the City's former programs were continued or modified in this update, some were removed due to being successfully implemented and others were added to respond to changes in state law and local conditions.

Many of the programs included in the prior Housing Element are being continued, although many program have been modified to comply with State law, to improve effectiveness for the current cycle, or to reduce redundancy. The table below provides a summary of each program, its progress, and status for the current update.

Implementation Program	Progress/Effectiveness	Applicability in the 2023-2031 Housing Element
Program HO-1.2.1: Every year, as part of the annual Housing Element review, the City shall review the vacant land inventory with the objective of ensuring the City can accommodate a variety of housing types. If a deficiency is found, the City shall take steps to change the General Plan and zoning as needed to increase the amount of available land. The City shall make the inventory available to the public, especially the development community, for their information and use. Timing: At annual review Responsibility: Planning Commission Funding: General Fund	Progress: The City continues to maintain a list of the available vacant land in the city that is appropriate to meet its share of regional housing needs. Additionally, the City is the early stages of exploring housing development options to redevelop a legacy industrial property, referred to as the Roseburg property, that is now Cityowned. This is currently in progress and will assist in the production of affordable housing in the city. Effectiveness: City staff reports on the Housing Element progress on an annual basis to the Planning Commission; this includes an update on the land inventory. The City receives development requests annually and receives input from interested individuals.	gram HO-1.2.1 and Program HO-1.2.2 that obligates the City to implement No Net Loss on a project by project basis. Program HE-1.2.2 calls on the City to annually review the vacant land inventory to ensure adequacy of sites suita-
Program HO-1.3.1: The City shall track and review changes in housing law to determine possible need for revisions in related General Plan policies and programs. Timing: Every five years upon revision of the Housing Element. Next review to be conducted in 2019. Responsibility: Planning Commission Funding: General Fund	Progress: In Spring 2022: The City initiated the 6 th cycle housing update. Mt. Shasta adopted urgency ordinance CCR-21-01 on December 22, 2021, to facilitate implementation of SB 9 (2021). Effectiveness: The City is incorporating recent changes in state housing law into the 6 th cycle update. This will include the recommended general plan and municipal code updates.	the City to reporting on legisla-

Implementation Program	Progress/Effectiveness	Applicability in the 2023-2031 Housing Element
Program HO-1.4.1: In order to increase public input and support of the City's housing programs, the City shall encourage the participation of groups interested in housing in the annual Planning Commission review of the Housing Element. This will occur through public notice and normal contact and solicitation of participation with local agencies and interest groups. Timing: At annual review Responsibility: Planning Commission Funding: General Fund	Progress: City staff report on the Housing Element progress is made on an annual basis to the Planning Commission. Effectiveness: City staff report on the Housing Element progress on an annual basis to the Planning Commission; this includes an update on the land inventory. The City gets very few development requests annually and has received limited input from local housing agencies or interest groups.	
Program HO-1.5.1: Subject to availability of funding, the City shall work with developers of housing located outside existing sewer and/or water service areas, or in areas where existing systems are at or near capacity, to develop or improve essential utility systems to facilitate housing development. City assistance may involve direct participation in improvements or cooperation in the formation of assessment districts or other means of financing necessary improvements. Timing: As opportunities are recognized. Responsibility: City Manager Funding: To be determined.	Progress: The City is continuing to explore opportunities to improve infrastructure to facilitate housing. The City issued an RFP to assist with annexing two areas into the City, which will evaluate infrastructure capacity and needs. Effectiveness: The Roseburg property is outside the City's existing service areas, and the City is currently exploring potential funding vehicles, e.g., enhanced infrastructure financing district (EIFD), to provide financial assistance with the infrastructure costs associated with developing this property.	
Program HO-1.5.2 : The City shall continue to develop and implement plans to expand domestic water and sewage collection and treatment systems such that planned development over the General Plan 20-year timeframe can be accommodated.	Progress: The City's wastewater infrastructure needs are determined through the City's Master Sewer Plan, the Sewer System Capacity Evaluation, and the	Housing Element because the

