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AGENDA ITEM NO.: 6 (Public Hearing and Action Item)

**PLANNING COMMISSION
MEETING DATE:** August 23, 2023

SUBJECT: 2021 Housing Element Revised - General
Plan Amendment (GPA) 2023-02/Inyo
County

EXECUTIVE SUMMARY

Staff has prepared a revision to the adopted 2021 Housing Element. This revision removes and replaces two of the Regional Housing Allocation Number (RHNA) site parcels. Staff has prepared a resolution (attached) for a recommendation to the Board of Supervisors to adopt GPA 2023-03/Housing Element Revised.

PROJECT INFORMATION

Supervisory District: County-wide

Recommended Action: Conduct a public hearing and adopt Resolution No. 2023-03 recommending that the Board of Supervisors certify that the 2021 Housing Element Revision is a Negative Declaration of Environmental Impact with addenda, pursuant to the California Environmental Quality Act (CEQA) and make certain findings with respect to and approve, GPA 2023-02/Housing Element Revised and send to the California Department of Housing and Community Development (HCD) for re-certification.

Project Planner: Cathreen Richards

BACKGROUND

The General Plan Housing Element is required pursuant to California Government Code Section 65580 et seq., and works to provide housing for all of Inyo County’s residents. Housing Element law is one of the most complicated of the General Plan Elements and Housing Elements must be approved by the State. It is also the only General Plan Element that has defined update requirements. Inyo County is currently on an eight-year update cycle.

The most current update to the Housing Element began in spring 2020 for the planning period 2021-2029. After a two-year process, the County’s Housing Element was updated, approved and finally certified by HCD in August, 2022. As part of a Housing Element approval, local jurisdictions essentially promise to implement the policies and implementation strategies contained in it. The 2021 Housing Element included that by April 2023 two-parcels of land, identified as sites for the RHNA, would have General Plan and Zoning redesignations to support higher density housing. When this did not happen, the County was put in jeopardy of no longer being in compliance with State Housing Element Law.

ANALYSIS

Housing Element law states that the availability of housing is of vital statewide importance, and the attainment of decent housing and a suitable living environment for every Californian is a priority of the highest order. The 2021 Housing Element Update plans for adequate housing for the county’s population based on income brackets. Planning for this housing in the Element is based on the RHNA numbers that were given to the County at the onset of the Update process. For the 2021 Housing Element the total RHNA number is 205 housing units.

The breakdown of units by income category can be seen on the following table:

Income Level	RHNA – Housing Units
Very Low	46
Low	40
Moderate	39
Above Moderate	80
Total	205

Three sites were identified in the 2021 Housing Element Update for the very-low, low, and moderate-income categories. The site selection was extremely difficult as the County has very little in the way of privately owned vacant land that meets the criteria for RHNA site selection. State guidelines require that the RHNA site parcels for the very-low, low and moderate-income categories be from 0.5-acres to 10-acres, have General Plan and Zoning designations that allow for no less than 20-units per acre - by right, and have

direct access to water and sewer utilities. The sites should also be free of environmental factors that could prohibit or make development more difficult/expensive. The sites should be near services, ideally including high-quality transportation opportunities. The sites were also required to be evaluated under the lens of Affirmatively Furthering Fair Housing goals (AFFH)¹.

One of the three parcels identified for the RHNA sites met all of the RHNA site selection requirements for very-low, low, and moderate-income housing units. It is located in Big Pine near the corner of Highway 395 and Bartell Road. The other two met all of the required criteria, except for the appropriate General Plan and Zoning designations. The 80-above-moderate income level RHNA site parcels were able to be identified from vacant single family residentially zoned parcels scattered throughout the northern part of the county (Bishop area to Lone Pine).

Staff worked on a separate, but parallel project (Vacant Lands and Housing Opportunity) at the same time as the Housing Element Update. This project was an exercise in finding parcels in the county that could support higher density residential development as there is a serious lack of it. Staff used the RHNA site selection criteria as part of this exercise. Eight total parcels were identified for General Plan and Zoning designation changes. None of these parcels are in private ownership since there are no privately owned parcels in the County that meet the criteria. Three of the parcels identified for possible designation changes were County owned parcels and five Los Angeles Department of Water and Power (DWP) owned. These parcels were then evaluated under CEQA with a Program Level Environmental Impact Report (PEIR). Of these parcels, two were selected for the Housing Element Update for the very-low, low and moderate-income sites due to their meeting the RHNA criteria (except for General Plan and zoning designations). These parcels are also located on the edges of the City of Bishop where job, services and transportation opportunities are the most abundant in the County and therefore are in an area considered 'High Opportunity' per AFFH evaluations and mapping conducted by the State. This same area is also very much in need of affordable housing. The other six parcels were also proposed for General Plan and zoning designation changes to increase the amount of available land for higher density housing in the County.

The eight parcels identified for designation changes (GPA and ZR 2023-01) did not receive a recommendation by the Planning Commission for Board adoption. The two parcels selected from the Vacant Lands and Housing Opportunity project for the RHNA sites selection, and one additional parcel not identified as a RHNA site, were not approved by the Board of Supervisors for designation changes. The other five parcels were approved for designation changes, but at Board adjusted levels that left them unable to support the 20-units per acre, by-right criteria, based on General Plan and zoning designations. This left the County's Housing Element in jeopardy of no

¹ Affirmatively furthering fair housing means "taking meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics." These characteristics include, but are not limited to: race, religion, age, ancestry, sexual orientation, gender identity, marital status, national origin, color, familial status, or disability.

longer being in compliance with State Housing Element Law and staff scrambling to find replacement parcels.

Staff focused on finding parcels that do not require General Plan and/or Zoning designation changes – and meet the RHNA sites selection criteria. After an extensive search of the county’s parcel data, staff found two parcels that could replace the two that were lost with regard to the ability of providing adequate housing units under the RHNA criteria. Neither parcel is ideal or tick all of the boxes like the first two did, but both were accepted by HCD after a review of them. One of the parcels is next to the one already identified in Big Pine on Bartell Road concentrating much of the County’s Housing Element RHNA sites in one place and the other is in Lone Pine west of Mt. Whitney Drive and the Mt. Whitney apartments, located in a Low Opportunity Area, per the State’s AFFH Opportunity Mapper (new sites maps attached).

Staff revised the 2021 Housing Element with the new RHNA sites and narratives regarding them (attached – changes identified in red text). The revised Housing Element was then sent to HCD for review on May 25, 2023. On June 26, 2023, the County received a letter from HCD (attached) stating that the proposed amendment will not negatively impact demonstrating adequate sites to accommodate the RHNA or the County’s current compliance with State Housing Element Law once the revised Housing Element is adopted, submitted to, and approved by HCD.

Staff is now bringing forward GPA 2023-02/Housing Element Revised with the two new RHNA sites for approval. These sites are effectively the only ones in the county’s pool of parcels that meet the State’s RHNA site requirements and can provide the area needed to support the number of units also required by the RHNA. The alternative to the Board not approving the GPA is the County having a Housing Element and consequently General Plan that are not in compliance with state law.

TRIBAL CONSULTATION

General Plan Amendments require Tribal consultation and on October 28, 2020 the County initiated Native American Consultation pursuant to the California Government Code Sections 65040.2, 65092, 65351, 65352.3, 65352.4, 65562.5, with the Big Pine Band of the Owens Valley, Bishop Paiute Tribe, Fort Independence Community of Paiute, Timbisha Shoshone, Kern Valley Indian Council, Walker River Reservation, 29 Palms Band of Mission Indians and the Lone Pine Paiute Shoshone. No Tribes requested consultation.

CEQA evaluations also require Tribal consultation. On May 17, 2021 the County initiated Native American Consultation pursuant to Assembly Bill 52 (AB52) and per Public Resource Code Section 21080.3.1(b) with the Big Pine Band of the Owens Valley, Bishop Paiute Tribe, Fort Independence Community of Paiute, Timbisha Shoshone, Kern Valley Indian Council, Walker River Reservation, 29 Palms Band of Mission Indians, Cazaban Band of Mission Indians, Torres Martinez Desert Cahuilla Indians and the Lone Pine Paiute Shoshone Tribe. Only the Bishop Paiute Tribe requested consultation. It was held on May 27, 2021. Staff presented the Housing Element to the Tribe. They had no comments and did not request further consultation.

ENVIRONMENTAL REVIEW

On June 18, 2021 a Notice of Availability for an Initial Study and Draft Negative Declaration of Environmental Impact to the State Clearinghouse and County Clerk for public review and comment. The comment period ended on July 18, 2021. No comments were received. Upon review of the revision to the 2021 Housing Element Update staff found that a subsequent ND was not necessary as the two new RHNA sites are on parcels that are highly disturbed and have General Plan and Zoning Designations that allow for the required housing density - by-right. No further discretionary review is required for the two RHNA replacement sites to be built upon. An addendum to the ND was prepared (attached).

CONSISTENCY

The updated RHNA sites, in the revised 2021 Housing Element are consistent with respect to their current General Plan and zoning designations to support the RHNA density requirements. The sites all have a Residential High-Density General Plan designation, which allows for up to twenty-four-units per acre, by right. They are also consistent with the existing zoning designations which are Multiple-family Residential three-units and above that also allows for high density residential development and multi-family housing.

NOTICING

The revised Housing Element was posted on the County website for public review on June 26, 2023. The public review was advertised in the Inyo Register on July 13, 2023. The Planning Commission hearing was posted in the Inyo Register on August 10, 2023 meeting the 10-day noticing requirement. No comments were received by the date of this staff report.

RECOMMENDATIONS

Staff recommends that the Planning Commission approve the resolution recommending that the Board of Supervisors certify that GPA 2023-02/Housing Element Revised is a Negative Declaration of Environmental Impact with addenda and does not require a Supplemental ND; make certain findings and approve GPA 2023-02/Housing Element Revision.

ATTACHMENTS

1. Resolution.
2. New RHNA Sites Maps.
3. Revised Housing Element Update (all changes are in red text).
4. June 26, 2023 Letter from HCD.
5. CEQA Addendum.

Attachment - Planning Commission Resolution

RESOLUTION NO. 2023-03

**A RESOLUTION OF THE PLANNING COMMISSION OF THE
COUNTY OF INYO, STATE OF CALIFORNIA,
RECOMMENDING THAT THE BOARD OF SUPERVISORS
CERTIFY THAT GPA 2023-02 IS A NEGATIVE DECLARATION
OF ENVIRONMENTAL IMPACT PURSUANT TO THE
CALIFORNIA ENVIRONMENTAL QUALITY ACT AND MAKE
CERTAIN FINDINGS WITH RESPECT TO AND APPROVE,
GENERAL PLAN AMENDMENT NO. 2023-02/ HOUSING
ELEMENT REVISED, COVERING YEARS 2021-2029**

WHEREAS, the General Plan Housing Element is required pursuant to California Government Code Section 65580 et seq., and works to provide housing for all of Inyo County's residents;

WHEREAS, the Inyo County Housing Element is required to be updated every eight-years, and the deadline for the most current Housing Element was August 30, 2021, for the Housing Element period extending between April 30, 2021 and April 30, 2029;

WHEREAS, Inyo County adopted a Housing Element in 1992 and updated it in 2001, 2003, 2009 and 2014;

WHEREAS, on April 20, 2020 the California Department of Housing and Community Development (HCD) transmitted the Regional Housing Need Allocation (RHNA) to Inyo County, which began the update process;

WHEREAS, the County's RHNA requires a total of 205 new units consisting of 46 very low income units, 40 low income units, 39 moderate income units and 80 above moderate income units;

WHEREAS, Inyo County prepared a Housing Element covering years 2021-2029 in compliance with state housing element law that identified sites to accommodate housing units to meet county's RHNA;

WHEREAS, correspondence was transmitted to stakeholders in the County in October 2020, including real estate professionals, homeless service providers, public agencies, and others, advising them of the update process and requesting input;

WHEREAS, pursuant to Senate Bill 18 (SB18) and Government Code Section 65352.3, on October 28, 2020 the County requested a list of native American contacts from the California Native American Heritage Commission (NAHC), to request consultations with, regarding the Housing Element update;

WHEREAS, the NAHC transmitted a list of Native American contacts to the County on October 14, 2020 for purposes of SB18 consultation regarding the Housing Element update;

WHEREAS, on October 28, 2020 the County initiated Native American Consultation pursuant to the California Government Code Sections 65040.2, 65092, 65351, 65352.3, 65352.4, 65562.5, with the Big Pine Band of the Owens Valley, Bishop Paiute Tribe, Fort Independence Community of Paiute, Timbisha Shoshone, Kern Valley Indian Council, Walker River Reservation, 29 Palms Band of Mission Indians and the Lone Pine Paiute Shoshone;

WHEREAS, no Tribes requested consultation;

WHEREAS, on May 17, 2021 the County initiated Native American Consultation pursuant to Assembly Bill 52 (AB52) and per Public Resource Code Section 21080.3.1(b) with the Big Pine Band of the Owens Valley, Bishop Paiute Tribe, Fort Independence Community of Paiute, Timbisha Shoshone, Kern Valley Indian Council, Walker River Reservation, 29 Palms Band of Mission Indians, Cazaban Band of Mission Indians, Torres Martinez Desert Cahuilla Indians and the Lone Pine Paiute Shoshone Tribe;

WHEREAS, only the Bishop Paiute Tribe requested consultation;

WHEREAS, on May 27, 2021 county staff and the First and Third District County Supervisors meet with the Bishop Paiute Tribe for consultation to discuss housing issues and the Tribe had no comments, nor did they request additional consultation;

WHEREAS, on Wednesday March 24, 2021 the County held an advertised public workshop via a Zoom meeting to educate interested parties about housing issues, the Housing Element update process, the sections with proposed changes in the Public Comment Draft Housing Element Update, and took comments;

WHEREAS, on Wednesday April 28, 2021 staff presented the Public Comment Draft of the Housing Element Update to the Planning Commission at a duly noticed public hearing;

WHEREAS, in addition to the March 24 and April 28, 2021 meetings, the County held six additional public and stakeholder workshops for the Housing Element Update;

WHEREAS, on April 28, 2021 the County sent a draft of the proposed changes to the Housing Element to HCD for review and comment;

WHEREAS, on June 25 HCD sent a letter of findings regarding the Housing Element and on June 16 and July 29, 2021 the county staff met with HCD to discuss the recommended changes;

WHEREAS, after HCD review, staff made the recommended changes to the Draft Housing Element and prepared it for review and approval;

WHEREAS, on June 18, 2021 the County submitted a Notice of Availability for an Initial Study (IS) and Draft Negative Declaration of Environmental Impact (ND) to the State Clearinghouse and County Clerk for public review and comment;

WHEREAS, on July 19, 2021 the comment period for the Initial Study and Draft Negative Declaration of Environmental Impact ended and no comments were received;

WHEREAS, the Inyo County Board of Supervisors, through Section 15.12.040 of Inyo County Code, has designated the Planning Commission to serve as the Environmental Review Board pursuant to Section 15022 of the California Environmental Quality Act (CEQA) Guidelines, which is responsible for the environmental review of all County projects;

WHEREAS, on August 11, 2021, the Inyo County Planning Commission, at a duly noticed public hearing, provided a recommendation, through a resolution, to the Board of Supervisors for approval the Housing Element and to certify that it is a Negative Declaration of Environment Impact;

WHEREAS, on August 17, 2021 the Inyo County Board of Supervisors adopted General Plan Amendment (GPA) 2021-01 updating the County's Housing Element and meeting the state deadline;

WHEREAS, on August 18, 2021 staff sent the Draft Housing Element Update to HCD;

WHEREAS, on November 16, 2021 HCD sent a letter of findings that required additional, substantial, additions and changes to the adopted Housing Element;

WHEREAS, county staff spent almost a year updating the Housing Element based on HCD findings, comments from stakeholders and the public;

WHEREAS, on June 14, 2022 staff held a workshop with the Board of Supervisors at a duly noticed public meeting to discuss the changes required by HCD and to take public comment;

WHEREAS, at the end of the workshop on June 14, 2022, the Board of Supervisors directed staff to include the presented changes and complete the Housing Element Update to bring back for adoption;

WHEREAS, on August 16, 2022 staff presented the Final Draft Housing Element Update and the Board of Supervisors approved the re-adoption of GPA 2021-01/Housing Element Update;

WHEREAS, on August 18, 2022 staff sent the Final Housing Element Update to HCD;

WHEREAS, on August 30, 2022 HCD sent a letter to the County stating that the County's Housing Element was in full compliance with State Housing Element Law.

WHEREAS, as part of the policies and programs included in the adopted Housing Element the County identified two parcels of land for General Plan and zoning reclassifications to support higher density housing to meet the RHNA sites requirements as prescribed by State Housing Law that were to be completed by April 2023;

WHEREAS, on March 22, 2023 staff presented the General Plan and zoning reclassification proposals for the two parcels identified in the Housing Element (GPA 2023-01 and Zone Reclassification 2023-01) to the Planning Commission at a duly noticed public hearing;

WHEREAS, the Planning Commission by a split vote was unable to provide a recommendation to the Board of Supervisors for adoption;

WHEREAS, on May 2, 2023 staff presented GPA 2023-01 and Zone Reclassification 2023-01 to the Board of Supervisors at a duly noticed public hearing and recommended approval;

WHEREAS, on May 2, 2023 the Board of Supervisors did not adopt GPA 2023-01 and Zone Reclassification 2023-01 with respect to the two parcels identified in the Housing Element, effectively putting the County's Housing Element in jeopardy of being out of compliance with State Housing Element Law;

WHEREAS, on May 23, 2023 county staff contacted HCD for direction on how to keep the County's Housing Element in compliance with State Housing Element Law;

WHEREAS, on May 23, 2023 staff from HCD provided direction to amend the RHNA sites inventory and submit it to HCD for review;

WHEREAS, staff prepared the amended sites inventory and updated sections of the Housing Element that addressed these sites and sent the revisions to staff at HCD on May 25, 2023;

WHEREAS, on June 26, 2023 staff from HCD sent a letter to the County stating that the draft amendment will not negatively impact demonstrating adequate sites to accommodate the RHNA or the County's current compliance with State Housing Element Law once the revised Housing Element is adopted, submitted to, and approved by HCD;

WHEREAS, on June 27, 2023 county staff posted the Draft Revisions to the Housing Element on its website for public review and comment;

WEREAS, since no individuals, organizations or governments previously requested notification relating to the 2021 Housing Element, on July 13th a notice was posted in the Inyo Register advertising that the Draft Revision to the Housing Element was posted on the county website for review and comment;

WEREAS, no comments were received;

WHEREAS, a notice of public hearing for GPA 2023-02/ Housing Element Revised to be held August 23, 2023, was published in the Inyo Register on August 10, 2023;

WHEREAS, this Commission does hereby find and declare adoption of GPA 2023-02/ Housing Element Revised to be in the public interest; and

NOW, THEREFORE, BE IT HEREBY RESOLVED that, based on all of the written and oral comments and input received at the August 23, 2023 hearing, including the staff report for the project, this Planning Commission makes the following findings regarding GPA 2023-02/Housing Element Revised and hereby recommends that the Board of Supervisors adopt the following findings for the proposed project:

RECOMMENDED FINDINGS

1. GPA 2023-02/Housing Element Revised is a policy document that works to provide housing for all of Inyo County's residents and is an Addendum to the Negative Declaration of Environmental Impact as reviewed and discussed in the Initial Study for GPA 2021-01/Housing Element Update.
2. Based on substantial evidence in the record, the proposed revisions to the Housing Element are consistent with the goals and policies of the Inyo County General Plan since the two replacement parcels currently have General Plan designations that conform to the RHNA site requirements and the proposed densities set forth in the revised Housing Element.
3. Based on substantial evidence in the record, the proposed revisions to General Plan Housing Element are consistent with the purposes and intent of Title 18 (Zoning Ordinance) of the Inyo County Code since the two replacement parcels currently have zoning designations that conform to the RHNA site requirements and the proposed densities set forth in the revised Housing Element.
4. Based on substantial evidence in the record the Revised 2021-2029 Inyo County Housing Element is consistent with California Government Code Sections 65580-65589.8 (Housing Element Law) as the County contacted HCD asking for direction regarding the RHNA sites included in the Housing Element that were not approved for General Plan and zone reclassifications and were given direction to amend the sites inventory and resubmit to them for review. Staff amended the sites inventory by finding two replacement parcels for the two that

had to be removed and sent this to HCD. After review, staff from HCD directed the County to adopt and submit to them for approval.

BE IT FURTHER RESOLVED, that the Planning Commission recommends that the Board of Supervisors take the following actions:

RECOMMENDED ACTIONS

1. Certify GPA No. 2023-02/Revised Housing Element is a Negative Declaration of Environmental Impact pursuant to CEQA.
2. Make certain findings with respect to and approve General Plan Amendment No. 2023-02/Housing Element Revised based on all of the information in the public record and on recommendation of the Planning Commission.

PASSED AND ADOPTED this 23rd day of August, 2023 by the following vote of the Inyo County Planning Commission:

AYES:

NOES:

ABSTAIN:

ABSENT:

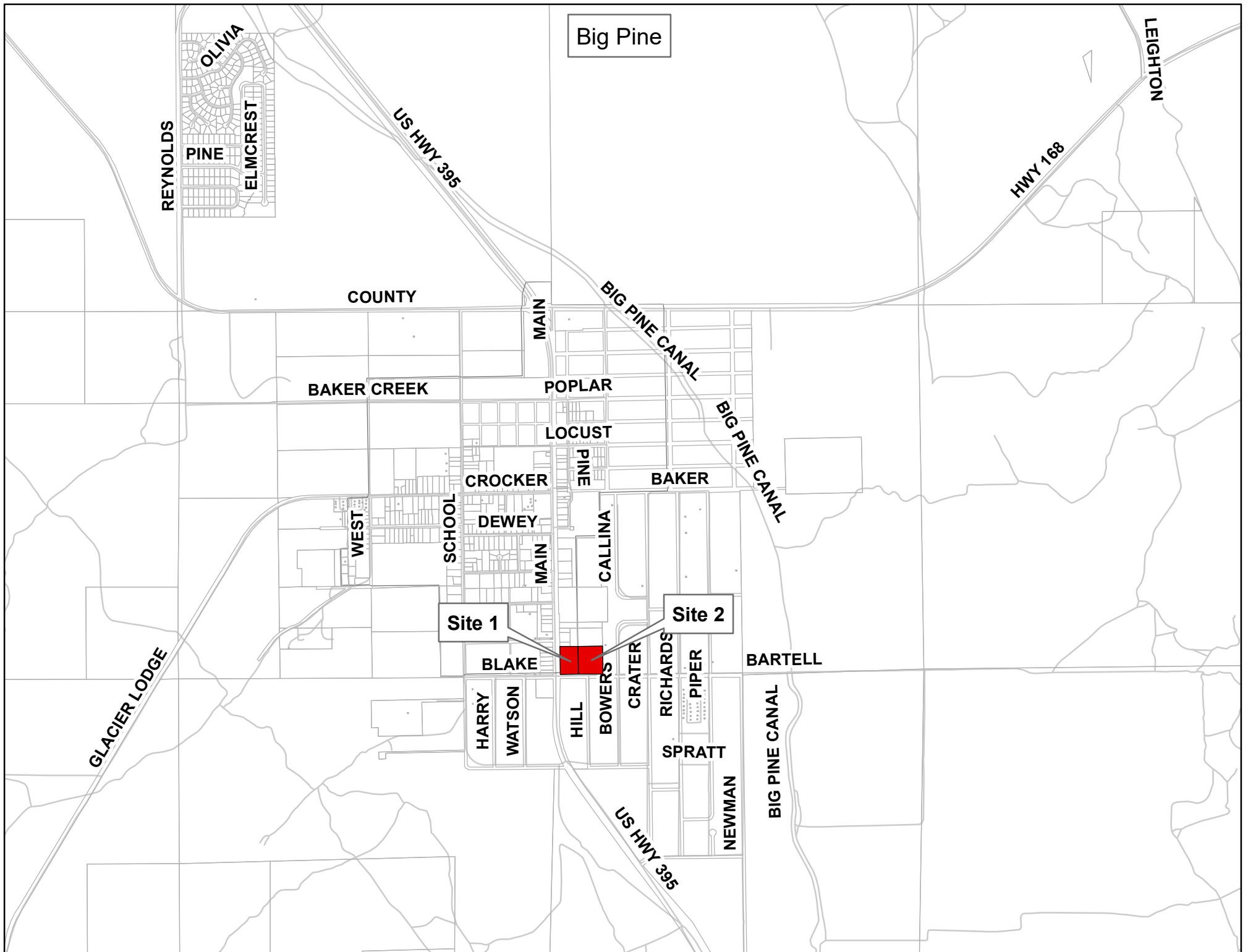
Todd Vogel Chairperson, Inyo County Planning Commission

ATTEST:

Cathreen Richards, Planning Director

By _____
Paula Riesen, Secretary of the Commission

Attachment - New RHNA Sites Maps



Big Pine

LEIGHTON

HWY 168

US HWY 395

REYNOLDS

PINE

ELMCREST

OLIVIA

COUNTY

BAKER CREEK

MAIN

POPLAR

LOCUST

CROCKER

PINE

BAKER

DEWEY

MAIN

CALLINA

Site 1

Site 2

BLAKE

CRATER

BARTELL

HARRY

WATSON

HILL

BOWERS

RICHARDS

PIPER

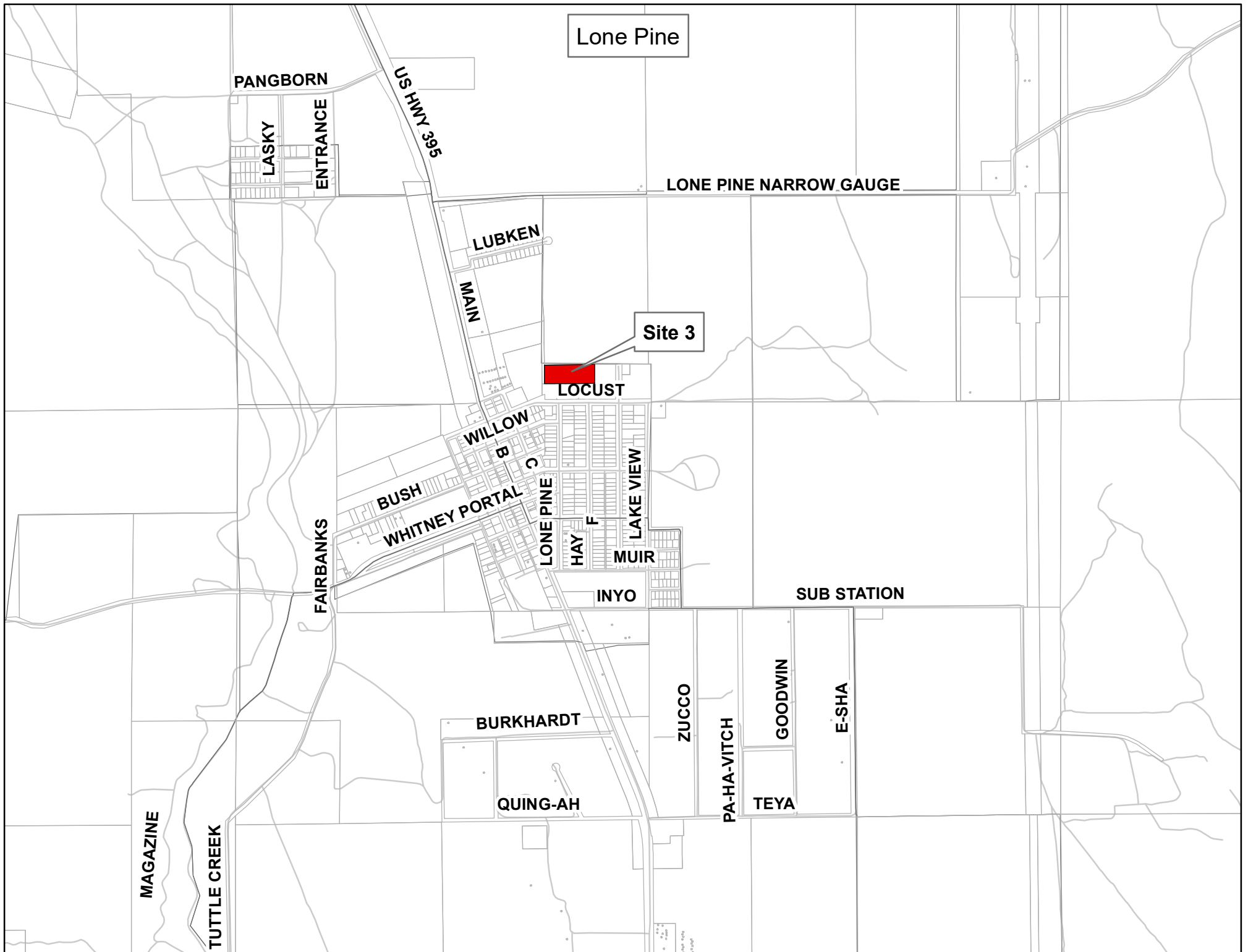
SPRATT

NEWMAN

BIG PINE CANAL

GLACIER LODGE

US HWY 395



Attachment - 2021 Housing Element Revised

INYO COUNTY HOUSING ELEMENT

2021 Housing Element Update

Updated July 21, 2022
Revised August 16, 2023



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CHAPTER ONE: INTRODUCTION

PURPOSE OF THE ELEMENT

In response to California’s critical housing needs, the state legislature enacted housing element law to fulfill the goal of adequate, safe and affordable housing for every Californian. The attainment of housing for all requires the cooperation of local and state governments. Housing element law requires local governments to adequately plan to meet their existing and projected housing needs including their share of the regional housing need. The Housing Element is one of required elements of a jurisdiction’s General Plan in the State of California.

Housing element law is the State’s main market-based strategy to increase housing supply. The law recognizes the most critical decisions regarding housing development that occur at the local level within the context of the general plan. In order for the private sector to adequately address housing needs and demand, local governments must adopt land-use plans and regulatory schemes that provide opportunities for, and do not unduly constrain, housing development for all income groups. California Government Code Section 65588 requires that local governments regularly review and revise the Housing Element of their General Plans. For Inyo County, this is every eight years. Inyo County’s last Housing Element update was in 2014 for the 5th Cycle.

California Housing Element laws have been added since the County’s last Update. The State increased its ability to enforce Housing Element requirements, and the ability for the public to challenge a jurisdiction’s compliance with Housing Element law. Inyo County’s 6th Cycle Housing Element Update has been created to comply with current State housing law as well as other federal, state and local regulations.

REVIEW AND REVISE

California State Housing Element Law (California Government Code Article 10.6) establishes the requirements for the Housing Element. Table 1 summarizes the State’s current Housing Element requirements, including special needs housing and identifies what chapter the applicable California Government Code sections are addressed in the County’s 2021- 2029 Housing Element Update.

The 5th Cycle Housing Element Update addressed special needs housing and provided policies to update the County code to address new state law regarding it. This was never completed as a complete overhaul of the County code was in progress that included these updates, but was never completed due to a lack of funding for a CEQA evaluation. This 6th Cycle update, again, includes programs that address special needs housing with timeframes and staff commitment to update the County code to include separately from any other potential code updates.

There were also several programs in the 5th Cycle addressing affordable housing. None was built. In this 6th Cycle update, several programs have been added to address possible factors that may be limiting the development of affordable housing. These include updates to the county code addressing: removing the need for a conditional use permit for multi-family development over 15- units; certain design standards such as lot size, parking and height requirements and setbacks; and, allowing for multi-family in additional commercial zones in the county (Programs 2.1.4, 3.2.4, 3.2.5).



None of the sites identified in the 5th Cycle update to satisfy the Regional Housing Needs Allocation provided by HCD were built. A completely new list has been developed for this 6th Cycle version.

The Los Angeles Department of Water and Power owns most of the land in the Owens Valley where the vast majority of people in the County live and where housing is needed the most. In all prior versions, including the 5th Cycle update of the Housing Element, working with Los Angeles to release land has been included. It is included – again in the 6th Cycle update with more emphasis on a regional approach and with hope on help from the State’s surplus lands program that should affect all jurisdictions in the State including the City of Los Angeles.

Table 1 – Government Requirements

Current Housing Element Requirements 2021-2029		
Issues Requiring Analysis	Gov. Code Section	Reference in Housing Element
Analysis of employment trends.	Section 65583.a	Chapter 2, Employment
Projection and quantification of existing and projected housing needs for all income groups.	Section 65583.a	Chapter 2, Households Cost Burden, Chapter 3 AFFH
Analysis and documentation of housing characteristics, including cost for housing compared to ability to pay, overcrowding, and housing condition.	Section 65583.a	Chapter 2, Households Cost Burden, Chapter 3 AFFH
An inventory of land suitable for residential development including vacant sites and sites having redevelopment potential.	Section 65583.a	Chapter 3 Sites Suitable
Analysis of existing and potential governmental constraints upon the maintenance, improvement or development of housing for all income levels.	Section 65583.a	Chapter 3 Analysis of Governmental Constraints
Analysis of existing and potential nongovernmental (private sector) constraints upon maintenance, improvement or development of housing for all income levels.	Section 65583.a	Chapter 3 Analysis of Non-Governmental Constraints
Analysis concerning the needs of the homeless.	Section 65583.a	Chapter 3 AFFH
Analysis of special housing needs: persons with disabilities, elderly, large families, farm workers, and female-headed households.	Section 65583.a	Chapter 3 AFFH
Analysis of opportunities for energy conservation with respect to residential development.	Section 65583.a	Chapter 3 Analysis of Non-Governmental Constraints
Identification of Publicly-Assisted Housing Developments.	Section 65583.a	Chapter 2 Special Housing Needs
Identification of Units at Risk of Conversion to Market Rate Housing.	Section 65583.a	Chapter 2 Special Housing Needs



Identification of the goals relative to the maintenance, improvement, and development of housing.	Section 65583.a	Chapter 5 Goals and Policies
Analysis of quantified objectives and policies relative to the maintenance, improvement, and development of housing.	Section 65583.b	Chapter 5 Goals and Policies
Identification of adequate sites that will be made available through appropriate action with required public services and facilities for a variety of housing types for all income levels.	Section 65583.c(1)	Chapter 3 Sites Suitable
Identification of strategies to assist in the development of adequate housing to meet the needs of low and moderate-income households.	Section 65583.c(2)	Chapter 5 Goals and Policies
Description of the Public Participation Program in the formulation of Housing Element Goals, Policies, and Programs.	Section 65583.d	Chapter 1 Introduction
Description of the Regional Housing Needs Assessment (RHNA)	Section 65583.e	Chapter 3 Regional Housing Need
Analysis of Fair Housing, including Affirmatively Furthering Fair Housing.		Chapter 3 AFFH
Review of the effectiveness of the past Element, including the City’s accomplishments during the previous planning period.	Section 65583.f	Appendix A

PUBLIC PARTICIPATION

The Housing Element reflects the values and preferences of Inyo County residents. The County engaged the public throughout the Update process. A total of 7 public workshops and hearings were held for the Housing Element Update from November 2020 through August, 2021. These included surveys about what the County needs with regard to housing and about issues related to accessibility and fair housing. The comments collected at all of the meetings were used to prepare the housing programs section.

Programs included based on public input include:

- Research into whether or not to allow for more than one ADU/JADU per parcel (Program 3.1.2)
- Definition for Tiny Homes (Program 3.1.3)
- Research into whether or not to allow for more rooms available for rent per single-family home (Program 3.2.4)
- Research on the availability of grants or low interest loans for infrastructure development in the more remote areas of the County (Program 5.3.1).
- Housing Specialist to include assistance in taking fair housing issue (Program 3.1.7).



The Public Review Draft of the Housing Element Update was made available for review and comment on the County’s webpage on April 5, 2021. The Draft was also sent to outreach participants and presented to the Planning Commission at an advertised public workshop on April 26, 2021. No comments were provided at the workshop that caused changes to the Draft.

Staff received numerous comments from HCD staff on the Public Outreach Draft. The Draft was updated based on these comments, sent back to HCD, and presented to the County Planning Commission for a recommendation to the Board of Supervisors for adoption on August 11, 2021. A noticed public hearing was conducted on the Draft Housing Element. No public comments were provided at the meeting or in response to the notice. The Planning Commission voted unanimously to recommend the Board of Supervisors adopt the 2021 Housing Element Update.

