

Appendix E, Volume 2 – Public Outreach and Community Engagement

September 5, 2023, HCD issued a letter with written findings regarding the Draft 2023-2031 Housing Element update. This letter states that while the Draft Housing Element addresses most of the statutory requirements certain portions needed additional information in order for HCD to consider the Housing Element for certification. The City has considered HCD's recommended modifications and incorporated revisions into the document and produced the Final 2023-2031 Housing Element as needed in order to respond to HCD's specific requirements to ensure the Housing Element substantially complies with Housing Element law.

On November 28, 2023, the Planning Commission of the City of Mt. Shasta held a duly noticed public hearing. Prior to the hearing, the City receive the following letters commenting on the Final 2023-2031 Housing Element. All letters received were transmitted to the Planning Commissioners prior to the hearing. Table E-1 below contains a roster of the organizations and individuals who submitted written comments.

Letter ID	Commenting Organization, Person, or Public Agency	Public Comment Date(s)
A	Dale La Forest/Mt. Shasta Tomorrow	11/28/2023
B	Johanna Windswept/Altorfer	11/28/2023
C	Barbara Ulbrich	11/28/2023
D	Peggy Risch	11/28/2023
E	Vicki Gold	11/28/2023
F	Beverly Harlan	11/28/2023

Mt. Shasta Tomorrow
101 E. Alma Street, Suite 100-A, Mt. Shasta, CA 96067
E-Mail: [REDACTED]

Planning Commission, City of Mt. Shasta planningcommission@mtshastaca.gov
Mt. Shasta, CA 96067 and Planning Director Jeff Mitchem <jmitchem@mtshastaca.gov

Public Comments on 2023-2031 HOUSING ELEMENT UPDATE Draft

Dear Planning Commissioners:

November 28, 2023

These public comments question the City's proposed approval of its Housing Element Update without first preparing CEQA review of the proposed harmful changes the Update could undoubtedly create in the community and local environment. This proposed Housing Element Update is not exempt from CEQA requirements as we have previously informed the City.¹

HOUSING ELEMENT UPDATE POSES POTENTIALLY SIGNIFICANT VISUAL IMPACTS

The Housing Element Update would compel the City to change zoning requirements and Design Guidelines. Those changes would exempt multi-family housing projects from the Planning Commission's discretionary approval process. Instead, the City is proposing to entirely allow City staff to make those decisions by a ministerial process without any public oversight or Planning Commission review. The Update proposes exempting large multi-family housing projects from the City's Architectural Review ordinance, Large Scale Building ordinance, and the Design Guidelines. Such changes may lead to significant aesthetic impacts if developers are no longer subject to local standards pertaining to aesthetic appearance or public review. For example, a very inappropriate 5-story apartment building could be permitted on Lake Street without compliance with our Architectural Design Guidelines or Planning Commission approval:



¹ See Mt. Shasta Tomorrow's April 17, 2023 letter: "Public Comments. . ." attached below as **Exhibit 1**.

Under the proposed Housing Element Update, a low-income apartment building in an R-3 zone² made from incompatible-appearing recycled shipping containers stacked up as shown in the following illustration could be approved solely by City staff without any public notice beforehand, or Planning Commission approval or environmental review:



The Staff Report proudly describes how much public involvement the City has provided for over a year leading up to this Housing Element Update. But what is not revealed is that the City is making significantly harmful, last minute changes to it with little public notice or review opportunity. For example, the current Staff Report for the first time now describes that the Update would amend the City's *Large Scale Building ordinance*³ to exclude all residential development, including multifamily residences, from its protections for buildings greater than 20,000 square feet in floor area. Such protections up to now have included architectural and site plan design review, landscaping requirements, and lighting standards. Now all those protections would be thrown away if the Housing Element Update is approved as currently proposed.

Hiding these changes from the public to almost the last minute like this is comparable to the despicable practice of "bait and switch." It is clearly fraudulent for the City to claim that the public has participated thoroughly in the draft Housing Element Update when such dramatic changes that threaten the scenic beauty of our community are introduced for the first time during the Thanksgiving weekend with little time or public notice to allow informed public review and comment.

² In Mt. Shasta's R-3 zones, multi-family apartment buildings can be up to 45 feet high, allowing even five stories.

³ The Large Scale Building ordinance is found at Municipal Code § 18.70.