Implementation Program	Progress/Effectiveness	Applicability in the 2023-2031 Housing Element
Timing: Continually Responsibility: City Manager Funding: General Fund	Wastewater Treatment Plant Capacity Evaluation. The City recently installed water meters at every service connection and approved a Rate and Fee Schedule for wastewater service based on water usage. Effectiveness: All capital projects are scheduled through the Capital Improvement Program and implemented as funds allow.	more expansive than the requirements of the Housing Element.
Program HO-2.5.1: The City shall review building and development requirements and standards, 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. Timing: Bi-annual review starting 2016. Responsibility: Building Department, Planning Department, and City Manager Funding: General Fund	Progress: Ongoing; the City continues to monitor and evaluate impacts fees necessary to provide infrastructure and services. Effectiveness: Due to limited application/permit activity there have been few opportunities to evaluate actual development fees.	Continue and modify per Program HO-2.3.3 that states the City will bi-annually monitor the development of new single family and multifamily housing to determine whether the City's development impact fees create an unjustified constraint to affordable housing development.
 Program HO-2.5.2: The City shall modify the Zoning Code to ensure consistency with State law and internal consistency related to regulations for specific residential land uses, including manufactured homes, group homes, and emergency shelters. Modifications shall include but shall not be limited to: 1. explicitly allowing group homes of six or fewer as a permitted use in all zones where single family units are permitted; 2. Adding transitional housing and supportive housing as permitted uses in the R-L and R-1/B-1 zones; 	Progress: The Zoning Code amendments specified in Program HO-2.5.2 have not been completed. Effectiveness: Due to limited resources and staffing changes, the City was unable to complete amendments to the Mt. Shasta Municipal Code.	_

Implementation Program	Progress/Effectiveness	Applicability in the 2023-2031 Housing Element
 Permitting manufactured homes on permanent foundations in all zones where single family units are permitted; and Clarifying provisions related to the zones where emergency shelters are permitted by right and adopting a locational restriction of no more than 300 feet from other emergency shelters. Timing: Review and update Zoning Code in 2016. Responsibility: Planning Department Funding: General Fund 		other titles where applicable, within one or two years of housing element adoption as specified in the Program.
 Program HO-3.1.1: The City shall encourage and support plans that include extremely low, very low, and low income housing in areas appropriate to the needs and desires of the population it would house, and at the same time be convenient to public services including bus service and public transit programs. The term "encourage and support", as used herein, may include, but is not limited to: Give priority to processing of affordable housing projects, taking them out of submittal sequence if necessary to receive an early hearing date; Allow phasing of infrastructure whenever possible at time of project review; Provide density bonus or other concessions to qualifying projects in accordance with Government Code 65915; 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; and Any other action on the part of the City which will help to keep development costs to a minimum. Timing: As residential project applications are considered. Responsibility: Planning Commission 	Progress: The City supported a 12-unit housing development on Carmen Drive that included 3 affordable units. The City is also working with the developer of another 25-unit affordable housing development on Chestnut Street. Effectiveness: This program appears effective.	