The Board of Supervisors held a noticed public hearing on August 17, 2021 for the proposed adoption of the 2021 Housing Element Update. No public comment was received at the hearing or in response to the notice. The Board did recommend that staff add a program to develop a regional housing partnership with the City of Bishop, local Tribes and possibly Mono County and the Town of Mammoth Lakes. This group will work on the housing issues common to all the jurisdictions in the Eastern Sierra Inyo/Mono and especially with the City of Bishop.

More detailed information about these workshops and hearings can be found in Appendix A.

CONSISTENCY WITH THE GENERAL PLAN

The Housing Element is consistent with the goals and policies of the current Inyo County General Plan. Each element in the General Plan was updated in 2001. No General Plan land use designations or regulations regarding them have been revised since 2001 that would trigger the need to update the General Plan to meet the policies and objectives of the Housing Element, or to provide for the County’s fair share of the regional housing need.

This Housing Element will continue to be amended as necessary to maintain consistency with the Inyo County General Plan by incorporating appropriate revisions to the goals and policies. Additionally, the County will maintain consistency throughout the planning period upon any amendments to the Inyo County General Plan.

CHAPTER TWO: HOUSING NEEDS

POPULATION

Population Growth Trends

An understanding of the demographics of Inyo County – past, present, and future – is essential to the process of updating the Housing Element. According to the Department of Finance, the population of the entire county as of January 1, 2020 was 18,584 and 14,763 for the unincorporated area. Table 2 shows population growth trends from 1970 to January 2020 for the unincorporated county.



In the 1960s, Inyo County experienced a 4-percent growth rate as the county gained popularity as a destination for recreation activities and retirement. This was the largest population boom in Inyo County since the early 1900s. In the 1970s, the county saw continued but more limited growth. Population growth slowed in the 1980s, when it increased by only 244 people. Most of this population growth was the result of in-migration of older persons of retirement or near-retirement age.

The 2000 Census showed unincorporated Inyo County as one of the few California jurisdictions that lost population. In the ten-year period from 1990 to 2000, Inyo County's population declined by 390 individuals. The 2010 Census indicated that population grew by 251 people, or 1.7-percent. The 2020 Census was not completed at the time of this update, but based on estimated population between 2010 and 2020 the population in unincorporated Inyo County grew by 96 people or less than 1 percent (0.6). The population of the unincorporated county has increased at an average annual rate of 0.4 percent, or six people per year, between 2013 and 2020.

Table 2- Population Growth Trends (2010–2020) – Unincorporated Inyo County

Year	Population	Numerical Change	Average Annual Change	
			Number	Percentage
1970	12,073	--	--	--
1980	14,562	2,489	249	2%
1990	14,806	244	24	0.2%
2000	14,416	-390	-39	-0.3%
2008	14,601	185	23	0.2%
2010	14,667	66	18	0.1%
2013	14,696	29	8	0.1%
2020	14,763	67	6	0.4%

**Source: Census Bureau (2010 Census, 2000 Census, SF3: P1 and 1990 Census, STF3: P1), 2008 DOF (Report E-5); HCD-HE Data Packages 2013 and 2020.*

According to California Department of Finance (DOF) information, the total population of Inyo County January 1, 2020 was 18,584. Table 3 shows how the total County population between 1960 to the beginning of 2020 was distributed between the City of Bishop (the only incorporated city in the county) and unincorporated Inyo County. Between 1960 and 2020, the distribution of the County's population between the unincorporated area and the City of Bishop remained stable. As the table shows, at the beginning of 2020 79-percent of the total county population resided in unincorporated areas, while the balance (21-percent) resided in the City of Bishop.



Table 3 - Inyo County Population (1960–2020)

Year	Total Population	City of Bishop	Percentage	Unincorporated County	Percentage
1960	11,684	2,875	25%	8,809	75%
1970	15,571	3,498	23%	12,073	78%
1980	17,895	3,333	19%	14,562	81%
1990	18,281	3,475	19%	14,806	81%
2000	17,945	3,575	20%	14,416	80%
2008	18,152	3,551	20%	14,601	80%
2010	18,546	3,879	21%	14,667	79%
2013	18,573	3,877	21%	14,696	79%
2020	18,584	3,821	21%	14,763	79%

*Source: California Department of Finance, Historical Census Population of Counties in California, 1850–1990; City/County Population & Housing Estimates, 1990–1998 (Report E-5); City/County Population & Housing Estimates, 2000–2008 (Report E-5); HCD-HE Data Packages 2013 and 2020

Table 4 provides a summary of the population by race/ethnicity for Inyo County (unincorporated and Bishop) from the 2014-2018 ACS. Those reporting White, American Indian, and Hispanic/Latino race and/or ethnicity made up the majority of the population in the unincorporated county with 63-percent, 13-percent, and 20-percent, respectively. The share of the population of American Indians and Hispanic/Latinos in Bishop differed from that of the unincorporated county. In Bishop, American Indians represented less than 1-percent of the city's population, which is 11-percent less than the share in the unincorporated county (13-percent). The Hispanic/Latino population in Bishop was 7-percent higher than in the unincorporated County (27-percent and 20-percent respectively).



Table 4 - Inyo County Population by Race/Ethnicity 2018

Race/Ethnicity	Unincorporated County		Bishop		Total County	
	Number	Percentage	Number	Percentage	Number	Percentage
White	9,022	63%	2,535	67%	11,557	64%
Black or African American	141	1%	31	1%	172	1%
American Indian or Alaskan Native	1,941	13%	15	< 1%	1,956	11%
Asian	169	1%	101	3%	270	1%
Hawaiian or Pacific Islander	34	< 1%	0	0	34	< 1%
Hispanic/Latino	2,862	20%	1,032	27%	3,894	21%
Some other race	15	< 1%	0	0	15	< 1%
Two or more races	209	< 1%	88	2%	297	2%
Total Population	14,393	100%	3,802	100%	18,195	100%

Source: ACS 2014-2018

EMPLOYMENT

The economic base of the county consists of employers that primarily serve the local population and tourists. Two major employment sectors in the county are considered export employers: hotels and the federal and state components of public administration. The local-serving employers are affected almost exclusively by population and income trends while export industries are affected by factors external to Inyo County. Table 5 provides a summary of employment by industry for Inyo County as reported by the 2014-2018 American Community Survey (ACS).

Of nearly 6,572 total jobs, the education and healthcare industry was the largest employer in the unincorporated county at about 23-percent, and the arts, entertainment, recreation and accommodations was about 17-percent. The next largest category is retail trade at 10-percent and public administration follows with 9-percent of total employment.

Economic projections suggest a continued increase in tourism-related employment and income, and only marginal growth in other private sector industries. The tourism expansion generates increases in higher paying government jobs, with the effect of increasing per capita income despite the lower pay of other tourism-supported business sectors, such as retail and lodging. Other demographic trends can contribute to the upward push in local incomes, such as the continued influx into the county of retirees with independent incomes and lower than average household sizes.



Table 5 - Employment by Industry (2020) – Unincorporated Inyo County

Employment by Industry	Unincorporated	
	Estimate	Percent
Civilian employed population 16 years and over	6,572	100%
Educational services, and health care and social assistance	1,483	23%
Arts, entertainment, and recreation, and accommodation and	1,096	17%
Retail trade	675	10%
Public administration	621	9%
Construction	547	8%
Transportation and warehousing, and utilities	490	7%
Other services, except public administration	411	6%
Professional, scientific, and management, and administrative	362	6%
Agriculture, forestry, fishing and hunting, and mining	285	4%
Finance and insurance, and real estate and rental and leasing	256	4%
Manufacturing	161	2%
Information	110	2%
Wholesale trade	75	1%

**Source: ACS 2014-2018*

The California Employment Development Department (EDD) published projections for the fastest growing occupations in the Eastern Sierra Region (Alpine, Inyo and Mono Counties) for the years 2016 to 2026. Table 6 displays the top ten occupations that were projected to have the most growth in the Region that have annual median incomes less than Inyo County’s median income of \$52,874.

The fastest growing top ten lower-income occupations in the region are projected to add 1,460 jobs by 2026 a growth of 12-percent among lower-income occupations. The “Healthcare Support” occupation category is projected to have the largest growth in the region, at 40-percent between 2016 and 2026, earning an annual median salary of \$38,748, which would fall into the Low Income category. The “Maids and Housekeeping” occupation category has lowest wage earners among the fastest growing occupations in the region, earning an annual median salary of \$24,481, which falls into the Very Low income category.



Table 6 - Growing Lower Income Occupations in the Eastern Sierra Region, 2016–2026

Occupation	Annual Average Employment		Percentage Change	Annual Median Salary
	2016	2026		
Healthcare Support	200	280	40%	\$38,748
Hotel, Motel and Resort Desk Clerks	340	410	20.6%	\$26,798
Maids and Housekeeping	940	1,100	17%	\$24,481
Building and Grounds Cleaning and Maintenance	1,420	1,640	15.5%	\$26,363
Personal Care and Service	780	900	15.4%	\$27,361
Protective Services	490	560	14.3%	\$48,396
Installation, Maintenance, and Repair	820	920	12.2%	\$46,105
Food Preparation and Serving	3,020	3,380	11.9%	\$26,127
Office and Administrative Support	2,310	2,520	9.1%	\$35,754
Sales and Related Occupations	1,450	1,520	4.8%	\$28,026
Total Occupation Growth	11,770	13,230	12%	--

Source: Employment Development Department, Labor Market Info: "Fastest Growing Occupations," 2016-2026.

HOUSEHOLD CHARACTERISTICS

Household Growth Trends

In 1980, there were 5,654 households in unincorporated Inyo County. According to the 2000 Census, the unincorporated county had grown to 6,033 households, representing a 6-percent increase between 1980 and 2000. In 2010 the household number had grown to 6,301. According to the January 2020 estimate provided by HCD, there are 6,148 households in unincorporated Inyo County representing a 2.4-percent decrease from 2010 (Table 7) (2020 Census data was not available at the time of this update).

Inyo County's aging population has a significant effect on household characteristics, as household trends for seniors differ from other demographic cohorts. Nineteen-percent of the unincorporated county's estimated 2018 population was at least 65-years of age. Statewide, 9.6-percent of the population is at least 65 years old. The high percentage of residents aged 65 and over suggests that Inyo County is an attractive location for retirees, and/or the people who live in Inyo County choose to age in place.



Table 7 - Household Growth Trends (1980–2018) – Unincorporated Inyo County

Year	Households	Numerical Change	Percentage Change
1980	5,654	--	--
1990	5,884	230	4%
2000	6,033	149	2.5%
2010	6,301	268	4%
2018	6,148	153	-2%

Source: Census Bureau (2010 Census P12, 2000 Census, SF3: H6 and 1990 Census, STF3: H4) and DOF (E-5 Report) HCD Data Package 2020

Of the total population in unincorporated Inyo County (14,342), the majority 11,603 (81-percent) are living in households. Table 8 presents a summary of the differing household types in the unincorporated county in 2018.

Table 8 - Population by Household Type (2000-2010) – Unincorporated Inyo County

Household Type	Number	Percentage
Family Households	4,300	53%
Married Couple	3,211	40%
Male Householder	283	3%
Female Householder	806	10%
Non-family Households	3,783	47%
Total Households	8,083	100%

Source: American Community Survey 2014-2018 DP02

Households by Tenure

According to the 2018 ACS, 72-percent of the households in unincorporated Inyo County are owner occupied. This was a decrease of 2-percent from 2010. Table 9 provides a summary of the change in tenure in the unincorporated portion of the county between 1980 and 2018. The ratio of owner to renter moves back and forth by 2-3-percent over time, indicating relative stability.



Table 9 - Households by Tenure (1980–2010) – Unincorporated Inyo County

	1990		2000		2010		2018	
	Number	Percentage	Number	Percentage	Number	Percentage	Number	Percentage
Owner	4,227	72%	4,386	73%	4,230	70%	4,434	72%
Renter	1,657	28%	1,647	27%	1,804	30%	1,714	28%
	5,884	100%	6,033	100%	6,034	100%	6,148	100%

Source: Census Bureau (ACS 2014–2018; 2010 Census SF1: H16; 2000 Census, SF 3: H7; 1990 Census, SF 3: H8)

According to 2018 ACS the vacancy rate in the unincorporated portion of the county was 17.6-percent, a difference of about a 1-percent increase from the 2010 vacancy rate. This indicates that there has not been a significant change in the characteristics of the County’s housing status.

Per the 2018 ACS data there are 1,312 vacant units in the unincorporated county representing 17.6-percent all units, of these, 719 were reported vacant as second homes used for “*seasonal, recreational, or occasional use.*” These vacant homes represent about 55-percent of the vacancies in the unincorporated county, showing a growing trend of second homeownership (vacant second homes represented 46-percent of vacancies in 2000). This trend can have a significant effect on housing availability and housing conditions for full time residents within the community.

The 2018 ACS reported that there were 59-rental units vacant and 6 rented, but not occupied. This is about 12-percent of the vacant housing units. There were only 3 homes for sale based on the same ACS date. This represents less than a half of a percent of the vacant units. This is a direct reflection of the tight real estate market and lack of private land available for new development. The majority of privately owned land in Inyo County that is realistically developable - already is.

Given these factors, housing growth has been minimal in Inyo County in recent years. In order to facilitate development of affordable housing, the County currently enforces and encourages state law allowing for the placement of mobile homes on all residentially zoned lots and Accessory Dwelling Unit (ADU) development. The County has also adopted a short-term rental ordinance that does not allow for non-hosted rentals. This means that an owner or resident has to be on the property at all times during a short-term rental, which makes the short-term rental of a whole housing unit by an absentee owner a zoning violation. In addition, current County policy is designed to concentrate new growth within and contiguous to existing communities (e.g., Bishop, Big Pine, Independence, Lone Pine). This will ensure development of housing units in the places of greatest need and where infrastructure is readily available.

Overcrowded Households

The United States Census Bureau defines an overcrowded household as a housing unit occupied by more than one person per room (not including kitchens and bathrooms). Units with more than 1.5 persons per room are considered severely overcrowded and indicate a significant housing need.



According to the 2018 American Community Survey, only 156 of the total households in the unincorporated County (6,148), approximately 2.5-percent, were in overcrowded situations. This percentage is low compared to the statewide average of 6.7-percent. Overcrowding has been declining since 1980 in the unincorporated areas of Inyo County. In 1990, there were 287 overcrowded households, the 2000 Census reported 237, in 2010 there were 159 and in 2018 there were 156.

Table 10 presents overcrowding data for the unincorporated county and California as a whole. As seen in the table, 1-percent of all owner-occupied households were overcrowded, compared to 6-percent of renter-occupied households. The state reported higher percentages of overcrowding for owners (4-percent) and renters (13-percent).

Table 10 - Overcrowded Households (2018) – Unincorporated Inyo County

Households	Owners		Renters		Total
	Number	Percentage	Number	Percentage	
Total Overcrowded Households	61	1%	95	6%	156
1–1.5 Persons per Room	61	1%	85	5%	149
1.5 or More Persons per Room	0	0	10	1%	10
Total Households	4,434	72%	1,714	28%	6,148
Statewide Overcrowding Rates	4%		13%		

Source: ACS 2018; 2021 HCD Data Package

Households Cost Burden

Cost burden calculations were provided by HCD data. As a rule of thumb, housing is considered affordable if less than 30-percent of household income is spent on rent or mortgage. Table 11 compares cost burden for housing between owners and renters for different income categories.

According to 2012-2016 HCD data, 24-percent of all households (both renter and owner) paid more than 30-percent of their income on housing costs. This is less than in 2010 when it was 32-percent. Table 11 shows the number of households by income category that spent over 30-percent (constituting a cost burden) on housing in unincorporated Inyo County.

Based on HCD household income data, the median household income (1-person) for the County is \$52,500, lower-income households (those earning up to 80-percent of the median income) are those making up to \$ 42,000 per year. According to the data, there were approximately 535 lower-income renter households (extremely low, very low and low) that suffered from cost burdens in paying housing costs, representing 31-percent of all renter households. The percentage of lower-income owner households that experienced a cost burden was higher with approximately 620 households or 14-percent of all owner households (a more detailed analysis can be found in the Affirmatively Further Fair Housing section).



Table 11- Housing Cost Burden (2020) – Unincorporated Inyo County

Housing Cost as a Percentage of Household Income			
Renter-Occupied Households			
Income Range	Households Paying > 30% of Income	Total Households	% of Total Cost Burdened Households
Extremely Low	180	260	69%
Very Low	195	320	61%
Low	160	395	41%
Moderate	20	260	8%
Above Moderate	25	510	5%
Subtotal	580	1,745	31%
Owner-Occupied Households			
Extremely Low	210	345	61%
Very Low	240	500	48%
Low	170	760	22%
Moderate	70	390	18%
Above Moderate	285	2,445	12%
Subtotal	975	4,440	22%
TOTAL	1,510	6,185	24%

Source: California Department of Housing and Community Development, 2020

HOUSEHOLD INCOME

Household income is one of the most significant factors affecting housing choice and opportunity. Income largely determines a household's ability to purchase or rent housing. The state and federal government classify household income into several groupings based upon the relationship to the county adjusted median income (AMI), adjusted for household size. The State of California utilizes the income groups presented in Table 12. For purposes of the Housing Element, the state income definitions are used throughout the document.



Table 12 - Inyo County-State Income Limits by Household Size (2020)

	1 person	2 persons	3 persons	4 persons	5 persons	6 persons	7 persons	8 persons
Extremely Low (0-30%)	\$15,800	\$18,050	\$21,720	\$26,200	\$30,680	\$35,160	\$39,640	\$44,120
Very Low (31-50%)	\$26,300	\$30,050	\$33,800	\$37,550	\$40,600	\$43,600	\$46,600	\$49,600
Low (51-80%)	\$42,100	\$48,100	\$54,100	\$60,100	\$64,950	\$69,750	\$74,550	\$79,350
Median (100%)	\$52,550	\$60,100	\$67,600	\$75,100	\$81,100	\$87,100	\$93,100	\$99,150
Moderate (81-120%)	\$63,050	\$72,100	\$81,100	\$90,100	\$97,300	\$104,500	\$111,700	\$118,950

Source: California Department of Housing and Community Development, 2020

AFFORDABILITY OF HOUSING

As shown in Table 12, HCD publishes official State income limits each year. The income categories are used as a determinant for qualifying households for housing programs as well as to understand how much households in the county can afford to spend on housing costs. Table 13 provides a summary of the 2020 state income limits for households by household size. The income limits are sorted by income group and presented as monthly income, monthly rent, and maximum (max.) sales price.

Monthly income is determined by dividing the annual income limit by 12-months. Monthly rent is 30-percent of the monthly income, which is the standard for determining affordable monthly housing cost. Maximum sales price is an estimate of the maximum amount a household could afford assuming a 4-percent interest rate over 30 years, in which no more than 30-percent of the household's gross monthly income is spent on housing cost.

For example, a 2-person household with an annual income of \$26,350 has a gross monthly income of \$2,196 and is considered to be a very low-income household. The affordable rent that the 2-person household could afford without being cost burdened is \$659, and the maximum sales price of a home this household can afford is \$79,026.

The affordable monthly rent and the maximum purchase price of homes in each income category will be used to determine the availability of housing affordable to each income group. This analysis can be found in the following sections of this Housing Element: Housing Rental Market and Housing Sales Market.



**Table 13 - Housing Affordability by Income Level – Inyo County
(2020)**

Income Group	1-Person	2-Person	3-Person	4-Person
Extremely Low				
Monthly Income	\$1,317	\$1,504	\$1,808	\$2,183
Monthly Rent	\$395	\$451	\$542	\$655
Max. Sales Price	\$49,817	\$58,313	\$72,121	\$89,266
Very Low				
Monthly Income	\$2,192	\$2,504	\$2,817	\$3,1297
Monthly Rent	\$658	\$751	\$845	\$938
Max. Sales Price	\$89,721	\$103,831	\$118,094	\$132,204
Low				
Monthly Income	\$3,508	\$4,008	\$4,508	\$5,008
Monthly Rent	\$1,053	\$1,203	\$1,353	\$1,503
Max. Sales Price	\$149,653	\$172,412	\$195,170	\$217,929
Median				
Monthly Income	\$4,379	\$5,008	\$5,633	\$6,258
Monthly Rent	\$1,314	\$1,503	\$1,690	\$1,878
Max. Sales Price	\$189,253	\$217,929	\$246,302	\$274,827
Moderate				
Monthly Income	\$5,254	\$6,008	\$6,758	\$7,508
Monthly Rent	\$1,576	\$1,803	\$2,028	\$2,253
Max. Sales Price	\$229,005	\$263,447	\$297,586	\$331,724

Source: 2020 Income Limits, California Department of Housing and Community Development, April 2020

Note: Affordable housing cost for renter-occupied households assumes 30% of gross household income, not including utility cost.

Monthly mortgage calculation: <https://www.zillow.com/mortgage-calculator/house-affordability/#zmm-calc-help>

Note: Affordable housing sales prices are based on the following assumed variables: 30-year fixed rate mortgage at 4% annual interest rate, no money down, \$800 per year homeowners insurance and 1.2 property tax rate.

Housing Rental Market

A survey of fair market rental rates for single-family and multi-family housing in Inyo County was obtained in October 2020. Comparing the market rental rates with the affordable monthly rent amounts presented in Table 14 helps determine the supply of affordable housing for each income level. According to the results of the surveyed rental rates and the monthly rental amounts that households with 1 to 4 persons can afford, households that fall between the very low-income and low-income category can afford rental rates for multi-family housing. The survey results show that households at or below the very low-income category pay in excess of 30-percent of the monthly



gross household income. Households at or above the low-income category earn sufficient monthly incomes to afford the median monthly rental rates found in the survey for all housing types (single-family, multi-family, and mobile homes).

Table 14 reports median rental rates for the county as a whole. Communities in and around Bishop tend to offer rental rates at or above the county median rental rates. Conversely, the communities of Independence and Lone Pine typically have rental rates that are below the county median rates.

**Table 14 - Point-in-Time Rental Survey
(Bishop, Big Pine, Independence, Lone Pine 2020)**

NUMBER OF BEDROOMS	SINGLE-FAMILY		MULTI-FAMILY	
	MEDIAN RENT	NUMBER OF UNITS SURVEYED	MEDIAN RENT	NUMBER OF UNITS SURVEYED
1 BEDROOM	\$788	14	\$650	12
2 BEDROOM	\$850	23	\$750	16
3+ BEDROOM	\$1,750	33	N/A	0
TOTAL	\$1,500	49	\$750	31

Source: Point-in-Time Rental Survey, Inyo County October and December 2020

Housing Sales Market

Home sales prices have been analyzed and compared with the affordability data in Table 13. This analysis allows the County to identify which income groups have the most difficult time finding affordable housing.

New Home Sales

The resale price of homes in the county between 2009 and 2014 as provided by the County Assessor is shown on Table 15. The assessor sales data is shown for the communities of Unincorporated Bishop, Bishop, Big Pine, Independence, Lone Pine, and the county as a whole. According to the Assessor's report, the median sales price for mobile homes situated in mobile home parks in the county as a whole was \$22,000, which means that households at or above the extremely low-income range can afford to purchase a mobile home without being cost burdened. The community with the lowest median mobile home sale price in a park was Lone Pine at \$5,000.

The median price at which condominium units sold in the county as a whole was \$152,500, affordable to households earning above moderate income. The City of Bishop was the only community to have condo sales and the median price was \$152,500. It is difficult to calculate the resale amount of projects with 2 or more units, because the median price reports the total cost of the project and not each individual unit. The median sales price for duplex projects in the county was \$193,500, with the lowest median sale price in Independence at \$117,000. The median sale price of projects with 3 and 4 units in the county as a whole was \$202,500.

Single-family homes have the highest median sales price of all the unit types. Between 2009 and 2014, the median sales price for single-family homes in the county as a whole was \$310,000. This is



up by \$33,500 from the 2010 number of \$276,500. The extremely low household income group identified in Table 13 would be able to afford the median resale price of a single-family home in the very rural areas of south and southeast Inyo County where there are not many services. The community of Independence had the second lowest median sales price of single-family homes at \$175,000 and would be affordable to the Low Income Group. The overall median sales prices for all housing types in the entire county increased from \$150,000 in 2014 to \$215,000 in 2020. The increase in the median sales prices can be attributed to the better economic conditions than what was found for the 2014 Housing Element update analysis. This increase in sales prices also indicates that housing is becoming less affordable to more income groups.

Table 15 - Inyo County Median Home Sales: 2014-2019

Community	Single-family	Condo	Two Units	Three Units and Above	Mobile Home	
					In park	On Private Property
Unincorporated Bishop	\$390,000	\$180,000	\$445,000	\$182,850	\$22,000	\$250,000
Bishop	\$284,000	\$137,000	\$300,000	\$336,000	\$23,500	\$275,000
Big Pine	\$265,000	--	\$197,000	362,500	\$53,835	\$179,000
Independence	\$175,000	--	\$150,000	60,000	\$15,250	\$82,000
Lone Pine	\$199,000	--	\$133,000	153,500	\$2,000	\$140,000
Other areas North	\$380,000	--	--	--	--	--
Other areas South	\$65,000	--	\$27,000	--	\$15,000	\$25,000
County Total	\$310,000	\$150,000	\$193,500	\$202,500	\$21,000	\$177,500

Source: Inyo County Assessor's Office, October, 2020

HOUSING STOCK CHARACTERISTICS

Housing Units by Type

As shown in Table 16, unincorporated Inyo County contains a variety of housing types, including 4,689 detached single-family residences, 137 attached single-family residences, 2,267 mobile homes, and 290 multi-family units (includes "2-4 units" and "5 plus units").

Single-family homes represent the dominant type of housing in the County. Between 2010 and 2020, the number of detached single-family residences increased by less than a percent from 4,850 to 4,879; the number of attached single-family residences increased by 3-percent from 128 to 137 units between 2010 and 2020.

Mobile homes are the second most popular housing type in Inyo County. Between 2010 and 2020 the number of mobile homes increased from 2,206 to 2,226 a 3-percent increase. This shows that mobile homes are still a popular housing type in the county, likely due to their affordability and the rural nature of the County.



Table 16 shows how Inyo County’s housing stock has changed between 2010 and 2020. Not a lot of new building occurred during this time. A total of 58 units have been added to the unincorporated portion of Inyo County’s housing stock, an increase of less than 1-percent.

Table 16 - Housing Units by Type (2010– 2020) – Unincorporated Inyo County

Housing Unit Type	2010		2020		Change	
	Number	Percentage	Number	Percentage	Number	Percentage
Single-Family Detached	4,850	64%	4,879	64%	29	0.5%
Single-Family Attached	128	2%	137	2%	4	3%
2–4 units	229	3%	229	3%	84	0%
5 Plus Units	139	2%	139	2%	6	0%
Mobile Home *	2,206	29%	2,226	29%	62	3%
Total Units	7,552	100%	7,610	100%	58	0.7%

Source: HCD Data Package, 2020

*Mobile home category includes “Other” (e.g., RVs, campers).

Between 2010 and 2020, the county experienced an increase in single-family development and in total mobile homes. This is a little different from the trend since 1990 where single family homes had the highest share of new residential development.

Mobile Homes are, especially in rural areas, a common alternative option for affordable housing. The time between 2010 and 2020 has shown an overall rise in all real estate prices. This would create a need in the housing market for more affordable options. There has also been an increase in single family attached units another more affordable type of housing.

Housing Stock Conditions

Structures older than 30-years are used as the accepted standard determining the need for “major rehabilitation.” Based on the 2020 HCD Data Package, approximately 82-percent, or 5,634 units, of all housing units within the unincorporated areas of the county were older than 30-years of age, indicating that much of the County’s housing stock either needs or has had major rehabilitation. It also illustrates the very low rate of new housing construction in the County. This data is presented in Table 17 below. The County’s Building and Safety inspectors find that approximately 10-percent of the County’s housing is in need of some rehabilitation. This estimate is based on a condition criterion of the housing unit not being at the code standard of the time in which it was built. Using the HCD data package unit number of 7,610 would indicate that about 761 units are in need of some level of rehabilitation. The County has addressed this with the formation of a low interest rehabilitation loan program, as well as, IMACA, County Planning and Building and Safety staffs providing information to the owners of housing in need of rehab about USDA, CDBG and HOME



financial help programs. A program has been added to this 2021 Update to rehabilitate 3-housing units per year during the Planning (Program 1.1.1).

Table 17 - Housing Units by Age – Unincorporated Inyo County (2013-2017)

Year Structure Built	Number	Percentage
Built 2014 or later	58	1%
Built 2010 to 2013	156	2%
Built 2000 to 2009	567	8%
Built 1990 to 1999	744	10%
Built 1980 to 1989	1,309	18%
Built 1970 to 1979	1,733	23%
Built 1960 to 1969	1,045	14%
Built 1950 to 1959	599	8%
Built 1940 to 1949	697	9%
Built 1939 or earlier	552	7%
Total	7,460	100%

Source: HCD Data Package, 2020

SPECIAL HOUSING NEEDS

Certain segments of the population may have more difficulty in finding decent, affordable housing due to special circumstances. In unincorporated Inyo County, these “special needs” groups include extremely low-income households, senior citizen households, large families, disabled and developmentally disabled persons, single-parent-headed households, the homeless, and farmworkers.

Extremely Low-Income Households

Table 18 displays the share of households by income category by HUD adjusted median family income (HAMFI) in the unincorporated portion of the county. The data presented in the table is reported by CHAS (Comprehensive Housing Affordability Strategy) in 2018. According to CHAS, between 2013-2017 9-percent of all households were extremely low-income. Of the 755 extremely low-income households, 380 are renters and 375 are owners. In conjunction with local community agencies and nonprofit service providers, the County has supported providing assistance to lower-income households and will continue to work to implement programs providing support that meets the housing needs of all income segments in the county.



**Table 18 - Unincorporated Inyo County Households by Income Level
(2013-2017)**

Income Level	Owners	Renters	Total	Percentage
Extremely low (0–30% HAMFI)	375	380	755	9%
Very low (30–50% HAMFI)	530	525	1,055	13%
Low (50–80% HAMFI)	810	770	1,580	20%
Moderate and above moderate (80% -100% HAMFI)	575	255	830	10%
Above (100% HAMFI)	2,815	990	3,805	47%
Total	5,110	2,915	8,025	100%

Source: Comprehensive Housing Affordability Strategy (CHAS) HUD Data Report, 2013-2017

Local nonprofit community agencies and the County Health and Human Service Department organize and operate a number of programs countywide, including low-income housing, emergency shelter, emergency food/commodities, and weatherization programs.

Inyo County has one assisted housing project in its jurisdiction owned by the Lone Pine Economic Development Corporation, the Mt. Whitney Apartments, which is a 33-unit housing project developed with funds from the Farmers Home Administration Section 515 Rental Housing Program and managed by a nonprofit staff.

The Housing Authority of the County of Stanislaus administers the Section 8 Housing Assistance Program - Housing Choice Voucher program, which provides vouchers for local privately owned housing to eligible families. The vouchers represent credit that can be applied to rental cost of any housing unit. Currently, there are approximately 29 vouchers allocated to Inyo County residents.

Persons with Disabilities

As reported by the 2018 ACS 2,489 (14%) of the population reported a disability. As seen on Table 19 below, about less than 1% of people reporting a disability are not employed.

**Table 19 - Persons with Disability by Employment Status**

	Number	Percentage
Total	8,003	100%
In the labor force:	6,433	80%
Employed:	6,092	76%
With a disability	252	3%
No disability	5,804	73%
Unemployed:	341	4%
With a disability	21	>1%
No disability	320	4%
Not in labor force:	1,570	20%
With a disability	324	4%
No disability	1,246	16%

Source: HCD 2020 Data Package

Table 20 displays the total number of disabilities reported by type of disability. For persons between the ages of 5 and 64, cognitive disabilities were the most prevalent, followed by ambulatory and independent living difficulties. In the 65-years and over category ambulatory disabilities were the most prevalent, followed by independent living difficulties.

Developmentally Disabled

The Census Bureau does not include developmental disabilities in their data and so it is not shown on Table 20. Developmental disabilities are defined as a continuing disability that originates before an individual becomes 18 years old and includes Mental Retardation, Cerebral Palsy, Epilepsy, and Autism. The Kern Regional Center located in Bakersfield, CA provides services to about 8,000 individuals with developmental disabilities who live in Inyo, Kern and Mono Counties. The Kern Regional Center reports that they serve 128-people with developmental disabilities that are from Inyo County.

People with developmental disabilities can often live and work independently. Individuals with more severe developmental disabilities may require group living quarters with supervision. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are also provided. Since developmental disabilities begin before adulthood, housing for persons with developmental disabilities is a progression from the person's living situation as a child to their needs as an adult.

There are several housing types appropriate for people living with a development disability: rent subsidized homes, licensed and unlicensed single-family homes, inclusionary housing, Section 8 vouchers, special programs for home purchase, HUD housing, and veteran's homes. The design of housing- accessibility modifications, the proximity to services and transit, and the availability of group living opportunities represent some of the types of considerations that are important in serving the needs of this group. Incorporating 'barrier-free' design in all, new multi-family housing



(as required by California and Federal Fair Housing laws) is especially important to provide the widest range of choices for residents with disabilities. Special consideration should also be given to the affordability of housing, as people with disabilities may be living on a fixed income.

The Housing Element contains Program 6.2.1 - Reasonable Accommodation. It ensures the availability of reasonable accommodations for persons with disabilities to make modification or exception to the rules, standards, and practices for the siting, development, and use of housing or housing-related facilities in an effort to eliminate barriers to equal opportunity to housing of their choice. This will include establishing an approval process and findings for modifications to design standards found in the zoning code, to ensure that Reasonable Accommodation is addressed. The County will further amend the Zoning Code to clarify that design standards can be modified without a variance and include the criteria for granting reasonable accommodations modifications as part of Program 6.2.1.

**Table 20 - Disability Type
Unincorporated Inyo County**

Disability	Number	Percentage
Total Disability Population 5 to 64 years	634	37%
With a hearing difficulty	107	6%
With a vision difficulty	79	5%
With a cognitive difficulty	325	19%
With an ambulatory difficulty	311	18%
With a self-care difficulty	191	11%
With an independent living difficulty	310	18%
Total Disabilities for Ages 65 and Over	1,074	63%
With a hearing difficulty	410	24%
With a vision difficulty	164	10%
With a cognitive difficulty	301	18%
With an ambulatory difficulty	776	45%
With a self-care difficulty	299	18%
With an independent living difficulty	530	31%
Total Disabilities	1,708	100%

Source: 2020 HCD Data Package

All forms of disability can hinder access to housing units of conventional design as well as limit the ability to earn adequate income. Although needs can vary widely, disabled persons need special facilities to help them overcome their disability or make their housing units more convenient. Some of these amenities include wide doorways that can accommodate wheelchairs, special bracing for handrails, lower countertops, and switches and outlets at the proper height to allow easy use. Unfortunately, very few housing units have these features, and consequently, they must be remodeled to serve the disabled. The conversion of a conventionally designed housing unit is usually well beyond the financial capability of most disabled persons.



The County actively implements state standards for the provision of accessible units in new developments. The County also encourages housing provided for disabled persons to be in close proximity to public transportation and services.

Seniors

The special needs of many senior households result from limited fixed incomes and from physical disabilities and dependence needs. As a result, seniors experience financial difficulty in coping with rising housing costs. The financial capacity for coping with increased housing costs depends heavily on the tenure status (owner or renter) of the elderly household. With infrequent and small increases in income and potentially large increases in housing costs, seniors who rent are at a disadvantage compared to seniors who own. Table 21 displays householders by tenure and age from the HCD 6th Cycle Data Package derived from the 2018 ACS. As shown in the table, 2,043 households had a senior householder (age 65 years and older) in Inyo County, representing a significant portion of Inyo County's household population, 33-percent. Of the over 65-years household population 13- percent rent their home.

Table 21 - Householders by Tenure by Age – Unincorporated Inyo County

Householder Age	Owners	Renters	Total
Householder 15 to 24 years	17	151	168
Householder 25 to 34 years	205	503	708
Householder 35 to 44 years	485	327	812
Householder 45 to 54 years	670	250	920
Householder 55 to 59 years	578	98	676
Householder 60 to 64 years	704	117	821
Householder 65 to 74 years	913	199	1,112
Householder 75 to 84 years	681	47	728
Householder 85 years and over	181	22	203
Total Households	4,434	1,714	6,148

Source: HCD 6th Element Data Package 2020

One area of great concern relates to rent increases in mobile home parks. Senior citizens are particularly vulnerable and often cannot afford the cost of moving their mobile homes to less expensive spaces. For example, disassembling, moving, and reassembling a doublewide mobile home can cost several thousand dollars. To troubleshoot this problem, the County supports local assistance organizations in addressing senior housing needs through policies and programs supporting rental subsidies, tenant purchase of mobile home parks, and housing rehabilitation assistance, including weatherization.