HOUSING ELEMENT UPDATE WOULD ELIMINATE ARCHITECTURAL REVIEW OF MULTIFAMILY RESIDENTIAL PROJECTS

Similarly, the Housing Element Update would eliminate all the protections offered by the City's Architectural Ordinance and Design Guidelines that pertain to multifamily residential projects. Instead of Planning Commission approvals for such projects that are currently required, the change would provide a *ministerial nondiscretionary design review* process for multifamily development that would occur behind closed doors with the City Manager or Planning Director, but no public involvement.⁴ Yet no design review standards that may be used by City Staff in their nondiscretionary design review process have yet been revealed to the public. Some of these draconian changes triggered by the Housing Element Update have never been disclosed to the public before, appearing now for the first time in the current Staff Report. Contrary to the Staff Report's claims, such significant non-discretionary changes are not mandatory in order to comply with State law, as described below. Yet these new significant changes in the Housing Element Update that literally eliminate our City's Design Guidelines that we've relied upon for decades, via a newly announced Program HO-2.3.7, are shown for the first time in the current Staff Report without any reasonable opportunity for public review.

For example, a five-story version of the following multi-family apartment building design made from shipping containers could be permitted by City Staff without any Planning Commission or public review or environmental review:

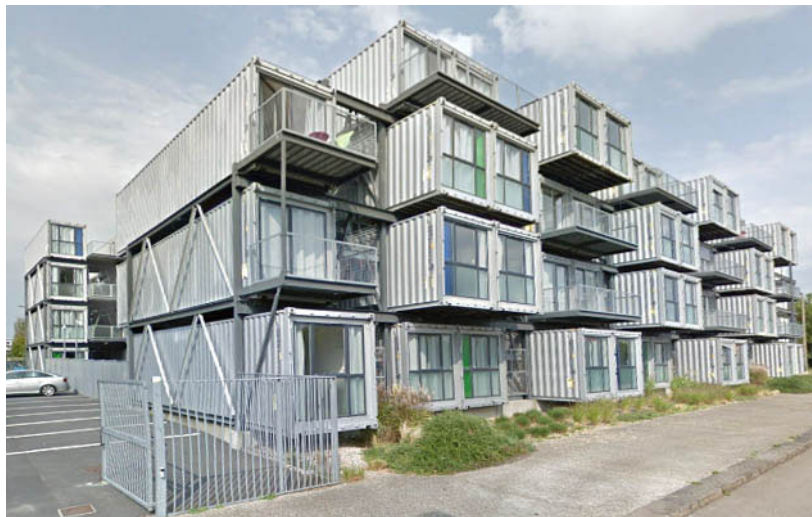


Our Design Guidelines are meant to protect the City against such architecturally incompatible development. But the City is now proposing with the proposed Update, in unexplained zeal to blindly develop multifamily housing at any cost, to eliminate such protective Design Guidelines.

⁴ See Housing Element Update, page 2-9, Program HO-2.3.7, which intends to eliminate design review and zoning ordinance design standards for multifamily developments.

The City is adding other new programs to the Housing Element Update that were never shown before the current Staff Report. Those new programs pertain to affordable housing and other housing including any types of multifamily developments, even those for average-income or affluent residents. (Programs HO-2.4.1 and HO-2.4.2) The City is revoking the authority of the Planning Commission for reviewing some of these projects and delegating instead that authority solely to the City Manager or Planning Director.

If a developer approaches the City with a scheme to use shipping containers for a low-income multifamily development project, can the public trust that such an unsightly project approved behind closed doors solely by City staff will not be needlessly harmful to our community and the surrounding scenic resources and mountain vistas we so strongly value?



HOUSING ELEMENT UPDATE IS NOT REQUIRED TO ELIMINATE DESIGN REVIEW, BUT THE CITY’S PLANNING CONSULTANTS ARE RECOMMENDING IT ANYWAY.

The City Staff is simply going too far in recommending removing design review and CEQA review for multifamily developments under these Housing Element Update changes. This appears to be an attempt to make their jobs easier, removing pesky citizen involvement, but with great risk to the public and our City’s appearance.

For example, the State Housing and Community Development agency (HCD) in its letter wants the City to remove (where “appropriate”) constraints to development of housing.⁵ Yet the City is ignoring altogether the word “appropriate” and instead proposes to remove all constraints, even those that would be *inappropriate* to delete. So, you might ask did the Staff Report evaluate what it means for the removal of architectural review to be “appropriate?” The answer is “No.” Nowhere does the Staff Report discuss the reasons the City adopted Architectural Design Guidelines in the first place, obviously enacted to protect some special character vital to our City’s viability and financial sustainability in a setting that promotes tourism amidst great scenic

⁵ See the Staff Report, PDF p. 14, where the HCD instructs the City to: “Address and, **where appropriate** and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing . . . ” (emphasis added)

beauty. Some kinds of design guidelines are actually quite appropriate as the City has used for several decades. Their removal is what is not "appropriate" if the lack of constraint harms our local scenic environment. We're not a typical California urban city. We depend upon tourism and an architectural theme to guide the design of our buildings, and to prevent inappropriate monstrosities from scaring the beauty of our surrounding scenic landscape. It should be no surprise that a developer of low-income housing will want to cut costs in every possible way, including potentially using the cheapest and possibly the least attractive materials possible.