Implementation Program	Progress/Effectiveness	Applicability in the 2023-2031 Housing Element
Funding: General Fund		
Program HO-3.1.2: The City shall encourage developers of large residential subdivisions (i.e., 50 or more units) to provide some affordable housing. At a minimum, this may entail encouraging developers to incorporate duplexes, triplexes, townhouses, or other affordable housing products or recommend the overlay of the Planned Development (P-D) zone district to provide development flexibility for clustering, mixed use, and condominium development. Timing: As residential development proposals of 50 or more units are submitted. Responsibility: Planning Department, Planning Commission, City Council Funding: Private development	Progress: The City did not receive any applications for residential projects with 50 or more units in the 5 th cycle planning period. Effectiveness: There have been no recent inquiries or residential projects containing 50 or more units.	Continue as modified per Program HO-5.1.2. The 50 unit threshold has been lowered to 8 units based on a review of Mt. Shasta's 5 th cycle permitting history. The 8 unit threshold is consistent with the Multi-Family Residential Standards of the 2010 Design Guidelines. The threshold is also consistent with the City's current practice.
Program HO-3.4.1: The City will assist private and non-profit organizations in the development of extremely low-, very low-, low- and moderate-income housing where such development does not conflict with other policies and provisions of the General Plan and City ordinances. Assistance will include: maintenance of relationships with funding and facilitating agencies and organizations; site identification; and local, state, federal permit assistance. Timing: Annual progress review; annual meeting with local housing advocates regarding coordination and assistance; and upon application submittal. Responsibility: City Manager Funding: General Fund	Progress: The City supported a 12-unit housing development on Carmen Drive that included 3 affordable units. The City is also working with the developer of another 25-unit affordable housing development on Chestnut Street, the Mountain Townhomes housing project. Effectiveness: This program appears effective.	incorporated into Program HO-
Program HO-3.4.2 : The City shall encourage, coordinate with and support agencies and organizations operating rental and mortgage subsidy and self-help housing programs. The City will refer persons interested in	Progress: The City communicates with local support agencies and will continue to	Continue and modify per Program HO-5.1.5.

Implementation Program	Progress/Effectiveness	Applicability in the 2023-2031 Housing Element
developing low-cost housing to appropriate government and non-profit organizations for assistance. Those provisions of the City's ordinance which support affordable housing (e.g., second dwellings, group housing, density bonuses), will be made available to the public in the form of "an affordable housing information brochure". This brochure will include information from the Housing Needs Study completed for the City in July 2005. Timing: Continuous coordination, as necessary, and completion of the brochure in 2016. Responsibility: City Manager, Planning and Building Departments Funding: General Fund	identify affordable housing providers and opportunities. Effectiveness: To incentivize ADU development, Mt. Shasta has an ongoing program to lower and eliminate fees for ADU applications and construction that started in 2018. Since the program's launch: At least 3 applications for ADUs were received and building permits were issued.	
Program HO-3.4.3: To support the development of housing affordable to extremely low-income households, the City shall continue to seek and pursue state and federal funds annually, or as funding becomes available; and grant priority to projects that include units affordable to extremely low-income households. Timing: Seek funding annually to assist extremely low-income households. Responsibility: City Manager Funding: General Fund	Progress: The City has researched the area for non-profit housing developers; however, the City has not found any that are considering the development of SROs in Mt. Shasta at this time. The City will continue to monitor this situation and support development of units affordable to extremely low income households. Effectiveness: The City reviews grant programs and notice of funding availability, however there is limited staff to evaluate when funding is applicable and to be able to apply for and implement programs.	Continue and modify per Program HO-5.1.4.
Program HO-3.5.1 : 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	Progress: The City has adopted new mitigation fees during this Housing Element planning period.	1

Implementation Program	Progress/Effectiveness	Applicability in the 2023-2031 Housing Element
housing would be dedicated to low- and moderate-income persons when a covenant is signed assuring continued use by low- and moderate-income households. Timing: Continually Responsibility: City Council Funding: General Fund	Effectiveness: The City has received limited proposals for low- and moderate- income housing. Fee reductions were considered.	
Program HO-3.5.2: The City will continue to review its planning, permitting and environmental review programs to identify potential constraints to housing development and means by which those constraints may be reduced. Timing: Annually Responsibility: City Manager Funding: General Fund	Progress: Due to limited resources and staffing changes, the City was unable to complete amendments to the Mt. Shasta Municipal Code in the 5 th cycle. Effectiveness: The City has identified potential constraints in its permitting and environmental review programs and proposes amendments to the Mt. Shasta Municipal Code to comply with current State law and reduce potential constraints.	Element includes numerous pro-
Program HO-3.5.3: Pursuant to Government Code Section 65589.7, the City will develop specific procedures to grant priority sewer and water service to those residential developments that include units affordable to lower income households. Timing: 2015 Responsibility: City Manager Funding: General Fund	Progress: The City prioritizes qualifying projects. Effectiveness: The City's existing procedures prioritize service connections for qualifying projects.	Continue and modify per Program HO-1.3.3 that commits the City to establishing written policies and procedures in compliance with GC 65589.7.
Program HO-3.5.4 : The City will monitor the development of new single family and multifamily housing by qualified developers and determine whether the City's development impact fees and conditional use permit	Progress: Due to limited development, resources, and staffing changes, the City has limited data compiled about this.	The monitoring of fees component of the Program is embodied in Program HO-2.3.3.