Large Households

Large households are defined as households with 5 or more persons. Data provided by HCD indicates that Inyo County has about 6-percent of households meeting that criterion. In comparison with the 2014 Housing Element data, the percentage of large families has decreased slightly by 1- percent. In circumstances in which the housing market does not meet the unique needs of large families, overcrowding can result. Fortunately, the county's relatively small overcrowding problem does not indicate this trend occurring on a broad scale. Table 22 shows households by tenure including large households in the unincorporated county.

The Housing Element establishes programs such as density bonus incentives for larger units and self-help housing to meet the needs of the county's large households. The County has had Density Bonus in its code for years. It will be update as well to accurately reflect current State law.

Table 22 - Household Size by Tenure – Unincorporated Inyo County

	Living Alone		2–4 persons		5+ Persons		Total	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Owner	1,290	59%	2,937	83%	207	60%	4,434	73%
Renter	902	41%	622	17%	137	40%	1,661	27%
Total Households	2,192	100%	3,559	100%	344	100%	6,095	100%

Source: Source: HCD 6th Cycle Data Package

Female-Headed Households

According to the 2020 HCD data package, 16-percent of all households within Inyo County are headed by a female and 9% of these have children. Female headed households with children are commonly in need of assistance and are often the households in most need of affordable housing, childcare, job training, and rehabilitation funds.

The financial constraints of single-parent households, especially those headed by females, are seen by the share of households reporting to be below the poverty level. The total number of families living below the poverty level is 468. Of the 468 households living below the poverty level, 188 or 5- percent of households were headed by females. Table 23 provides a summary of female headed households in the county as reported by the ACS 2014-2018.

**Table 23 - Female Headed Households – Unincorporated Inyo County**

Householder Type	Number	Percentage
Female Headed Households	550	16%
Female Heads with Own Children	301	9%
Female Heads without Children	249	7%
Total Householders	3,524	100%
Female Headed Households Below Poverty Level	188	5%
Total Families Below Poverty Level	468	13%

Source: 2020 HCD Data Package

The needs of a single, employed, parent typically includes housing that requires minimal maintenance and is located near employment, schools, transit, shopping, and day care. To address the housing needs of single-parent-headed households, the 2021 Housing Element extends existing affordability programs, such as rent subsidies, and sets forth several new programs, including supporting housing rehab, ADU and affordable housing development to increase the supply.

Families and Persons in Need of Emergency Shelter

There are many social, economic, and physical conditions that have led to an overall increase in the homeless populations throughout the State of California. Factors contributing to the rise in homelessness include the general lack of housing affordable to low, very low, and extremely low-income persons, increases in the number of persons whose incomes fall below the poverty level, reductions in public subsidies to lower-income persons, and the deinstitutionalization of persons with mental illness. The 2020 Point in Time Count found there are 123-homeless individuals who are homeless in the County. Seventeen of these individuals are children and 39 are homeless for the first time. Sixty-one people are living out of their vehicles. Table 24 illustrates the number of homeless people by category.

**Table 24 - Homeless Persons - Inyo County (2020)**

Category	Number
Total Homeless	123
Sheltered	22
Unsheltered	101
Number of Children	17
Chronically Homeless	26
First Time Homeless	39
Veterans	16
With a Physical Disability	39
With a psychiatric or Emotional Condition	46
Fleeing Domestic Violence	19
In Families with Children	27
Sleeping in Vehicles	61

Source: Inyo Mono Advocates for Community Action (2020 point in time count)

Inyo County has a transitional housing program (THP+) that serves foster or group home children when they reach age 18. The County helps these populations find an apartment, helps with financial support, and assists with searching for employment. Area non-governmental organizations the Inyo Mono Advocates for Community Action (IMACA) and Wild Iris also operate around 14-transitional housing units.

The County does not have a homeless shelter, but along with IMACA, the Salvation Army and others, provide hotel/motel vouchers for emergency shelter. For homeless families, County Child Protective Services will rent a hotel room for one night then, County Social Services will pay for a longer-term temporary hotel rooms and assist with finding long-term housing and obtaining services.

To address the needs of homeless individuals living in their vehicles, the County added to Program 3.1.4, to design a safe parking program and choose a site or multiple sites where unhoused individuals can safely park their vehicles and have access to onsite restrooms and security. This will be completed within three years of certification. The County is also working on a program to donate 9-FEMA trailers to house homeless people.

A housing development currently being planned by IMACA within the City of Bishop that serves all of Inyo County will include 5-permanent Supportive Housing Units. There are currently none in Inyo County. IMACA also administers a Rapid Rehousing Project on properties scattered throughout the area. There is currently no Low Barrier Navigation Centers in the County; however IMACA is proposing one that will be located within the City of Bishop that will serve all of Inyo County.



As part of Program 3.1.5 (Partnerships for Affordable Development), the County will meet with nearby jurisdictions, including the City of Bishop on an annual basis, to coordinate on affordable housing strategies, consolidate local data and knowledge regarding affordable housing developers, and focus on the needs of Extremely Low Income households.

The County operates two Wellness Centers one on Short Street in Bishop and one on Washington Street in Lone Pine. The centers provide case management services and provide a place for anyone who needs a free shower, coffee, meals, a safe place to be, referrals, bilingual services, and activities. If no temporary shelter can be found, the centers will provide a free sleeping bag and tent. The centers do not advertise their services and instead depend on referrals from the County's Social Services and Mental Health divisions, the Salvation Army, and IMACA. Wellness Center staff also regularly search for people in need, especially during the summer months when there are more homeless in the area - see the Governmental Constraints section of this Housing Element for more discussion on housing for persons in need of emergency shelter and transitional housing services.

Farmworkers

According to the 2017 USDA Census of Agriculture as shown in Tables 25 and 26, there were approximately 193 farmworkers in Inyo County, 57-percent of which are seasonal workers (i.e., less than 150-days). The housing needs of farmworkers do not represent a large portion of the County's housing needs and can be addressed through existing programs to identify lands and assist in the development of housing for low and moderate-income households. Since farmworkers are mostly found in the unincorporated County, countywide data is representative of it.

Table 25 - Number of Farmworkers (2017) – Inyo County

Hired Farm Labor	
Farms	58
Workers	193

Source: USDA 2017 Census of Farmworkers

**Table 26 - Farmworkers by Days Worked (2017) – Inyo County**

150 Days or More		
	Farms	34
	Workers	82
Farms with 10 or More Workers		
	Farms	0
	Workers	0
Fewer than 150 Days (Seasonal)		
	Farms	33
	Workers	111

Source: USDA 2017 Census of Farmworkers

The 2004 update of the Inyo County Zoning Code included amendments that ensured the County is in compliance with Health and Safety Code Sections 17021.5 and 17021.6, the Employee Housing Act, to facilitate the provision of employee housing, including farmworkers. The County’s Open Space and Recreational Commercial zone (C5), which include agriculture provides for employee housing as an accessory use stated by: *Dwellings of persons regularly employed on the premises for agricultural or domestic duties (OS) or Dwellings of persons regularly employed on the premises for commercial recreational activities (C5) mobile homes subject to the provisions of state law, may be used for this purpose.* There are no limitations on the number of people or structures that can be used for employee housing in this language. There is, however, some disconnect in the County’s definition of employee housing to the implementation of it. Although the term ‘employee housing’ is used in no place in the code except in the definition, it will be changed from calling out “five or more unrelated persons or families” to not calling out a specific number (Program 2.1.5).

Units at Risk of Converting to Market-Rate Uses

Affordable housing units in Inyo County consist of one assisted housing project, the Mt. Whitney Apartments. It is a 33-unit housing project developed with funds from the Farmers Home Administration Section 515 Rental Housing Program. The project was constructed in 1987 and is owned by the Lone Pine Economic Development Corporation (LPEDC). Given its nonprofit ownership and operation, it has been determined that the project is not at risk of converting to market-rate housing. The state of affordable housing in the County has not changed since the 2014 update as no new assisted housing projects have been built since. The County has also not had any developments that have taken advantage of its density bonus program.

CHAPTER THREE: NEED, RESOURCES AND CONSTRAINTS AND AFFIRMATIVELY FURTHER FAIR HOUSING

REGIONAL HOUSING NEED

A Regional Housing Needs Allocation (RHNA) Plan is required pursuant to Section 65584 of Article 10.6 of California Housing Element law and is prepared for jurisdictions in the State by



HCD. The housing need is the minimum number of units needed to serve the projected household population and to accommodate a normal vacancy rate and the expected loss of housing stock.

As shown below on Table 27, unincorporated Inyo County has a projected housing unit need of 205 total units based on household growth expected during the 2021 Housing Element timeframe, with at least 42-percent of these units targeted toward lower-income households. The County has been allocated 46-units for very low-income households and approximately half of those are presumed to be for extremely low-income households (in accordance with AB 2634, which requires the County to document its projected extremely low-income housing need).

Table 27 - Regional Housing Needs (2019-2029) – Unincorporated Inyo County

Income Group	Number	Percentage
Extremely Low	23	11%
Very Low	23	11%
Low	40	20%
Moderate	39	19%
Above Moderate	80	39%
Total	205	100%

Source: 2020 HCD Data Package

For the 6th cycle Housing Element update, the RHNA for Inyo County covers a planning period of December 31, 2018 through April 30, 2029. Therefore, all units built or permitted between that date and the present day can be credited toward the County's RHNA. For a credit to apply to an extremely low, very low, low, or moderate-income allocation, it must have a deed restriction or otherwise documented sales price or rental rate that falls within the affordable range for those income groups.

Population growth and development, in general, in the County is low and slow. As shown in Table 28, the County has issued no building permits since January 1, 2021. Also, no development has occurred since 2018 that counts towards the RHNA progress in Inyo County.

**Table 28 - Progress toward Regional Housing Needs (2019 to 2029)**

Income Group	RHNA	Units Built Since January 2019	Remaining RHNA 2021-2029
Extremely Low	23	0	23
Very Low	23	0	23
Low	40	0	40
Moderate	39	0	39
Above Moderate	80	0	80
Total	205	0	205

Source: Regional Housing Need Plan, 2019-2029; County of Inyo Planning Department

RESOURCES AND CONSTRAINTS

Land Inventory

Inyo County has a very large land area (10,500-sq-miles). More than 98-percent of this land, however, is public land and under Federal and State management or owned by the City of Los Angeles. This leaves less than 2-percent of the land in the County for development. A vacant land inventory conducted by the County in 2020 found that most of the County's privately owned vacant land is outside of established communities, in areas with environmental constraints, located outside of fire district boundaries (making subdivision impossible), outside of water and sewer service district boundaries (making development prohibitively expensive) and large distances from services. Virtually, all of the vacant land within or adjacent to existing infrastructure, within the communities located along the Highway 395 corridor where a majority of Inyo County's population lives, is owned by the City of Los Angeles.

Since 1970, Inyo County and the Los Angeles Department of Water and Power (DWP) have been in litigation over the construction of a second aqueduct and associated groundwater pumping and water export. In 1989, the Inyo County Board of Supervisors and Los Angeles City Council gave tentative approval to a groundwater management agreement. An environmental impact report (EIR) was prepared by the two parties to address the impacts of the second aqueduct and the agreement. One of the mitigation measures identified in both the tentative agreement and the EIR was the need to release Department-owned lands in the Owens Valley to lessen the impacts of DWP land ownership patterns on the orderly growth of the county and affordability of housing.

The final agreement provided for the release of 75-acres of land in the county adjacent to communities with access to water and sewer systems. A majority of the properties selected are currently zoned for residential development and were given General Plan designations appropriate for residential development. The identified parcels are in or adjacent to the communities of Lone Pine, Independence, Big Pine, and Bishop. To date none of these lands located in the unincorporated county has been sold to private interests.



Additionally, Program 3.1.1 commits the County to identifying alternate sites in the event that DWP is unwilling to develop housing on these sites. Program 3.1.1, also includes that the County will facilitate dialogues with other agencies in the region who are large holders of land. Nearby jurisdictions including Mono County, Mammoth Lakes and Bishop will be included in these conversations to facilitate housing development for both their employees and the region's residents.

The LADWP also owns properties located along the main streets of Inyo County towns that could also be considered for sale. Practically all of these properties are zoned for commercial and mixed use development that allows for multi-family dwellings.

For the 2021 update a new site list has been developed. The parcels included on it (for very low to moderate income categories) are: located within fire districts; within or adjacent to water and sewer service districts; are outside of environmentally sensitive areas; and, they are vacant. County Assessor Parcel Maps were reviewed by County staff to determine the development potential of residential lots.

Analysis of Suitability - General: Physical and Environmental

There are many physical and environmental attributes of land in Inyo County that can impede development. There are potential physical and environmental constraints to consider that can inhibit development on vacant and underutilized sites.

Physical Attributes – A majority of vacant parcels in Inyo County have development limitations based on their distance from existing infrastructure. Most of the undeveloped private land in the county is located in remote areas or rural communities that do not have water and sewer systems nor are they located within a local fire district.

Vacancy Rates – Inyo County's reliance on tourism for its economic foundation also plays a part in the lack of available land and/or properties for suitable housing. The County has a rather high vacancy rate (about 18%), which would intuitively equate to more available rentals or sales. This is not the case; however. Many of the County's vacancies are actually second/vacation homes. This keeps them both empty most of the time and off rental and/or sales market exacerbating the already constrained housing inventory. Allowing a higher intensity of uses on sites may increase their redevelopment potential and lower overall vacancy rates. Additionally, the County has considered exploring other strategies such as vacancy taxes.

Infrastructure – As previously mentioned, many communities in Inyo County are not served by water or sewer services primarily due to the expense of creating new systems to serve outlying rural areas with low populations. Program 5.3.1 seeks long term development of new systems for the outlying rural areas, but all above moderate and moderate income sites have water and sewer available through a community service district, other than sites indicated in the inventory as requiring well and septic. Sites 1, 2, and 3 in the inventory all have water and sewer access up to the street.



The information below summarizes total water and sewer and sewer access, as confirmed by the Big Pine and Lone Pine Community Service Districts and the Inyo County Water System for Lone Pine and the City of Bishop – ensuring there is adequate supply to meet the County’s RHNA.

Site 1 and Site 2 is are served by the Big Pine Community Service District (BPCSD) and a contractor for the district confirmed that there is sufficient water and sewer capacity for 100 additional households, well enough over the to serve the expected capacity of 8162-units. Sites 2 and 3 can be is served by the City of Bishop Lone Pine Community Service District (sewer) and the County Water Systems that serves Lone Pine (water). In discussions with the Lone Pine Community Service District’s Administrative Manager City of Bishop’s public works director, the County confirmed that there is sufficient sewer capacity at their Wastewater Treatment Plant (WWTP) for 1.6 million gallons per day (GPD), and only 600,00 GPD are currently being utilized as it is currently under capacity and can handle about twice of what it is serving now (serving about 700-households with the capacity for 600-700 more). This more than adequately provides for the 45-units proposed for the Lone Pine site. Water provision is also adequate for the proposed Lone Pine Site according to the Deputy Director of County Public Works that runs the Lone Pine Water System. The County Water System that provides water service in Lone Pine is allocated a defined amount of water by the Inyo County, City of Los Angeles Long Term Water Agreement (LTWA). Lone Pine is allocated 550-acre feet of water annually by the LTWA, which is currently close to capacity (the 5-year average 2009/10-2018/19 was 515-acre feet), but can support the 45 units/households proposed. There are no issues with the ability of obtaining extra water, but there may be a higher cost to the County to purchase water over the 550-acre-feet currently allocated. At a rate of 425 gallons per day per person, this leaves more than sufficient capacity for 2,300 households, well over the 125-units being attributed to the given sites. Total water capacity is 3 million gallons per day and on highest demand days, the provider produces about 2.3 million gallons. The remaining 700,000 gallons of available capacity and the Public Works Director estimated each household uses 687 gallons per day, ensuring available water capacity for more than 1,000 new units.

Environmental Attributes – Due to the remoteness and the long-term vacancies of undeveloped properties in Inyo County, there are many environmental attributes that affect developable areas. The presence of listed species is the most common. There are also wetlands, earthquake faults and some areas are also prone to avalanches. These physical attributes do not prohibit development but rather restrict development and increase development costs.

The County of Inyo does not have any Williamson Act properties but does have several large tracts of agricultural land. These lands were not considered for the land inventory identifying potential residential development.

AFFIRMATIVELY FURTHERING FAIR HOUSING (AFFH)

Introduction AFFH

Affirmatively furthering fair housing means “taking meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.” These characteristics include, but are not limited to: race, religion, age, ancestry, sexual orientation, gender identity, marital status, national origin, color, familial status, or disability. Assembly Bill 686 (AB 686) caused AFFH to be included into California State Law. An assessment of AFFH must now be included in all Housing



Elements.

The California Department of Housing and Community Development prepared the 2020 Impediments to Fair Housing Choice (AI) for regions in California. Inyo County is part of Region 8 – the Eastern Central California Region. It also includes: Alpine, Amador, Calaveras, Mariposa, Mono, and Tuolumne counties. Information in the AI has been used, in part, to help prepared this section of the 2021 Housing Element update.

Most of the counties in the Eastern Central Region had a low number of building permits occurring from 2013 to 2018 and Calaveras was the only county with a significant amount of units built that



count towards the very low and low income RHNA allocation. Inyo County had a total of 31 building permits occurring between 2013 and 2018. This is an average of about 6-units per year, illustrating the slow growth and development in Inyo County. There were no very low income units, 1-low income, 8-moderate and 22-above moderate. Only 14-percent of the Inyo County's RHNA was realized during this 5-year period, including in the above moderate category.

Fair Housing Enforcement and Outreach

The Fair Housing Act prohibits discrimination in housing because of: Race; Color; National Origin; Religion; Sex; Familial Status; Disability or other protected characteristics. The eastern sierra, including Inyo County is served by one fair housing service provider, the Eastern Sierra Continuum of Care (CoC). It also serves Mono and Alpine Counties and all of the incorporated cities in the three counties. The CoCs mission is to end homelessness through street outreach and providing emergency shelters, transitional housing, permanent supportive housing, rapid rehousing and other assistance to homeless individuals and families. The CoC's partners include IMACA, Wild Iris, the Inyo County department of Health and Human Services, Mammoth Lakes Housing, Inyo-Mono Association for the Handicapped, the Mono County Dept. of Social Services, the Alpine County Dept. of Health and Human Services, and the Salvation Army. Current CoC programs include: Homeless Housing, Assistance and Prevention (HHAP) Program, a 1-time block grant providing local jurisdictions with funds to address homelessness challenges (CoC is also seeking HHAP funds to support new and expanded safe parking facilities, a new homeless navigation/crisis center, landlord incentives and new/expanded youth homeless service projects). These will primarily be located within or on the boundary of the City of Bishop, but will service all of Inyo County.

Additionally, as part of Program 3.1.4, the County is committing to coordinating with the Eastern Sierra Continuum of Care to identifying a safe parking site and developing a program that allows unhoused individuals living in their cars to have access to onsite restrooms and security.

Information on the AFFH Data Viewer indicates that no Equal Opportunity Fair Housing and (FHEO) cases have been filed in Inyo County as of 2020. The Department of Fair Employment and Housing (DFEH) also take complaints regarding employment and fair housing infractions. The annual reports prepared by DFEH for the years 2015-2019 showed there were no fair housing complaints filed in Inyo County, as well.

A comment was received during a public outreach meeting for the update, regarding fair housing complaints which pointed out that most people in the County probably do not know where to file a complaint or who to ask about access to fair housing. The County is currently in the process of working on establishing a housing specialist position for the County. A program is being added to the Update to include having this specialist's services include helping people submit fair housing complaints, as well as, providing housing information (Program 3.1.7).

Opportunity Mapping

HCD together with the California Tax Credit Allocation Committee (TCAC) created the California Fair Housing Task Force to provide research, policy and other strategic recommendations to further assist public entities in California in affirmatively furthering fair housing. The Task force developed Opportunity Area Maps to examine and demonstrate how resources are geographically distributed.



The maps provide an illustrative summary of economic, environmental, and education resources available, and include a “filter” to identify areas with poverty and racial segregation based on the following criteria:

- Poverty: Tracts with at least 30 percent of population under federal poverty line
- Racial Segregation: Tracts with location quotient higher than 1.25 for Blacks, Hispanics, Asians, or all people of color in comparison to the County.

As the following table and map indicate, Block Groups 060270008003, 060270008004 and 060270001001 are low resource areas. Block Groups 060270008003 and 060270008004 include the town of Lone Pine. It is the second largest community in the County with approximately 1,800 people. The third Block Group is located outside of the City of Bishop to the north and east. People living in this Block Group are located on the west and south sides of it and have access to moderate, high and very high resource areas surrounding them. Most of this Block Group is unpopulated and located in the Inyo National Forest and Bureau of Land Management lands.

The County is adding a program to the 2021 Housing Element Update to research possible opportunities and potential funding sources to help develop infrastructure in the more remote locations in the County (also moderate and low opportunity areas) to help promote more housing development (Program 5.3.1). There is still very little in the way of growing employment opportunities in these areas, however, which causes a more limited need for housing and services.

Table 29 - Inyo County Opportunity Areas by Block Group

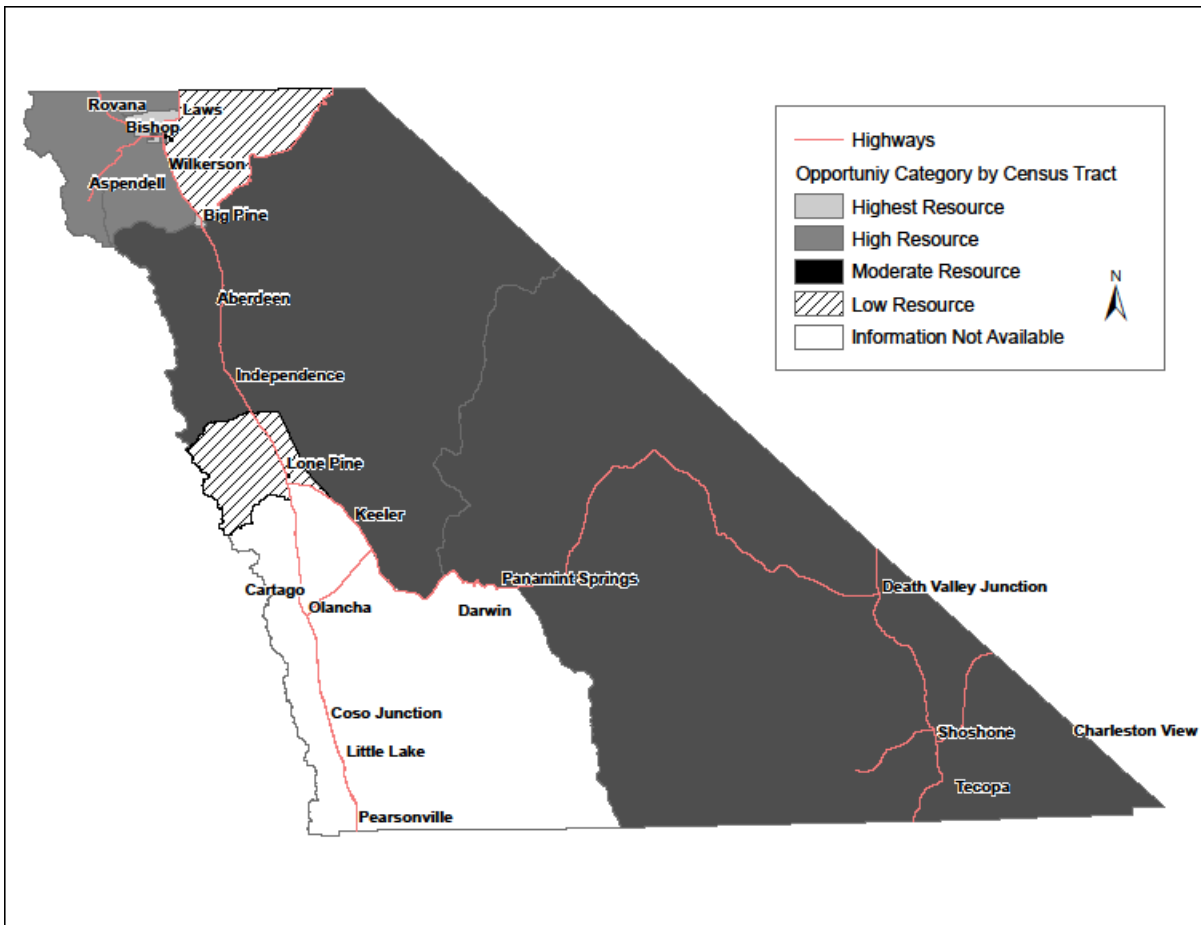


Block Group	Opportunity Category	Economic Score	Environmental Score	Education Score
060270001001	Low	0	78	21
060270001002	Highest	78	78	21
060270002001	High	64	64	7
060270002002	High	71	64	21
060270003001	High	92	50	21
060270003002	Highest	100	50	21
060270004001	Moderate	50	0	21
060270004002	High	86	0	21
060270004003	Moderate	57	0	21
060270004004	Low	36	0	21
060270005001	Moderate	14	92	85
060270005002	Highest	43	93	100
060270008001	Moderate	21	29	93
060270008002	N/A	N/A	N/A	N/A
060270008003	Low	29	29	0
060270008004	Low	7	29	14

Source - California Fair Housing Task Force map viewer 2021



Opportunity Map



Source - California Fair Housing Task Force map viewer 2021

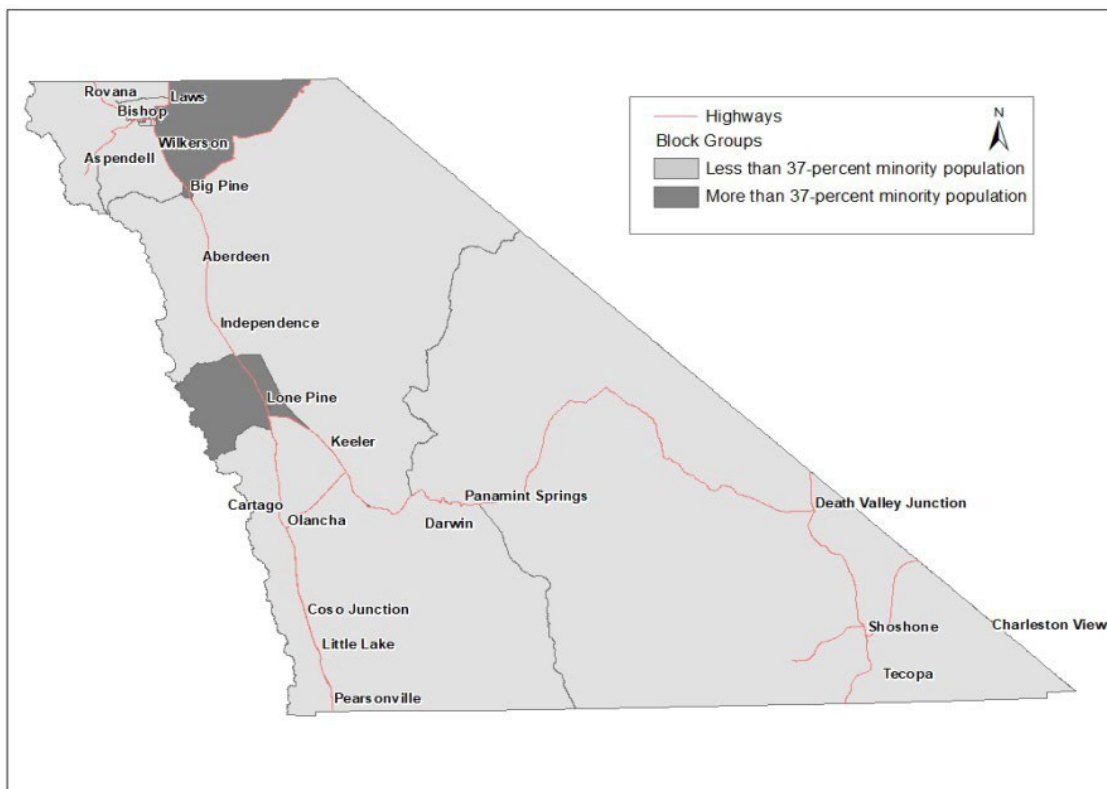
Integration and Segregation

Race and Ethnicity

Because Inyo County’s towns are small and the geographies used to illustrate segregation are too large, it is difficult, at best, to determine whether there are pockets of concentrated protected classes in the County. The small town sizes most likely works to the benefit of better integration than is found in urban areas. For example, all children in a specific Inyo County town go to the same school. Everyone has access to the same stores, transit system, parks, medical facilities and etc. According the DFEH reports 2015-2019 there were no reports of civil rights infractions in Inyo County. Based on the County’s local knowledge, some of the towns located in remote areas do tend to have lower income residents than in the more populated area in the northern part of the County near the City of Bishop. People living in these remote areas must travel long distances to acquire goods and services, but even in these instances, everyone who lives in these communities face the same limitations.



The 2020 Regional Analysis of Impediments to Fair Housing Choice (2020 Regional AI) defined minority concentrations as a census block group with a proportion of minority households that is greater than the overall minority average of the total area (in this case Inyo County). In Inyo County the minority population represents 37-percent of the total population. This percentage does include the City of Bishop as it could not be subtracted out based on data available from the Census. The following Map shows that the highest concentration of minorities in Inyo County is found in the Lone Pine area Block Groups 060270008003 and 060270008004 Big Pine 060270005002, the area north and east of Bishop 060270001001 and Block Group 060270004001, which entirely covers the Bishop Paiute Reservation where the high minority percentage (91-percent) is by design. In total, there are 5 total Block Groups with high minority concentrations. It is of worthy of noting that the Big Pine Block Group 060270005002 is also a high opportunity area (see map below). There is also a concentration of minority population in the Lone Pine Block Groups. An Indian reservation is included in one of the Lone Pine Block Groups 060270004001, as well, but it is not all of it.



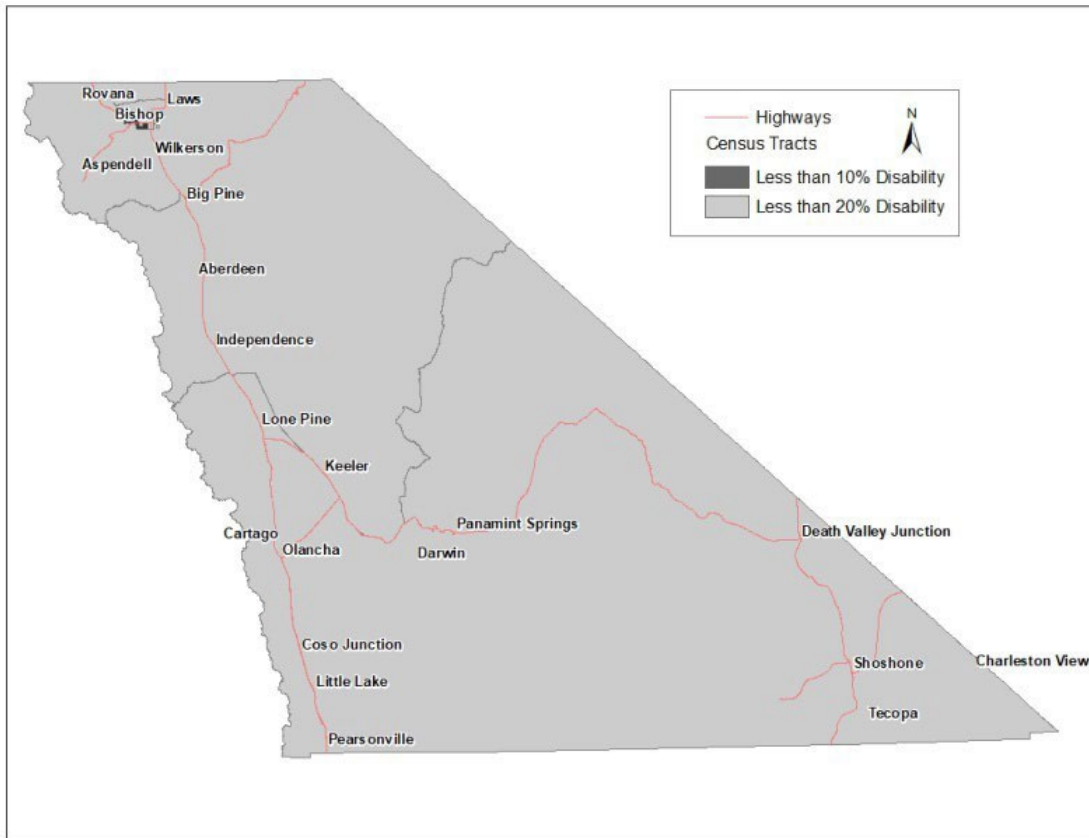
Source – ACS DP05-2019

Disability

Census data captures disability characteristics as having: vision, hearing, ambulatory, cognitive, and independent living difficulties. As seen on the map below, in Inyo there are no Census Tracts with a disability percentage over 20-percent. The percentages of disabled people in the County are also very evenly distributed between Census Tracts showing no areas of concentration. The highest rate of disability by Census Tract is found in CT 4, CT 5 and CT 8 all with 16-percent; CT 1 is 15-percent;



CT 2 11-percent and CT 3 has 8-percent. This illustrates no areas of concentrated disability in the County. The overall disability rate in the County is 14-percent. This is somewhat higher than the State rate of about 11-percent. The County also has an older population, which likely influences the disability rate.



Source – ACS S1810-2019

Familial Status

As shown on the following Table 30, about 42-percent of households in Inyo County identify as married couple families. Census Tracts CT 1, CT 2 and CT 3 exceed this number with about 56, 58, and 73-percent respectively. CT 4 has the lowest percentage of married couple households with 25-percent. In the County, about 12-percent of households have children under 18-years. CT 3 has the highest percentage of households with children under 18 with 25-percent. Census Tract 4 has the lowest percentage of married couple households (25-percent) and the highest percentages of both female headed households and those with children under 18 (15-percent and 7-percent respectively). Non-family households exceed the percentage of married couple households in CT 1, CT 4, CT 5 and CT 8. CT 4 has the highest percentage of non-family households at 56-percent. It also has the highest percentage of householders living alone at 52-percent. Householders living alone that are also over 65-years are fairly evenly distributed from 13-20-percent, except in CT 2 where it is 9-percent. Overall, the County has a 45-percent of householders living alone and 20-percent are over 65-years. This is another example of the aging population trend in Inyo County. Female



Householders with children under 18-years do not represent a large proportion of Inyo County Households and they are fairly evenly distributed. Census Tracts 4 and 8 have the highest percentages (6.8 and 6.7 respectively).

