

Chapter VII—Quantified Objectives

Quantified Objectives for housing construction, rehabilitation, and conservation of existing affordable units are contained in this section along with a discussion of programs to be implemented to help achieve the community goals with qualified objectives for the maximum number of housing units (by income level) over the remaining time frame of the element.

A. Overview:

The Housing Element uses three categories of quantified objectives. These are:

- **Producing new housing units.** Mostly, production comes from new construction. It may involve adaptive reuse of non-residential structures for housing opportunities.
- **Rehabilitating existing housing units.** To extend the useful life of older residential structures, rehabilitation keeps housing units in service to meet the residential needs of the community.
- **Conserving affordable housing.** Rather than creating new housing units or extending the life of existing housing units, conservation programs apply to the preservation of affordable units at risk of conversion to market rates.

Table VII-1 delineates those quantified objectives, by income level.

TABLE VII-1
Summary of Quantified Objectives by Income Category

INCOME LEVEL	NEW CONSTRUCTION	REHABILITATION OF EXISTING UNITS	CONSERVATION OF UNITS AT-RISK	TOTAL
VERY LOW	736	30	122	888
LOW	544	15	0	669
MODERATE	800	0	0	800
ABOVE MOD	1,120	0	0	1,120
TOTAL:	3,200	45	122	3,367

B. Goals, Policies and Implementation:

In order to meet these projected numbers for construction, rehabilitation and conservation as noted above, the following respective goals and policies together with program implementation commitments will be enacted.

Housing Programs that will enact the City's goals and policies during the remaining term of this Housing Element follow. These goals and policies insure a total dwelling capacity equal to the new construction need for all income levels, including rental and manufactured housing, homeless shelters and transitional and farmworker housing. Policy actions will include regulatory concessions and incentives as well as insuring utilization of federal and state financing and/or subsidies.

Goal 1: New Housing Construction

Assure sufficient development potential to accommodate future residential growth and construction.

Policy 1-A Action steps to provide adequate sites.

- (1) The City will continue its one-stop, fast track permit process. The Community Development Department coordinates the review and decision-making on required permits and also provides information regarding the status of all applications and permits for residential developments. The permit processing of the City will continue to gather, organize and distribute the information needed by applicant/developers, staff, Planning Commission and City Council in an expeditious fashion.
- (2) Through the Density Bonus Ordinance (effective January 18, 2007), the City provides housing incentives, in the form of greater density than would otherwise be allowed under the current zoning designation, for developers willing to construct affordable housing units. Density bonus provisions may be applied to overcome specific design issues that require relief from the code standards.
- (3) The City will continue its economic development efforts to increase wages and bring higher paying jobs to its residents.

Policy 1-B Action steps to annex sufficient land for residential needs.

- (1) The City will continue to support the use of land for residential development to meet its growing housing need and will actively encourage planned residential developments through annexation of suitable land. Expectations for the current annexation program, initiated in 1994, projected that about 8,000 new housing units would be built over a twenty-year period. This program has been successfully implemented, and the City will continue to monitor the need for future annexations, if appropriate.
- (2) Based on the UC Davis Farmworker Data and the Census 2000 data, Santa Maria houses 55% of the Santa Barbara County farmworker population. The resident baseline population is 10,600 farmworkers workers in the County and the maximum population peaks in June, adding 9,700 more workers (UC Davis, 1999-2000). The calculated demand generated by farmworkers in Santa Maria ranges between 3,100 and 4,600 dwelling units. Los Adobes de Maria I and II owned and operated by Peoples' Self Help Housing Corporation, Inc., provide 117 farmworker apartment units and are model projects to be replicated. The City will work cooperatively with County and State government entities as well as non-profit and agriculture community to address housing for all special needs populations.

Policy 1-C Action steps to encourage mixed-use development:

(1) The City's Mixed-Use Ordinance (effective 12/16/2004) increases the flexibility of the zoning district to support compatible uses from other zoning districts. The Ordinance grants the Zoning Administrator, Planning Commission, and City Council increasing levels of oversight to allow reduced standards for parking, setbacks, landscaping, open space and/or increased height. The Ordinance is a "design-based" regulation, which understands that the uses inside the structure will change over time and the code allows the adaptation to occur without government controls. Spaces may be mixed and "re-mixed" to meet the needs of the community. Mixed-Use projects that encourage provision of affordable housing are given priority, especially those within the Downtown Specific Plan area, accommodating special needs populations and housing the local workforce by employers.