Implementation Program	Progress/Effectiveness	Applicability in the 2023-2031 Housing Element
requirements create an unjustified constraint to affordable housing development. Timing: Annually Responsibility: City Council Funding: General Fund	Effectiveness: As part of this update the City will compile and review this information to determine if impact fees are a constraint to housing development and will continue to monitor annually.	The monitoring of conditional use permit requirements aspect of the Program is deleted. The 2023-2031 Housing Element includes numerous programs, many of which are mandated by State law, that commit the City to specific regulatory and procedural changes for the purpose to remove procedural and regulatory requirements that constrain housing production: see Programs HO-2.3.1 through HO-2.3.9.
Program HO-4.1.1: The City shall continue to support efforts of non-profit organizations, such as the Great Northern-Corporation Services, who undertake rehabilitation programs and apply for State and Federal funds for rehabilitation programs. Timing: Ongoing Responsibility: City Manager Funding: General Fund	Progress: The City continues to support the efforts of organizations that operate rehabilitation programs. Effectiveness: The City has researched non-profit organizations and will continue to identify rehabilitation programs and housing providers.	, -
Program HO-4.1.2: The City shall use the code enforcement program as a means of keeping track of the condition of the housing stock. This, along with periodic review by Planning Commission and City Council of residential areas needing improvements, could identify needed code enforcement action, necessary improvements to City infrastructure, and/or the opportunity to obtain financing for improvements. Timing: Continually	Progress: As the City becomes aware of issues needing attention, they are addressed. The City has taken action on violations related to health and safety issues on a case-by-case complaint basis. Effectiveness: The City has limited funding and staffing for code enforcement and it is	Discontinued and replaced by Program HO-3.1.1. This is a comprehensive program that commits the City to preparing a Housing Conditions Survey; providing free guidance and technical assistance to homeowners who wish to repair and improve the habitability and weatherization of

Implementation Program	Progress/Effectiveness	Applicability in the 2023-2031 Housing Element
Responsibility: City Manager Funding: General Fund	largely complaint driven; issues are addressed on a case-by-case basis.	existing housing; developing an Owner-Occupied Rehabilitation (OOR) program and seeking funding; supporting organizations that offer zero and \$0 cost rehab and weatherization; and encouraging agencies and non-profits that promote homeowner maintenance and improvement of self-help skills.
Program HO-4.1.3: As information becomes available, the City shall notify or cooperate in notification of owners of homes in need of rehabilitation or weatherization about programs that could help meet rehabilitation needs. The City shall continue to offer free guidance and technical assistance through the Building Department to homeowners who wish to repair and improve existing housing. The City will encourage and, as appropriate, participate in the activities of other agencies promoting homeowner maintenance and improvement self-help skills. Timing: On-going as opportunities are recognized. Responsibility: City Manager Funding: General Fund	Progress: The City continues to provide rehabilitation resources and guidance to homeowners upon request. Effectiveness: The City has received requests and provided guidance/ technical assistance to homeowners.	Continue and modify as per Program HO-3.1.1 described above.
Program HO-4.2.1 : The City shall maintain a list of non-profit organizations interested in the retention and construction of affordable housing and entities qualified and interested in participating in the offer of Opportunity to Purchase and Right of First Refusal, and meet with and assist organizations desiring to maintain affordable housing in the city. The City shall also respond to the property owner on any Federal or	Progress: The City continues to maintain a list of non-profit organizations interested in affordable housing construction and meets with organizations upon request. Effectiveness: Due to lack of application/permit activity, there have been limited opportunities to implement this program.	Continue as Program HO-3.3.2.