Table 30 – Familial Status

	Inyo County	CT 1	CT 2	CT 3	CT 4	CT 5	CT 8
Total Households	7,950	1,177	703	973	2,601	1,076	1,420
Number Married Couple Households (HH)	3,307	660	406	709	655	336	541
Pct. Married Couple	41.6	56.1	57.8	72.9	25.2	31.2	38.1
Households with Children under 18	988	189	88	241	497	142	239
Pct. HH with Children under 18	12.4	16.1	12.5	24.8	19.1	13.2	16.8
Number Female Householder no spouse present	779	124	39	39	386	82	109
Pct. HH Female Householder no spouse present	9.8	10.5	5.5	4.0	14.8	7.6	7.7
Number Female Householder no spouse present with Children under 18	315	0	11	19	178	12	95
Pct. HH Female Householder no spouse present with Children under 18	4.0	0.0	1.6	2.0	6.8	1.1	6.7
Number Non-Family Household	3,654	368	247	214	1,464	598	763
Pct. HH Non-Family Hous	46.0	31.3	35.1	22.0	56.3	55.6	53.7
Pct. Housholder Living Alone	45.0	29.9	22.8	20.0	52.0	44.0	45.0
Pct. Householder Living Alone Over 65	20.0	14.0	9.0	13.0	16.0	20.0	20.0

Source – ACS S1101-2019

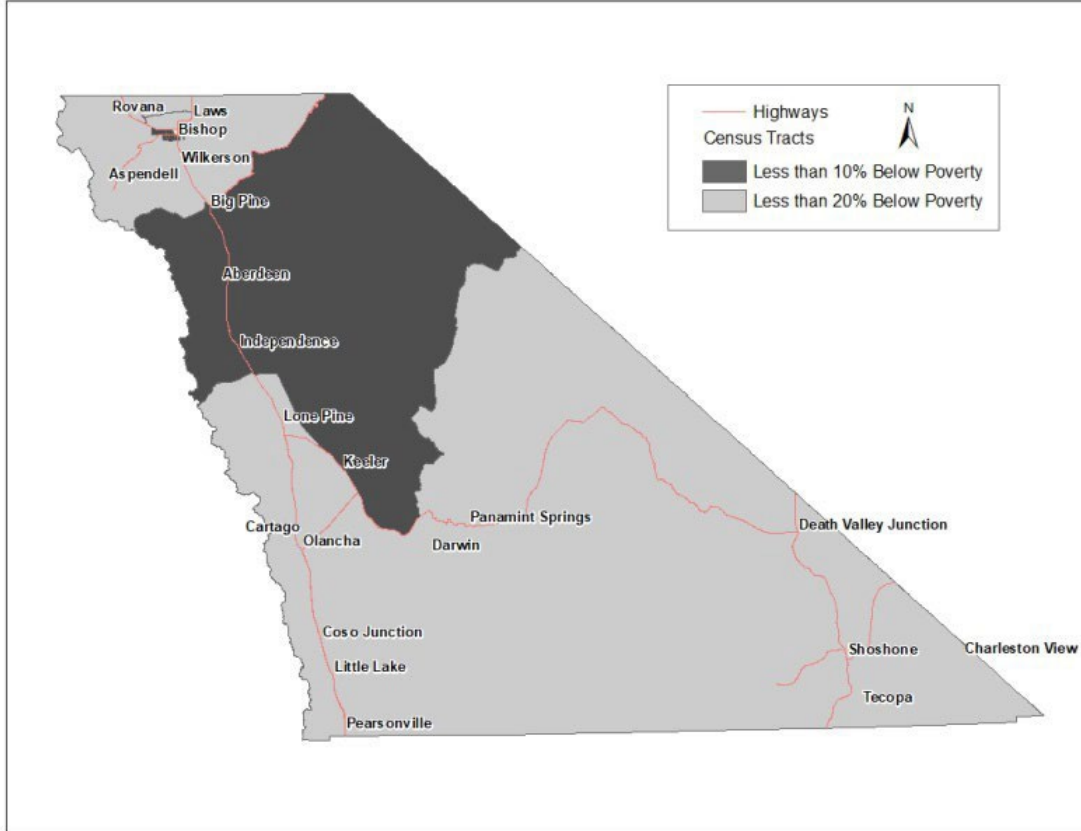
Poverty Status

Inyo County as a whole has a 9.3-percent poverty rate, or 1,635 people who are identified as living under the poverty level. This number is dispersed across the County fairly evenly with one Census Tract (CT 3) with a much lower rate than the rest with 3.6-percent. Census Tract 8 has the highest poverty rate of 14.5-percent. None of the CTs are over 30-percent, which is the metric of significance in the opportunity mapping conducted by California Fair Housing Task Force.

Table 31 – Poverty Status

	Inyo County	CT 1	CT 2	CT 3	CT 4	CT 5	CT 8
Total Population for Whom Poverty Status is determined	17,562	2,709	1,693	2,541	5,395	2,215	3,009
Number below Poverty Level	1,635	277	185	92	459	187	435
Pct. Below Poverty Level	9.3	10.2	10.9	3.6	8.5	8.4	14.5

Source – ACS S1701-2019



Source – ACS S1701-2019

Racially Concentrated Areas of Affluence

Another indicator used help evaluate fair housing choice is Racially Concentrated Areas of Affluence (RCAAs). These are broadly defined by HUD as affluent white communities. No formal definition for RCAA has been offered by HCD or HUD, though. HCD has suggested that they can be determined by identifying census tracts with a white population over 40-percent, and high median income levels. Inyo County overall has a 62-percent White population. There is not a single Census Tract with a White population under 40-percent. Census Tract 3 has the highest White population with 87-percent and CT 4 has the lowest with 50-percent, showing some varying range, but no concentration in specific areas. The County’s median household income is \$57,316. This is lower than the State median household income of \$75,235. There are, however, two Census Tracts that are over the County and State median incomes at \$86,875 (CT2) and \$96,036 (CT3). Based on HCD’s - Inyo County-State Income Limits by Household Size (2020) the County’s median income as a whole and by Census Tract fall roughly fall into the Low – Moderate income categories.

Racially/ ethnically concentrated areas of poverty

The Housing and Urban Development Department (HUD) Racially and Ethnically Concentrated Areas of Poverty (RECAPs) illustrate the cross sections of poverty and segregation found within a community. These areas are common throughout California; however, the Eastern Central Region



does not have any RECAP areas according to the current data used to identify them. This means that there are not intersections of concentrated poverty and race/ethnicity classified in Inyo County based on the RECAP data. To further explore this, the CoC developed a tool called the Racial Equity Tool. It includes homelessness and poverty counts by race in the CoC area (Inyo, Mono and Alpine counties) and for California as a whole. This Tool is was developed to help analyze potential racial disparities among people experiencing homelessness. Using the data gathered from the CoC Point-In-Time Count, and American Community Survey data, racial equity data was created for the CoC Counties (Alpine, Inyo and Mono).

The data summarized on Table 32 indicates that the CoC study area has an overall lower rate of poverty, and substantially lower rate of homelessness, than California as a whole. The CoC has a slightly higher rate of poverty for black residents (24.8%) than the State overall (22.2%), but a lower rate of homelessness than for all races evaluated.

Table 32 – Racial Equity in Continuum of Care Counties

State of California and CoC Counties (Alpine, Inyo Mono) - Race Equity Comparison						
	Total Population		Population living below poverty rate		Homeless Population	
	CA	CoC	CA	CoC	CA	CoC
Total Pop.	33,982,847	33,457	5,773,408	3,419	151,378	214
Total Pct.	100%	100%	17%	10.20%	4.70%	0.64%
White Tot.	23,607,242	27,498	3,183,011	2,623	92,164	195
White Pct.	61%	82%	13%	9.50%	3.90%	0.004%
Black Tot.	2,263,222	266	502,610	66	44,086	0
Black Pct.	6%	1%	22.20%	24.80%	0.019%	0
Native Tot.	292,018	2,730	62,078	462	6,797	19
Native Pct.	1%	8%	21.20%	16.90%	2.30%	0.7%
Asian Tot.	5,655,699	602	629,262	125	4,783	0
Asian Pct.	15%	2%	23.70%	21%	0.8%	0
Other Tot.	7,164,666	2,360	1,396,447	143	13,448	0
Other Pct.	18%	7%	19.5	6%	0.19%	0

Source – CoC Racial Equity Tool

This of course does not mean that there are no areas with some concentrations of race/ethnicity and poverty in the County, even though they do not rise to the levels usually found in more populated urban and suburban areas. CT 8 has the highest levels of minority population, female householders with no spouse present and children under 18, persons with disabilities and persons living in poverty. A program has been included to focus efforts on housing opportunities for extremely low income groups, in general, and with a special focus on CT 8, especially the area including Lone Pine (Program 7.1.1).



Access to opportunity

Residents in the remote areas of the County have less access to opportunity than those living in the more populated areas. Towns located in the south and east parts of the County range from around 230 to 7 people. Some of these communities require long distance travel to employment, schools, medical facilities, stores and etc.

Education

Inyo County has six public school districts. These are Bishop Unified, Big Pine, Death Valley, Lone Pine, Owens Valley and Round Valley. Between these Districts there are 17 schools. Several of these schools operate from the same campus. For example, an elementary, middle and high school are all located on a single site in Shoshone. Inyo County's public schools are located in CT 2, 3, 4, 5 and 8. There are also various private schools and preschools scatter throughout the County. A Community College (a branch of the Cerro Coso system) is located in the Bishop area in CT2. Between 2015 and 2020 all of the County's School Districts, except Owens Valley (in CT5) had Title I eligible schools. The other school District in CT5 was Title 1 eligible. A Title I eligible school is one in which the percentage of children from low-income families is at least 35 percent of the children from low-income families, served by the Local Education Agencies. This data is consistent with the County's overall poverty data and does not show concentrations of schools with children in poverty in specific areas. They tend to be spread over the County fairly evenly.

The High school graduation rate in Inyo County is 85.2%. This is only slightly less than the State rate of 87.6%. It is impossible to get these rates by district as many of the County's high schools are very small in population and graduate less than 10 students per year. The State Office of Education does not release data for less than 10 graduating students due to privacy issues.

Employment

According to the 2019 ACS data, there are 8,579 people 16-years and over that are in the civilian labor force. Of these, 8,229 were employed. This represents 96% of the civilian labor force, leaving about a 4-percent unemployment rate. The poverty rate for employed people in the County is 5.4- percent and for unemployed it is 36.9-percent. Table 33 shows these same characteristics by Census Tract.

**Table 33 – Employment Status**

	Inyo County	CT 1	CT 2	CT 3	CT 4	CT 5	CT 8
Total Population for Whom Poverty is Determined	17,562	2,709	1,693	2,541	5,395	2,215	3,009
Civilian labor force 16 years and over	8,579	1,233	891	1,136	2,794	1,082	1,443
Percent Total Pop for Whom Pov is Determined in Civilian Labor Force 16-Years and Over	48.8%	45.5%	52.6%	44.7%	51.8%	48.8%	48.0%
Number Civilian labor force 16 Years and Over Employed	8,229	1,171	860	1,118	2,644	1,055	1,381
Pct. Civilian labor force 16 Years and Over Employed	95.9%	95.0%	96.5%	98.4%	94.6%	97.5%	95.7%
Number Civilian labor force 16 Years and Over Unemployed	350	62	31	18	150	27	62
Pct. Civilian labor force 16 Years and Over Unemployed	4.1%	5.3%	3.6%	1.6%	5.4%	2.5%	4.3%
Pct. Living in Poverty of Civilian labor force 16 Years and Over Employed	5.4%	4.7%	4.0%	5.1%	4.9%	9.6%	5.1%
Pct. Living in Poverty of Civilian labor force 16 Years and Over Unemployed	36.9%	64.5%	N/A	55.6%	26.7%	3.7%	61.3%

Source – ACS S1701-2019

Only CT 5 shows a poverty rate of employed people (9.6-percent) that is (slightly) higher than the County's overall poverty rate of (9.3-percent). It also has the second highest percentage of employed people and lowest percentage people who are unemployed in poverty. The rest of the Census Tracts have rates of working poor (those employed and living in poverty) that are quite a bit lower than the County's poverty rate. This is a good sign that the rate of working poor in the County is not especially high.

As illustrated on Table 34, the County also does not show a lot of disparity by race/ethnicity in its unemployment numbers. Native Americans have the highest unemployment rate in the County at 8.7-percent followed by Hispanic or Latinos at 6.2-percent. These are not especially large numbers and are lower than the overall County percentage. The County has added a program (Program 7.3) to update its General Plan policies to ensure all Environmental Justice requirements are met, per State law.

Table 34 - Percent Unemployed by Race/Ethnicity

	Inyo County
Percent Unemployed	4.1%
White	2.8%
Black or African American alone	5.1%
American Indian and Alaska Native alone	8.7%
Asian alone	1.9%
Native Hawaiian and Other Pacific Islander alone	0.0%
Some other race alone	1.1%
Two or more races	2.4%
Hispanic or Latino origin (of any race)	6.2%



Transportation

Transportation is an important factor in the ability of a person to access opportunity. Inyo County's low population and huge land area make access to jobs, schools, goods and services much more difficult than in urban and suburban areas. There is one transit service provider in the County (Eastern Sierra Transit) and it does not service all of the small towns in the County. The southwest part of the County has no transit service and southeast has one bus a week that takes people from Tecopa to Pahrump Nevada. The City of Bishop and closely surrounding area has more local service provision than the rest of the County. There are two buses that go from Bishop to Lone Pine and back twice a day.

All Transit provides and evaluates metrics that reveal the social and economic impacts of transit, specifically by looking at connectivity, access to jobs, and frequency of service. According to All Transit, and not surprisingly, Inyo County has a very low ranking of 0.4. This indicates a low combination of trips per week and a low number of jobs accessible by transit resulting in a low number of people who take transit to work. This is, again, a symptom of the geography and land use patterns in the County.

The area around Bishop has much more transit service opportunity than the rest of the County. It is also the area with high and very high opportunity areas, as well as the greatest need for housing opportunities. Program 2.1.7 has been added to address disparity in transportation services by having the regional housing working group (Program 2.1.6) along with its review and evaluation of housing needs at the regional level will also look at issues, policies and programs to address gaps in transportation that might be contributing to fair access to jobs and services in relation to housing opportunities. This will include, but not be limited to: working with regional employers on ride share, van pool and transit voucher programs for their employees to better attain access to jobs in the Bishop area. The County's General Plan also already includes policies to address public transit for special needs populations, including PT 1.3, which speaks to accessibility. PT 1.3 states: Support and promote accessibility in public transportation to the maximum extent practicable, including continued support of special service vans that provide a high level of service to low mobility groups.

To meet the needs of lower income households who may not be able to afford a car, the county will complete a carshare pilot program within three years of certification, as described in Program 2.1.7. The purpose of this program is to establish methods to share transportation costs, carpool as needed to the largest regional employers, and manage recent large rises in energy prices.

Environmental

The California Office of Environmental Health Hazard Assessment (OEHHA) assesses health risks caused by environmental contaminants. To help identify areas that are disproportionately burdened by pollution, OEHHA developed the California Communities Environmental Health Screening Tool (CalEnviroScreen). The OEHHA assessment for Inyo County's six Census Tracts can be seen on Table 35. A higher score reflects a higher burden. The results for each indicator range from 0- 100 and represent the percentile ranking of the census tracts compared to other census tracts throughout the State. Census Tracts 5 and 8 have the highest percentile ranking in the County. These rankings are, however, low-moderate at 40 and 47 respectively. They both have high solid



waste effects (CT 5 is high and CT 8 is very high) and both have County landfills within their boundaries. Census Tracts 5 and 8 have the highest percentile of population characteristics.

The Cal Enviro Screen Tool also provides information on Disadvantaged Communities. Inyo County has no disadvantaged communities. The County does, however, have existing policies in its General Plan that directly relate to Environmental Justice issues, these include:

- RH 1.2 - Encourage reduction of vehicle miles traveled to promote energy conservation and reduce air pollution.
The County is also in the process of conducting a Vehicle Miles Traveled (VMT) study.
- WR 1.4 - Continue the review of development proposals and existing uses pursuant to the requirements of the Clean Water Act, LRWQCB, and local ordinances to reduce polluted runoff from entering surface waters.
- AQ 1.1 - Work with the LADWP and the GBUAPCD to reduce wind-raised dust from Owens Lake.
- AQ 1.3 - Work with the GBUAPCD to develop programs and project review requirements that will reduce air pollution generation, especially PM10.

The County has two Board of Supervisors' members who sit on the Great Basin Unified Air Pollution Control District (GBUAPCD) Board to ensure the County's concerns and ideas are heard in policy development and implementation programs.

- AQ 1.2 - The County shall require large development projects (hospitals, schools, high-occupancy public facilities, and industrial/commercial facilities over 20,000 square feet) to mitigate air quality impacts. Mitigations may include, but is not limited to the following: providing bicycle access and parking facilities, provide preferential parking for high-occupancy vehicles and car pools, and establishing telecommuting programs or satellite work centers.
- LU 2.16 - The County may permit the siting of churches, schools, child care, social institutions, cultural institutions and/or activities, parks and recreation facilities, greenbelts, and similar public facilities within a residentially designated area. The County may permit the siting of public facilities and utility system components in lands designated as NR. These uses are allowed so long as these uses are designed and operated in a manner that does not adversely impact the residential areas.
- PSU 2.2 - The County shall require that new development pays its fair share of the cost of developing new facilities and services and upgrading existing public facilities and services. Exceptions may be made when new development generates significant public benefits (e.g., low income housing) or when alternative sources of funding can be identified to offset foregone revenues.
- GOV 2.1 - Continue Participation on Collaborative Planning Efforts. The County shall continue its participation in collaborative planning efforts and work to expand participation to all affected government agencies.
- GOV 2.2 - Public Participation The County shall work with federal and state agencies, local districts, utilities (e.g., LADWP), and Native American tribes to ensure that the County and the public are involved early in any planning process and that routine feedback and public input is requested.



In addition to the programs already included in the County’s General Plan that address environmental justice, the County will add an Environmental Justice Element to its General Plan (Program 7.3).

Table 35 – Environmental Factors

	CT 1	CT 2	CT 3	CT 4	CT 5	CT 8
Overall Percentiles						
CalEnvrioScreen 4.0 Percentile	8	19	14	37	40	47
Pollution Burden Percentile	0	17	2	14	21	70
Population Characteristics Percentile	40	24	43	59	54	33

Source – Cal EnviroScreen 2021

Disproportionate Housing Needs

‘Disproportionate housing needs’ as defined by (24 C.F.R §5.152) are: ‘significant disparities in the proportion of members of a protected class experiencing a category of housing needs when compared to the proportion of a member of any other relevant groups or the total population experiencing the category of housing need in the applicable geographic area.’ The determination of disproportionate need accounts for housing cost burden (payments exceeding 30% of gross income) and severe burden (payments exceeding 50-percent of gross income), overcrowding (housing with more than 1 person per room), and substandard housing (lacking complete kitchen or bathroom facilities), are shown on Table 36 – note that data showing payments exceeding 50-percent of gross income are unavailable.



Table 36 –Disproportionate Housing Needs

	Inyo County	CT 1	CT 2	CT 3	CT 4	CT 5	CT 8
Housing Factor							
Occupants per Room							
Occupied Housing Units	7,950	1,177	703	973	2,601	1,076	1,420
1.00 or fewer occupants	4,452	1,116	699	966	2,583	1,074	1,314
Pct. 1 or fewer	97.5%	94.8%	99.4%	99.3%	99.3%	99.8%	92.5%
1.01 or more occupants	177	50	4	7	13	2	101
Pct. 1.01 - 1.51	2.2%	4.2%	0.6%	0.7%	0.5%	0.2%	7.1%
1.51 or more	21	11	0	0	5	0	5
Pct 1.51 or more	0.3%	0.9%	0.0%	0.0%	0.2%	0.0%	0.4%
Gross Rent as a Percentage of Household Income							
<i>All Occupied Units Paying Rent</i>	2,428	102	151	N/A	1,391	271	490
Less than 30% of Gross Income	56.6%	88.2%	65.6%	N/A	51.5%	68.3%	58.2%
More than 30% of Gross Income	43.4%	11.8%	34.4%	N/A	48.5%	31.7%	41.8%
Substandard Conditions							
Occupied Housing Units	7,950	1,177	703	973	2,601	1,076	1,420
Lacking Complete Plumbing	48	0	0	0	0	0	48
Pct. Lacking Complete Plumbing	0.6%	0.0%	0.0%	0.0%	0.0%	0.0%	3.4%
Lacking Complete Kitchen	114	0	0	0	63	2	49
Pct. Lacking Complete Kitchen	1.4%	0.0%	0.0%	0.0%	2.4%	0.2%	3.5%
No Telephone Service	92	9	5	0	20	3	55
Pct. No Telephone Service	1.2%	0.1%	3.3%	0.0%	0.8%	0.3%	3.9%

Source – ACS S1701-2019

Inyo County and its associated Census Tracts do not have significant numbers of overcrowding or substandard conditions. The County as a whole, however, does show that 43.4-percent of occupied rental units have renters who are cost burdened. Census Tract 4 has the highest percentage of renters who are cost burdened at 48-percent this is the CT that primarily represents the City of Bishop and it is subject to the City's jurisdiction and Housing Element. Census Tract 8 has 41.8- percent of renters that are cost burdened. Programs 2.1.4, 3.1.2, 3.2.2, 3.2.3 and 3.2.4 are included to help in the provision of high density housing, ADU/JADU development, more rental opportunity in single family homes and opening up commercially zoned property to more multi-family housing, which is intended to promote higher density housing and more rentals in the County.

Other factors contributing to disproportionate housing needs are elderly residents who are commonly on fixed incomes. As can be seen on Table 30, age is a factor in Inyo County where 20- percent of Households have a householder who is 65-years or older. Census Tracts 5 and 8 both also show that 20-percent of households have a householder 65-years or older. The County shall explore the issues facing its seniors and their housing needs. The housing stakeholder group established during the housing element update will continue to meet to further define housing issues in the county including senior and employee housing. This work will include identifying and applying for grants to provide affordable and special needs housing (Program 7.2.1).



Displacement Risk

The level of displacement risk faced by Inyo County residents is difficult to assess primarily due to geography and landuse patterns. There are definite concerns about availability of housing, rental costs and an aging population, though. During the several public meetings held for the housing element, lack of housing, lack of land to build housing and lack of rentals and rental costs were expressed repeatedly. There are also concerns related to the increase of second home ownership in the County. The high costs and lack of available land has been and can continue to drive prices up that could result in people leaving the County. Census Tract 8 has the highest proportion of renters paying over 30-percent of their income to rent at 41.8-percent and CT 2 is the next highest with 34.4-percent.

Displacement among seniors is especially pervasive in California. The County will also implement Program 3.1.2 to create a promotional brochure for ADUs that will focus on their value to households with seniors as a way to facilitate aging in place and collecting a second rent to offset housing costs. This brochure will advertise the various sources of funding, including a CalHFA program that offers \$25,000 for lower income homeowners to fund preconstruction costs for ADUs as well as a County program with funds available for rehabilitation loans. Program 3.1.2 also includes the County making a determination about Accessory Commercial Units (ACUs) within two years of certification. These ACUs can offer light commercial uses, including grocery stores, childcare centers, and coffeeshops. The County will ensure that if ACU's are added as a permitted use, the development standards will intensify to ensure no loss of housing capacity. Having these options in residential neighborhoods can also help to reduce Vehicle Miles Traveled (VMT) and help homeowners offset housing costs and fund rehabilitation.

Summary of Fair Housing Issues and Programs

1. Inyo County does not currently have a person dedicated to helping people with fair housing complaints and working to help fill the housing needs of its citizens.

The County is currently in the process of developing a housing specialist position for the County. This specialist's services will include taking fair housing complaints, as well as, providing information and support for affordable housing, as well as, other services as appropriate. (Program 3.1.7).

2. There are extremely low income people scattered throughout the county. Census Tract 8, however, does show some concentration of poverty, disability, female householders with children under 18 and householders 65-years and older.

Efforts to provide housing opportunities for the extremely low income group and special needs populations will include an additional focus on CT 8, especially in the Lone Pine and Tecopa areas (Program 7.1.1).

3. Factors contributing to disproportionate housing needs are elderly residents who are commonly on fixed incomes. Inyo County overall has 20-percent of Households with a householder who is 65- years or older. Census Tracts 5 and 8 on their own also show that 20-percent of households have a householder 65-years or older.



The housing stakeholder group established during the housing element update will continue to meet to further define housing issues in the county including senior housing. This work will include identifying and applying for grants to provide affordable and special needs housing including senior housing (Program 7.2.1).

4. Census Tract 8 has the highest percentages of people identified, by the metrics analyzed in this assessment, as disproportionately disadvantaged when compared to the remaining 5 Census Tracts in Inyo County. Census Tract 8 also includes two of the Block Groups that are identified as low resource in the County. Census Tract 1 is also identified as low resource, but based on the other evaluations at a finer scale, this is inconsistent. The geography of CT1 is more likely the culprit to its low resource score. The population lives on south and west sides of CT1. The rest of the Tract is in the Inyo Nation Forest and BLM lands that are vacant. The people who live in CT 1 use the resources found in the Bordering Census Tracts that are High and Moderate Resource areas. This leaves CT 8 as the Tract with the highest displacement risk.

A program has been included in the Housing Element to direct special focus to CT 8 when pursuing affordable housing grants and fair housing support opportunities (Program 7.1.1).

5. High cost burdens on renters is found within all of the County's Census Tracts, except CT 1. All but CT 1 have over 30-percent of renters cost burdened. In contrast, CT 1 is roughly 12-percent. The distribution of this is fairly even 31.7-percent to 41.8-percent across the other five CTs. This excludes CT 4, which is primarily influenced by the City of Bishop. It is 48.5-percent, but would fall under the City's jurisdiction and Housing Element programs.

(Programs 1.1.1, 2.1.3, 2.1.4, 3.1.1, 3.1.2, 3.2.2, 3.2.3, 3.2.4, and 5.3.1 address affordable housing, including rental housing).

Analysis of Realistic Capacity

The County's RHNA suitable sites as a product of the analysis realistic capacity (see below) are enough to meet the County's allocation of 23-units for Extremely Low 23-units, Very-Low, 23-units for Low and 39-units for Moderate income residents. In an effort to help achieve the goal of providing affordable housing for extremely low income and special needs residents, the County has developed several programs to address these issues, please see programs section.

The Residential Site Inventory, based on the state's selection criteria only evaluates those lands that are between 2 and 10-acres, are sufficiently served by existing infrastructure, can be easily connected to sewer and water systems, or have the required area for individual water wells and septic systems and have access to phone and internet services. Since Inyo County has no privately owned vacant land that meets this criteria, sites owned by the City of Los Angeles and the County were used for the extremely low, very low, low and moderate income sites. The capacity calculations used to identify sites for extremely low, very low, low and moderate income housing were conducted per Government Code 65583.2(c)(2). The 20-unit per acre, based on the County being listed as a non-metropolitan county, was used along with an 80% reduction of total capacity to achieve *realistic capacity*. It should also be noted that since Inyo County also has no parcels that meet the site criteria, provided by statute that are zoned for high density residential development, anywhere near infrastructure and services, Sites 2 and 3 will be required to be re-zoned so the County can meet the



overall capacity requirements. Program 2.1.3 is included to ensure that Sites 2 and 3 are re-zoned within 2-years of the Housing Element adoption. These parcels are currently part of a vacant land study and re-zone analysis being conducted by the County through an SB2 grant.

To address any possible shortfall and further streamline housing development, the County will ensure by-right rezoning requirement in accordance with state housing law. In the event that Sites 1 and 3 are not made available by DWP, the County will ensure that rezoned sites also adhere to the by right zoning requirements outlined in Government Code 65583.2, subdivisions (h) and (i). These rules will, among other things, ensure that sites will allow 100 percent residential and any mixed use project includes at least 50-percent residential as well. This action will be completed simultaneously with the actions outlined in Program 2.1.3 to rezone and change the general plan designation for Sites 1 and 3.

Through this Housing Element, the County is taking several concrete actions that increase the probability for housing development on sites. These programs include, Program 7.1.1, that reduces many development standards including front and rear setbacks, as well as Program 3.2.3. which commits the County to allowing mixed use and multifamily housing as a by right permitted use in the CB zone.

The County also plans to distribute a survey to property owners outlining the updated development standards by December 2024. This will help to ensure the County is in dialogue with these property owners and can help facilitate development.

Sites Suitable for Extremely Low, Very Low, Low and Moderate Income Units

Inyo County's RHNA allocation for very-low (includes extremely low), low and moderate-income units is 125, with no carry over units from 2014. For all of the sites listed below, the County has confirmed that there is water and sewer access up to the street. Additionally, Program 2.1.3 will ensure that there is by-right zoning for all of these sites in accordance with Government Code 65583.2 by April 2023. The County has identified 3-sites (see Appendix C for maps) that can accommodate the allocations, these include:

Site 1 – Bartell Street/Big Pine – This is an approximate 3-acre parcel that is located in the community of Big Pine. The General Plan designation of this parcel is Residential High Density that allows up to 24-dwelling units per acre, meeting the 20-unit/per acre site selection requirement for non-metropolitan counties. This parcel is zoned Multi-family Residential, 3 units and above (R3). For the purposes of meeting the County's lower-income RHNA, the County will assume a realistic capacity of 80% of the 24-dwelling unit per acre maximum for a total of 61 dwelling units/. The County will plan to pursue a 100% affordable site and therefore expects all units to be affordable to lower income households. This site is in an area that is identified as a High Resource area.

Adequate sewer and water is available through the Big Pine Community Service District to this parcel and the infrastructure for it is available to the site. It is also located in a local fire district and has readily available phone and internet service. It is currently owned by the City of Los Angeles.



Additionally, Program 3.1.1 includes that the County will identify alternate sites in the event that DWP is unwilling to release this site for sale or develop them for affordable housing. Since the county code includes that multi-family residential development of more than 15-units per acre, in the R3 zone, requires a Conditional Use Permit and this can be considered a constraint, a program (Program 2.1.4) is being added to remove this requirement by April 2023 to ensure consistency with the by right zoning requirements in Government Code 65583.

Site 2 – Highway 395 and Bartell /Big Pine – This is an approximate 2.4-acre parcel that is located in the community of Big Pine. The General Plan designation of this parcel is Residential High Density that allows up to 24-dwelling units per acre, meeting the 20-unit/per acre site selection requirement for non-metropolitan counties. This parcel is zoned Multi-family Residential, 3 units and above (R3). For the purposes of meeting the County’s lower-income RHNA, the County will assume a realistic capacity of 80% of the 24-dwelling unit per acre maximum for a total of 46 dwelling units. The County plans to pursue a 100% Moderate income site. This site is in an area that is identified as a High Resource area.

Adequate sewer and water is available through the Big Pine Community Service District to this parcel and the infrastructure for it is available to the site. It is also located in a local fire district and has readily available phone and internet service. It is currently owned by the City of Los Angeles.

Additionally, Program 3.1.1 includes that the County will identify alternate sites in the event that DWP is unwilling to release this site for sale or develop them for affordable housing. Since the county code includes that multi-family residential development of more than 15-units per acre, in the R3 zone, requires a Conditional Use Permit and this can be considered a constraint, a program (Program 2.1.4) was added to remove this requirement by April 2023 to ensure consistency with the by right zoning requirements in Government Code 65583. This was adopted by the County in December 2022.

Site 3 – Locust Street/Lone Pine – This parcel is 3.6-acres and the General Plan designation of this parcel is Residential High Density that allows up to 24-dwelling units per acre, meeting the 20-unit/per acre site selection requirement for non-metropolitan counties. This parcel is zoned Multi-family Residential, 3 units and above (R3). For the purposes of meeting the County’s lower-income RHNA, the County will assume a realistic capacity of 80% of the 24-dwelling unit per acre maximum for a total of 69 dwelling units/. The County will plan to pursue 25-units for lower income households and 20-units to moderate.

Adequate sewer is available through the Lone Pine Community Service District to this parcel and water from the Inyo County Town Water System. The infrastructure for these services are available to the site. It is also located in a local fire district and has readily available phone and internet service. It is currently owned by the City of Los Angeles.

Additionally, Program 3.1.1 includes that the County will identify alternate sites in the event that DWP is unwilling to release this site for sale or develop them for affordable housing. Since the county code includes that multi-family residential development of more than 15-units per acre, in the R3 zone, requires a Conditional Use Permit and this can be considered a constraint, a program (Program 2.1.4) was added to remove this requirement by April 2023 to ensure consistency with the by right zoning requirements in Government Code 65583. This was adopted by the County in December 2022.

Site 2 – Jay Street/Bishop – This parcel is close to 6 acres and has a General Plan Designation of Public Facilities and a zoning designation of Public. This parcel is currently undergoing CEQA review for a General Plan designation change to Central Business District and zoning to Central Business



~~(CB), which meets the 20 dwelling unit per acre requirement for a non-metropolitan county. The County's CB zone allows for mixed use commercial/residential outright as well as multi-family with a CUP. Since requiring a CUP can be considered a constraint a program (Program 3.2.3) has been included for the County to move forward with allowing for multi-family outright in the CB zone. The 20-unit per acre calculation also had an 80% reduction to achieve a realistic capacity number of 91-units. These units can be a mix of (extremely low, very-low, low and moderate-income households) and are allocated by income with 54 lower income units and 8 moderate. This site is in an area that is identified as a High Resource area.~~

~~Adequate sewer and water is available to this parcel from the City of Bishop, although it will require either a boundary adjustment or out of area service contract through the Local Agency Formation Commission (LAFCo). The site is located in a local fire district and has available phone and internet service. It is currently owned by the County. This parcel is considered a good candidate for a mixed commercial/mixed income residential project.~~

~~**Site 3 – East South Street/Bishop** This parcel is over 5-acres and has a General Plan designation of Retail Commercial and a Zoning designation of One-Family Residential. This parcel is currently undergoing CEQA review for a General Plan designation change to Residential High Density and zoning to Multi-family Residential, 3 units and above (R3), which meets the 20 dwelling unit per-acre requirement for a non-metropolitan county. The General Plan designation will be updated to match the zone's density by June 2023. Since the County code includes that multi-family residential development of more than 15-units per acre, in the R3 zone, requires a conditional use permit, the same program to eliminate this requirement as in Site 1 (Program 2.1.4) affects this parcel. These units can be a mix of (extremely low, very-low, low and moderate-income households) and are allocated by income with 43 lower income units and 20 moderate. This site is in an area that is identified as a High Resource area. Adequate sewer and water is available to this parcel from the City of Bishop, although it will require either a boundary adjustment or out of area service contract through the Local Agency Formation Commission (LAFCo). The site is located in a local fire district and has available phone and internet service. It is currently owned by the City of Los Angeles; there are no current plans to sell the property within the planning period. A program to require the zone and General Plan designation change within 2-years of adoption of the housing element is included under 2.1.3.~~

~~Program 3.1.1 includes that the County will identify alternate sites in the event that DWP is unwilling to release this site for sale or develop them for affordable housing. Since the county code includes that multi-family residential development of more than 15-units per acre, in the R3 zone, requires a Conditional Use Permit and this can be considered a constraint, a program (Program~~



~~2.1.4) is being added to remove this requirement by December 2024 to ensure consistency with the by right zoning requirements in Government Code 65583.~~

Property Owner Survey

To increase the feasibility of housing development for sites in the inventory, the County will reach out to the property owners of each parcel with (1) a brochure outlining new development standards as well as (2) a survey to gauge the property owners' interest in redevelopment by December 2024. As part of Program 3.2.1.

Sites Suitable for Above Moderate Income

The County identified 58 infill parcels that can accommodate the 80 above moderate income dwelling units identified in the RHNA. All of these parcels are located within a local fire district boundary so they can be subdivided where appropriate. These parcels are also either located within or adjacent to a water and sewer service provider, or they are over .5-acres as recommended for septic systems.

Communities in the more remote areas of the county such as Keeler, Darwin, Cartago, Olancho, Tecopa, Shoshone, Sandy Valley, and Charleston View, include vacant parcels with residential zoning. Since limited development of residential units in these areas can be anticipated, they are not included in the land inventory. These areas do; however, provide for additional residential development opportunities throughout the planning period including for affordable housing.

Accessory Dwelling Units are also a realistic means to provide more housing opportunities in Inyo County. Permits are being applied for more frequently for ADUs in the County and the County has updated its code to reflect all current State regulations regarding ADUs. Although not counted towards the site inventory, they will most likely add to it during the 6th Housing Element Cycle. The County is also committing to advertising the value of ADUs and JADUs to homeowners through Program 7.1.1 and the development of certain promotional brochures. The County will highlight the relatively cheap cost of second units through garage conversions and target senior households to share the value of these for aging in place. In addition to highlighting the \$25,000 CalHFA ADU grant program, the County's housing rehabilitation loan program is also applying for additional HCD grant money to fund the program. This money will be distributed during the planning period for loans to at least 15-ADUs or rehabilitation projects, equaling about 3 per year for the Housing Element Planning period.

County Owned Sites

The County owns 66 parcels throughout the County with existing administrative buildings and road yards. Of the 66-parcels, 32 are located in the Owens Valley.

All but 3 of the Owens Valley parcels are currently built on for various County offices, roads yards, libraries, parks -etc. The 3 vacant parcels are located in Bishop and Big Pine. ~~The Bishop parcel is currently in the process of a zone change and is included in the RHNA site inventory Site 2. This zone change will be completed by April 2023.~~ The two parcels in Big Pine are environmentally



constrained with special status species and a wetland. The Bishop parcel would need to be annexed into the City of Bishop for services, so the County believes this parcel should be evaluated and rezoned by the City. This parcel will, however, be further evaluated for housing development viability as included in Program 5.3.2

The County also has several road yards and an airport on some of its properties in the Owens Valley. Two of the road yard parcels are currently undergoing zone and General Plan reclassifications to multi-family residential to encourage high density housing development. These parcels are located in Lone Pine. The County will complete the two zone changes and reclassifications by April 2023.