Moreover some other cities in California have had their housing elements approved even though they retained discretionary design guidelines and standards. Yet the current Staff Report does not mention that fact. For example, the City of Winters in 2022 updated its Housing Element while at the same time retaining its Design Review requirements. The City of Winters states that its “*design review requirements have not posed a constraint to development.*” It states that: “*The use of design review has created minimal cost impact on single-family and multi-family development because the types of architectural styles and embellishments required by the City do not, by themselves, cost significantly more to construct than other types of architectural styles.*”⁶

⁶ See City of Winters' 2022 Housing Element Update, page 71, available online at:

https://www.cityofwinters.org/wp-content/uploads/2023/03/6th-Cycle-Housing-Element-Update_Final.pdf

Winters Design Guidelines

“The City Residential Design Guidelines were created in a joint effort by the Winter Planning Commission and Winters Economic Development Commission in November 1999. The design guidelines were developed with the specific objectives of facilitating economic and residential development in the City and ensuring that the small-town character of the City was preserved.

“The Winters Residential Design Guidelines impose development standards that are not contained in the City’s Zoning Ordinance, including neighborhood design, circulation design, residential site design, and duplex design standards. Besides the obvious aesthetic issues, one of the goals, or perhaps the focus, of design review is to ensure that the City’s small-town character is preserved and enhanced. Thus, the standards are subjective. To ensure the guidelines are consistently applied to each residential project, a list of design elements or qualities that could be incorporated into the design of projects is included below each standard to identify how to meet the applicable design standards. For example, the residential site design standards identify that “roof designs in residential neighborhoods should add variety to the overall streetscape.” To achieve this, the guidelines identify the use of gables, hips, and dormers for roofs; the use of architectural asphalt shingles, concrete or clay tile, and slate or similar visual materials for roofs; and the use of roof structures and embellishments such as louvers, vents, lanterns, pinnacles, cupolas, finials, compounded fascias, parapets and eve moldings.” (Excerpt from City of Winters 2022 Housing Element Update, as finally approved by Winters City Council on September 7, 2023)

One aspect of the removal of constraints to new housing development would be the financial cost that constrains some kinds of development. So the public has the right to know in advance if removal of architectural design features would actually make housing any cheaper to build? The Staff Report does not examine this issue.

For example, it costs the same to paint an apartment building with ugly and inappropriate colors as it does to paint it with attractive colors, so why should the City remove its requirement that building colors adhere to the City's recommended color chart for new projects?

For another example, it might not cost any more to install alpine-shaped roof features to the face of a building than it would cost to install the same sized features made with an industrial motif more appropriate for an urban area found in a less scenic location. Again, that issue is not considered by the City's consultants who have written this Housing Element Update.



The City is blindly seeking to remove all constraints from multifamily developments without any showing or evidence that in doing so, the developers will make that housing more affordable. Some developers simply have bad taste, or their architects may care little for our community's priorities if they can make a bold statement to feed their egos and attract attention for their client.

HCD writes that "the [housing] element requires a complete analysis of potential governmental and nongovernmental constraints." But is there such a "complete analysis" of those constraints?

The Staff Report, without citing any specific law that mandates it, states: "*The element must include or modify programs committing to permit multifamily projects with objectivity and certainty and addressing or removing the CUP requirements for multifamily housing in zones intended to permit multifamily housing.*" If there was such a law, why did the HCD state that the Winters' H.E. Update substantially complied with State law with the discretionary Design

Guidelines discussed in and allowed by the City of Winter's 2022 Housing Element Update that was approved in 2023? Clearly the Mt. Shasta consultants do not understand State law.

The Housing Element Update would exempt all multi-family projects from design review and environmental review, not just those where 10% or more of the units are made to be affordable. That makes no sense if the objective of State law is to make more affordable housing. It's an unwarranted gift to developers of average or expensive multi-family housing. It's a threat to the community from potentially unattractive large scale projects as well as smaller multifamily developments.

Currently, the City requires architectural design approval by the Planning Commission for multifamily (R-3) housing projects. It also imposes some size restrictions for "large scale building" multifamily projects; i.e. those with gross floor areas greater than 20,000 square feet.⁷

By definition and long-established precedence, the City has included these restrictions on the design of new multifamily housing projects to protect our local environment. So removing these restrictions with the Update and subsequent Municipal Code revisions will remove protections for the community.

