



**AGENDA NO: Public Comment**

**MEETING DATE: July 7, 2020**

**AGENDA CORRESPONDENCE  
RECEIVED BY THE PLANNING COMMISSION  
FOLLOWING POSTING OF THE AGENDA IS ATTACHED  
FOR PUBLIC REVIEW PRIOR TO THE MEETING**

Mr. Graham:

These are my comments regarding the draft Housing Element up to but not including Adequate Sites Inventory and beyond. Background data is as important as Goals, Policies, and Actions. I understand the deadline was yesterday, May 14, 2020. Would you prefer I wait and submit them during Planning Commission review of the Element? I assume the Planning Commission item will be a Public Hearing providing for Public Comment. Like a draft EIR, will you be responding to comments, including them in your staff report, or what action will be taken with them?

Sincerely,  
Betty Winholtz

### **Format**

I don't like the colored stripes down the paper. It does not make the text more attractive to read. It is more a waste of space making the document longer than it needs to be. In addition, it makes it more difficult to see page numbers.

### **Public Participation** (pages 3-4 through 3-9)

In order to satisfy the requirement for "shall make a diligent effort to achieve public participation of all economic segments," the "City conducted a series of community meetings and public hearings." This requirement was not fulfilled for these reasons: **The housing element is written to include all that will occur before adoption by the end of the 2020. Public hearings are starting now, upon adoption, the statement will be accurate.**

1. To date, there have been no public hearings.
2. One workshop is listed, not a series of meetings. It was held between Thanksgiving and Christmas. 12 people attended (12/12/19).
3. 20 people filled out surveys. The survey was advertised at the "public workshop and through the City's website." They were available through the holidays (12/12/19-1/14/20). **The web-based survey (Survey Monkey) was closed January 14, 2020, however, the other on-line survey (same content, but more ability to elaborate on responses) has continued to be available on the website since it was originally posted (under Hot Topics).**

4. 2 emails were received.

5. "[T]he Housing Element was posted on the City's website...to ensure it was available to all community members." This was helpful for those who have computers, but as COVID-19 revealed via schools trying to get students online to do their studies, many Morro Bay families don't have internet access, as well as some of the elder population.

How were residents suppose to know there is a Draft Housing Element? There was no ad taken out in the local newspaper. Was it announcement on the local radio station? Was there a notice sent out in the monthly water/sewer bills? If a notice was included with the monthly bill, those bills reach roughly 5,000/7,000 households. The 2,000 excluded are mobile home park residents and apartment building dwellers because only one bill is sent to the park/building owner. Both mobile homes and multi-family buildings are predominantly occupied by low income families. **The original notification for the start of the Housing Element review process was prior to the public workshop and included notices in kiosks, water bill mailers, website postings, email notices via 'notify me'. The public notification and involvement were reviewed extensively by HCD and given the unique situation this year, was deemed to meet the public notice requirements.**

Grammatically, there is something wrong with this sentence on page 3-9: "In order the let the public know of the availability of the public draft Housing Element the **CITY** is spreading the word through their online Notify Me application to provides updates on City documents and projects via email to those who have signed up." **This is a big document with many people reviewing and providing comments. This document will continue to be edited and corrections made as we go through the public hearing process.**

**Coastal Zone** (pages 3-9 through 3-11)

The list on page 3-10 does not use the word "required." All the answers in the table on page 3-11 use the word "required." This makes me wonder if this is incomplete data. There has been, "new construction, demolition, conversion, and replacement of housing units for low- and moderate-income households" that has not been

required by design or inclusionary rules and not listed here. Perhaps the research hasn't been done or records kept. Nor does this data identify the many conversions from long term rental housing to short term/vacation rental housing in the last 5 years. The city has an ordinance that apartment conversions to condos be documented. Long term rentals converted to short term rentals should be documented, too. **Unclear what this comment relates to – was not able to find this on the pages noted.**

### **Housing Needs Assessment** (pages 3-13 through 3-60)

1. The discrepancies between Tables H-2 and H-3 projections is why I would encourage the City to ask HCD to postpone the deadline for the Housing Element until the 2020 Census comes out next year. We need real time data and its only months away. Should postponement not happen, Table H-2 should be considered the more reliable of the 2 tables. Lower estimates have always been confirmed in the past when real time data arrives.