Objectives:

New Residential Units: Encourage/approve development applications to meet all or part of the below remaining regional share of need (RHNA):

- 736 units affordable to very-low income households
- 544 units affordable to low income households
- 800 units affordable to moderate-income households
- 1,120 units affordable to above-moderate income households

Responsibility:

Staff of the Community Development Department is responsible to successfully implement the Mixed-Use Ordinance. By December 31, 2010, staff will develop standards, etc. for City approval that can be given to developers as a menu that specifies reduced standards for parking, setbacks, landscaping, open space and/or increased height and/or incentives (financial and/or regulatory). This information will also be made available to the public in the following ways:

- Handouts on mixed-use development standards available at the front counter and online
- Internet posting of mixed use definitions, policies, and procedures
- City identification of potential mixed use development areas.

Staff will regularly monitor and report on the progress and status of this action to the Planning Commission and City Council by October 1 of each year via the filing of the General Plan Annual Report (consistent with Government Code §64500) and make appropriate revisions to achieve stated objectives over the planning period.

New programs, like the Mixed-Use Ordinance, cause the reexamination of how development standards are applied. The City has adopted a building conservation code and will regularly review and adopt revisions to the Uniform Building Codes.

Policy 1-D Action steps to encourage infill:

- (1) The City's General Plan establishes goals for preserving agricultural land at the perimeter of the City and this boundary remains distinct. The City will examine ways to encourage the principles of Smart Growth through infill and high-density housing development in several focused areas including the Downtown Specific Plan area.
- (2) The City continually analyzes the relationship between available public facilities and services and sites suitable for residential development to assure meeting the need for services. Leapfrog development is more costly if urban infrastructure (water, sewer, gas, electricity, roads, etc.) is not adjacent to the site. The City assures development sites for affordable housing receive priority scheduling for capital improvements. Building in areas where services already exist does not add significant costs to off-site improvements. CDBG funds will continue to be used to offset extraordinary costs where appropriate.
- (3) The City of Santa Maria and the County of Santa Barbara allocate HOME funds to the Housing Authority of the County of Santa Barbara or other qualified non-profit housing providers for construction of apartments that house low- and moderate-income families.
- (4) The Downtown Specific Plan was approved in 2008. Subsequent actions will be undertaken relating to establishing downtown worker programs and transit oriented development standards.

Timeline:

The above action steps are ongoing activities of the City.

Responsibility:

Consistent with Government Code §64500, the Community Development Department will monitor and report to the Planning Commission and City Council about the status and progress of the Housing Element each year. The Annual Report (i.e., General Plan Annual Progress Report) filing will be completed by April 1.

Goal 2: Housing Rehabilitation

Support decent, affordable housing programs that target low- and moderate-income sectors of the community for rehabilitation projects.

Timeline:

The above action steps presented below are ongoing activities of the City.

Responsibility:

Community Development; Administrative Services/Special Projects

Policy 2-A Action steps to improve sub-standard housing conditions:

- (1) The City continues to maintain an active code compliance program of complaint-based inspections in target neighborhoods. The intent of this program is to stop destabilizing elements in the area and work with other programs to encourage housing rehabilitation and neighborhood security. The City may augment the complaint-based inspection program with a building inspection clearance prior to resale of single-family, duplex, tri-plex, and four units of properties.

- (2) The City will coordinate its public improvements with neighborhood improvement programs. The City Council periodically reviews capital improvement requirements and will amend its scheduling for funding allocation to coordinate with private sector residential maintenance and improvement projects.
- (3) Each requested demolition uses the safety of the structure and the threat of imminent collapse as the standard for review. Housing units will be carefully reviewed to determine absolute need for demolition and if rehabilitation can avoid unnecessary reduction of housing. When demolition is required, efforts will be directed toward timely replacement of housing compatible with the existing neighborhood.
- (4) The City will continue to provide CDBG funds toward the operation of a residential rehabilitation loan program for low income homeowners. Repair and maintenance projects will include heating units, kitchen remodels, plumbing, roofing, window and door replacements, painting, and garage conversions. All loans are secured by a deed of trust recorded against the property. Proceeds from payments and payoffs will be recycled into future building and repair projects. It is projected that 30 loans will be provided over the next five years.