The County will also evaluate its other roads yards in Bishop, Big Pine and Independence for possible consolidation to eliminate the need for all of them and/or at these particular locations, as well as, for potential locations for housing development. Zoning and General Plan designation changes will also be proposed for any parcels that are deemed appropriate for high density and/or affordable residential development.

~~In the Sites Inventory, there is a total of one County Owned site. It is labeled accordingly and has a total capacity of 63 units. This site is in the process of a by right rezoning during the planning period, particularly in the event that Sites 1 and 3 are unavailable. Capacity in the sites inventory below is currently based on the existing zoning and general plan designations. However, the County is in the process of rezoning these sites. On lots with existing buildings, the County will evaluate development standards and look to develop housing.~~

Table 37 below provides a site-by-site inventory of the vacant land that is currently available to provide sites to meet the County's 2021 RHNA. Table 38 provides a comparison of the County's remaining RHNA with the capacity provided by the sites in Table 37.



**Table 37 - Vacant Land Inventory – Unincorporated Inyo County
(SEE MAP IN APPENDIX B)**

APN	Project Type	GP Designation	Zoning	Allowable Density	Acres	General Plan Max. Units	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	County Owned? (Yes/No)	Realistic capacity	Existing Use	Infrastructure Present/On-Constraint
004-160-05	Mixed income: extremely low, very low (43-units), moderate (19-units)	RH	R3	7.6-24	3.2	24	61	0	0	No	61	Vacant	Water and sewer available to prop
008-240-04 004-120-11	Mixed income: extremely low, very low, low, (43-units) moderate-Moderate income: (20-units)	Changing to RH	Changing to R3	7.6-24	5.25 <u>2.4</u>	24	43	19 <u>20</u>	0	No	62 <u>46</u>	Vacant	Water and sewer available to prop
008-240-04 026-330-10	Mixed income: extremely low, very low, low, (54 <u>25</u> -units) moderate (8 <u>20</u> -units)	Changing to CBD	Changing to CB	7.6-24	5.69 <u>3.6</u>	24	54 <u>25</u>	8 <u>20</u>	0	Yes	62 <u>69</u>	Vacant	Water and sewer available to prop
002-036-10	Subdivision – above moderate	RMH	RMH-5,800	7.6-15	0.17	2	0	0	2	No	2	Vacant	Water and sewer available to prop
002-034-07	Infill – above moderate	RM	RMH-5,800	4.6-7.5	0.15	2.6	0	0	1	No	1	Vacant	Water and sewer available to prop
002-095-09	Infill above moderate	RM	RMH-5,800	4.6-7.5	0.15	1.1	0	0	1	No	1	Vacant	Water and sewer available to prop
002-051-04	Infill above moderate	RM	RMH-5,800	4.6-7.5	0.15	1.1	0	0	1	No	1	Vacant	Water and sewer available to prop
002-043-14	Infill above moderate	RM	RMH-5,800	4.6-7.5	0.15	1.1	0	0	1	No	1	Vacant	Water and sewer available to prop
002-055-12	Infill above moderate	RM	RMH-5,800	4.6-7.5	0.30	1.1	0	0	1	No	1	Vacant	Water and sewer available to prop
004-070-42	Infill above moderate	RM	RMH-5,800	4.6-7.5	0.17	2.3	0	0	1	No	1	Vacant	Water and sewer available to prop



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APN	Project Type	GP Designation	Zoning	Allowable Density	Acres	General Plan Max. Units	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	County Owned? (Yes/No)	Realistic capacity	Existing Use	Infrastructure Present/On-Constraint
004-020-48	Infill above moderate	RM	RMH-05,800	4.6-7.5	0.23	1.3	0	0	1	No	1	Vacant	Water and sewer available to prop
004-031-17	Infill above moderate	RM	RMH-5,800	4.6-7.5	0.25	1.7	0	0	1	No	1	Vacant	Water and sewer available to prop
004-090-05	Subdivision above moderate	RM	RMH-5,800	4.6-7.5	0.60	1.9	0	0	3	No	3	Vacant	Water and sewer available to prop
004-101-09	Subdivision above moderate	RM	RMH-5,800	4.6-7.5	1.00	4.5	0	0	5	No	5	Vacant	Water and sewer available to prop
005-071-09	Infill above moderate	RM	RMH-5,800	4.6-7.5	0.16	7.5	0	0	1	No	1	Vacant	Water and sewer available to prop
005-071-10	Infill above moderate	RM	RMH-5,800	4.6-7.5	0.17	1.2	0	0	1	No	1	Vacant	Water and sewer available to prop
005-109-48	Infill above moderate	RM	RMH-5,800	4.6-7.5	0.20	1.3	0	0	1	No	1	Vacant	Water and sewer available to prop
005-113-32	Infill above moderate	RM	RMH-5,800	4.6-7.5	0.25	1.5	0	0	1	No	1	Vacant	Water and sewer available to prop
008-270-14	Subdivision above moderate	RM	RMH-7,200	4.6-7.5	0.45	1.9	0	0	2	No	2	Vacant	Water and sewer available to prop
010-352-15	Infill above moderate	RM	RMH-7,200	4.6-7.5	0.31	3.4	0	0	1	No	1	Vacant	Water and sewer available to prop
010-352-15	Infill above moderate	RM	RMH-7,200	4.6-7.5	0.31	2.3	0	0	1	No	1	Vacant	Water and sewer available to prop
010-361-28	Infill above moderate	RM	RMH-7,200	4.6-7.5	0.32	2.3	0	0	1	No	1	Vacant	Water and sewer available to prop
010-361-27	Subdivision above moderate	RM	RMH-7,200	4.6-7.5	0.38	2.4	0	0	2	No	2	Vacant	Water and sewer available to prop
010-353-13	Subdivision above moderate	RM	RMH-7,2000	4.6-7.5	0.41	2.9		0	2	No	2	Vacant	Water and sewer available to prop



HOUSING ELEMENT

APN	Project Type	GP Designation	Zoning	Allowable Density	Acres	General Plan Max. Units	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	County Owned? (Yes/No)	Realistic capacity	Existing Use	Infrastructure Present/On-Constraint
010-550-23	Infill above moderate	RM	RMH-7,200	4.6-7.5	0.22	3.1	0	0	1	No	1	Vacant	Water and sewer available to prop
010-550-22	Infill above moderate	RM	RMH-7,200	4.6-7.5	0.22	1.7	0	0	1	No	1	Vacant	Water and sewer available to prop
011-080-55	Infill above moderate	RRH	R1-1.0	1	0.56	1.7	0	0	1	No	1	Vacant	Water and sewer available to prop
011-080-53	Infill above moderate	RRH	R1-1.0	1	0.56	0.6	0	0	1	No	1	Vacant	Water and sewer available to prop
011-020-50	Infill above moderate	RRH	R1-1.0	1	0.76	0.6	0	0	1	No	1	Vacant	Water and sewer available to prop
011-070-51	Infill above moderate	RRH	R1-1.0	1	1.05	0.8	0	0	1	No	1	Vacant	Water and sewer available to prop
011-080-31	Infill above moderate	RRH	R1-1.0	1	1.16	1.1	0	0	1	No	1	Vacant	Water and sewer available to prop
011-330-56	Infill above moderate	RL	R1-10,000	2.0-4.5	0.64	1.2	0	0	1	No	1	Vacant	Water and sewer available to prop
011-480-20	Infill above moderate	RVL	R1-0.5	2	0.51	2.9	0	0	1	No	1	Vacant	Water and sewer available to prop
011-480-21	Infill above moderate	RVL	R1-0.5	2	0.51	1.0	0	0	1	No	1	Vacant	Water and sewer available to prop
011-470-04	Infill above moderate	RVL	R1-0.5	2	0.71	1.0	0	0	1	No	1	Vacant	Water and sewer available to prop
011-470-31	Infill above moderate	RVL	R1-0.5	2	0.71	1.4	0	0	1	No	1	Vacant	Water and sewer available to prop
011-500-21	Infill above moderate	RVL	R1-0.5	2	0.88	1.4	0	0	2	No	2	Vacant	Water and sewer available to prop
011-490-09	Infill above moderate	RVL	R1-0.5	2	0.99	1.8	0	0	2	No	2	Vacant	Water and sewer available to prop



HOUSING ELEMENT

APN	Project Type	GP Designation	Zoning	Allowable Density	Acres	General Plan Max. Units	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	County Owned? (Yes/No)	Realistic capacity	Existing Use	Infrastructure Present/On-Constraint
011-480-16	Infill above moderate	RVL	R1-0.5	2	1.01	2.0	0	0	2	No	2	Vacant	Water and sewer available to prop
011-490-15	Infill above moderate	RVL	R1-0.5	2	1.08	2.0	0	0	2	No	2	Vacant	Water and sewer available to prop
011-470-17	Infill above moderate	RVL	R1-0.5	2	1.13	2.2	0	0	2	No	2	Vacant	Water and sewer available to prop
011-500-06	Infill above moderate	RVL	R1-0.5	2	1.15	2.3	0	0	2	No	2	Vacant	Water and sewer available to prop
011-500-02	Infill above moderate	RVL	R1-0.5	2	1.15	2.3	0	0	2	No	2	Vacant	Water and sewer available to prop
011-520-23	Infill above moderate	RL	R1-14,000	2.0-4.5	0.65	2.3	0	0	1	No	1	Vacant	Water and sewer available to prop
011-530-01	Infill above moderate	RL	R1-14,000	2.0-4.5	1.17	2.9	0	0	2	No	2	Vacant	Water and sewer available to prop
011-430-32	Subdivision above moderate	RL	R1-14,000	2.0-4.5	1.33	5.3	0	0	3	No	3	Vacant	Water and sewer available to prop
013-100-23	Infill above moderate	RRH	RMH-1.0	1	0.67	6.0	0	0	1	No	1	Vacant	Water and sewer available to prop
026-044-01	Subdivision above moderate	RM	RMH-7,200	4.6-7.5	1.25	0.7	0	0	6	No	6	Vacant	Water and sewer available to prop
026-430-01	Infill above moderate	RRM	RR-2.5	0.4	2.50	9.4	0	0	1	No	1	Vacant	Septic and well required
026-430-06	Infill above moderate	RRM	RR-2.5	0.4	2.50	6.3	0	0	1	No	1	Vacant	Septic and well required
026-430-10	Infill above moderate	RRM	RR-2.5	0.4	2.50	6.3	0	0	1	No	1	Vacant	Septic and well 0required
026-430-03	Infill above moderate	RRM	RR-2.5	0.4	2.50	6.3	0	0	1	No	1	Vacant	Septic and well required



HOUSING ELEMENT

APN	Project Type	GP Designation	Zoning	Allowable Density	Acres	General Plan Max. Units	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	County Owned? (Yes/No)	Realistic capacity	Existing Use	Infrastructure Present/On-Constraint
026-430-04	Infill above moderate	RRM	RR-2.5	0.4	2.50	6.3	0	0	1	No	1	Vacant	Septic and well required
026-430-07	Infill above moderate	RRM	RR-2.5	0.4	2.50	6.3	0	0	1	No	1	Vacant	Septic and well required
026-430-02	Infill above moderate	RRM	RR-2.5	0.4	2.50	6.3	0	0	1	No	1	Vacant	Septic and well required
026-430-05	Infill above moderate	RRM	RR-2.5	0.4	2.50	6.3	0	0	1	No	1	Vacant	Septic and well required
026-430-08	Infill above moderate	RRM	RR-2.5	0.4	2.50	6.3	0	0	1	No	1	Vacant	Septic and well required
026-430-09	Infill above moderate	RRM	RR-2.5	0.4	2.50	6.3	0	0	1	No	1	Vacant	Septic and well required
002-036-10	Subdivision above moderate	RMH	RMH-5,800	0.4	0.15	6.3	0	0	2	No	2	Vacant	Septic and well required



Table 38 provides a summary of the County's RHNA needs and the units provided to meet the remaining allocations in the land inventory from Table 37 above. Table 38 shows that based on the reasonable estimates of realistic capacity that were developed by the County, there is a slight surplus of sites to fulfill the RHNA.

Table 38 - RHNA and Vacant Land Summary

Income Level	2021 RHNA Allocation	Unit Provided by Land Inventory	Shortfall/Surplus
Extremely Low	23	33	0
Very Low	23	32	0
Low	40	85	+45
Moderate	39	91	+71
Above Moderate	80	80	0
Total	205	321	+116

OTHER HOUSING RESOURCES

Tribal Housing Departments

Local Native American tribes provide housing services, including programs for construction and rehabilitation of residences, relocation assistance, and emergency housing. Although units produced pursuant to these programs on tribal lands cannot be counted toward the RHNA, the programs provide important resources for housing production and support for affordable and emergency housing in Inyo County.

ANALYSIS OF GOVERNMENTAL CONSTRAINTS

Housing affordability is affected by factors in both the private and public sectors. Actions by the County can have an impact on the price and availability of housing in Inyo County. Land use controls, site improvement requirements, building codes, fees, and other local programs intended to improve the overall quality of housing may serve as a constraint to housing development.

Land Use Controls

Land use and 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 Land Use Element of the Inyo County General Plan and corresponding zoning provide for a full range of residential types and densities dispersed throughout the county. Residential densities in Inyo County provide for a wide range of development from Residential High (RH), which has a minimum density requirement of 15.1-dwelling units per acre and a maximum of 24-dwelling units per acre and its corresponding zoning districts for multiple residential, to larger lot 5-acre minimum rural residential designations. The Zoning Ordinance contains six residential districts that correspond to the residential densities established in the General Plan. Further description of each zone can be found in Table 39 below.

Table 39 - Land Use Designations

Land Use Designation	Description
Rural Residential (RR)	Intended to protect established neighborhoods of one-family dwellings and to provide space in suitable locations for additional development of this kind, with appropriate community facilities.
Starlite Estates Zone (RR-0.5)	Provides suitable areas and appropriate environment for low density, single-family rural residential uses, where certain agricultural activities can be successfully maintained in conjunction with residential uses. The RR (rural residential) 0.5 acre-Starlite Estates zone is intended to be applied to the area known as Starlite Estates and adjoining private lands which may be without fully developed services.
One Family Residence (R-1)	Intended to protect established neighborhoods of one-family dwellings and to provide space in suitable locations for additional development of this kind, with appropriate community facilities.
Multiple Residential (R-2)	Intended to protect established neighborhoods of such dwellings and to provide space suitable in appropriate locations for additional housing developments of duplexes.
Multiple Residential (R-3)	Provides a zone classification for those areas designated for multiple residential development beyond that permitted by the R-2 zoning district. It is intended to provide locations for multiple-housing developments such as apartments, townhouses, condominiums and mobile home parks.

Source: Inyo County code, 2009

Tables 40 and 41 below show the development standards for each residential land use and zoning designation. Residential densities range from less than 1 dwelling unit per acre in the Residential Ranch, Residential Estate, and Rural Residential designations to between 15.1 and 24 units per acre in the Residential High designation. The maximum height limit for residential units in the R-2 and R-3 zones under the Residential Medium High and Residential High designations allows up to 3 stories or 40 feet, which is appropriate for population centers where higher density development is encouraged in a rural area such as Inyo County. Parking standards for single-family require two off- street parking spaces per unit. The requirements are appropriate for a rural county and are



considered vital to preserving the county’s character. Therefore, considering the variety of land use and zoning designations provided by the County’s General Plan and Zoning Ordinance, the development standards displayed in the following two tables do not constrain housing development.

These standards will be reviewed and updated to provide for higher densities and FARs, smaller minimum lot sizes and lower parking requirements to match with corresponding changes to zoning design standards by December 2024.



Table 40 - General Plan Land Use Designations for Residential and Commercial Uses

General Plan					Zoning		
Land Use Designation	Label	Residential Density (du/acre)	Non-residential Intensity (FAR)	Minimum Parcel Size (Acre)	District	Label	Minimum Lot Size
Residential							
Residential High	RH	15.1–24.0	N/A	N/A	Multiple Residential	R-3	10,000 sq. ft.
Residential Medium-High	RMH	7.6–15	N/A	N/A	Multiple Residential	R-2	6,500 sq. ft.
					Multiple Residential	R-3	10,000 sq. ft.
					Single Residential or Mobilehome Combined	RMH	Varies (5,800 sq. ft. typical)
Residential Medium	RM	4.6–7.5	N/A	N/A	One Family	R-1	1 acre
					Single Residential or Mobilehome Combined	RMH	Varies (5,800 sq. ft. typical)
					Misc.	Misc.	Misc.
Residential Low	RL	2.0–4.5	N/A	N/A	One Family	R-1	1 acre
					Single Residential or Mobilehome Combined	RMH	Varies
					Misc.	Misc.	Misc.
Residential Very Low	RVL	2.0	N/A	0.5	One Family	R-1	None
					Single Residential or Mobilehome Combined	RMH	Varies
					Starlite Estates	RR-0.5 Starlite	0.5 acre



General Plan					Zoning		
Land Use Designation	Label	Residential Density (du/acre)	Non-residential Intensity (FAR)	Minimum Parcel Size (Acre)	District	Label	Minimum Lot Size
Residential Rural High	RRH	1.0	N/A	1.0	Rural Residential	RR	1 acre
					One Family	R-1	1 acre
					Single Residential or Mobilehome Combined	RMH	Varies
					Misc.	Misc.	Misc.
Rural Residential Medium	RRM	0.4	N/A	2.5	Rural Residential	RR	1 acre
Residential Estate	RE	0.2	N/A	5	Rural Residential	RR	1 acre
Residential Ranch	RR	0.1	N/A	10	Rural Residential	RR	1 acre
Commercial							
Central Business District	CBD	7.6–24.0	1.00	N/A	Central Business	CB	10,000 sq. ft.
Retail Commercial	RC	7.6–24.0	0.40	N/A	General Commercial and Retail	C-1	10,000 sq. ft.
					Highway Services and Tourist Commercial	C-2	10,000 sq. ft.
					Misc.	Misc.	Misc.
Heavy Commercial/Commercial Service	HC	7.6–24.0	0.40	N/A	Heavy Commercial	C-4	10,000 sq. ft.
Resort/Recreational	REC	0.4–24.0	0.40	2.5	Open Space	OS	40 acres
					Commercial Recreation	C-5	5.0 acres
					Misc.	Misc.	Misc.
					Misc.	Misc.	Misc.
					Misc.	Misc.	Misc.

Source: Inyo County Zoning Ordinance and General Plan.



Table 41 - Additional Residential Zoning District Development Standards

Development Standard	RR	RR-0.5	R-1	R-2	R-3	RMH
Minimum Lot Width	125 ft	100 ft	50 ft	50 ft	75 ft	50 ft
Front Yard Setback	50 ft	25 ft	25 ft	25 ft	15 ft ³	25 ft
Interior Side Yard Setback ²	20 ft	5 ft	5 ft	5 ft	5 ft ¹	5 ft
Street Side Yard Setback ²	20 ft	5 ft	5 ft	5 ft	5 ft ¹	5 ft
Rear Yard Setback ²	30 ft	25 ft	20 ft	20 ft	15 ft	20 ft
Maximum Building Height of Primary Structures ¹	2.5 stories	2.5 stories	2.5 stories	3 stories (or 40 ft)	3 stories (or 40 ft)	2.5 stories
Parking	2 sp/du	2 sp/du	2 sp/du	2 sp/du	2 sp/du; 1 guest sp/4 du	2 sp/du

Source: Inyo County code, 2009; Land Use Element of General Plan

¹ 5 feet for one-story. An additional 5 feet per story is required for multi-story projects.

² Accessory structures (other than second dwelling units) may encroach into required side and rear yards in the rear half of the property, provided that at least a 5-foot setback from the property line is maintained. In the R-3 zone, no rear yard setback is required. In the RMH zone, primary structure encroachments may be permitted into the rear yard under specified circumstances.

³ Exceptions apply.

PROVISION FOR A VARIETY OF HOUSING TYPES

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 identification is evaluating the County's Zoning Code and its provision for a variety of housing types. Housing types include single-family dwellings, duplexes, guest dwellings, mobile homes, group residential homes, multiple unit dwellings, convalescent homes, accessory structures, supportive housing, and single-room occupancy units. Table 42 below summarizes the housing types permitted, conditionally permitted, and prohibited under the County's Zoning Code and is updated based on the required changes generated from this update.

The Zoning Ordinance permits residential development in the county's non-CB commercial districts as a conditional use. In the CB zone, multi-family uses are conditionally permitted and mixed-use is permitted by right. ADUs and JADUs are allowed in all of the residential and mixed use zones. Single family homes are allowed in the industrial zones as an accessory use if occupied by the owner, lessee, caretaker, or watchman of the business and agriculture worker housing is allow in the Open Space zone. Mobile home parks are permitted in the commercial, C-5 zone. The County has approved an ordinance to conditionally permit multiple dwellings and mixed uses in the remaining non-CB commercial zones. The county is also updating the CB Zone to allow for 100-percent residential (multi-family) without a conditional use permit and mixed-use with 50-percent residential development.

As part of Program 7.1.1, the County will ensure updates to the zoning code pursuant to SB-9 in all areas where SB-9 apply. The County will also update residential zones to reduce minimum lot size requirements, setbacks and parking requirements as well as change some of the current one-family zones to multi-family. After the SB9 updates, additional updates will begin with the Lone Pine area as a program targeted to providing more housing opportunities in a low opportunity area. Additionally, as part of Program 3.1.4, the County will permit SRO's ministerially and add them as a permitted use in the R3 Zone to encourage naturally affordable housing types, by the end of 2024.

All of the residential and commercial zoning design standards will be reviewed and updated to provide for higher densities, smaller minimum lot sizes, reduced setbacks and lower parking requirements to match with corresponding changes to the General Plan standards by December 2024.

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Table 42 - Housing Types Permitted by Zoning District

Housing Types	RR	RR-0.5	R1/RMH	R-2	R-3	C-1	C-2	C-3	C-4	C-5	CB	OS
Single-Family Detached	P	P	P	P	P	P ²	P ²	P ²	P ²	P ²	C ¹	P
Accessory Dwelling Units/Junior Accessory Dwelling Units	P	P	P	P	P	P	P	P	P	P	P	P
Single-Family Attached	P	P	P	P	P	P ²	P ²	P ²	P ²	P ³	C ¹	NP
Duplexes	NP	NP	NP	P	P	C	C	C	C	P	P	NP
Multi-family 3-units and above	NP	NP	NP	NP	P	C	C	C	C	C	P	NP
Mobile Homes/Manufactured Homes	P	P	P	P	P	P ²	P ²	P ²	P ²	P ³	C ¹	P
Farm Worker Housing	NP	NP	NP	NP	NP	NP	NP	NP	NP	NP	NP	P
Emergency Housing/Shelters	NP	NP	NP	NP	NP	A ⁵	A ⁵	A ⁵	A ⁵	A ⁵	A ⁵	NP
Single-Room Occupancy (SRO)	NP	NP	NP	NP	P	P	P	P	NP	NP	P	NP
Transitional/Supportive Housing/ Group Homes	P*	P*	P*	P*	P*	P*	P*	P*	P*	P*	P*	NP
Boardinghouse	NP	NP	NP	C	NP	NP	NP	NP	NP	NP	NP	NP
Mobilehome Park	NP	NP	NP	C	C	NP	NP	NP	NP	C	NP	NP
Residential Care Facility	C	NP	NP	NP	P	NP	NP	NP	NP	NP	NP	NP

Source: Inyo County Zoning Code, 2021

P = Permitted Use

C = Conditional Use

A = Accessory Use

NP = Not permitted

P* = Transitional housing, supportive housing and group homes are permitted in the same manner as other residential dwellings of the same type in the same zone

(Government Code Section 65583(a)(5)).

¹ *Conditionally allowed when: A detached residential dwelling unit, if it is for occupancy by the owner or lessee of the business premises on the same parcel, or by a caretaker or watchman.*

² *A dwelling unit within a business building may be qualified as an accessory use if it is for occupancy by the owner or lessee of business premises therein, or by a caretaker or watchman, provided that a minimum fifty percent of the usable floor area is being utilized for the principal permitted use.*

³ *As an accessory use: dwellings of persons regularly employed on the premises for commercial recreational activities. Mobile homes may be used for this purpose.*

⁴ *Allow outright if proposal meets the requirements provided for in CA Government Code 65662*

⁵ *Parking requirements can only include for staff working at the facility*

Density Bonus Overlay Zoning District

The State enacted density bonus law to allow developers to build residential projects at greater densities than a jurisdiction's General Plan allows if such projects include very low, low and moderate- income housing units. Inyo County's Density Bonus Overlay Zone District (Inyo County code Chapter 18.65) was adopted in 2004 and amended in 2007. It follows the provisions of CA Government Code 65915 Density Bonuses and other Incentives, and includes language that *'the maximum building density for any affordable housing development or senior citizen development shall be as follows or as required by statute . . .'* Or, as required by statute' causes the County's Density Bonus Zoning 18.65 to continue to be in compliance as any updates to the building densities made by the state automatically update the code. The County will, however, update its Density Bonus code section to consistently reflect current State law as the table included does not.

Central Business Zoning District

The County's General Plan, which was adopted in 2001, included provisions to allow for mixed and residential uses in commercially designated areas. Subsequently, the County implemented the General Plan's direction to permit such uses in the Central Business (CB) District land use designation. This action instituted a new CB zoning district in the hearts of Big Pine, Independence, Lone Pine, and Keeler that conditionally permits multiple dwellings and permits mixed uses by right. The ordinance creating the new CB zoning district regulations and amending the County's zoning maps accordingly was adopted in early 2007, and it is current.

The County is also including a program to allow multi-family dwellings in the CB zone by right (Program 3.2.3) by December 2024.

Multiple Dwellings and Mixed Uses in all Commercial Zoning Districts

The County's General Plan and Zoning Code include provisions to allow for mixed commercial and residential use in all of the County's commercially designated areas as conditional uses, except for the CB zone where mixed use is allow outright. The County is also including a program to allow for by right mixed use in additional commercial zones (Program 3.2.3) by December 2024.

Constraints to Housing for Persons with Disabilities (Community Care Facilities Act SB 520)

Inyo County recently updated its Zoning Code with a process for individuals with disabilities to make requests for reasonable accommodation with respect to zoning, permit processing, or building laws. The Planning Director may administratively approve requests for modification to certain standards with regard to reasonable accommodation (Program 6.3.1). The County Building and Safety Division is also responsible for ensuring that all building permit applications for new construction meet the requirements of the Americans with Disabilities Act (ADA) and the California Disabled Accessibility Guidebook (CalDAG). Additionally, any permits for renovation or structure modification require that the structure be brought into conformance with ADA and CalDAG.

Senate Bill 812 (Persons with Disabilities)

In January 2011, California housing element was amended by SB 812. This law requires an analysis of the special housing needs of persons with disabilities, including an estimate of the number of persons with developmental disabilities, an assessment of their housing needs, and discussion of potential resources. SB 812 defines a "developmental disability" as a continuing disability that originates before an individual becomes 18 years old, and includes Mental Retardation, Cerebral Palsy, Epilepsy, and Autism. These estimates can be found in the Person's with Disabilities section.

Zoning and Land Use

In effort to remove any zoning or land use regulations that may inhibit the development of housing and facilities for disabled persons the County updated its Zoning Code with language addressing reasonable accommodation. Also, the 2004 update of the Zoning Code reviewed and modified the County's policies to ensure compliance with fair housing law, including occupancy standards. These are still relevant in this 2021 update.

The Zoning Code does not provide residential parking standards for persons with disabilities that differ from the County's regulated parking standards. However, exceptions to the parking requirements may be granted in conjunction with any discretionary development permit, including a reduction in parking requirements for special needs housing.

Inyo County has made efforts to remove constraints on housing for persons with disabilities by providing flexibility as to the location of group homes, adult day care homes, and residential care homes and facilities. Residential care facilities for more than 6 persons must be permitted without discretionary review in all residential zones. The County will update its zoning code to correctly state this (Program 6.2.1). Updates to this program will also include defining application requirements as well as approval findings for Reasonable Accommodation.

Permits and Processing for Reasonable Accommodation

The County strives to remove any permitting and processing barriers for persons with disabilities by ensuring that requests to retrofit homes for accessibility comply with ADA and CalDAG, and meet all

of the development and building standards in Title 24. These would be reviewed on a case by case basis by Building and Safety staff in conjunction with planning staff. The Planning Director will approve the exceptions to the zoning (Program 6.3.1).

Building Codes

The County uses and enforces the Uniform Building Code (UCB) as its local building code as mandated by the State Attorney General. The County does not have additional building codes beyond what is in the UCB. These codes are considered to be the minimum necessary to protect public health, safety, and welfare. Enforcement of the UCB is delegated to the County's Building and Safety Department and is carried out at the plan review stage and at the time of building/site inspection as well as thorough code enforcement. All work for which a building permit is issued must be inspected at the time of completion and/or at specified stages of construction. Inyo County does not have cases where the cost or length of time to obtain a building permit have hampered or ended a development project. Typically, the time from a call for a request for an inspection to the time the building inspector shows up is less than a week. Inspections to the remote areas of the County tend to take longer than those located in the Owens Valley.

Any request by a developer to build units under the minimum set by the General Plan and implemented by the zoning code, would require a Variance approval from the Planning Commission. A request to lower the unit requirement in a multi-family zone or commercial zone that does not have a verifiable reason based on a parcel's inability to accommodate the units would not be recommend by staff and would not likely be approved by the Planning Commission.

The County does not have code that conflicts with the UCB or that might diminish the ability to accommodate persons with disabilities and as discussed above the County is open to amendments to its codes as long as the health and safety of persons who may be affected are not affected by them.

The county had approximately 1,708 residents living with a disability according to the 2020 HCD Data Package American Community Survey and roughly 128 with Developmental Disabilities, also per the HCD data. To better accommodate the needs of this population and provide for persons with disabilities seeking fair access to housing in the application of its zoning and building regulations, the County has incorporated a reasonable accommodations ordinance into the Zoning Code per Program 6.3.1. This ordinance will provide a means of requesting exceptions to the zoning and building regulations that may be a barrier to fair housing opportunities. These requests will be reviewed on a case by case basis and will be approved based on a criterion that the building inspectors' finding that the proposed changes will not affect the building's ability to meet building and safety code. Additionally, the County has amended the Zoning Code to allow residential care facilities for 6 or fewer persons in all residential zones as permitted uses as well as Single Room Occupancy opportunities are allowed in all of the County's commercial zones.

State Requirements Regarding Fire Hazards

Senate Bill 1241 Section 66474.02 was added to the Government Code on September 13, 2012. 66474.02. It requires that before approving a tentative or a parcel map for which a tentative map was

not required, the legislative body of a County make three findings regarding areas located in either a state responsibility area or a very high fire hazard severity zone, these findings include:

(1) A finding supported by substantial evidence in the record that the design and location of each lot in the subdivision, and the subdivision as a whole, are consistent with any applicable regulations adopted by the State Board of Forestry and Fire Protection pursuant to Sections 4290 and 4291 of the Public Resources Code.

(2) A finding supported by substantial evidence in the record that structural fire protection and suppression services will be available for the subdivision through any of the following entities:

(A) A county, city, special district, political subdivision of the state, or another entity organized solely to provide fire protection services that is monitored and funded by a county or other public entity.

(B) The Department of Forestry and Fire Protection by contract entered into pursuant to Section 4133, 4142, or 4144 of the Public Resources Code.

(3) A finding that to the extent practicable, ingress and egress for the subdivision meets the regulations regarding road standards for fire equipment access adopted pursuant to Section 4290 of the Public Resources Code and any applicable local ordinance.

(b) This section shall not supersede regulations established by the State Board of Forestry and Fire Protection or local ordinances that provide equivalent or more stringent minimum requirements than those contained within this section.

These new requirements have already affected the County's ability to subdivide land, as the findings have proven impossible to meet due to the County's very rural nature and the fact that Cal Fire will not enter into agreements to provide service to residential areas. Fire Districts in the County are all volunteer organizations. This makes providing additional facilities and firefighters extremely difficult. Currently, no subdivision applications affected by SB-1241 include those that have been identified in this updated Housing Element for meeting the County RHNA, the County anticipates, however, that the fire findings will continue to be an issue until there are changes or clarifications in SB-1241.

Second Residential Units/Accessory Dwelling Units

To ensure compliance with new State ADU laws and to mitigate the constraints to the development of ADUs, the County amended the Zoning code to allow for ADUs as permitted uses, in all Residential and Mixed Use zones, and allows all ADU applications to be ministerially reviewed for conformance with the minimum allowable standards. The County is also participating in a loan program for housing rehabilitation and ADU and JADU development and it has been included as a program (Program 3.1.2).

To meet the County's RHNA, a total of 32 ADUs and JADUs are projected during the planning period, for a total of 4 per year. Given the County's programs to develop a promotional brochure on ADUs within one year certification, an acceleration in permits can be anticipated. In addition, as part of Program 7.1.1, the County is also considering permitting 2 ADU's on many single unit lots, with incentives for deed restrictions for affordability. To ensure that its targets are being met, the County added a monitoring component to Program 3.1.2 to see that projections are being met and will recalculate, if necessary.

Emergency Shelters, Transitional and Supportive Housing

The County’s zoning code allows transitional housing as a permitted use in all residential zones and emergency shelters as a permitted use in the Commercial Zone – Highway Services and Tourist Commercial (C2). This complies with Senate Bill 2 (SB 2) that was signed into law effective January 1, 2008. The C2 zoning encompasses approximately about 490-acres over 166-parcels. Currently, there are 8-vacant parcels of land with the C2 Zoning designation. They range in size from about 100,000- sq-ft to 8,000-sq-ft. Any of these could be used as a whole parcel or the parcel could be partially used for emergency shelters. They also range in location and are found in Pearsonville, Olancho, Cartago, and there are several in the City of Bishop. This indicates there is potential for emergency shelters to be built on each end of the County and in the most populated area – Bishop. To satisfy the requirement that emergency shelters must be regulated the same as other residential uses of the same type in the same zone the County will review and update its code where necessary (Program 5.1.1).

Additionally, transitional and supportive housing types must be considered residential uses and be subject only to the restrictions that apply to other residential uses of the same type in the same zone. Both “transitional” and “supportive” housing must be explicitly defined as they are in the California Health and Safety Code Sections 50675.2 and 50675.14, respectively. Transitional housing may take many forms, including group housing or multi-family units, and may provide supportive services for its recipients but with a limited stay of up to 6-months. Supportive housing is more permanent in nature, is linked to either on-site or off-site services, and is occupied by a target population as defined by Health and Safety Code 53260 such as persons with AIDS, low-income persons with mental disabilities, person recovering from substance abuse, or persons with chronic illnesses.

To comply with current State regulations, the County will expand its definition of transitional housing and will add a separate definition for supportive housing types to ensure clarity in the zoning code. Transitional and supportive housing will also be listed as permitted accessory uses in each residential zone. To satisfy the requirement that these use types must be regulated the same as other residential uses of the same type in the same zone the County will review and update its code where necessary (Program 5.1.1).

AB 2162, which updated Government Code 65651, requires that supportive housing meeting specific criteria be permitted by right where multi-family housing is permitted including in mixed use and nonresidential zones. And if such housing is located within half mile from transit, no minimum parking can be required. The County will update the zoning code to ensure compliance with AB 2162 (Program 5.1.1).

Extremely Low-Income Households

Assembly Bill 2634 (AB 2634) (Lieber, 2006) requires the quantification and analysis of existing and projected housing needs of extremely low-income households. The County’s existing need is documented in Table 37 and its projected need is 23-units, which is half of its official very low-income allocation as discussed in the RHNA section. Housing Element updates must also identify zoning to encourage and facilitate housing for extremely low-income households. These housing types tend to be supportive housing and single-room occupancy units (SROs). As noted in the discussion of

transitional and supportive housing above, Program 3.1.4 addresses the County's need to facilitate supportive housing types.

In an effort to facilitate the development of housing for extremely low-income households and comply with AB 2634, the County has explicitly listed single-room occupancy unit as a use type in the Zoning Code. SROs are typically meant for occupancy by one person as they are small (200–250 square feet) and may include food preparation or sanitary facilities, or both. The update includes SROs as an outright permitted use in the R3, C1, C2, C3, and CB (Program 3.1.4). Program 3.2.3 will also expedite SRO development by allowing for by right multi-family residential development in the R3 and CB zone. Program 5.2.2 addresses development standards currently found in the County's zoning code that can hinder high density and affordable housing. It, among other things addresses parking standards that may be acting as a hindrance to development. Program 3.1.4 includes allowing for SROs in the R3 zone, as well.