Implementation Program	Progress/Effectiveness	Applicability in the 2023-2031 Housing Element
State notices including Notice of Intent or Opt-Out Notices on local projects. Timing: As needed upon receipt of notices. Responsibility: Planning Department Funding: General Fund		
Program HO-4.2.2: The City shall continue to monitor "at-risk" subsidized housing when subsidies are within 10 years of expiring (California Government Code Section 65583). The City shall publicize existing State and Federal notice requirements to nonprofit developers and property owners of at-risk housing. The City shall also assist in the search for gap funding for "at risk" projects that may decide to pay off existing assisted loans during the course of the planning period, including but not limited to CDBG and California Housing Finance Agency funds. Timing: As needed upon receipt of notices. Responsibility: City Manager Funding: General Fund	Progress: The City continues to monitor "at-risk" subsidized housing and has reached out to property owners of at-risk housing in the past year. Effectiveness: This program appears effective.	gram HO-3.3.1. To minimize the
Program HO-4.2.3: The City shall consider adopting a condominium conversion ordinance that would limit the ability to convert from rental units to condominium units, taking into account the impact of the conversion on the availability of rental units. City staff shall conduct an analysis of the potential impacts of condominium conversions on the availability of rental housing, study options for a condominium conversion ordinance, and present the analysis and options to the City Council to consider adoption of an ordinance. Timing: Ordinance to be considered in 2016 Responsibility: Planning Department, City Manager Funding: General Fund	Progress: The City has not adopted a condominium conversion ordinance. Effectiveness: It appears this program may not be effective and may no longer be needed.	Continue and modify as Program HO-3.4.2, but remove program if not effective during the 6 th cycle.

Implementation Program	Progress/Effectiveness	Applicability in the 2023-2031 Housing Element
Program HO 5.1.1: The City shall partner with area social services agencies and non-profit organizations to assess the need for supportive housing types for seniors, people with disabilities (including developmental disabilities), extremely low-income residents, and the homeless, and identify funding sources to develop needed services in the city. Timing: Continually Responsibility: City Manager Funding: General Fund	Progress: Ongoing; the City continues to implement the Uniform Building Code requirements for housing that is accessible for persons with disabilities. Effectiveness: The City has researched area for non-profit housing developers and will continue to identify housing providers and opportunities.	Continue and modify per Program HO-4.3.1(6).
Program HO-5.1.2: The City shall support the development of low-cost child care facilities and job training programs in the city to encourage female householders to enter the job market. The City shall meet with the child care council on an annual basis to review possible childcare needs of the community. Timing: Annually Responsibility: Planning Department Funding: General Fund	Progress: The City will continue to assess the childcare needs of the community. Effectiveness: There have been few opportunities to implement this program.	Continue and modify per Program HO-5.1.3.
Program HO-5.4.1: The City shall support agencies and organizations serving the homeless by annually updating referral information on local homeless agencies. Timing: Annually Responsibility: City Manager Funding: General Fund	Progress: Ongoing Effectiveness: The City delegated its PLHA formula allocation to Siskiyou County. The funds are to be used for a project to provide services and shelter for persons experiencing homelessness.	Continue and modify per Program HO-4.3.1(3).
Program HO-5.4.2 : The City shall assist appropriate public and/or non-profit entities as feasible to develop a shelter for homeless persons in the city by pursuing grant opportunities and providing technical assistance in grant applications for State and Federal funding.	Progress: Ongoing Effectiveness: The City delegated its PLHA formula allocation to Siskiyou County. The funds are to be used for a project to	Continue and modify per Program HO-4.3.1(2).