Policy 2-B Action steps to assist special needs populations:

- (1) The City has staff dedicated to grant writing and administration. Funding sources are continually reviewed. State Bond funding is one of the potential sources for projects to be accessed. The adopted Consolidated Plan and subsequent Annual Action Plans outline the goals and objectives for the allocation of Federal HOME and CDBG entitlement programs. To avoid confusion, the Housing Element will refer the reader to the Federal reports for the most up to date status of federally funded housing programs and support services. The City will actively seek funding for projects to assure a balance of housing opportunities for its residents.
- (2) The City is working with two local non-profit agencies that have been designated as Community Housing Development Organizations (CHDOs). (See detailed description of CHDOs in Policy 3A, below). One CHDO will undertake various housing related activities including transitional and supportive housing facilities, and new construction of affordable permanent rental units. The other will concentrate on rehabilitation of existing affordable units and new construction of affordable owner units. The City has provided funding to both agencies to proceed with these projects.
- (3) Mobile homes provide affordable housing options and are encouraged to expand through ordinance amendments enacted in the previous planning period. In 2003, the Mobile Home Park density limitations were increased from seven dwelling units per acre to ten dwelling units per acre in any land use designation. Additionally, the zoning code was amended to permit two units on substandard lots (less than 6,000 square feet) in the R-2 zoning district. The R-2 zoning district no longer requires 3,000 square feet per dwelling unit, but allows two units on any R-2 lot less than 6,000 square feet as long as the development meets other R-2 standards.
- (4) The City will continue to offer a Housing Assistance Program for first-time homebuyers in partnership with the County of Santa Barbara.

- (5) The City encourages property owners to rent using the Section 8 Program to encourage rental property retain higher standards as monitored by the Housing Authority of Santa Barbara County.
- (6) The City will closely monitor the conversion of condominiums to minimize losses to the rental housing stock. Each conversion is to be handled on a case-by-case basis; appropriate conditions are placed on any project at the time of approval.

Policy 2-C Action steps to expand economic opportunities:

- (1) The City will continue funding the Santa Maria Valley Chamber of Commerce to provide economic development services.
- (2) The City will support the creation of new jobs and housing by annexing areas for new employment opportunities and seek to retain currently zoned commercial and industrial property by implementing industrial reserve zoning.
- (3) The City encourages job creation through new business location and existing business expansion and has set aside funds for a Business and Retention Loan Program. The Santa Maria Valley Chamber of Commerce provides technical assistance for this Loan Program.

Goal 3: Housing Conservation

Work with local housing providers to conserve affordable units at risk of conversion to market rates.

Timeline:

The above action steps presented below are ongoing activities of the City.

Responsibility:

Community Development; Administrative Services/Special Projects

Policy 3-A Action steps to maximize governmental assistance to conserve affordable housing units currently receiving subsidies:

- (1) Through the Section 8 Rental Certificate and Voucher Programs, the Housing Authority of the County of Santa Barbara provides rental subsidy payments directly to private property owners on behalf of eligible low-income tenants who cannot afford market rate rents without a subsidy. The assistance is tenant-based rather than project-based. As of March 31, 2005, there were 1,835 Section 8 assisted units located in the City. This represents 54% of the countywide allocation of 3,396. At that time, there were 3,321 households on the Section 8 waiting list and 4,176 on the public housing waiting list. Households using this program will continue to be provided assistance and the Housing Authority will continue to apply for new funds to increase Section 8 assistance.
- (2) The City will encourage property owners and non-profit organizations to develop strategies to maintain affordability controls on government-assisted projects.
- (3) The City will monitor the Union Plaza project to assure qualified entities with the managerial and financial capacity acquires and rehabilitates this property if and when an Opt Out notice is filed. The State offers numerous opportunities for financing project construction using Proposition housing bond proceeds. The City uses its Federal HUD Community Development

Block Grant and HOME allocations to invest in projects and contributes to a First-Time Buyer Program administered by the County of Santa Barbara.

With regard to the financing constraint, the City has staff dedicated to grants administration; funding sources are continually reviewed. Housing Bond Propositions help to fund affordable housing, but bonds are just one of the potential sources for project financing. During the term of this Housing Element, the City of Santa Maria Special Projects Division will continue to seek new outside funding sources for the community and collaborate with community partners. The City has an adopted Consolidated Plan and adopts Annual Action Plans regarding the allocation of Federal HOME and CDBG program funds. To avoid confusion, the Housing Element will refer the reader to the Federal reports for the status of federally funded housing programs and support services.