2. In Table H-5, are we to assumed that mobile home park residents are counted in the Owner category rather than the Renter category? **Some Mobile home park residents own and some rent. They are included as such.**

3. Table H-8 accounts for Morro Bay residents' commutes. What is not reflected here are the commuters into town who work tourist jobs and can no longer afford to live here. The jobs/housing balance category needs to be look at from both angles. **The information is based on the data available.**

4. The Percentage column does not align with the Number column.

5. Page 3-22 addresses Vacant Units. The first paragraph sets the criteria ("A lower vacancy rate may indicate that households are having difficulty in finding housing that is affordable, leading to overcrowding or households having to pay more than they can afford."). The second paragraph describes the data that meets that criteria but does not articulate the conclusion: finding affordable housing in Morro Bay is difficult and is leading to overcrowding and paying more that is affordable.

Table H-14 shows a large number of vacant units to be seasonal, 88%. Morro Bay City Council has set a cap of 250 vacation rental permits. It would be instructive to know how many of the 1,194 units beyond the 250 permits are illegally vacation rentals and how many are not. **The comment in the document is 'seasonal, recreational or occasional use', which would include second homes. Vacation Rentals and enforcement of the 250-vacation rental limit is addressed in other documents/ordinances.**

6. Table H-15 identifies only 488 mobile housing units. Yet, we know there are 1,000 mobile home park residents. Even if there are 2 people per household, and we know many are single person occupied, that doesn't account for the missing numbers. Are permanent RVs not included in this figure? **Based on the Mobile/Mfg home market study, RV's were removed from this count because they do not meet the HCD definition for a permanent housing unit. The total count is based on the survey of mobile home parks in the city that meet the definition.**

7. The data introduced on page 3-25 needs to be put into the context for why it was gathered. At the time, the City was deciding whether to form redevelopment district(s). The intent of the surveyors was to find things wrong with the building stock, so it would be profitable to redevelop. Ultimately, the redevelopment idea was voted down. Due to the intent for gathering the data and the age of the data (16 years old), this information should be discarded. Even 2009 and 2014 data is old due to the "discovery" of Morro Bay in the last 5 years. New construction has been 3+bedroom single family houses and upgrades for resale value.

8. Table H-22 may be representative, but a survey sample of 19 units out of a possible 2,000+ is too small sample. Nor does the sample discriminate between single family detached houses, apartments or anything in between. **Info is based on data available.**

9. Should Casa de Flores be identified somewhere in the discussion on page 3-42? Should the Alzheimer house be mentioned somewhere under special needs? **These are market rate senior care facilities. The need is for affordable housing to reduce the cost and overcrowding.**

10. Page 3-43 states, "housing for large families appears to have improved since 2011." But why? Mostly 3+bedroom single family houses were built over the last decade? Higher paying jobs in SLO? Inheritance? Other? **Not clear what the comment relates to.**

11. On pages 3-44 through 3-45, I question whether services offered in SLO should be considered as part of Morro Bay's offering to the homeless. It is 13 miles to SLO requiring a bus ticket, and another 3 miles to the Prado Center, requiring a transfer. Does the City officially contribute to these services? **Noted.**

12. It is not clear whether the 97 Section 8 vouchers mentioned on page 3-45 are part of the 115 assisted units in Table H-34. Please clarify if the 97 should be subtracted from the 115 or added to the 115. **The 115 relates only to the identified facilities in the table and the various programs that provide rental assistance to those facilities.**

13. On page 3-46 under At Risk Units, I have a different interpretation of the first paragraph as stated in the second paragraph. In particular, since the first paragraph states, "all state and/or federally assisted low-income housing units that may at some future time be lost," I don't read that language referring only to "financially subsidized low-income housing projects." I read it to mean all housing units receiving government money which would include Section 8 housing and developmentally disabled housing, etc., not just projects. **Section 8 is tenant based and prior to 2020, accepting Section 8 was at the landlord's option. The Section 8 program does not set affordable rents, but rather provides tenants with a subsidy. The 'At Risk Units' that are the subject of this section are those with project-based subsidies that can be re-capitalized prior to expiration with new funding that will preserve the long-term affordability.**

**From:** Rob Kitman [REDACTED]  
**Sent:** Sunday, July 05, 2020 1:15 PM  
**To:** Dana Swanson <[dswanson@morrobayca.gov](mailto:dswanson@morrobayca.gov)>; PlanningCommission <[PlanningCommission@morrobayca.gov](mailto:PlanningCommission@morrobayca.gov)>; Erica Crawford <[erica@morrochamber.org](mailto:erica@morrochamber.org)>  
**Subject:** Housing element comment

Morro Bay City Planning Commission:

I want to echo the Morro Bay Chamber of Commerce of Commerce message, "we need more houses to support businesses and the economy, and now more than ever!"