Implementation Program	Progress/Effectiveness	Applicability in the 2023-2031 Housing Element
Timing: When requested Responsibility: City Manager Funding: CDBG, ESG, or other grant funds	provide services and shelter for persons experiencing homelessness.	
Program HO-6.1.1: The City shall support Pacific Power and Great Northern Corporation's Service's energy audit and weatherization programs, and 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 planning period by providing information on currently available weatherization and energy conservation programs to residents of the City. The City shall have information available for the public at the front counter at City Hall and will distribute related information when appropriate, including distribution through the mail. Timing: Ongoing Responsibility: Building Department Funding: Private and government funds	Progress: The City disseminates information on energy conservation programs. Although one local weatherization program has been discontinued, the City wants to keep and/or find a replacement program. Additionally, the County air pollution control district has an existing program for reduced-cost, efficient wood burning stoves and provides low cost vouchers for wood (with funding every couple of years). Effectiveness: This program appears effective and will be continued.	9
Program HO-6.1.2: 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. Timing: Continually Responsibility: Planning Department, Building Department Funding: General Fund	Progress: The City requires compliance with the Zoning Ordinance and California Building Code, including Title 24, to ensure energy conservation in new residential projects. Effectiveness: All new units must comply with Title 24.	

Implementation Program	Progress/Effectiveness	Applicability in the 2023-2031 Housing Element
Program HO-7.1.1: The City shall support designated regulatory agencies in the prevention and correction of any reported discrimination in housing. Timing: Continually Responsibility: City Manager Funding: General Fund	Progress: Posters from the California Department of Fair Employment and Housing have been posted at City Hall to assist those with discrimination complaints. As complaints are received, individuals are directed to the appropriate agency. Although there have been no formal complaints filed with the City, the City is periodically contacted about renter and tenants' rights and provides information as applicable. Effectiveness: This program appears effective as residents contact the City with questions.	Continue as part of Program HO-7.1.1, the AFFH action plan.
Program HO-7.1.2: 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. Timing: Continually as complaints are received. Responsibility: City Manager Funding: General Fund	Progress: Posters from the California Department of Fair Employment and Housing have been posted at City Hall to assist those with discrimination complaints. As complaints are received, individuals are directed to the appropriate agency. Although there have been no formal complaints filed with the City, the City is periodically contacted about renter and tenants' rights and provides information as applicable. Effectiveness: This program appears effective as residents contact the City with questions.	Continue as part of Program HO-7.1.1, the AFFH action plan.
Program HO-7.1.3 : The City shall provide information concerning discrimination compliant procedures to the public at social service centers,	Progress: Posters from the California Department of Fair Employment and Hous-	Continue as part of Program HO-7.1.1, the AFFH action plan.

Implementation Program	Progress/Effectiveness	Applicability in the 2023-2031 Housing Element
the senior center, City Hall, the library, housing projects participating in HUD Housing Choice Voucher 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, handicapped, and lower-income households. Timing: Continually Responsibility: City Manager Funding: General Fund	ing have been posted at City Hall to assist those with discrimination complaints. As complaints are received, individuals are directed to the appropriate agency. Although there have been no formal complaints filed with the City, the City is periodically contacted about renter and tenants' rights and provides information as applicable. Effectiveness: This program appears effective as residents contact the City with questions.	
Overall effectiveness of the 5 th cycle's goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female-headed households, farmworkers, and persons experiencing homelessness).	The City processed a 12-unit housing project on Carmen Dr. that included 3 affordable units and is working with the developer of another proposed 25-unit affordable housing project on Chestnut St. The City did not have the staff or other resources available to consistently implement programs that specifically target special needs populations.	cluding programs that address the housing of special needs pop- ulations.