- (4) A Community Housing Development Organization (CHDO) is a specific type of private nonprofit, community-based service organization that has obtained or intends to obtain staff with the capacity to develop affordable housing for the community it serves. HOME jurisdictions must set aside at least 15 percent of their allocations for CHDOs exclusively so it is an advantage to be a CHDO in securing funding. One of the City's goals for the 2004-05 budget period was to facilitate and establish the formation of a CHDO by a local non-profit in an effort to support programs that would increase the supply of housing for low- and moderate-income households.

According to the Special Projects Division, there are eight CHDOs approved for Santa Barbara County:

- Good Samaritan Shelter, Inc. (GSS)
- Habitat for Humanity, NSBC, Inc. (HFH)
- Lompoc Housing & Community Development Corporation (LHCDC)
- Peoples' Self-Help Housing Corporation (PSHHC)
- Santa Barbara County Community Housing Corporation (CHC)
- Coalition for Housing Accessibility Needs Choice & Equality (CHANCE)
- Cabrillo Economic Development Corporation (CEDC)
- Housing Authority of Santa Barbara County (HASBC)

The City continues its work with area non-profits that specialize in housing for persons with disabilities. Peoples' Self-Help Housing Corporation (PSSHHC) has a non-profit CHDO as a division within its corporate structure. PSSHHC is expected to continue its construction for special needs population including the disabled and farmworkers.

By City Ordinance, the City allocates a percentage of its hotel and motel Transient Occupancy Tax to economic development efforts. The Santa Maria Valley Chamber of Commerce holds a contract to provide economic development services for the City. In addition, an Economic Development Commission meets twice a month to coordinate efforts in the economic development arena.

Goal 4: Strategies to Reduce or Remove Government Constraints on Housing

Where appropriate and legally possible, the following strategies address the removal of governmental constraints (65583(c) (3)) on the construction of housing for all income levels especially that for low and moderate income households.

Timeline:

This information is presented below for each strategy.

Responsibility:

This information is presented below for each strategy.

- 1. Land Controls:** As a charter city, General Plan amendment projects are not subjected to the processing limitations and may be acted on more than four times each year. The City should discourage General Plan amendments, except in cases demonstrating good long range planning in the best interest of the City, and encourage public participation in the comprehensive General Plan element updates and truly implement fast-tracking processing that saves the developer money.

The City adopted a Mixed Use Zoning Ordinance (Chapter 49 or Title 12) in December 2004. The ordinance is aimed at creating and regulating opportunities to establish mixed-use projects within the City. The ordinance seeks to allow the provision of a mixture of compatible office, commercial, industrial and residential uses in order to create a more efficient and pedestrian-friendly environment and infuse new vitality into qualifying underdeveloped properties. Some of the objectives of the ordinance are to expand residential opportunities, reduce urban sprawl and promote infill development.

- First Baptist Church Caretaker and Valley Christian Academy Staff Housing Project is located at 2970 Santa Maria Way. The use permits identify seven units in four modular buildings on the campus for staff housing. Three duplex buildings house new teachers and one unit houses the caretaker for the church. The site is zoned PF (Public Facilities).
- Centennial Square Project is located at the southwest corner of Miller Street and Plaza Drive. In conjunction with a General Plan Amendment and rezoning action to change the a large portion of the site to R-3 (High Density Residential), the mixed use project was approved for 88 condominium apartment units in the rezoned portion and 10,166 square feet of office space and seven upstairs apartments. The 6-acre site was zoned CPO (Commercial Professional Office).
- Celebration Project is located at the west side of Miller Street, between Inger and Daniel. The project was approved for 42 single-family houses surrounded on three sides by 14 mixed-use buildings along all three street frontages. Each building was approved for 2,000 square feet of office space on the ground level and three condominium apartments in the building. The 7-acre site is zoned R-2, but was restricted to 42 units. The mixed-use project resulted in 38 additional units being added to the maximum allowed density.

- McClelland-Inger Project is located on the northwest corner of McClelland Street and Inger Street. In conjunction with a General Plan Amendment and rezoning action to change the 2.83-acre site to R-3 (High Density Residential), the project was approved for 40 condominium apartment units with 8,978 square feet of office space and seven upstairs apartments
- Lakeview Promenade Project is located on the northwest corner of SR 135 and Skyway Drive. In conjunction with a General Plan Amendment and rezoning action to change a portion of the full block (9.4-acre) site to R-3 (High Density Residential), the project was approved for a senior lifestyle center with 263 condominium apartment units and 69,004 square feet of ground floor commercial spaces.