Zoning and Building Permit Fees - Transparency

Inyo County charges various fees for development permitting. These fees are set to only cover the cost of staff time to process permits. Table 43 summarizes the County's fee requirements for residential development. These fees are considerably lower than fees charged in most jurisdictions throughout the state. Fees do not impose an unreasonable burden upon applicants, as Inyo County has one of the lowest fee structures in the state.

A typical building permit is a ministerial action in Inyo County, meaning additional landuse entitlements and/or CEQA review - are not required. After a building permit is submitted, it is reviewed by Planning Department staff for zoning consistency. Typically, there are no zoning issues that cause a land use entitlement to be required (for those that might occur, see Tables 43 and 44). For this typical review, the Planning Department charges \$50. Building and safety also charges for building permit applications. According to the Building and Safety Department, the cost of a building permit is set by the value of the work being done including material and labor. The total cost is generated by the Engineering New Record Building Cost Index. A typical building permit for an average single family home in the County is roughly \$7,000. A multi-family home building permit is more difficult report. There has been one multi-family project in about 10-years. It was a triplex that had a building permit fee of \$6,785, which represents an approximate \$2,262 per unit cost. Currently multi-family projects with over 15-units also require a Conditional Use Permit (\$1,490). Program 2.1.4 is being added to remove the requirement for multi-family housing over 15 units to require a conditional use permit as a way to lower the cost of larger multi-family developments. Applicants can find all of the information they need to complete an application for a building permit on the County's website. The fee structure for land use entitlements and 'how to' handouts are also available. Anyone can also access the County's Geographic Information Systems portal to look up individual parcels to find zoning and General Plan designations as well as parcel size. The County Planning Department webpage provide access to the General Plan and its land use designations. The zoning code can be found on the County's main page, as well as, through a link on the Planning Department webpage. It contains all of the development standards necessary to prepare a development proposal. In addition to this, planning and building and safety staffs are always available to answer questions via phone call or email.

**Table 43
Inyo County Typical Fees for a Typical Residential Development**

TYPICAL FEES FOR TYPICAL RESIDENTIAL DEVELOPMENT		
FEE CATEGORY	FEE AMOUNT	
PLANNING AND APPLICATION	Single-Family	Multifamily
Plan Check – Zoning Review (Planning Department)	\$50	\$50
Building Permit (Building and Safety Department)	Approx. \$7,000	Approx. 2,262 per unit
Total Building Permit Fees	\$7,050	Approx. 2,312 per unit
SUBDIVISION		
Certificate of Compliance	\$1,000	\$1,000
Parcel Merger	\$600	\$600
Parcel Map	\$1,800	\$1,800
Tract Map	\$2,325	\$2,325
ENVIRONMENTAL		
Initial Study	\$500	\$500
Negative Declaration	\$600	\$600
Environmental Impact Report	Cost deemed by estimate	Cost deemed by estimate
IMPACT		
List typical fees, e.g., Police, fire, water and sewer, etc.	N/A	N/A
LAND USE ENTITLEMENTS – NOT TYPICAL FOR RESIDENTIAL DEVELOPMENT	Single-Family	Multifamily
Conditional Use Permit – A conditional use permit is required by the County for Multi-family structures over 15-units (R-3 zone)	Not Typical \$1,500	\$1,490
Variance – Variances may be required if the proposed project does not meet the development standards of the district in which it is proposed.	Not Typical \$1,500	Not Typical \$1,500
General Plan Amendment – A General Plan Amendment would be required if someone wished to change the designation or allowed residential density of a parcel.	Not Typical \$1,525	Not Typical \$1,525
Zone Reclassification – A Zone Reclassification would be required if someone wished to change the designation or allowed residential density of a parcel.	Not Typical \$1,450	Not Typical \$1,450

On/Off-site Improvement Standards and Impact fees

The County does not currently charge the type of impact fees common in many municipalities. Instead, it requires each land developer to mitigate only the problems that their subdivision or project creates. For example, if a subdivision is located in an area where drainage may be an issue, the developer is required to mitigate the problem so that it will not adversely affect surrounding properties. For roads, the County’s requirements are based on Caltrans requirements which specify only those on- and off-site improvements necessary to maintain an efficient and safe road system.

The exclusion of costly impact fees effectively reduces the cost of developing housing in Inyo County. More specifically, the County subdivision ordinance requires 60-foot street widths for local and collector streets, with curbs, gutters and sidewalks (40 feet with a waiver). However, “rolled curbs” are permitted, and the Planning Commission often waives requirements for sidewalks where circumstances warrant, such as in lower density developments. The County also provides flexibility in these requirements for affordable housing projects. Circulation improvements in mobile home parks are governed by Title 25, which allows for gravel roads and reduced street widths, resulting in lower development costs.

In addition to County fees charged at the time building permits are issued, fees for sewer and water connections and school impact fees are collected by each individual district. These fees vary widely by district according to the services they provide, individual financial and project objectives, and the special circumstances of each district. The fees these districts charge are not under the control of the County.

Table 44 - Process, Procedures and Timeframes

	Process/Procedure	Time/Approximately
Single Family Dwellings	A Plan check review is conducted for zoning and general plan compliance, including: density, height, setbacks, use, parking and environmental factors.	One week
Multi Family Dwellings	A Plan check review is conducted for zoning and general plan compliance, including: density, height, setbacks, use, parking and environmental factors.	One week
Ministerial Building Permit	For new homes, building permits typically can be reviewed and approved in two to three weeks. The permit is reviewed by both the Building and Planning Departments before final approval.	2-3-weeks
Tentative Tract Map	Reviewed by Subdivision Committee and other required agencies; CEQA evaluation is conducted; Planning staff presents to Planning Commission; if approved Final Map must be approved by Board of Supervisors	45-90-days The applicant then has 2-years to complete and submit the Final Map.
Tentative Parcel Map	Reviewed by Subdivision Committee and other required agencies; CEQA evaluation is conducted; Planning staff presents to Planning Commission; if approved Final Map must be approved by Board of Supervisors	45-90-days The applicant then has 2-years to complete and submit the Final Map.
Conditional Use Permit and Variance	Reviewed by County departments, planning staff and other required agencies; CEQA evaluation is conducted; Planning staff presents to Planning Commission.	30-90-days
Enforcement	Inyo County enforces the California State Building Codes (UBC). These codes are considered to be the minimum necessary to protect public health, safety, and welfare. Enforcement of the UBC is delegated to the County's Building and Safety Department and is carried out at the plan review stage and at the time of building/site inspection. All work for which a building permit is issued must be inspected at the time of completion or at specified stages of construction. Inyo County primarily enforces housing code violations through inspections performed on a complaint basis. Where code citations are issued, property owners are given a reasonable time frame in which to correct deficiencies.	30-days and up

ANALYSIS OF NON-GOVERNMENTAL CONSTRAINTS

Fees, site improvement costs, processing and permit procedures, building codes, land use controls, availability of public services, and environmental considerations are necessary considerations but do not impose significant constraints to development in Inyo County in comparison to non-governmental factors such as limited private land resources and high housing costs in relation to incomes. These variables are national in scope and widely recognized. The discussion below focuses on these non-governmental and market constraints to housing development.

Land Costs

While land costs in Inyo County are well below highly urbanized areas, the scarcity of privately owned vacant land has resulted in inflated land values (especially in northern Inyo County near Bishop). The most significant constraint to provision of additional housing opportunities in Inyo County is the lack of privately owned vacant land. Currently land costs in the County, based on Zillow listings, range from around \$11,000 for a third of an acre in Olancho to \$225,000 for just over a third of an acre in the Bishop area. These land costs are lower than the State average, but can still constrain development. According to the Federal Housing Finance Agency, the average land value in California in 2019 was \$512,500 for a quarter-acre lot.

Construction Costs

Construction costs include materials, labor, construction financing, and builder profit. These costs will vary depending on structural requirements and by the quality of the construction (such as roofing materials, carpeting, cabinets, bathroom fixtures, and other amenities). Because of these factors, it is hard to establish an absolute measure of construction cost.

The International Code Council provides estimates of construction costs. The average cost to construct a one-two residential unit home (2020) is \$124-\$157 per square foot. Multi-family buildings average \$114-\$169 per square foot. Based on previous evaluations, the material costs represents about 57-percent, labor costs approximately 42-percent, and equipment 1-percent of the total cost estimate. This would make a modest 1,200-square-foot house cost about \$148,800 to build.

Custom homes and units with extra structural requirements or amenities can run much higher. Lower costs can be achieved by reducing amenities and using less costly building materials, decreasing construction financing costs, and use of alternative construction methods such as manufactured housing or mobile homes. Additional savings can be realized through use of mass production methods. This can be of particular benefit when density bonuses are used for the provision of affordable housing.

Though the County does not have much control over market conditions, lower housing costs can be achieved by encouraging (a) reduction in amenities and quality of building materials (above a minimum acceptability for health, safety, and adequate performance); (b) availability of skilled construction crews

who will work for reasonable wages; and (c) use of manufactured housing (including both mobile home and modular housing).

An additional factor related to construction costs is the number of units built at the same time. When the number of units developed is increased, construction costs over the entire development are generally reduced based on economies of scale. This reduction in costs is of particular benefit when density bonuses are used for the provision of affordable housing.

Infrastructure Constraints

Another factor adding to the cost of new construction is the cost of providing adequate infrastructure including major and local streets, curbs, gutters, sidewalks, water and sewer lines, and street lighting. In many cases, these improvements are dedicated to the County which is then responsible for their maintenance. The cost of these facilities are typically borne by developers and added to the cost of new housing units and eventually passed on to the homebuyer or property owner. The County, typically, does not, require these types of exactions. This can be attributed to several factors, but is primarily because large housing developments – do not – get built in Inyo County. New housing units are most commonly single family homes (frequently manufactured) located on vacant parcels within an already established neighborhood, or in a remote area on a large lot. Services are generally already available or the development requires septic and well installations. Roads are usually already available built and most do not have sidewalks. The County looks at each project individually and requires each land developer to mitigate only the problems that their subdivision or building project creates. For example, if a subdivision is located in an area where drainage may be an issue, the developer is required to mitigate the problem so that it will not adversely affect surrounding properties. For roads, the County's requirements are based on Caltrans requirements which specify only those on and off- site improvements necessary to maintain an efficient and safe road system.

Availability of Financing

Interest rates are determined by national policies and economic conditions, and there is little that local governments can do to affect these rates. Although Inyo County cannot affect interest rates charged by lending institutions, they can assist developers of low cost housing in finding more favorable financing, such as financing through the Community Reinvestment Act. According to lending institutions in the county, currently, most homebuyers will secure a mortgage with an interest rate between 2.5 and 4 percent, depending on the financial position of the mortgage applicants.

Environmental Constraints

Some land in Inyo County is unavailable for development because of environmental features. These features either pose a hazard to those who may choose to build in the area or diminish valuable resources. As a result, County regulations limit development in these areas because of the danger involved. Environmental constraints to development include the following:

- Geologic Hazards – Earth quake zones, landslide and avalanche areas and other geologic hazards may pose a threat to property and lives. County policy discourages development in these areas to ensure the public's safety, although it does not prohibit it.

- Soils with Low Permeability Rates – Many parts of the county are not served with public sewer systems and therefore must rely on septic systems. In some parts of the county, non-engineered septic systems cannot be used because the soils have low permeability rates which prevent effective operation of septic tank systems.
- Excessive Slope – In areas of 30-percent slope, improvements for accessibility, site preparation, and sewage disposal are very difficult.
- Listed Species – In some areas of the county, private land is situated within endangered or threatened species habitats. Development within these areas requires mitigation measures that may be costly to implement.

Energy Conservation

Inyo County has adopted and implemented Title 24 of the California Code of Regulations through its Building and Safety Department. This allows the County to apply the most up-to-date energy conservation standards to all new residential buildings (and additions to residential buildings) except hotels, motels, and buildings with four or more habitable stories. The regulations specify energy-saving design for walls, ceilings, and floor installations, as well as heating and cooling equipment and systems, gas cooling devices, conservation standards, and the use of non-depleting energy sources, such as solar energy or wind power.

Opportunities for additional energy conservation practices include the implementation of “mitigation measures” contained in environmental documents prepared on residential projects in Inyo County. The energy consumption impacts of housing developments may be quantified within the scope of these reports, prepared by or for the County. Mitigation measures to reduce energy consumption may be proposed in the appropriate section of the reports. These mitigation measures, in turn, may be adopted as conditions of project approval.

Although the standards seem extensive and costly, builders and consumers realize that the benefits in energy savings over the long run outweigh the initial cost, especially in climates like that of Inyo County. Utilities now account for a substantial amount of the total monthly cost of maintaining a house. Building energy-efficient homes and encouraging weatherization programs will over time reduce residents’ monthly housing expenses (Program 1.3.1).

Zoning Ordinance 18.79 governs the installation of small wind energy conversion systems in the unincorporated portion of the county. The ordinance is designed to allow residents to take advantage of generating power via wind while ensuring that the placement and installation of wind energy conversion systems does not have an adverse impact on public health and safety.

The county encourages small-scale renewable energy facilities in the Government Element and through the Renewable Energy General Plan Amendment. The County also provides for streamlined permitting for small-scale, such as roof-top and ground mount solar energy generation.

Energy Conservation Programs for Low-Income Households

Southern California Edison (SCE) operates numerous programs that are available to assist low-income families with conserving energy and reducing expenditures for electricity. The High Bill Helper provides for rebates for new air conditioners, refrigerators, swamp coolers, and pool pumps. The Energy Star Lighting program provides compact fluorescent bulbs. Through its Energy Management Assistance program, SCE pays for purchase and installation of certain appliances for income-qualified applicants. SCE's CARE and FARE programs provide for utility bill reductions for income-qualified applicants as well. Additionally, local SCE staff will undertake on-site energy audits upon request to advise how to reduce energy consumption and associated costs.

LADWP has similar programs to help with rebates for inefficient appliances and assistance for low-income rate payers through its Lifeline program. LADWP staff will also provide energy audits upon request.

CHAPTER FOUR: PROGRESS IN MEETING 2014 HOUSING ELEMENT GOALS

Appendix B includes a table of the effectiveness of the implementation measures from the 2014 Housing Element. The County did not include programs for special needs housing in the 2014 version. To remedy this exclusion Programs: 3.1.4, 5.1.1, 6.3.1 and 7.1 have been included in this 6th Cycle Housing Element Update.

The County's primary accomplishments regarding the Housing Element has been updating the zoning code to make Accessory Dwelling Units and Junior Accessory Dwelling Unit development, only subject to County design guidelines when they are not in conflict with State regulation; beginning a rehabilitation program for affordable housing and ADU/JADU development, and continuing to work with the Los Angeles Department of Water and Power (DWP) to release land located in the county to increase the amount of buildable land. An increase in available vacant land in populated areas would, in turn, increase the capacity for residential development in the county, which would help facilitate development of housing for all income levels. Another major accomplishment was the reclassification of the Central Business (CB) zone in the County code to allow for mixed and residential uses, thus increasing the residential development capacity throughout the county. In addition, amendments to the remaining commercial zones have been approved that will open up land in these zones to residential development, as well. These actions will provide additional capacity for residential units.

In many cases, the essence of existing programs has been continued but may have been combined with other programs or the language may have been modified to better reflect the County's role in the housing market and to focus on the tools it has at its disposal to facilitate the development of housing affordable to all income levels. The required review of the status of reaching the Goals stated in the 2014 Housing Element Update includes:

CHAPTER FIVE: HOUSING PROGRAM

This section of the Housing Element contains goals and policies the County has adopted and will continue to implement as practicable to address a number of important housing-related issues. Six major issue areas are addressed by the goals and policies of the Housing Element: (1) maintain the supply of sound, affordable housing through the conservation of existing sound housing stock; (2) provide adequate sites for housing; (3) ensure that a broad range of housing types are provided to meet the needs of both existing and future residents; (4) increase opportunities for homeownership; (5) remove constraints to the development of affordable housing; and (6) promote equal opportunity of housing choice for all residents. Each issue area and the supporting goals and policies are identified and discussed in the following section. Implementation measures identifying the time frame in which each policy will be implemented and the responsible entity follows the discussion of each program.

GOALS AND POLICIES

Maintenance and Preservation of Housing

Existing housing conditions vary considerably throughout Inyo County. Although much of the housing stock may be sound, there are many dwelling units that are dilapidated or require substantial repairs. As the County's housing stock continues to age, ongoing maintenance is vital to prevent widespread deterioration. It is also important to focus on what is already built as the County has very little available, vacant, land. The Housing Element focuses on expanding rehabilitation efforts by pursuing available federal and state funds to upgrade and maintain the County's housing stock.

Goal 1.0 - Maintain the existing housing stock and eliminate substandard housing conditions in Inyo County.

Policy 1.1 - Housing Rehabilitation Funding

In addition to its own investment, the County shall seek and manage additional federal and state funds for housing rehabilitation and weatherization assistance. The County will also continue to provide outreach programs to educate the public about available housing rehabilitation and weatherization assistance and fire safety issues.

Program 1.1.1: The County supports the provision of rehabilitation assistance to owner and renter-occupied households to facilitate unit upgrading. The County has initiated a rehabilitation program with the goal of encouraging owners of vacant houses to rehabilitate them and rent or sell them. This program also includes funding for ADUs/JADUs as well as the management of other rehabilitation funding such as No Place Like Home that focuses on low-income rentals and owner occupied dwellings.

Funding: Community Development Block Grant (CDBG) and Inyo County. The County shall encourage financing housing rehabilitation efforts and ADU/JADU development. To do this, the County shall consider and if appropriate complete grant applications for CDBG and possibly HOME funds at least twice during the planning period for extremely low, very low and low income units.

Research available state funds on an annual basis as Notice of Funding Availability (NOFA) is released. The County has set a goal of the rehabilitation of 15-units between 2021-2029 (equals 3-units per year for 5-years).

Responsible Party: County Planning Department; Department of Health and Human Services.

Time Frame: CDBG, HOME applications, 2021-2029 as NOFAs are released and 15-units 2021- 2029

Policy 1.2 - Housing Rehabilitation Code Enforcement

The County shall advocate for the rehabilitation of substandard residential properties by homeowners and landlords.

Program 1.2.1: The County shall ensure sensitive residential code enforcement and provide information on available rehabilitation assistance to bring substandard residential structures and neighborhoods into compliance with County codes and to be improved to meet current fire safe ordinances pertaining to access, water flow, signing, and vegetation clearing. Fire safety is also enforced by the County Building and Safety officials as a required element of their inspections of new buildings and is commonly an element of subdivision applications.

Funding: Community Development Block Grant (CDBG). The County shall encourage financing housing rehabilitation efforts and affordable housing construction. To do this, the County shall consider and if appropriate, complete grant applications for CDBG and possibly HOME funds. Research available state funds on an annual basis and pursue as appropriate (as Notice of Funding Availability (NOFA) is released).

Responsible Party: County Planning Department and Building and Safety Department

Time Frame: 2021-2029 as NOFAs are released

Policy 1.3 - Energy Efficiency

The County will focus efforts to promote energy efficiency by supporting programs such as weatherization and utility assistance programs that alleviate energy costs for households. The County shall maintain its webpage dedicated to energy efficiency education and programs.

Program 1.3.1: The County shall continue to support efforts to improve the energy efficiency of dwelling units by providing an informational webpage dedicated to energy efficiency and programs that support providing weatherization and utility bill assistance to low-income households; encouraging reduction of housing costs through energy conservation by providing households with light bulbs, reduced price energy-efficient appliances, energy audits, and other services.

Funding: CDBG, LIHEAP, Southern California Edison, and the Los Angeles Department of Water and Power.

Responsible Party: Planning and Building and Safety Departments, local housing service providers, Southern California Edison, Los Angeles Department of Water and Power (LADWP)

Time Frame: Ongoing

Program 1.3.2: The County shall rebuild its dedicated webpage to housing resources including for energy efficiency and loan programs.

Funding: Planning Department budget.

Responsible Party: Planning Department

Time Frame: Within 1-year of HCD Certification of the 6th Cycle Housing Element

Goal 2.0 - Provide adequate sites for residential development.

For the 2021 update the County reevaluated its site inventory. No sites identified in the 4th or 5th Cycle Update were re-used as most relied on land that cannot be subdivided and/or is not near necessary infrastructure, or services. None of sites identified in the 4th or 5th Cycle Update have been developed; therefore, none identified to meet the very low, low or moderate income RHNA have developed at inappropriate densities.

Policy 2.1 – Adequate Sites 2021-2021, monitoring: The County will monitor the sites identified for very low, low and moderate income units.

Program 2.1.1 – If monitoring indicates that development has occurred on any of the parcels identified in the site inventory, the County shall ensure there is existing adequate capacity or identify additional sites to compensate for the loss.

Funding: Planning Department Budget

Responsible Party: Planning Department

Time Frame: Within the 2021-2029 Housing Element timeframe

Program 2.1.2: The County shall maintain an up-to-date inventory of sites suitable for residential development and provide this information to residential developers and to the real estate community. This inventory will include DWP land release sites.

Funding: Planning Department Budget

Responsible Party: Planning Department

Time Frame: Within the 2021-2029 Housing Element timeframe

Program 2.1.3: The County shall complete the re-zoning of Sites 2 and 3 as well as reclassifying the General Plan designation as identified in the sites inventory by April 2023. These sites will be rezoned

in accordance with Government Code 65583.2, subd. (h) and (i), which will ensure that 100 percent residential is a by right permitted use and any mixed use project will have at least 50 percent residential. The updates will also ensure that projects with 20 percent affordable to lower income households are approved by right.

Funding: SB2 Grant Funding

Responsible Party: Planning Department

Time Frame: Rezone, general plan designation changes and by right zoning in accordance with Government Code 65583.2 to be completed by April 2023.

Program 2.1.4: The County shall complete an update to the Code to remove the requirement for multi-family housing over 15 units to require a conditional use permit by April 2023, with the timeline coinciding with the above by right rezoning.

Funding: Planning Department budget

Responsible Party: Planning Department

Time Frame: CUP requirement to be removed by April 2023.

Program 2.1.5: The County shall update its Code definition of employee housing to remove the description of “five or more unrelated persons or families” eliminating the number based restriction in the definition, and making it compliant with current State regulations, within 2-years of HCD Certification of the 6th Cycle Housing Element.

Funding: Planning Department budget

Responsible Party: Planning Department

Time Frame: Within 2-years of HCD Certification of the 6th Cycle Housing Element

Program 2.1.6: The County shall within the 2021-2029 Housing Element timeframe and beyond create a regional housing working group including but not limited to the City of Bishop, Local Tribes, and Inyo County to review and evaluate housing needs at a regional level and prepare policies and programs to address those needs and to ensure adequate housing throughout the region.

Funding: County and City of Bishop budgets

Responsible Party: Inyo County

Time Frame: Within the 2021-2029 Housing Element timeframe and beyond

Program 2.1.7: The regional housing working group along with its review and evaluation of housing needs at the regional level will also look at issues, policies and programs to address gaps in

transportation that might be contributing to fair access to jobs and services in relation to housing opportunities. This working group will meet at least once per year. This will include, but not be limited to: working with regional employers on ride share, van pool and transit voucher programs for their employees. The County will establish a carshare pilot program within three years of certification that will offer residents methods to share transportation costs, and carpool to the largest employers. Transportation costs are one of the largest expenses for residents of the County and are subject to rise with shifts in energy prices. Additionally, the cost of providing parking for housing developers. As part of this carshare pilot program, the County will look to allow carshare parking in lieu of standard parking minimums in multifamily and mixed use buildings.

Funding: County and City of Bishop budgets

Responsible Party: Inyo County

Time Frame: Working group meeting will occur annually. County to complete carshare pilot program with recommendations on parking within three years of certification.

Housing Opportunities

Inyo County encourages the construction of new housing units to ensure that an adequate housing supply is available to meet the County's existing and future needs. Providing a balanced inventory of housing in terms of unit type (single-family, mobile home, multi-family, etc.), cost, and location will allow the County to fulfill a variety of housing needs.

Goal 3.0 - Encourage the adequate provision of housing by location, type of unit, and price to meet the existing and future needs of Inyo County residents.

Policy 3.1 - Variety of Housing

The County shall continue to identify and evaluate the best approaches to providing a variety of residential development opportunities to meet the needs of all its citizens. This includes all housing types, such as: single-family homes, mobile homes, accessory dwelling units (ADU/JADU), apartments, to accommodate special needs and income levels.

Program 3.1.1: The County shall meet on an annual basis with DWP, BLM, the Forest Service and other federal, state, and local agencies to identify appropriate land for release, thus enabling the County to provide additional sites for housing development. These meetings will also seek to include nearby jurisdictions including the City of Mammoth Lakes and the City of Bishop, to further facilitate regional coordination. Additionally, the County will continue to coordinate with various Tribal Councils to pursue collaborative housing projects. In addition to meeting on annual basis, the County will obtain a concrete determination on the LADWP's willingness to permit housing development on Sites 1 and Sites 3 listed in the inventory by the end of 2024. If LADWP is unwilling or unable to facilitate housing on these sites, the County will determine alternate sites to accommodate this capacity by the end of 2023.

Funding: Planning Department Budget

Responsible Party: County, local housing service providers, Tribal Councils, Bureau of Land Management (BLM), DWP, Forest Service

Time Frame: Annual meetings with DWP, BLM and other federal / state agencies Determination for alternate sites for Sites 1 and Sites 3 if LADWP is unwilling or unable to facilitate housing on sites by end of 2024.

Program 3.1.2: The County shall continue to encourage ADU/JADU development. Since development opportunities are mostly available through infill, the County has consistently followed State law regarding ADUs, although it has had outdated ADU language in its zoning code. In March 2021 the zoning code was updated to accurately reflect State ADU regulations, by incorporating the State regulations by reference. Along with this work, ideas were brought forward related to additional allowances for ADU/JADUs (2 per parcel) in the County beyond the State's. The County will continue to explore ideas for allowing expanded ADU/JADU development.

As described in Program 7.1.1, ADUs and JADUs are an important way to facilitate anti-displacement by supporting seniors who need to age in place. The County will develop a promotional brochure advertising ADUs and JADUs within one year of certification from HCD.

The County will also identify which zones to permit Accessory Commercial Units (ACUs) within three years of certification and will allow ACUs as a conditional use within at least one residential zone. This can provide for more flexibility in terms of land uses, increasing opportunities for small businesses and mitigating issues with food access by making groceries and restaurants more readily available. If pursued, these ACUs will be permitted in addition to all allowed residential development and will not be counted towards any limitations on density.

To ensure that ADUs are permitted at the expected rate projected, the County will monitor and reassess its ADU projections mid-cycle in 2025 and adjust, as necessary.

Funding: Planning Department Budget

Responsible Party: Planning Department

Time Frame: Promotional brochure within one year of certification. Evaluation of ACUs within three years of certification. To ensure that ADUs are permitted at the expected rate projected, the County will monitor and reassess its ADU projections mid-cycle in 2025 and adjust, as necessary.

Program 3.1.3: Tiny Homes are currently not defined in the County code. They are allowed by right as the County does not regulate the minimum size of residential units. They are also allowed as ADU/JADUs. To make tiny home development more accessible the County shall update the zoning code to include a definition of Tiny Homes.

Funding: Planning Department Budget

Responsible Party: Planning Department

Time Frame: Within 2-years of HCD Certification of the 6th Cycle Housing Element

Program 3.1.4: Based on new and still relevant existing State law, Low Barrier Navigation Centers, and Transitional and Supportive Housing will be added to the County code definitions. These along with Emergency Shelters and Single Occupancy Residences (SROs) will have language added and/or updated to accurately match requirements provided for by State law. This includes: Transitional housing, supportive housing and group homes are permitted in the same manner as other residential dwellings of the same type in the same zone. Low Barrier Navigation Centers and Emergency shelters cannot have parking requirements beyond spaces needed for employees and cannot be required if located within one-half-mile of a transit stop.

The County will also add SROs as a permitted use in the Multi-family 3-units and above residential (R3) zone and design development standards with reduced parking requirements by the end of 2023. The County will propose no more than 0.5 parking spaces per SRO unit.

The County intends to design a program for safe parking sites for approximately 25 individuals sleeping in their vehicles to ensure access to onsite restrooms and security. The County will choose a possible site(s) for safe parking within three years of certification.

Funding: Planning Department Budget

Responsible Party: Planning Department

Time Frame: SROs as an outright permitted use in R3 zone by end of 2023. Safe Parking site chosen within three years of certification.

Program 3.1.5: The County shall provide expanded affordable housing opportunities by partnering with local organizations and providing technical assistance and/or pass-through funds as appropriate for the development of units affordable to extremely low, very low, or low-income households. As part of these partnerships, the County will obtain local data and knowledge from nearby jurisdiction on an annual basis, as outlined in Program 3.1.1. This will include a list of qualified entities, discussions on past successful projects, discussions on suitable development standards, and experiences with affordable housing developers.

Funding: Available State, Federal, and local funds (HOME, MHP, CDBG, etc.)

Responsible Party: County, local housing service providers

Time Frame: Annual meetings and coordination with nearby jurisdictions regarding affordable housing projects through the 6th cycle.

Program 3.1.6: The County will continue to explore Employer Assisted Housing Programs by forming a working group with major employers in the area to discuss how the County can assist in the development of employer-assisted housing in Inyo County.

Funding: Planning Department Budget; available state, federal, and local funds (HOME, MHP, CDBG, etc.)

Responsible Party: County, local housing service providers

Time Frame: Within the 2021-2029 Housing Element timeframe

Program 3.1.7: The County will continue working on establishing a housing specialist position for the County. This person will help identify housing opportunities for income levels, be available to take fair housing complaints and help get people to the appropriate organization/agency for help.

Funding: County General Fund

Responsible Party: County, Mammoth Lakes Housing

Time Frame: Within the 2021-2029 Housing Element timeframe

Policy 3.2 - High Density Housing

The County shall encourage the development of higher density housing in appropriate locations throughout the communities. Locate higher density residential development within close proximity to services, jobs, transit, recreation, and neighborhood shopping areas.

Program 3.2.1: The County shall encourage higher density residential development in areas of population concentration by conducting outreach to developers and property owners to encourage higher density residential development. In addition, the County will explore funding options for appropriate housing as funds become available.

Once the changes to development standards outlined in Program 7.1.1 are updated, the County will create a brochure describing the more permissive development standards and how they may reduce development costs and increase total allowable housing. Within one year of the rezone completion date (rezone date is no later than December 2024), the County will circulate this brochure to the owners of all properties in the sites inventory and also include a template letter requesting responses on if the property owners may be interested in redevelopment.

Funding: Planning Department Budget

Responsible Party: County, local housing service providers

Time Frame: Complete brochure on new development standards and distribute property owner survey for all owners of sites listed in sites inventory by no later than December 2024

Program 3.2.2: The County shall encourage development of housing for low-income households through provision of density bonus incentives. The County shall prepare updates to the density bonus chapter (18.65) of the County code as required by the State and inform applicants of new opportunities for density increases.

Funding: Planning Department Budget (development fees)

Responsible Party: Planning Department

Time Frame: Within 2-years of HCD Certification of the 6th Cycle Housing Element

Program 3.2.3: Encourage high density residential development in specific Commercial Zones. The County will continue to explore ideas brought forth during its SB2 Vacant Lands grant work in allowing for outright permitting of multi-family units in the Central Business zone, as well as, explore opportunities for permitted by right mixed use and high density housing in other commercial zones. Areas along the County's small town main streets (highway 395) have vacant commercial parcels and empty buildings. Reevaluating these parcels for 'missing middle' housing opportunities, such as cottage apartments, 4-plexes and etc. could potentially do a lot to help the County meet its own housing goals. This work will also include a review of design requirements such as parking, setbacks, minimum lot size and height standards that could be improved to encourage more high density housing. The County will also seek out resources for the development of missing middle preapproved plans that require low cost renovations and may share indoor spaces and amenities to meet certain development standards.

In addition to the updates outlined in Program 7.1.1 updating development standards such as minimum parcel size, the County will also allow multifamily and mixed use housing as a permitted use in the CB zone. This will allow the County to expand the number of candidate sites for housing, which is particularly useful in the event that the LADWP-owned sites (Sites 1 and 3) are not available for reasons outside of the County's control.

Funding: Planning Department Budget

Responsible Party: Planning Department

Time Frame: Within 3 years of HCD certifying the 2021-2029 Housing Element

Program 3.2.4: Encourage higher density in established residential neighborhoods by evaluating current residential codes for the appropriateness of increasing the number of rooms allowed to be used for long term rentals.

Funding: Planning Department Budget

Responsible Party: Planning Department

Time Frame: Within the 2021-2029 Housing Element timeframe

Program 3.2.5: Encourage higher density in established residential neighborhoods by evaluating current residential codes for design standards that might work to better encourage multi-family housing. This will include setback, minimum lot size, height and especially parking standards in the County's multi-family zones.

Funding: Planning Department Budget

Responsible Party: Planning Department

Time Frame: Within 3 years of HCD certifying the 2021-2029 Housing Element

Policy 3.4 - Manufactured and Mobile Homes

The County will continue to promote the utilization of manufactured housing and mobile home purchase and placement as an affordable homeownership opportunity.

Program 3.4.1: The County shall provide technical assistance to mobile home park residents who want to purchase their mobile home park. To accomplish this, the County will advertise the program to mobile home park residents, including conducting meetings with tenants.

Funding: Planning Department Budget, Mobilehome Park Resident Ownership Program (MPROP)

Responsible Party: County, local housing service providers

Time Frame: Within the 2021-2029 Housing Element timeframe on an as-needed basis and as NOFAs for MPROP are released

Program 3.4.2: The County will remove its Mobile Home overlay as it is not used and is non-compliant. Language clarifying that mobile/manufactured homes on a foundation are to be processed the same as the process applicable to a conventional single dwelling unit in the same zone.

Funding: Planning Department Budget

Responsible Party: County

Time Frame: Within 2-years of HCD Certification of the 6th Cycle Housing Element

Policy 3.5 - Financial Assistance for Housing

Provide financial assistance for the conservation and/or development of housing affordable to extremely low, very low, and low-income households.

Program 3.5.1: The County will support the efforts of local housing service providers to assist low-income households with utility bills by providing assistance to a minimum of 150-households annually through the LIHEAP (Low-income Energy Assistance Program).

Funding: State Department of Economic Opportunity, CSBG

Responsible Party: County, local housing service providers

Time Frame: Within the 2021-2029 Housing Element timeframe

Program 3.5.2: The County shall encourage rental subsidies for lower-income families and elderly persons. The County shall encourage listing of rental units with local housing service providers.

Funding: HUD Section 8 Housing Choice Vouchers

Responsible Party: County, Stanislaus Housing Authority

Time Frame: Within the 2021-2029 Housing Element timeframe

Program 3.5.3: The County shall provide for the continued affordability of the County’s low and moderate-income housing stock. Although not anticipated, if any deed-restricted affordable units currently serving County residents are at risk of converting to market rates, the County will facilitate a preservation program with the owner and/or operator of the project at risk. The goal will be to identify additional funds to either continue the affordability of the at-risk project or to replace those units once they are no longer affordable to lower-income households.

Funding: County, local housing service providers

Responsible Party: County, local housing service providers

Time Frame: Within the 2021-2029 Housing Element timeframe

Homeownership

The option of homeownership in California has become a privilege which is often not available to lower-income households or potential first-time homebuyers. Rising construction and land costs due to the scarcity of land for residential development in Inyo County have greatly contributed to the cost of housing. In addition, interest rates can exclude certain households from qualifying for loans. The County will continue to help facilitate the creation of affordable homeownership opportunities in its jurisdiction.

Goal 4.0 - Provide increased opportunities for homeownership.

Policy 4.1 - Self-Help

The County shall encourage “self-help” housing to allow lower-income households to build their own homes.

Program 4.1.1: The County will continue to make efforts to coordinate with established self-help housing groups to solicit interest in developing projects in the county to facilitate self-help housing as a form of homeownership for lower-income households.

Funding: Planning Department Budget

Responsible Party: County, local housing service providers

Time Frame: Within the 2021-2029 Housing Element timeframe

Policy 4.2 - Purchase Assistance Programs

The County will facilitate the availability of home purchase assistance programs for low and moderate-income households.

Program 4.2.1: The County will consider, as appropriate, applying for state and federal grant funds to provide homeownership opportunities that may include interest rate write-downs, down payment assistance, and mortgage revenue bond financing through state and federal programs.