As the 2018 Business of the Year recipient and current member of the Government Affairs Committee, I can tell you the greatest threat to my family's 61 year, essential service business is finding and retaining quality employees. Cost of local housing is a huge roadblock to long-term employee acquisition and retention. Out of my 13 full-time employees, only one lives in the City of Morro Bay in addition to me. ONE! And I do pay at and above market labor rates and compensation packages.

The City must have a clearer, more reasonable approach and process to allow housing units to be built or retrofitted that hourly workers can afford. The City of Morro Bay government as a whole and specifically the Planning Commission must play its part to lower the current unreasonable and unpredictable barriers to local building projects.

Housing is good business. In the GAC's work, we noted that fewer than 20 new housing units have been built every year, and that we need two to three times that number to move the job-housing imbalance needle, reduce vehicle miles traveled (VMT) and greenhouse gas emissions, and increase the sustainability and resiliency of the economy.

Please stop the excuses and allow more good quality, affordable housing to be built.

Respectfully,

Rob Kitman

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
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[REDACTED]

**From:** Meredith Bates [REDACTED]

**Sent:** Sunday, July 05, 2020 5:32 PM

**To:** Susan Stewart <[sstew49815@aol.com](mailto:sstew49815@aol.com)>; Jesse Barron <[jbarron@morrobayca.gov](mailto:jbarron@morrobayca.gov)>; Michael Lucas <[mlucas@morrobayca.gov](mailto:mlucas@morrobayca.gov)>; Gerald Luhr <[gluhr@morrobayca.gov](mailto:gluhr@morrobayca.gov)>; [jingratta@morrobayca.gov](mailto:jingratta@morrobayca.gov); Scot Graham <[sgraham@morrobayca.gov](mailto:sgraham@morrobayca.gov)>; Dana Swanson <[dswanson@morrobayca.gov](mailto:dswanson@morrobayca.gov)>

**Subject:** July 7 PC Meeting

Dear Planning Commission,

Thank you for studying the Housing Element. I like your attention to detail in your decisions and reviews. Some of my comments below are reflected in others' public statements. I appreciate the opportunity to provide input.

I am concerned about the very low and low-income residents of Morro Bay and the abundance of NIMBYism that discriminates against the poor in our town. I agree with SLOCOG about the Adequate Sites Inventory which "only lists one site available for the low-income category with a realistic density of 215 units. This inventory concentrates the income ranges of extremely low, very-low and low to this one site".

I'm also in agreement with the Chamber of Commerce when they noted "Further, we should ensure that our housing policy (or lack thereof) does not drive us to the same fate as other coastal communities by becoming a community of only wealthy retirees and visitors. That is not a good model to achieve economic and fiscal sustainability, one of the City's major goals".

Regarding Goal H-3: "Special Needs: Address unique housing needs for special needs individuals in new or adapted existing homes", I'd like to see assurance that new low-income housing projects with any government funding are ADA accessible. Many of our low and very low income residents are seniors and/or people with disabilities.

Thank you for your kind attention.

Respectfully,

Meredith Bates, Morro Bay Resident

**From:** betty winholtz [REDACTED]  
**Sent:** Monday, July 06, 2020 2:53 AM  
**To:** Gerald Luhr <[gluhr@morrobayca.gov](mailto:gluhr@morrobayca.gov)>; Michael Lucas <[mlucas@morrobayca.gov](mailto:mlucas@morrobayca.gov)>; Joseph Ingraffia <[jingraffia@morrobayca.gov](mailto:jingraffia@morrobayca.gov)>; Jesse Barron <[jbarron@morrobayca.gov](mailto:jbarron@morrobayca.gov)>; Susan Stewart <[ssewart@morrobayca.gov](mailto:ssewart@morrobayca.gov)>  
**Cc:** Scot Graham <[sgraham@morrobayca.gov](mailto:sgraham@morrobayca.gov)>  
**Subject:** draft housing element

Dear Planning Commission:

Comments #1-10 are my responses to Staff/Consultant addressing previous input. Following #1-10 are new comments referencing pages 3-53 through 3-98.

Thank you for your consideration,  
Betty Winholtz

### Page 3-10 "How Input Received on Public Draft Has Been Addressed in the Housing Element"

- 1.) When questions were asked, rather than answer them, this statement was made: "No revisions were made in response to this comment." This statement is appropriate sometimes, but not when a specific question is asked. For example, "Does the draft include an index to aid in review?"
- 2.) Will the consultant or city staff not comment on suggested changes, or make suggested changes, unless directed to do so by the Planning Commission or City Council?
- 3.) Concern that the "City has not offered adequate opportunities for public participation" is not addressed by adding more text to the section as stated. Summer workshops would address the concern, but they were not held in June and the Planning Commission hearing is now. So is the intent to inform the public about a completed document rather than to receive input as to whether the document reflects the public's goals? Would the workshops be held through Zoom?
- 4.) The "grammatical error on page 3-9" is stated as "has been corrected", but it has not.
- 5.) The response that the date "is not currently available" when asked about including "data on conversion of long-term rentals to short-term rentals" should not stop the collection of such data, particularly as the

residents and the city address the Housing Element and struggle with writing a vacation rental ordinance. It's pertinent information.