The mixed-use units (without land rezoned to R-3) total 322. With the units on the sites rezoned with the project, there are 450 units added to the potential residential inventory because of mixed-use approvals.

2. **Building Codes:** The City recently implemented a volunteer program that is proving successful. With an increase in funding and staffing this program can be expanded. The Code Compliance Division is stepping up its outreach to the Spanish-speaking population with homeowner and landlord / tenant information.

Responsible Department: City Attorney

Timeframe: Ongoing

Expected Results During Housing Element Period: 50% compliance per year; 110 dwelling units brought up to code per year.

3. **Site Improvements:** The City will seek ways to reduce long term service and maintenance costs resulting from new development. Such methods include, but are not limited to, requiring: private roads, sidewalks, lighting and landscaping districts, and improvement districts. The Maintenance Annuity Fund (MAF) concept may be applied to annexation areas resulting in a long-term adverse fiscal impact on the City.

City Council policy continues to allow reduced perimeter fencing standards when the subdivision is adjacent to residential land uses. In addition, the new small public street standard is being implemented. Normally, block walls are required for perimeter subdivision fencing to reduce off-site noise impacts on the residences. When a new subdivision borders residential property, however, a combination of masonry and wood wall may be permitted, reducing development costs significantly.

Responsible Agency: Community Development

Timeframe: Ongoing

Expected Results During Housing Element Period: Lower construction costs may be transferred to buyers

- 4. Fees and Exactions:** The City will continue to grant a Subdivision/Residential In-Lieu Park Fee credit of up to 100% of the fee for existing facilities that convert to senior projects, provided the projects have on-site recreational facilities that meet certain criteria. In limited cases, the City plans to continue its policy of deferring payment of a portion of the fees on projects affordable to lower income persons. The City also plans to continue to offer a reduced traffic impact fee to affordable and senior housing projects. City fees for projects funded under the HOME Program will be waived where legally permitted by City ordinances, on a case-by-case basis.

Responsible Departments: Recreation and Parks, Public Works Engineering, Community Development

Timeframe: Case-by-Case (ongoing)

Expected Results During Housing Element Period: 200 senior/affordable dwelling units will benefit from fee reductions

- 5. Processing and Permit Procedures:** The City policy is to expedite permit processing whenever possible. Pre-application meetings and procedural handouts help assure that applications will be complete, thereby reducing processing time. The City continues to accept and process building permit applications prior to completion of Planning Commission approval of a project, but at the risk of required plan revisions causing additional time to be spent on the project. The City Council no longer reviews tentative subdivision maps, eliminating one month of processing time. Building permit applications may be filed and processed prior to completion of Planning Commission approval of a project. A new courtesy inspection procedure allows inspections before permits are issued on a case-by-case basis subject to certain criteria. The City Building Department has offered classes on water heater installation, and those plumbers who have passed the test have been certified to install water heaters without obtaining counter permits.

Responsible Agency: Community Development

Timeframe: Case-by-Case (ongoing).

Expected Results During Housing Element Period: Lower construction costs may be transferred to buyers

Goal 5: Promotion of Equal Housing Opportunities

Timeline:

The above action steps presented below are ongoing activities of the City.

Responsibility:

Community Development; Administrative Services/Special Projects

In order to promote equal housing opportunities per Section 65583(c)(5), the County of Santa Barbara HOME Consortium, with the assistance of its member cities, prepared an Analysis of Impediments to Fair Housing Choice in May 1997, which was updated September 1, 2006. As part of the preparation, a survey of community service agencies was conducted to assess the number and types of fair housing complaints, Home Mortgage Disclosure Act data were collected and analyzed, and maps of the County's racial composition were created. As a result, impediments were identified and an action plan was developed. The following four impediments were identified through the Analysis for the City of Santa Maria.