Funding: Planning Department Budget, CDBG, HOME

Responsible Party: Planning Department

Time Frame: Within the 2021-2029 Housing Element timeframe, with a goal of completing at least one project benefiting low income households.

Removal of Constraints on Housing Development

Governmental and non-governmental constraints to development can impede both the supply and affordability of housing. Certain governmental constraints can be minimized to facilitate new construction.

Goal 5.0 - Remove governmental constraints on housing development.

Policy 5.1 - Compliance with new State Regulations

Program 5.1.1: The County shall update its zoning code to properly address new State laws regarding Density Bonus, Low Barrier Navigation Centers, Emergency Shelters and Transitional and Supportive Housing, pursuant to AB 2162.

Funding: Planning Department Budget

Responsible Party: County

Time Frame: Within 1-year of HCD Certification of the 6th Cycle Housing Element

Program 5.2.1: The County routinely works with homeowners to expedite their permits and provide flexibility in submittal requirements for owners developing their own homes. The County will also annually review its permit and development plan processing timelines and look for ways to expedite or simultaneously conduct development reviews to ensure timely processing.

Funding: Planning Department Budget

Responsible Party: County

Time Frame: Annually and ongoing as projects are submitted for review

Policy 5.2 - Expedited Permit Processing and Project Review: The County shall continue to expedite project review and facilitate timely building permit and development plan processing for residential developments, especially those with an affordable housing component or density bonus proposal.

Program 5.2.1: The County routinely works with homeowners to expedite their permits and provide flexibility in submittal requirements for owners developing their own homes. The County will also annually review its permit and development plan processing timelines and look for ways to expedite or simultaneously conduct development reviews to ensure timely processing.

Funding: Planning Department Budget

Responsible Party: County

Time Frame: Annually and ongoing as projects are submitted for review

Program 5.2.2: The County shall evaluate and consider alternative processes to help expedite and encourage affordable housing projects, such as administrative approvals of use permits projects and modifications to the design standards in the zoning code regarding setbacks, lot sizes, parking and height standards..

Funding: Planning Department Budget

Responsible Party: County

Time Frame: Within 3-years of HCD Certification of the 6th Cycle Housing Element

Policy 5.3 - Infrastructure

The County has very remote areas without water or waste water treatment facilities. Some of these same areas also have vacant private land that other better served areas of the County do not. In an effort to help to open the possibility of development in these areas, the County will work to identify potential ways provide adequate infrastructure to accommodate residential development in all areas of the unincorporated county.

Program 5.3.1:

The County has water and sewer infrastructure up to the street for each of Sites 1, 2, and 3 in the inventory. For sites listed for moderate and above moderate income, all are within a community service district and have to be served water and sewer access, unless otherwise indicated that well and septic is required.

For other sites in more remote areas, the County shall explore ways to help to facilitate the provision of infrastructure to accommodate residential development by researching opportunities for providing the necessary infrastructure in remote locations for residential development. Strategies to increase

densities in these locations will also include development standards where it is feasible with regard to infrastructure, especially with regard to water and sewer.

Funding: Planning Department Budget

Responsible Party: County, local housing service providers.

Time Frame: Annually seek out grant funding from federal and local sources, within the 2021-2029 Housing Element timeframe

Accessibility of Housing

Program 5.3.2 County Property:

The County currently owns 66-parcels of land in the County. Of the 66-parcels, 32 are located in the Owens Valley. The rest are in the more remote areas of the County with limited to no infrastructure or services. All but 3 of the Owens Valley parcels are currently built on for various County offices, roads yards, libraries, parks -etc. The 3 vacant parcels are located in Bishop and Big Pine. ~~The Bishop parcel is currently in the process of a zone change and is included in the RHNA site inventory Site 2. This zone change will be completed by April 2023.~~ The two parcels in Big Pine are environmentally constrained with special status species and a wetland. This parcel will, however, be further evaluated for housing development viability. The County also has several road yards and an airport on some of its properties in the Owens Valley. Two of the road yard parcels are currently undergoing zone and General Plan reclassifications to multi-family residential to encourage high density housing development. These parcels are located in Lone Pine. The County will complete the two zone change and reclassifications by December 2024.

The County will also evaluate its other roads yards in Bishop, Big Pine and Independence for possible consolidation to eliminate the need for all of them and/or at these particular locations, as well as, for potential locations for housing development. Zoning and General Plan designation changes will also be proposed for any parcels that are deemed appropriate for high density and/or affordable residential development.

Funding: Planning Department Budget

Responsible Party: Inyo County Planning and Public Works departments, County Administrative Officer.

Time Frame: Rezone County Owned Within 3-years of HCD Certification of the 6th Cycle Housing Element..

On order to make adequate provision for the housing needs of all segments of the community, the County must ensure equal and fair housing opportunities are available to all residents.

Goal 6.0 - Promote equal opportunity for all residents to reside in housing of their choice.

Policy 6.1 - Equal Opportunity

The County shall work to prohibit discrimination in the sale or rental of housing with regard to race, ethnic background, religion, handicap, income, sex, age, household composition or other protected characteristics.

Program 6.1.1: The County shall take positive action to assure unrestricted access to housing. The County will continue to support local housing service providers to provide fair housing services and assist in program outreach.

Funding: Planning Department Budget

Responsible Party: County, local housing service providers, Stanislaus Housing Authority

Time Frame: Within the 2021-2029 Housing Element timeframe

Policy 6.2 - Residential Care Facilities The County shall work to ensure that equal and fair housing opportunities are available to all residents.

Program 6.2.1: The County will continue efforts to mitigate or remove constraints on housing for persons with disabilities and will update its code to accurately follow new State regulations.

Funding: Planning Department Budget

Responsible Party: County

Time Frame: Within 2-years of HCD Certification of the 6th Cycle Housing Element

Policy 6.3 - Reasonable Accommodation – The County shall ensure the availability of reasonable accommodations for persons with disabilities, including developmental disabilities.

Program 6.3.1

The zoning code will be updated to more clearly state that the Planning Director may administratively approve requests for modification to certain standards with regard to reasonable accommodation on a case by case basis and with the criterion that the modifications do not affect the structure meeting building and safety standards per Building and Safety staff. In addition, the County will define its Reasonable Accommodations process, including its approval process and required findings. This process will not just be limited to building code requirements, but also to zoning and land use provisions. The County will update its Development Code in accordance with these requirements within three years of certification.

Funding: Planning Department Budget

Responsible Party: County

Time Frame: Within 2-years of HCD Certification of the 6th Cycle Housing Element

Goal 7.0 – Affirmatively Furthering Fair Housing.

As defined by State law, and pursuant to AB 686, the County will affirmatively further fair housing by taking meaningful actions, in addition to opposing discrimination, that overcomes patterns of segregation and fosters inclusive communities free from barriers that restrict access to opportunity based on protected classes. This will be accomplished with the following programs.

Policy 7.1 The County shall work to ensure housing opportunities in areas with concentrations of minority population, female householders with no spouse present and children under 18, persons with disabilities and persons living in poverty that were found in the County through the AFFH evaluation. Even though they do not rise to the levels usually found in more populated urban and suburban areas in Inyo County, they are there. Census Tract 8 that incorporates the entire county south of Lone Pine and east to the Nevada border has the highest levels these concentrations.

Program 7.1.1

The County shall work to provide affordable housing opportunities for areas with concentrated poverty and other protected characteristics in the County. This is primarily found in Census Tract 8, and more specifically the community of Lone Pine. This will be accomplished by partnering with local organizations to target this area and providing technical assistance and/or pass-through funds as appropriate for the development of units affordable to extremely low, very low, or low-income households.

The County shall work to provide affordable housing opportunities for areas with concentrated poverty and other protected characteristics in the County. This is primarily found in Census Tract 8, and more specifically the community of Lone Pine. This will be accomplished by partnering with local organizations to target this area and providing technical assistance and/or pass-through funds as appropriate for the development of units affordable to extremely low, very low, or low-income households.

The County will also ease development standards in the RMH, R1, R2 and R3 zones to, reduce setbacks, and allow more missing middle housing types on lots traditionally zoned for single-family homes. By doing so, the County will offer aging homeowners an opportunity to finance their retirement and offset their cost of living by renting additional units. This program will also act as an anti-displacement strategy, by highlighting to homeowners how ADUs and JADUs can be used to fund needed home repairs as well as offsetting mortgage costs. This program will be started in Lone Pine and applied to other communities after.

Table 41 and 42 reflect current development standards by zoning district. The County will update the minimum lot width, minimum lot size, minimum parcel size and maximum densities for all residential zones and revise the front and rear yard setbacks per zoning district to accommodate higher density housing. The County will make these revisions by the end of 2023. Easing these development standards will raise the probability of housing development on these sites and increase the allowable floor area that can go to residential development.

In light of recent legislation (SB-9, updating Government Code 65852.21), duplexes are now a permitted (P) use in all residential zones in certain specific areas of rural Inyo County surrounding the City of Bishop. The County will update the permitted uses within residential zones located in areas subject to SB-9 to include duplexes, and adopt procedures to facilitate SB-9 within two years of certification.

Funding: Available State, Federal, and local funds (HOME, MHP, CDBG, USDA, etc.)

Responsible Party: County, local housing service providers

Time Frame: ADU Promotional Brochure within one year of certification. Remove minimum lot width, minimum lot size, minimum parcel size and maximum densities for all residential zones, except Rural Residential due to infrastructure concerns, and revise front yard / rear yard setbacks to facilitate higher density development by the end of 2023.

Policy 7.2 - The County shall work to ensure that the needs of its senior population are met. Inyo County overall has 20-percent of Households with a householder who is 65-years or older. Census Tracts 5 and 8 on their own also show that 20-percent of households with a householder 65-years or older.

Program 7.2.1

The County will continue working with the housing stakeholder group established during the housing element update to further define housing issues in the county and specifically senior housing. This work will include identifying and applying for grants to provide affordable housing located near services. A focus will be placed on Census Tracts 5 and 8 as these include the areas in the County with the highest percentages of households with a householder 65-years and older. The housing stakeholder group will target new members from these Census Tracts and meet every six months. The group will discuss strategies to support multigenerational households and designing development standards that support aging in place. Intensifying existing single unit homes with ADUs, JADUs, can be an important way to fund housing costs, including mortgages and rehabilitation projects for senior households. The group will evaluate shared housing strategies and look to design / adopt template agreements that can help facilitate cost-sharing arrangements for a variety of households by the end of 2023.

Funding: County Planning Department budget, available State, Federal, and local funds (HOME, MHP, CDBG, USDA, etc.)

Responsible Party: County, housing stakeholder group, local housing service providers, senior program providers

Time Frame:

Meetings with housing stakeholder group twice per year, design materials and policies for cost-sharing programs for senior households by the end of 2023.

Program 7.3

The County currently has policies that address environmental justice issues. Pursuant to CA Government Code 65302(h), the County will add policies in appropriate sections of its General Plan that relate to healthy food access, safe and sanitary homes and physical activity. In addition, the County will create an Environmental Justice Element within four years of adoption that includes all objectives listed. The Environmental Justice element will discuss the carshare program described in Program 2.1.7 and collaborate through an annual meeting with regional employers and neighboring jurisdictions to provide alternatives to vehicle ownership.

In addition to the carshare pilot program, the County will evaluate Accessory Commercial Units (ACUs) and the prospect of allowing light commercial uses in residential zones in addition to existing residential. The County will make a decision on which zones to permit ACUs within three years of certification and will allow ACUs as a conditional use within at least one residential zone. This will help to reduce Vehicle Miles Traveled and also provide for more flexibility in terms of land uses, increasing opportunities for small businesses and mitigating issues with food access by making groceries and restaurants more readily available. If pursued, these ACUs will be permitted in addition to all allowed residential development.

Funding: Funding source yet to be identified

Responsible Party: Planning Department

Time Frame: Environmental Justice Element with carshare pilot program to be completed within three years of adoption. Regional employers and neighboring jurisdictions meeting will occur annually.

Table 45 - Quantified Objectives

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Task	Income Level					Total
	Extremely Low	Very Low	Low	Moderate	Above Moderate	
RHNA	23	23	40	39	80	205
Construction Goals (from Sites Inventory)	23	23	40	39	80	80
ADUs and JADUs	13	13	6	0	0	32
Energy Efficient Units	1	1	1	1	0	4
Preservation Goals (Mobilehome Parks)	2	2	2	2	2	10
Home Rehabilitation Program	3	3	3	3	3	15
Housing Assistance (Housing Choice Vouchers provided)	1	1	1	0	0	3
Total	33	33	52	50	90	233

Source: HCD, 2020 and Inyo County Planning Department, 2020

**Appendix A
Public Outreach**

The County began work on the 2021 update in November 2020. Staff took questions and comments related to housing issues during a public outreach meeting for a Vacant Lands Inventory and Evaluation of General Plan and Zoning Designations for Possible Rezoning to Encourage Affordability through Higher Density Housing. A meeting was also held with County Health and Human Services and Mammoth Lakes Housing (a local affordable housing non-profit) in November 2020 and a meeting with the Inyo Mono Advocates for Community Action (IMACA) in January 2021, a low income (focus on extremely low), special needs and housing non-profit. These meetings focused on the barriers to providing housing for the populations they work with. The issues they identified were:

- No land for development
- No developer interest/affordable housing not profitable
- Infrastructure issues to support development are too expensive to address
- Rural area non-profits have a difficult time competing for funding
- Rural areas cannot get the necessary points for grant opportunities due to transit requirements among others. Funding geared to urban areas.

Possible solutions:

- Continue to work with the Los Angeles Department of Water and Power (DWP) on land divestments and long term leases for mobile home parks located on their land
- Grants for infrastructure improvements
- More opportunities for re-purposing and rehabilitating properties, especially multi-family, with restrictions on raising rents
- Include the communities in the remote southeast part of the County, primarily Tecopa
- Incentives for owners of vacant houses to rent, IMACA can provide property rehabilitation funding if rented to homeless or at risk people
- Encourage ADU development.

To initiate the formal outreach process, more than 20-letters/emails were sent to a broad cross-section of stakeholders in the County. Consultation invitations were also sent to 10-tribal representatives. The

letters briefly described the reason for the update and requested the stakeholders provide input at any time during the update process by visiting the Housing Element update section on the County's website, directly contacting County staff, requesting a meeting, or by attending a virtual public workshop.

Tribal Consultations

One Tribe, the Big Pine Paiute Tribe of the Owens Valley, requested consultation, but never responded to scheduling requests.

Public Workshops

In addition to the several meetings County staff held with local non-profits. A meeting with: IMACA and Mammoth Lakes Housing; a local realtor; property manager; developer; a representative from DWP; and a representative from the Northern Inyo Hospital District (a major employer in the County) was held in February 2021. An additional public workshop was hosted by the Planning Commission during the draft stage of the 2021 Housing Element in March 2021. The goal of these workshops was to gather feedback from stakeholders and the attending public regarding the housing concerns of Inyo County residents and housing service providers.

At the first meeting staff posed several questions, including:

1. What do you see as the most limiting factor in your organizations' ability to succeed in its housing mission?
2. What sort of policies or programs do you think would be the most effective in improving your organization's ability to succeed your housing mission?
3. What do you think local governments should do to help your organization achieve its mission?
4. Other relevant questions, thoughts, ideas?

Responses included:

1.
 - I deal primarily with moderate and above moderate properties; there is never enough rental stock
 - All but one attendee agreed that there is not enough housing stock or land for development in the County
 - DWP has to balance. Their land is considered essential for water provision for the City of Los Angeles

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- State regulations regarding fire protection puts limitations on subdivision and the affordability of building
- The lack of housing opportunity is a challenge for local employers. It affects their ability to secure and retain employees. This includes even at the high end of housing opportunities
- DWP employees leave the area too, due to the lack of available housing
- It took IMACA over 10-years to purchase property from DWP for a permanent supportive housing project, this is too long
- There is a growing homeless population
- There needs to be more gap funding from local jurisdictions to make up for what grants do not cover.

2.

- Change County zoning to allow for more than one ADU per property (restrict to long term rentals)
- Relax zoning to allow for more units in general
- Create incentives for developers
- Creation of more Community Service Districts – fire protection
- Infrastructure planning
- Infrastructure financing
- DWP needs to release more land, especially in the Bishop City limits
- Down payment assistance programs by employers (DWP)
- Assistance for rehabilitation of rundown and/or vacant properties
- Loan fund for ADU development or vacant houses (income restricted)
- New taxes or fees to create a pool of money to grant or loan to developers
- Self-build housing projects and co-ops.

3.

- It is easier for DWP to release land to other jurisdictions than to private parties
- Create a twenty-year housing plan identifying areas for development, rezoning, etc. Community input would be very beneficial. Plan should include south County as well
- Put limitations on the number of short-term rental permits per year and limit the number of nights they can be rented
- Work on vacancy issues (second homes)
- Landlord incentives to rent to low income and get more to participate in Section 8 housing
- Rehabilitation funding can create more habitable space
- Allow for more residential use on commercially zoned property
- Get DWP properties zoned for residential development prior to divestment. Chose by infrastructure availability
- Target properties that are easiest to develop for General Plan and zoning designation changes
- Taxation programs for vacant properties with a very targeted program for allocation these funds to affordable housing projects.

4. There were no additional questions, thoughts or ideas.

Planning Commission Workshop

The Planning Commission hosted a public workshop on the Housing Element Update on March 24, 2021. Staff prepared a number of questions for the attendees to respond to. These questions were:

1. Have you or someone you know experienced housing discrimination in Inyo County?
2. If so, were there barriers to reporting it?
3. What barriers exist locally to access to housing?
4. What do you think the County can do to improve access to housing?

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5. Is access to services an issue where you live?
6. If you have a disability, does your home have reasonable accommodations?
7. What housing types does the County need more of?
8. What housing types does the County need less of?
9. What has been the most difficult barrier for you, personally, in finding housing opportunities in the County?
10. Where should additional housing be located in the County?
11. What is your dream home?

Responses included:

1. No one had experiences with housing discrimination
2. There may be barriers to reporting. People might not know where to report and there may also be a lack of legal aid.
3.
 - As a property manager the barriers to getting rental housing I find are: income, credit, a lack of rental housing and multi-family units, and pets. As for ownership: out of price range, no workforce housing or down payment assistance, not enough land for development.
 - The hospital has contract employees that need shorter rental periods and lower costs as many have homes and mortgages elsewhere, pets. The hospital has had to purchase property so there contract employees have housing
 - The costs of development here are too high for non-profit developers to be interested
 - The lack of land has made it impossible for the hospital to build housing for their workers
 - Look into vacant commercial buildings and sites for residential development. Local gap funding for grants, makes getting the points for low-income housing easier to get
 - Look into land transfer concept and lots sales DWP-USDA
 - Allow for 2 ADUs per parcel and make rezoning requirements easier for smaller lots so more units can be built per parcel.
 - Limit ADUs rented for short-term

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4.
 - Reasonable accommodations for disabled is expensive there need to be programs to help financially
5. There were no responses to this question
6.
 - Small infill, affordable rentals and ownership opportunities, first time buyer help
 - Look into homeowner land trust model
 - Senior housing
 - 1 and 2 bedroom units are in high demand – not enough of them
 - Encourage repurposing vacant commercial properties
 - Empty DWP homes should be rented or sold
 - Help people who want to move here from somewhere else without community connections to find available housing a housing availability clearinghouse
 - Local online rental finder
 - Approach owners of vacant homes to try to get them to rent or sell
 - Create a vacant building tax to help fund affordable housing projects
 - The lack of land supply creates the biggest barrier, maybe use eminent domain to get land and/or units in disrepair, etc.
7.
 - County does not need more large lot developments, there are plenty
8.
 - I just had the opportunity to get a job in the County and a rental in Big Pine that is my dream home.
 - Safe and warm that costs no more than 35% of monthly incomes.

Planning Commission Hearing

The Planning Commission held a hearing on August 11, 2021 to consider a resolution recommending the Board of Supervisors adopt the 2021 Housing Element as presented by staff. A comment from the commission was offered suggesting that the County should be looking at its housing issues from a more regional perspective.

No public comment was received at the hearing or in response

Board of Supervisors Hearing

The Board of Supervisors held a noticed public hearing on August 17, 2021 to consider adopting the 2021 Housing Element Update. The Supervisors provided direction to staff to add a housing program to develop a regional housing workgroup to evaluate housing issues at the regional level and prepare policies and programs to address them.

No public comment was received at the hearing or in response to the notice.

Comment Letters

In addition to gathering comments from attendees at the public workshop, residents were invited to submit comments directly to the County regarding the questions related to access and availability as well as the draft of the Housing Element update. No comment letters were received by the County during the housing element update process.

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Appendix B Housing Program Review 2014-2020

2014 Housing Program	Time Frame	Accomplishments	Continue/Modify/ Delete
<p><i>Implements Policy 1.1</i></p> <p>The County supports the provision of rehabilitation assistance to lower-income owner and renter-occupied households to facilitate unit upgrading. The County will encourage initiation of a rehabilitation program with the goal of improving 15 units over the planning period (3 per year). Funding: CDBG</p>	2014–2019	<p>Effectiveness/Progress: The County did not initiate a rehabilitation program during the planning period due to a lack of staff and funding for this type of activity.</p>	<p>Appropriateness: The County will continue to support local housing assistance providers' efforts and is in the process of initiating its own rehabilitation loan program.</p>
<p><i>Implements Policy 1.2</i></p> <p>The County shall ensure sensitive residential code enforcement and provide information on available rehabilitation assistance to bring substandard units into compliance with County codes and to meet current fire safe ordinances. Funding: County</p>	Ongoing	<p>Effectiveness/Progress: The County continued to educate the public and stakeholders about housing programs, including housing rehabilitation and weatherization assistance.</p>	<p>Appropriateness: The County will continue to support outreach efforts for rehabilitation, fire safety or weatherization efforts in the county. These are primarily conducted by Building and Safety and Planning staff.</p>
<p><i>Implements Policy 1.3</i></p> <p>The County shall continue to provide outreach programs to educate the public about available housing rehabilitation assistance and fire safety issues.</p>	Ongoing	<p>Effectiveness/Progress:</p> <p>The County continued to educate the public and stakeholders about housing programs, including housing rehabilitation and weatherization assistance.</p>	<p>Appropriateness: Will continue this program. It has been added to the one above to reduce repetition.</p>
<p><i>Implements Policy 1.4</i></p> <p>The County shall continue to focus efforts on promoting energy efficiency through participation in weatherization, utility assistance and maintaining an energy efficiency webpage.</p> <p>Funding: County, local utility providers</p>	Ongoing	<p>Effectiveness/Progress: The County works with local non-profits and utility providers to raise awareness of energy efficiency, utility assistance and weatherization programs.</p>	<p>Appropriateness: The County will continue to support outreach efforts for energy efficiency programs and maintain its webpage.</p>
<p><i>Implements Policy 1.4</i></p> <p>The County shall continue to support efforts to improve the energy efficiency of dwelling units by providing weatherization assistance to low-income households. Funding: HUD Section 8 Certification and Housing Vouchers</p>	Ongoing	<p>Effectiveness/Progress: The County does not provide funding for this activity but if a need for this service arises, the County would refer inquiries to local housing service providers. The County coordinated a series of task forces to educate the public and stakeholders about housing programs, which may have included roommate location assistance.</p>	<p>Appropriateness: This program will be continued.</p>

HOUSING ELEMENT

2014 Housing Program	Time Frame	Accomplishments	Continue/Modify/ Delete
<p><i>Implements Policy 1.4</i></p> <p>The County shall work to provide assistance to low-income households with utility bills by encouraging utilities and local housing service providers to continue to implement and expand programs to assist such households, including reductions and other utility assistance programs for income-qualified candidates. Augment current program funding. Funding: State of California Older Americans Act, CDBG</p>	Ongoing	<p>Effectiveness/Progress: According to DWP, one local housing service provider assists approximately 150 households per year through the LIHEAP (Low-income Energy Assistance Program). The utilities also provide assistance to income-qualified families. They intend to continue and expand these programs.</p>	<p>Appropriateness: This program will be continued.</p>
<p><i>Implements Policy 1.4</i></p> <p>The County shall continue to encourage utility providers and local housing service providers in reducing housing cost through energy conservation by providing households with light bulbs, reduced price energy-efficient appliances, energy audits, and other services. Funding: CDBG</p>	Ongoing	<p>Effectiveness/Progress: The County is not aware of the effectiveness or progress of this light bulb program. However, if possible, the County would continue to support this program if implemented. Alternatively, the County refers interested residents to the Southern California Edison (SCE) California Alternate Rates for Energy (CARE) and Family Electric Rate Assistance (FERA) program.</p>	<p>Appropriateness: The County will continue to support weatherization and energy efficiency efforts administered by other entities in the county.</p>
<p><i>Implements Policy 2.1</i></p> <p>The County shall facilitate the development of vacant and underutilized residential parcels identified in the Housing Element residential site inventory.</p>	Ongoing	<p>This program has been implemented, however, no sites in the inventory were developed.</p>	<p>Appropriateness: This program has been revamped to meet new state regulations and will continue.</p>
<p><i>Implements Policy 2.1</i></p> <p>The County shall maintain an up-to-date inventory of sites suitable for residential development and provide this information to residential developers and to the real estate community. This inventory includes DWP land release sites. Funding: State Department of Economic Opportunity, CDBG</p>	Ongoing	<p>Effectiveness/Progress: Site information was provided through a Vacant lands inventory and general plan and zoning designation assessment. The Planning Department provides information about property that is available for housing development upon request. The County has continued to try to coordinate with DWP and other public agencies for land releases of property available for housing development.</p>	<p>Appropriateness: This program is updated and will be continued.</p>

HOUSING ELEMENT

2014 Housing Program	Time Frame	Accomplishments	Continue/Modify/ Delete
<p><i>Implements Policy 3.1</i></p> <p>The County shall continue to work with DWP, BLM, the Forest Service and other federal, state, and local agencies to identify appropriate land for release, thus enabling the County to provide additional sites for housing development. Additionally, the County will continue to coordinate with various Tribal Councils to pursue development of affordable housing units on reservations. Funding: Planning Department budget</p>	<p>Ongoing</p>	<p>Effectiveness/Progress: The County has worked with DWP to release lands for residential development. The County is currently working with a variety of local, state, and federal agencies to identify appropriate government lands for release.</p>	<p>Appropriateness: Continue to work with DWP and various federal, state, and local agencies to identify appropriate government land for release. This program will continue.</p>
<p><i>Implements Policy 3.1</i></p> <p>The County shall provide expanded affordable housing opportunities by partnering with local organizations and providing technical assistance and/or pass-through funds as appropriate for the development of units affordable to extremely low, very low, or low- income households.</p> <p>Funding: Planning Department budget</p>	<p>Ongoing</p>	<p>Effectiveness/Progress: The County did apply for CDBG funding in 2013, but was not awarded. The County will continue to facilitate the application for funding with local partners.</p>	<p>Appropriateness: The County will continue to pursue funding opportunities as appropriate.</p>
<p><i>Implements Policy 3.1</i></p> <p>The County will explore an Employer Assisted Housing Program by forming a working group with major employers in the area to discuss how the County can assist in the development of employer-assisted housing in Inyo County. Funding: Planning Department budget</p>	<p>Ongoing</p>	<p>Effectiveness/Progress: The County was not able to make progress on this program due to the depressed economy and subsequently Covid.</p>	<p>Appropriateness: The County will facilitate discussions with employers regarding housing assistance.</p>

HOUSING ELEMENT

2014 Housing Program	Time Frame	Accomplishments	Continue/Modify/ Delete
<p><i>Implements Policy 3.1</i></p> <p>The County will continue to implement the final Housing Plan developed by the Housing Task Force adopted in 2005 in conjunction with the Housing Element programs. Funding: Planning Department budget (development fees)</p>	Ongoing	<p>Effectiveness/Progress: The County has continues to monitor the Home program and potential opportunities for additional housing funding as well as provide information to developers about the density bonus provisions in the code.</p>	<p>Appropriateness: The County will continue this program.</p>
<p><i>Implements Policy 3.1</i></p> <p>The County shall support local housing assistance providers to work to assist in locating roommates to share existing housing. This will be accomplished by contributing to funding and assisting in program outreach to expand program utilization. Funding: Planning Department budget</p>	Ongoing	<p>Effectiveness/Progress: The County does not provide funding for this activity but if a need for this service arises, the County would refer inquiries to local housing service providers.</p>	<p>Appropriateness: This program will be continued.</p>
<p><i>Implements Policy 3.2</i></p> <p>The County shall encourage higher density residential development in areas of population concentration by conducting outreach to developers and property owners to encourage higher density residential development. In addition, the County will explore funding options for appropriate housing as funds become available. Funding: Planning Department budget</p>	Ongoing	<p>Effectiveness/Progress: The County works with land owners and develops to encourage and aid in the development of high density residential construction.</p>	<p>Appropriateness: This program will be continued to facilitate the provision for affordable home opportunities.</p>
<p><i>Implements Policy 3.2</i></p> <p>The County shall encourage development of housing for low-income households through provision of density bonus incentives. The County shall provide the updated density bonus chapter of the code as requested to inform applicants of opportunities for density increases. Funding: Respond to NOFAs for MHP, HOME program</p>	Ongoing	<p>Effectiveness/Progress: The County does offer a density bonus to developers. The ordinance was updated in 2007. It includes guidelines for one, two, or three concessions for affordable housing: one concession for housing developments that include at least 5 percent of the total units for very low- income households, at least 10 percent for lower-income households, or at least 10 percent for moderate-income households in a common interest development; two concessions for housing developments that include at least 10 percent of the total units for very low-income households, at least 20 percent for lower-income households, or at least 20 percent for moderate-income households in a common</p>	<p>Appropriateness: This program is not appropriate to continue because the County is not a developer. However, it does support the efforts of developers planning to build homes affordable to low- or moderate-income households. The County will also update the Code to reflect current State Law.</p>

HOUSING ELEMENT

2014 Housing Program	Time Frame	Accomplishments	Continue/Modify/ Delete
		interest development; three concessions for projects that include at least 15 percent for very low-income households, at least 30 percent of the total units for lower-income households, or at least 30 percent for persons or families of moderate income in a common interest development. The density bonus chapter of Title 18 of the County code is distributed upon request.	
<p><i>Implements Policy 3.4</i></p> <p>The County shall provide technical assistance to mobile home park residents who want to purchase their mobile home park. To accomplish this, the County will advertise the program to mobile home park residents, including conducting meetings with tenants. Funding: Available State, Federal, and local funds (HOME, MHP, CDBG, etc.)</p>	Ongoing	Effectiveness/Progress: The County provides information to mobile home park residents and provides referrals to HCD, USDA and other mobile home advocacy groups, as well as local real estate lenders.	Appropriateness: This program will continue.
<p><i>Implements Policy 3.4</i></p> <p>The County will continue to allow manufactured housing as a permitted use in all residential zones. Funding: Planning Department budget, HOME, MHP</p>	Ongoing	Effectiveness/Progress: County code allows for manufactured housing in all residential zones.	Appropriateness: This will continue as practice, but since it is not a program, it will be removed.
<p><i>Implements Policy 3.5</i></p> <p>The County will support the efforts of local housing service providers to assist low-income households with utility bills by providing assistance to a minimum of 150 households annually through the LIHEAP (Low-income Energy Assistance Program). Funding: Pursue FmHA funds</p>	Ongoing	Effectiveness/Progress: The County works with local non-profit recipients of LIHEAP funding to continue this program	Appropriateness: This program will be continued.
<p><i>Implements Policy 3.5</i></p> <p>The County shall encourage rental subsidies for lower-income families and elderly persons. The County shall encourage listing of rental units with local housing service providers. Coordinate with HCD to receive additional subsidies for rental assistance. Funding: Planning Department budget</p>	Ongoing	Effectiveness/Progress: One local housing service provider administers Housing Choice Vouchers (Section 8) for the County. The County routinely refers inquiries to local housing service providers.	Appropriateness: This program will be continued.