6.) I continue to be concerned that dated data is being used upon which current decisions are being made, some of which is more than 15 years old, before the 2010 census. This should not be allowed. Time should be allotted to collect current data; the Element is not due until December.

7.) Long term RVs should be counted as part of the mobile home stock, otherwise it is under-reported.

8.) The comment regarding Table H-12 is not addressed (my comment #4) because I left the Table number off. In Table H-12, the percentages do not add up to 100%.

9.) I agree with the suggested language change that weak words like "encourage" and qualifying words like "when feasible" should be replaced with stronger language.

10.) I press the point regarding the "color bar" for 3 reasons. First, this document will be printed; color cost more. Second, this document is a law; laws don't need to look attractive. Third, the color causes the page number to be difficult to read.

Regarding the page number location: put the number either in the middle of the bottom of the page, or consistently on the left or the right (this document will be used online; pages aren't "flipped" online so the number should consistently be in the same location for efficiency.

Page 3-53. In our anxiousness to provide the number of housing units as State mandated, it is important for the City to not settle for what is brought to it by whomever. The Atascadero/Seaview project brought to the Planning Commission last month is a perfect example. Low income person should not be condemned to a living situation that makes living difficult, just to get a roof over their head. For example, no elevator in a 3-story building: climbing stairs carrying bags of groceries up and hoping not to slip carrying a basket of laundry down. Picture paramedics and their equipment turning the landing corners. I believe it is the Planning Commissions job to require a project to fit the needs of those whom it is suppose to serve.

Page 3-56 to 62, Figures and Tables: ID's without street addresses are difficult to identify. Before approving these maps and tables please have the sites clarified. For example, are ID#1 and 2 a bank and a gas station?

I don't understand why the zoning is not maxed out if increasing housing units is the goal, i.e. ID#1-4 could be duplexes; ID#5-7 could double their projected number of units. Also, why allow "above moderate" when we need "low" to extremely low"? The word "affordable" is not listed in Table H-35. It is a confusing term and should be replaced with more exact wording.

Page 3-64. Table H-37, footnote #2: one year, 2019, does not make a trend.

Page 3-65. Delete "affordable and" in the second line of the next to last paragraph.

Page 3-66. In the first paragraph, should "to 0.99 mgd" actually be "by 0.99mgd"? Otherwise the flow is decreasing.

Page 3-69. Punctuation error on line 4 of "Analysis" and line 6 of "Local Land Use".

Page 3-70. Delete the word "affordable" in line 2 of bottom paragraph unless specifically defined.

Page 3-71. This section appears to answer the directive on Page 3-2, "Analysis of potential and actual governmental constraints on the maintenance, improvement, or development of housing for all income levels." I am at a loss to see how highlighting 5 of 6 projects, all of which are market rate (\$700,000-\$1,000,000) demonstrates how the City doesn't constrain "housing for all income levels." Certainly, "the City allows greater opportunities for projects to achieve maximum density, yet still provides for development projects to meet the City's overall adopted goals" (Page 3-72), but those goals have not included low to very low housing.

Page 3-73. What are the "specific parking standards for affordable projects" other than parking reductions as used in this paragraph?

Page 3-81. Table H-40. change so lower density is not allowed in higher density, i.e. single family not allowed in R-3 or R-4.

Page 3-82. Remove the "moderate" category when calculating density bonus. That is what is traditionally chosen by developers (see list on Page 3-71), so the City isn't getting low or very low inclusionary housing.

Page 3-83. Typos in lines 6 and 7 from the top.

Page 3-89. There should be parameters to this administrative approval: "Any single-family dwelling."

3-90. Second bullet should quote the Zoning Ordinance so it doesn't have to be looked up.

3-97. Include the bolded words, "reduces the housing supply for local residents by **eliminating housing and** driving up home values and average rents." As referenced on Page 3-98, last paragraph.

3-98. Delete the words "the Coastal Commission" from the first paragraph.

3-98. Should "landslides" be added to Environmental Constraints?

3-98. "Higher" than what? under Seasonal Vacancies.