- **A primary impediment to equal choice of housing in the City at present is the lack of availability of affordable housing, particularly units for large families.** Based on the vacancy rates, there is clearly a greater need for larger rental units than for zero and one bedroom units. The lack of affordable larger units constitutes an impediment to fair housing, and because Hispanic households tend to be large, they are disproportionately affected.
- **Concentrations of low income and racial/ethnic populations are often segregated from other Santa Maria residents.** The City must continue to make efforts to upgrade existing lower income neighborhoods in order to improve the living conditions of the residents and to encourage residents of varied income and racial/ethnic backgrounds to move into such neighborhoods. An effort must also be made to ensure a broad geographical distribution in the provision of affordable housing.
- **Tenants and landlords are unaware of current Fair Housing laws.** According to Legal Aid Foundation, the number of reported cases of discriminatory practices is on the rise throughout the County. The majority of housing discrimination cases goes unreported because of lack of education of tenants as to their rights and intimidation and threats by landlords. Many landlords are not professionals and are not aware of the laws that apply to them; it is believed that knowledge of the laws and their penalties can serve as a deterrent to discriminatory practices.
- **Few programs exist to educate potential homebuyers.** Increased homebuyer education is needed to prepare first-time homebuyers for the many responsibilities of homeownership. Potential homebuyers need be given information about housing discrimination and the procedures involved in locating, qualifying for, and securing a home.

The following Fair Housing Action Plan was developed to address the impediments identified in the Analysis. Included are actions proposed for implementation during this Housing Element:

1. **Execute a renewable agreement for fair housing services.** Legal Aid Foundation currently has an agreement with the City to perform fair housing services. This agreement will be renewed to cover the following terms of the agreement:
 - a) Interview at least 15 tenants of City residences regarding the habitability of their living quarters.
 - b) Assist in the resolution of at least two discrimination disputes through mediation or, if necessary, litigation.
 - c) Conduct one community workshop regarding the rights of single parents, minorities, and persons with disabilities to equal housing opportunity.
 - d) Review local newspapers monthly and report on the presence of discrimination in advertising of residential tenancies.
 - e) Train volunteers and conduct a fair housing audit, performing random testing of at least five landlords and/or property managers per year.
 - f) Analyze all information gathered from the preceding five activities and prepare at least one report based on that analysis.

2. **Execute a renewable agreement for fair housing services.** Conflict Solutions Center currently has an agreement with the City to perform fair housing services. This agreement will be renewed to cover the following terms of the agreement:
 - a) Mediation services for fair housing complaints, when litigation can be avoided. Settlement services for fair housing proceedings, when litigation has already begun.
 - b) Residents of Santa Maria are offered rental housing mediation services on a sliding fee scale from \$0 to \$10 depending on their ability to pay.
3. **Maintain permanent displays housing printed informational materials in Spanish and English directed to housing consumers regarding their rights under Fair Housing laws and how they may obtain assistance if they believe they are victims of discrimination.** The City continues to maintain informational displays at City Hall, the Santa Maria Public Library, and the Community Development Department.
4. **Adopt a proclamation declaring April as Fair Housing Month.** The City will declare April as Fair Housing Month as it has done for the past several years.
5. **Use HOME Consortium funds to provide more affordable rental housing and homebuyer assistance.** It is projected that there will be greater emphasis on education than assistance in the early years of the 2009 Housing Element. County HOME Consortium Homebuyer Assistance and Homebuyer Education program funding will be identified in the Annual Action Plan and subsequently, actions will be discussed in the Grantee Performance Reports that are filed annually with HUD.
6. **In conjunction with the County HOME Consortium, provide homebuyer education, in both English and Spanish for families interested in the Consortium Homebuyer Assistance Program and homeownership in general. Include credit counseling as part of the education.** It is projected that there will be greater emphasis on education than assistance in the early years of the 2009 Housing Element. County HOME Consortium Homebuyer Assistance and Homebuyer Education program funding will be identified in the Annual Action Plan and subsequently, actions will be discussed in the Grantee Performance Reports that are filed annually with HUD.
7. **Provide handicap modifications for owner-occupied properties under the CDBG-funded Residential Rehabilitation Loan Program.** It is projected that there will be approximately 30 loans provided over the next five years. Residential Rehabilitation Loan Program funding will be identified in the Annual Action Plan and subsequently, actions will be discussed in the Grantee Performance Reports that are filed annually with HUD.
8. **Make efforts to upgrade lower income neighborhoods under the Neighborhood Conservation Program.** There are no specific projects planned under the Neighborhood Conservation Program. Funded Neighborhood Conservation Programs will be identified in the Annual Action Plan.

9. **Continue to Implement the Reasonable Accommodations Ordinance (Chapter 12-50 of the Municipal Code).** This Ordinance was adopted in 2007 in accordance with the U.S. Fair Housing Act. And California Government Code Section 12955.6.

References Cited in this Chapter: None

Appendices to this Chapter: None