HOUSING ELEMENT

2014 Housing Program	Time Frame	Accomplishments	Continue/Modify/ Delete
<p><i>Implements Policy 3.5</i></p> <p>The County shall provide for the continued affordability of the County's low and moderate-income housing stock. Although not anticipated, if any deed-restricted affordable units currently serving County residents are at risk of converting to market rates, the County will facilitate a preservation program with the owner and/or operator of the project at risk. The goal will be to identify additional funds to either continue the affordability of the at-risk project or to replace those units once they are no longer affordable to lower-income households. Funding: Planning Department budget</p>	Ongoing	<p>Effectiveness/Progress: The County works with housing developers to provide for and maintain housing, in the event that deed restricted units are at risk, the County will work to preserve the units and educate the public regarding the importance of low-income units.</p>	<p>Appropriateness: This program will continue</p>
<p><i>Implements Policy 4.1</i></p> <p>The County will continue to make efforts to coordinate with established self-help housing groups to solicit interest in developing projects in the county to facilitate self-help housing as a form of homeownership for lower-income households. Funding: Planning Department Budget, CDBG</p>	Ongoing	<p>Effectiveness/Progress: The County routinely works with potential housing developers to increase housing supply. This includes to self-help housing groups.</p>	<p>Appropriateness: The County will continue to provide homeownership information to county residents.</p>
<p><i>Implements Policy 4.2</i></p> <p>The County will annually consider applying for state and federal grant funds to provide homeownership opportunities that may include interest rate write-downs, down payment assistance, and mortgage revenue bond financing through state and federal programs. Funding: Planning Department budget</p>	Ongoing	<p>Effectiveness/Progress: The County did not directly apply for any funding to provide homeownership opportunities that include interest rate write-downs, down payment assistance, and mortgage revenue bond financing through state and federal programs.</p>	<p>Appropriateness: This program will be continued.</p>
<p><i>Implements Policy 4.2</i></p> <p>The County shall coordinate with local lenders to provide program information to the public about homebuyer assistance programs such as CalHFA, RCRC, and USDA.</p>	Ongoing	<p>Effectiveness/Progress: The County works with local lenders, real estate professional and housing providers to provide information to the public on loan opportunities available.</p>	<p>Appropriateness: Lenders do not work with these programs – Removed.</p>
<p><i>Implements Policy 5.1</i></p> <p>The County shall continue to allow second units, condominium</p>	Ongoing	<p>Effectiveness/Progress: Zoning code allows for all of these affordable options to be available to County</p>	<p>Appropriateness: This practice will continue, but since it is not a program it</p>

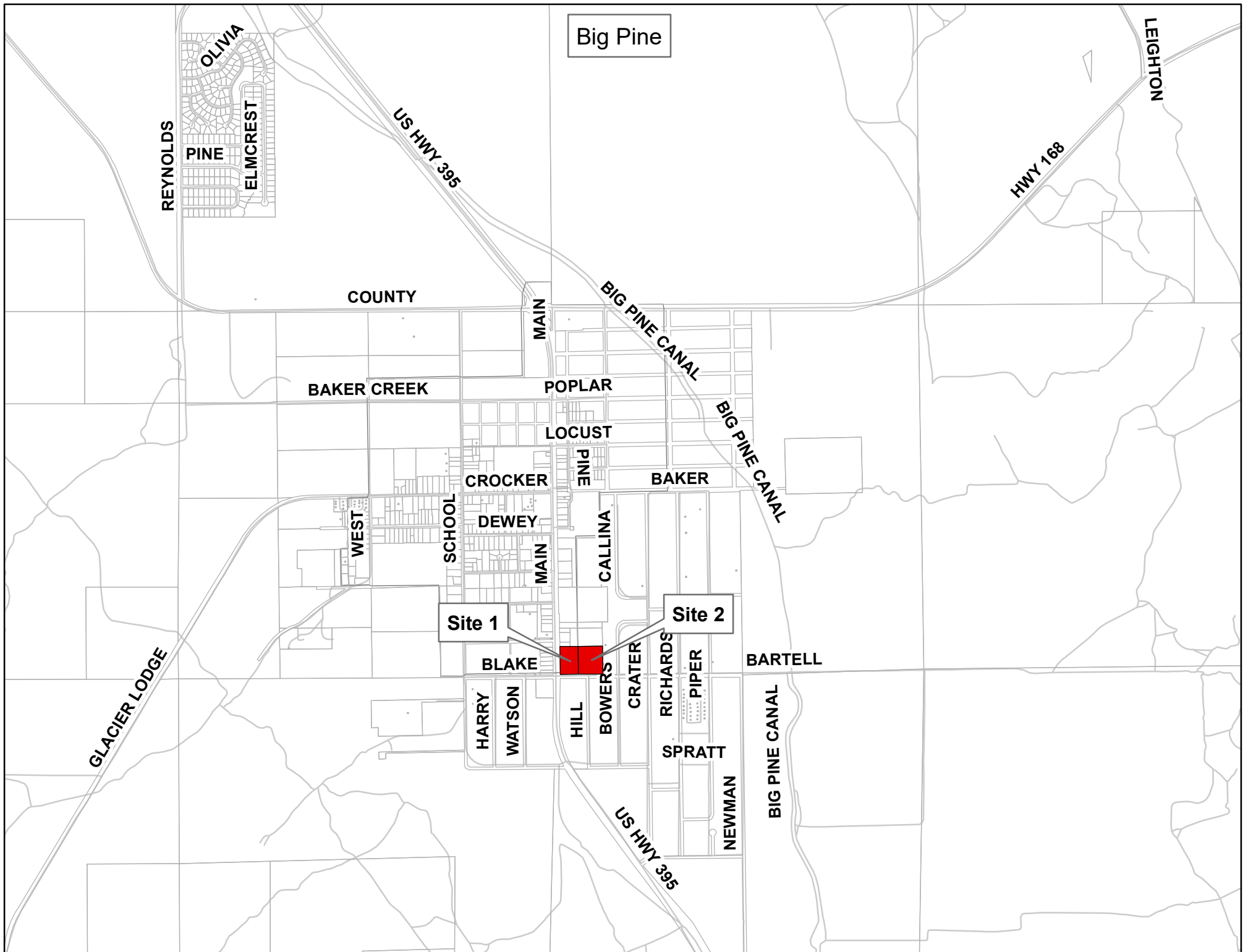
HOUSING ELEMENT

2014 Housing Program	Time Frame	Accomplishments	Continue/Modify/ Delete
<p>conversions, density bonuses, and residential units in commercial zones as specified in the County's Zoning and Subdivision Ordinances.</p>		<p>residents.</p>	<p>is being removed.</p>
<p><i>Implements Policy 5.1</i> The County shall continue to expedite project review and facilitate timely building permit and development plan processing for residential developments, including those with an affordable housing component.</p>	<p>Ongoing</p>	<p>Effectiveness/Progress: The County routinely works with homeowners to expedite their permits and provides flexibility in submittal requirements for owners developing their own homes. Typical processing times are relatively short. County staff attempt to do all plan processing as efficiently as possible. A planner is assigned to a project when it is first submitted as follows it through permitting to minimize some inefficiency.</p>	<p>Appropriateness: This program will continue.</p>
<p>COMPLETED PROGRAMS</p>			
<p>Chapter 633 of the Statutes of 2007, also known as SB 2, requires jurisdictions to allow for permanent emergency shelters as a permitted use in at least one zone. This zone may be residential, commercial, or industrial but must be appropriate for this type of use and not be completely built out. In accordance with SB 2, the County will evaluate the most appropriate zone to permit shelters and amend the County code accordingly within one year of the adoption of this Housing Element.</p>	<p>Completed</p>		
<p>According to Chapter 633 of the Statutes of 2007, also known as SB 2, the County must explicitly allow both supportive and transitional housing types in all residential zones. The County shall update its Zoning Ordinance to include separate definitions of transitional and supportive housing as defined in Health and Safety Code Sections 50675.2 and 50675.14. Both transitional and supportive housing types will be allowed as a permitted use subject only to the same restrictions on residential uses contained in the same type of structure.</p>	<p>Completed</p>		
<p>To ensure zoning flexibility that allows</p>	<p>Completed</p>		

HOUSING ELEMENT

2014 Housing Program	Time Frame	Accomplishments	Continue/Modify/ Delete
for the development of single-room occupancy (SRO) units, the County will update its Zoning Ordinance to explicitly allow for SROs in developed areas near services and transit.			
Chapter 1062 of the Statutes of 2002, also known as AB 1866, requires jurisdictions to allow second units ministerially in all residential zones. The County will amend the County code to reflect this requirement while maintaining its current standards for second units that require a floor area of up to 30 percent of the principal dwelling unit up to a maximum of 1,200 square feet.	Completed		
Currently residential care facilities are permitted with a conditional use permit in the RR and R-3 zones. Pursuant to Chapter 671 of the Statutes of 2001, also known as SB 520, the County will amend the County code to allow flexibility for the location of residential care facilities by permitting facilities for 6 or fewer persons by right in all residential zones.	Completed		
The County shall incorporate reasonable accommodation provisions into its Zoning Code to provide a means for persons with disabilities to request exceptions to zoning and building regulations that may be act as a barrier to their housing choice.	Completed		

Appendix C – Proposed RHNA Sites Maps



Big Pine

LEIGHTON

US HWY 395

HWY 168

REYNOLDS

PINE

ELMCREST

OLIVIA

COUNTY

BAKER CREEK

MAIN

POPLAR

LOCUST

CROCKER

PINE

BAKER

DEWEY

MAIN

CALLINA

Site 1

Site 2

BLAKE

HILL

BOWERS

CRATER

RICHARDS

PIPER

BARTELL

HARRY

WATSON

HILL

BOWERS

CRATER

RICHARDS

PIPER

SPRATT

NEWMAN

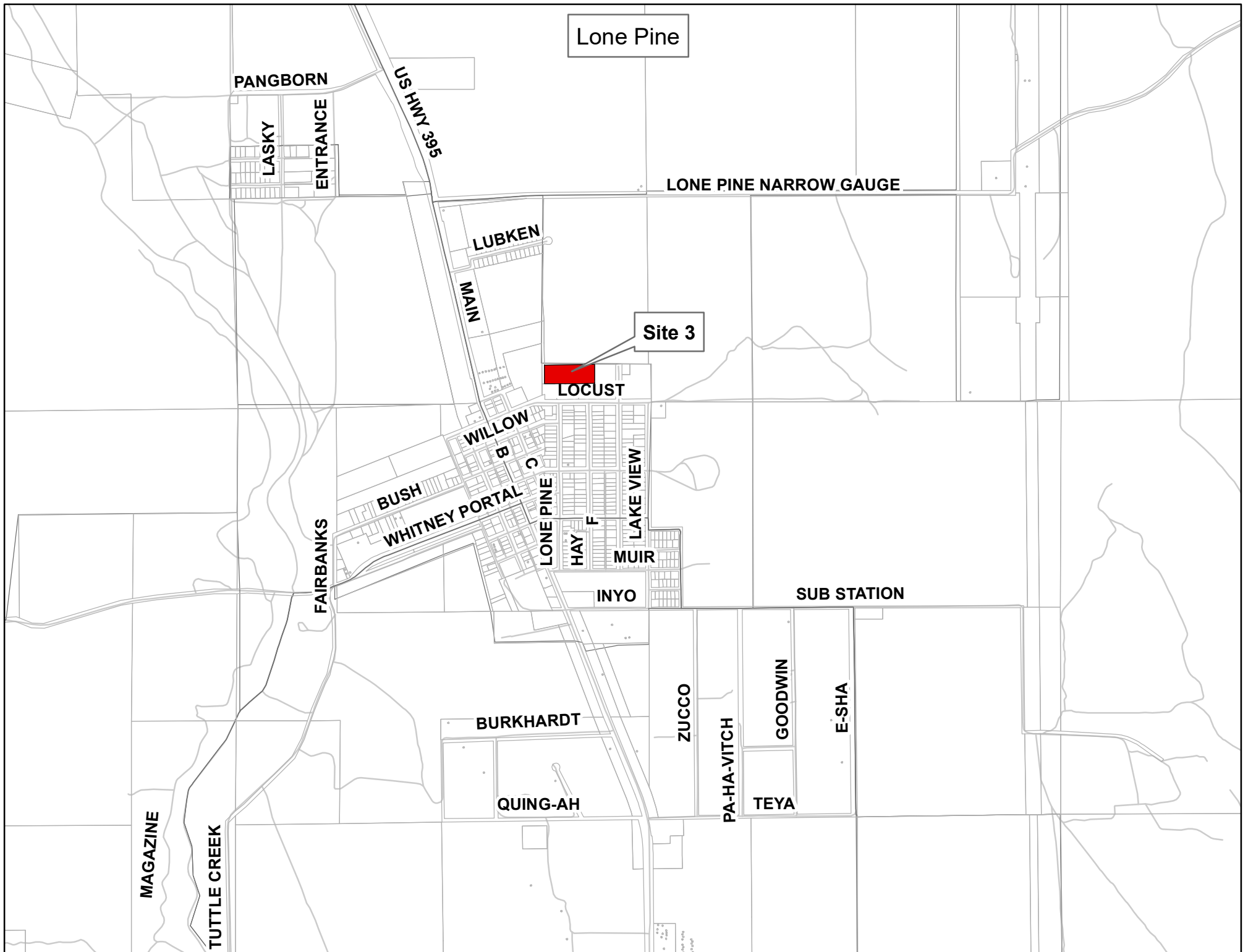
GLACIER LODGE

US HWY 395

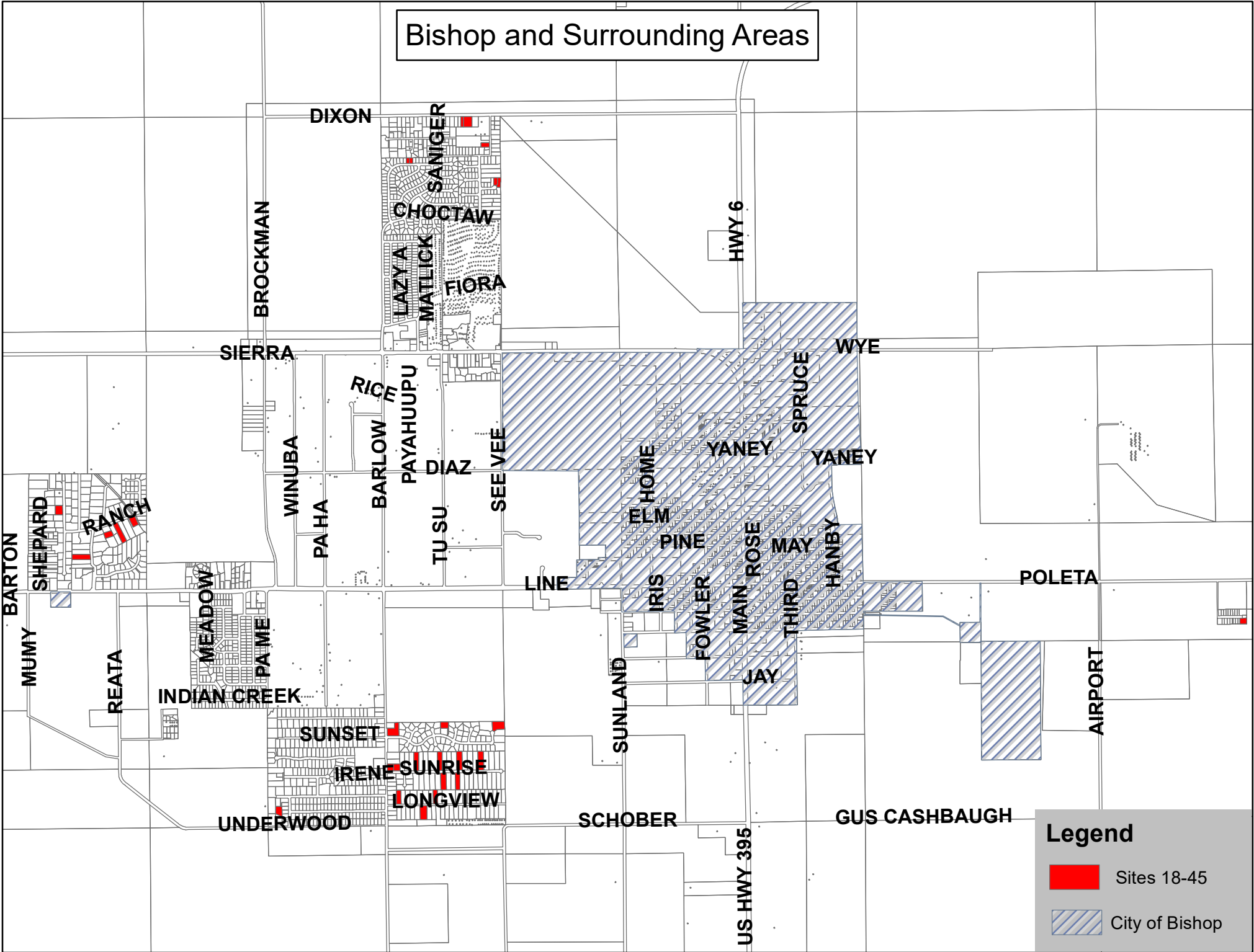
BIG PINE CANAL

BIG PINE CANAL



BIG PINE CANAL

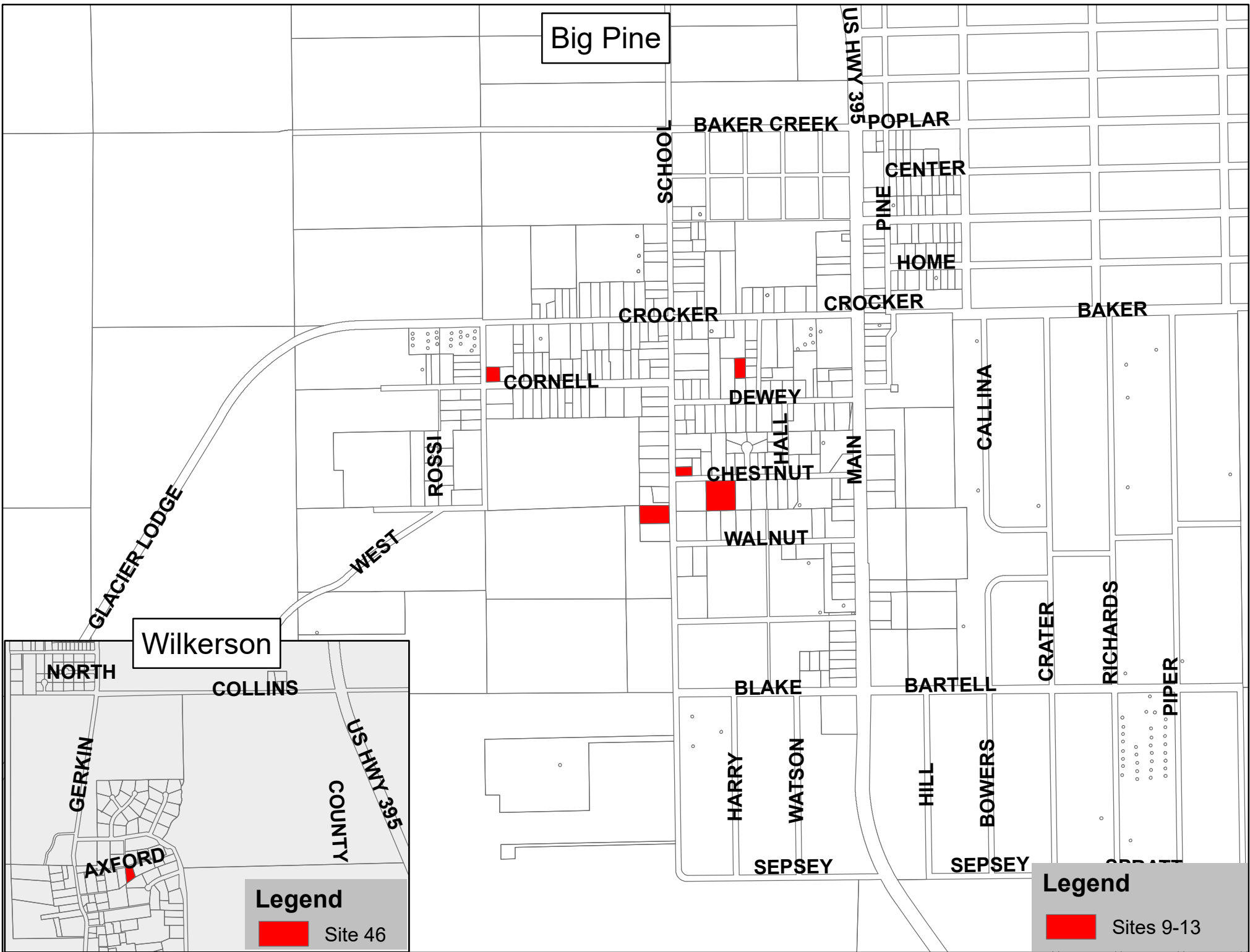


Bishop and Surrounding Areas



Legend

-  Sites 18-45
-  City of Bishop



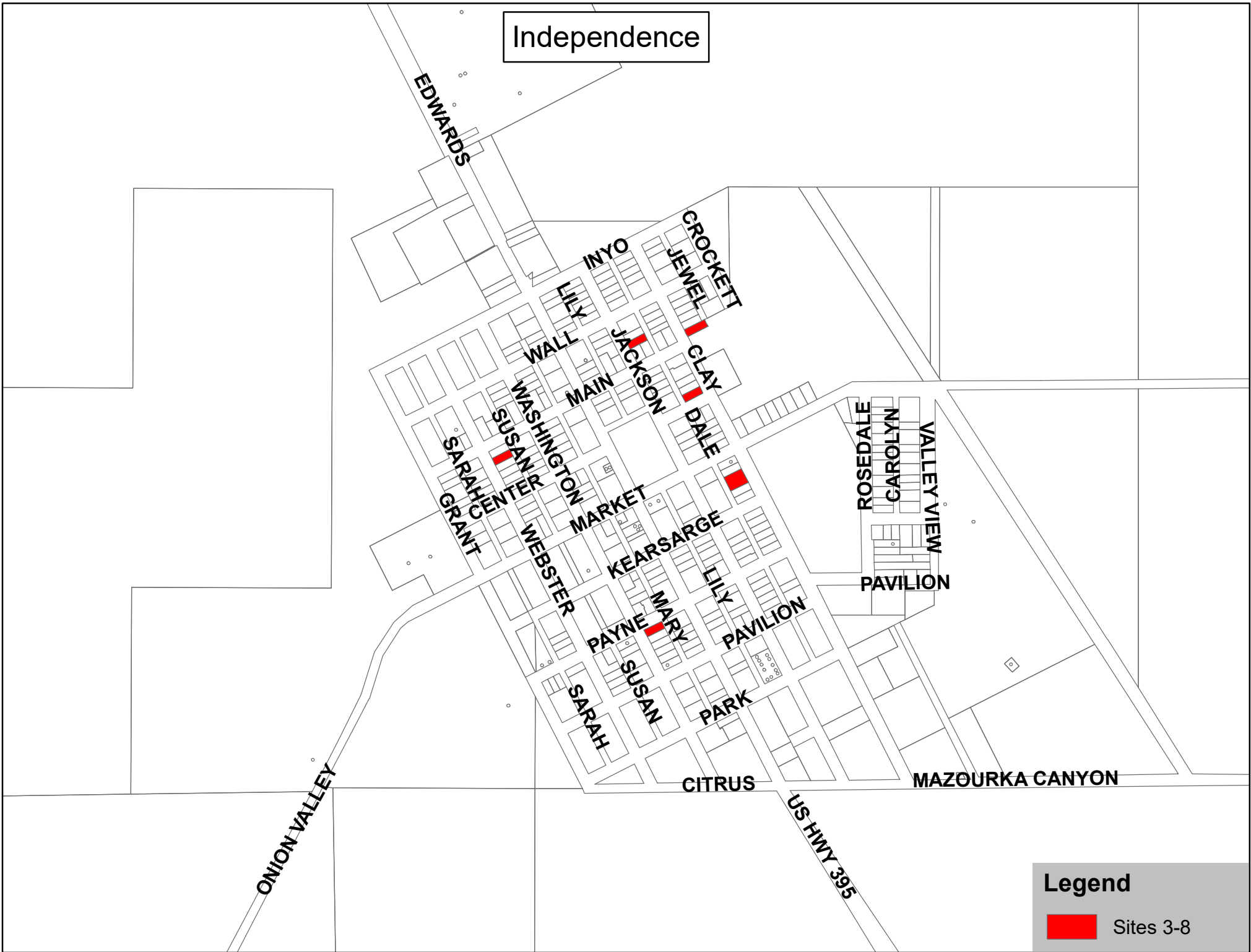
Big Pine

Wilkerson

Legend
[Red Triangle] Site 46

Legend
[Red Square] Sites 9-13

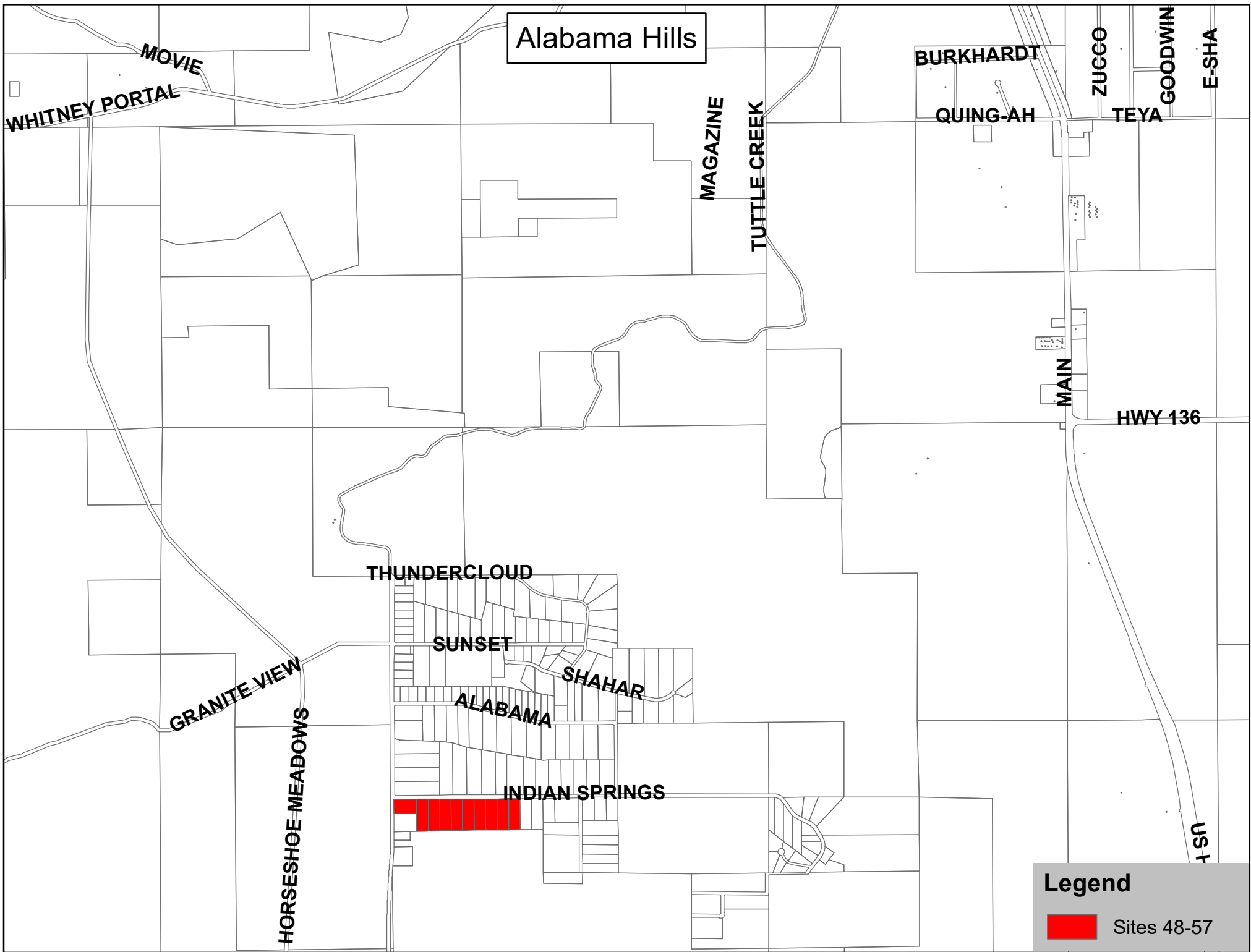
Independence



Legend



Sites 3-8



Alabama Hills

WHITNEY PORTAL
MOVIE

BURKHARDT
QUING-AH

ZUGGO
TEYA
GOODWIN
E-SHA

MAGAZINE
TUTTLE CREEK

MAIN

HWY 136

THUNDERCLOUD

SUNSET

SHAHAR

ALABAMA

INDIAN SPRINGS

GRANITE VIEW

HORSESHOE MEADOWS

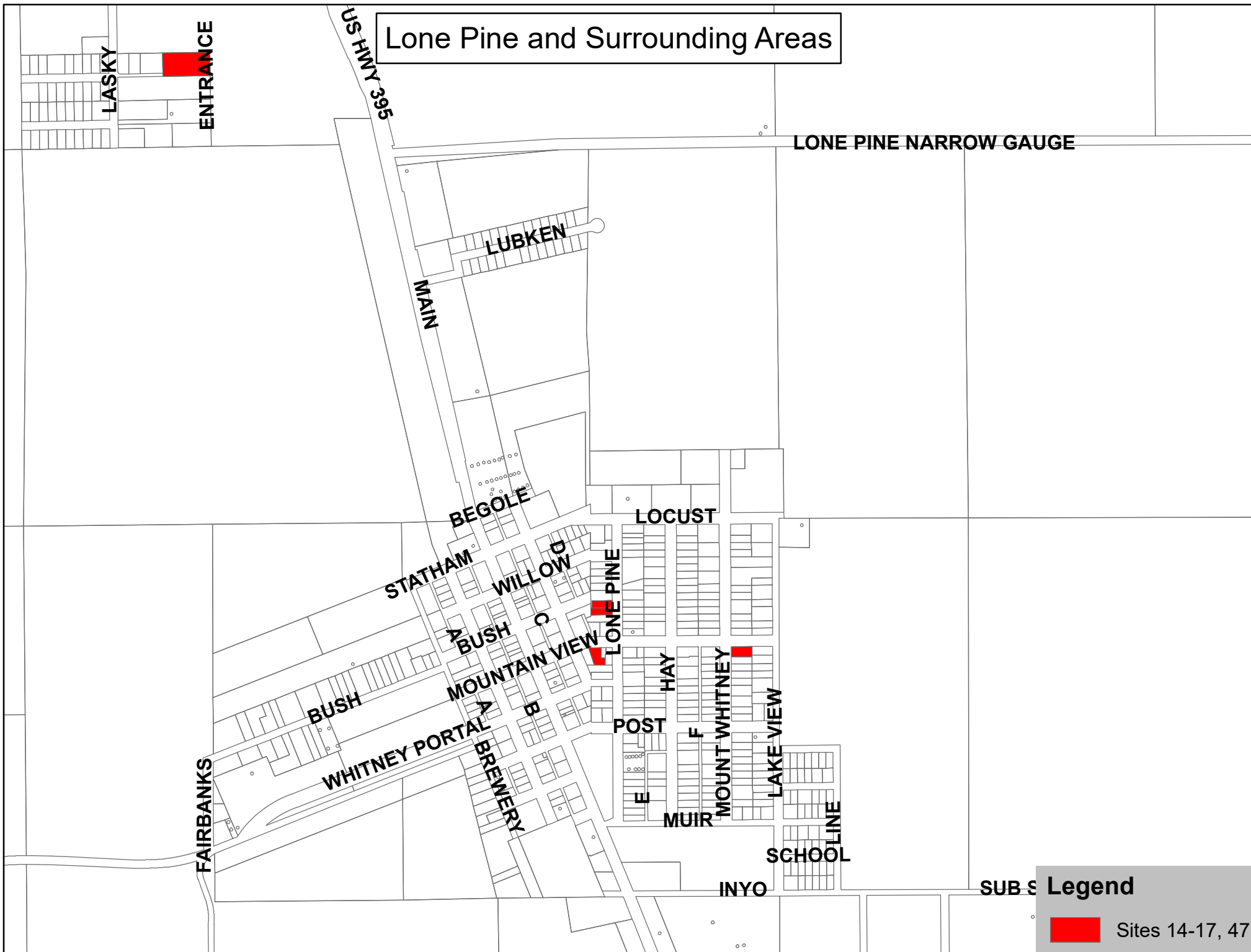
Legend



Sites 48-57

US 1

Lone Pine and Surrounding Areas



Legend
[Red Square] Sites 14-17, 47

Attachment - June 26, 2023 Letter from HCD

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov



August 9, 2022

Cathreen Richards, Director
Community Development Department
County of Inyo
168 N Edwards St.
Independence, CA 93526

Dear Cathreen Richards:

RE: County of Inyo's 6th Cycle (2021-2029) Revised Draft Housing Element

Thank you for submitting the County of Inyo's (County) revised draft housing element received for review on August 3, 2022, with minor technical clarifications received on August 8, 2022. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review.

The revised draft element meets the statutory requirements of State Housing Element Law, as described in HCD's November 16, 2021 review. The housing element will comply with State Housing Element Law (Article 10.6 of the Gov. Code) when it is adopted, submitted to, and approved by HCD, in accordance with Government Code section 65585.

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the County must continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available while considering and incorporating comments where appropriate.

For your information, pursuant to Government Code section 65583.3, the County must submit an electronic sites inventory with its adopted housing element. The County must utilize standards, forms, and definitions adopted by HCD. Please see HCD's housing element webpage at <https://www.hcd.ca.gov/community-development/housing-element/index.shtml#element> for a copy of the form and instructions. The County can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the County will meet housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the County to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: <https://www.opr.ca.gov/planning/general-plan/guidelines.html>.

HCD appreciates the hard work and dedication that you provided in the preparation of the County's housing element and looks forward to receiving the County's adopted housing element. If you have any questions or need additional technical assistance, please contact Shawn Danino, of our staff, at Shawn.Danino@hcd.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul McDougall", with a stylized flourish at the end.

Paul McDougall
Senior Program Manager

Attachment - CEQA Addendum

**Addendum No. 1 to the Negative Declaration of Environmental Impact
Prepared for the Inyo County Housing Element Update 2021-2029 - General
Plan Amendment (GPA) 2021-01**

[State Clearinghouse No. 2021060395]

This Addendum has been prepared pursuant to the California Environmental Quality Act (CEQA) in order to evaluate a revision and readoption of the County's Housing Element Update 2021-2029. This update consists of a swap of two parcels of land identified as sites for the County's Regional Housing Needs Allocation (RHNA). The two replacement parcels were not evaluated in the original Initial Study and Draft Negative Declaration (ISND). The project was approved by the Inyo County Board of Supervisors on August 17, 2021 and readopted on August 16, 2022. The two replacement parcels will make up for a loss of RHNA sites that occurred due to the failure of the reclassification (General Plan and Zoning) of the two original RHNA site parcels as set forth in the adopted and certified Housing Element.

Authority

CEQA Guidelines Section 15164 and Inyo County Code Section 15.36.220 indicate, in part, that an addendum to a Negative Declaration may be prepared if none of the requirements for preparation of a subsequent environmental document apply. The decision-making bodies shall consider the addendum prior to making a decision on the project. The addendum need not be circulated for public review.

Project Description

The General Plan Housing Element is required by all California jurisdictions, pursuant to California Government Code Section 65580 et seq., and works to provide housing for all of Inyo County's residents. The County's Housing Element was first adopted in 1992 and updated in 2001, 2003, 2009, 2014 and most recently in 2022.

Beginning in 2020 staff began the 2021-2029 Housing Element Update and it was finally approved by the County Board of Supervisors and Certified by the California Department of Housing and Community Development (HCD) in August 2022. This updated included the requirements set forth in State Housing Element Law including the County's required RHNA. This is the number of housing units, by income categories, that the County must plan for in the Housing Element. The RHNA required a total of 205 new units consisting of 46 very low-income units, 40 low-income units, 39 moderate-income units and 80 above-moderate income units. Two of the Parcels identified as RHNA sites were required to have General Plan and Zoning designation changes to support higher density housing by April 23, 2023. When these changes were not adopted, the Housing Element was put in jeopardy of no longer being compliant with State Housing Element Law. By swapping out the original two parcels with two new parcels the County will maintain its Housing Element compliance.

MND General Plan Amendment 2021-01/Housing Element Update

The MND prepared for GPA 2021-01/Housing Element Update and certified in 2022, evaluated the project through an IS. The ISND identified no impacts that were potentially significant (attached) as the parcels identified for RHNA sites were in areas that would not be impacted by

the level of housing development planned for in the Housing Element and no individual sites had environmental impacts that were considered significant.

Need for an Addendum to the Original ND Prepared for GPA 2021-01/Housing Element Update

The proposed swap of the two RHNA site parcels requires the addendum to the original CEQA document as the two new parcels were not evaluated under the 2021 ISND that was prepared and certified for the project.

Specifically, CEQA Guidelines Section 15162 notes that once a Negative Declaration has been certified for a project, the preparation of a subsequent Negative Declaration is not necessary unless the lead agency for the project (in this case, Inyo County) determines that “substantial changes” are proposed either in or by the project itself, or changes are proposed in the circumstances under which the project is undertaken, or if substantial new information becomes available concerning the project. Staff concluded that there is no need for a subsequent Negative Declaration, since the two replacement RHNA parcels currently have General Plan and Zoning designations that allow for the density and type of housing proposed for them in the Housing Element – by right. In other words, this development could happen without the two parcels being identified in the Housing Element.

CEQA Guidelines Section 15164 notes that an Addendum to a Negative Declaration should be prepared by the lead agency for a project. The Guidelines further note that an Addendum is appropriate “if some changes or additions are necessary but none of the conditions described in (CEQA Guidelines) Section 15162 calling for preparation of a subsequent Negative Declaration have occurred.” Staff has determined that preparing the Addendum is appropriate since the two replacement RHNA sites parcels were not previously reviewed under CEQA but also currently have the correct General Plan and Zoning designations for the development types identified in the Housing Element. They will not require further discretionary approval for development and both parcels are disturbed.

CEQA Guidelines Section 15164 also states an Addendum to an EIR or Negative Declaration “need not be circulated for public review but can be included in or attached to a final EIR or adopted negative declaration” for the project. As a result, staff has not circulated this Addendum to the ND for public review, but rather has included it as an attachment to the original ND prepared for GPA 2021-01/Housing Element Update.

Findings

CEQA Guidelines Section 15162 indicates that no subsequent environmental document is required unless certain conditions apply. These conditions do not exist for proposed GPA 2023-02 Housing Element Revision, as discussed below:

1. No substantial changes will result from the swap of the two RHNA site parcels that will require major revisions to the previous ND as there are no new significant effects or substantial increases in the severity of previously identified significant effects.

The proposed project is consistent with the environmental analysis provided in the ND prepared for GPA 2021-01/Housing Element Update as the two replacement RHNA sites are

already disturbed and denuded of vegetation. These parcels also currently have General Plan and Zoning designations that allow, by right, the type and density of development set forth in the Housing Element.

2. No substantial changes have occurred with respect to the circumstances under which the project is being undertaken, which might require major revisions of the previous ND due to the involvement of significant effects or a substantial increase in the severity of previously identified significant effects.

Staff, has analyzed the proposed project and found that no substantial changes have occurred with respect to the circumstances of the overall project that will result in significant environmental effects or increases in severity. The two replacement RHNA site parcels have no additional significant effects that add to the original ND. As a result, no substantial changes in the circumstances or severity of previously identified effects are expected to occur from the proposed RHNA sites replacement.

3. No new information of substantial importance that was not known, and which could not have been known with the exercise of reasonable diligence at the time the previous ND was certified, shows or indicates that any of the following has occurred, or will occur, as a result of the two parcel's replacement:

- A. One or more significant effects not discussed previously.

There are no substantial changes as the two replacement parcels already have appropriate General Plan and Zoning designations for the type and density of development as set forth in the Housing Element and the project does not cause new impacts that were not evaluated in the certified ND prepared for GPA 2021-01/Housing Element Update.

- B. Significant effects previously examined will be substantially more severe.

There are no significant environmental effects identified on the replacement parcels that were previously identified significant and can be substantially more severe, as these parcels were not previously reviewed and using them to replace the original two RHNA site parcels does not create new significant impacts.

- C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project.

There were no mitigation measures or alternatives identified in the ND prepared for GPA 2021-01/Housing Element Update.

- D. Mitigation measures or alternatives which are considerably different from those analyzed in the previous ND would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

There were no mitigation measures or alternatives identified in the ND prepared for GPA 2021-01/Housing Element Update.

None of the above-specified conditions apply to the proposed GPA 2023-02/Housing Element Revision; therefore, no subsequent environmental document is required. Consideration of this Addendum is adequate to comply with CEQA for this project, pursuant to CEQA Guidelines Section 15164.