The purpose of such restrictions (in [Municipal Code § 18.70](#)) is *"To break up the apparent mass and scale of "large scale" . . . multifamily residential structures and development in order to ensure that such structures and development are compatible with Mt. Shasta's mountain theme design principles, scale, and sense of place."* The City proposes to eliminate these protections.

THIS HOUSING ELEMENT UPDATE IS NOT EXEMPT FROM CEQA REVIEW

The photographic examples above illustrate how unfettered multifamily projects that may no longer be held to our architectural design guidelines could create significant aesthetic impacts to our community. But inexplicably the consultants that the City hired have stated the Housing Element Update is exempt from CEQA (under CEQA Guidelines Section 15061(b)(3)) as Housing Element adoption will not have a significant effect on the environment. Are they blind? Have they no "common sense," a term used in the exemption they cite to?

The exemption that the City is claiming, CEQA Guidelines Section 15061(b)(3), states:

"The activity is covered by the common sense exemption that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA."

How in the world could it be seen with certainty that there is no possibility that exempting multifamily projects from our City's design review will have no effect on the environment?

⁷ City of Mt. Shasta Municipal Code § 18.70.070(E): "Where any building exceeds a GFA of 20,000 square feet, the minimum spacing between such building and any other building on the site shall be 20 feet. This spacing requirement shall be enforced regardless of building configuration or arrangement. The intent of this minimum spacing requirement is that the outdoor spaces created between the buildings should have pleasant proportions which achieve a human scale. Arranging multiple structures around courtyards is encouraged."

§ 18.70.080(C): The architectural style of new construction shall be the "mountain village theme" pursuant to Chapter 18.60 MSMC.



The City's statement that the Update will not have a significant effect is entirely unsupported with any facts or analysis. One would think the City's consultants would provide at least a little explanation, but they don't. When closely reading what the City now proposes in the Update, the exact opposite is clearly evident if the cheapest form of multifamily developments is permissible with no design review by the Planning Commission or CEQA environmental review.

Enactment of this proposed Housing Element Update will, with reasonable certainty, negatively impact the environment. That's because this Update is one of a series of linked actions that can potentially harm the community, and CEQA review is required when such a series of actions begins. If the Update is approved, it will nullify inconsistent zoning regulations about multifamily housing like pertinent and discretionary sections of Municipal Code 18.70 (Large Scale Building Ordinance) and Architectural Review. Under California law, the General Plan takes precedence over other local zoning and design regulations.⁸ That means the City would later have to modify those other sections of law to make them consistent with the new change to the General Plan, but immediately this Housing Element Update would exempt Multi-family Projects from public and Planning Commission discretionary review. Thus, CEQA review is required now before the Commission considers and approves or recommends approval of the Housing Element Update.

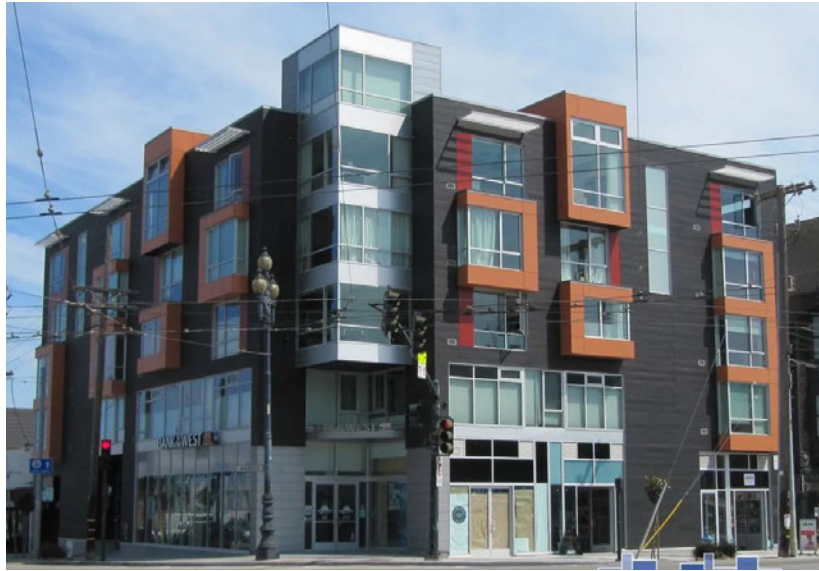
For example, Sacramento County updated its Housing Element and held its Update require CEQA review.⁹ That Housing Element Update considered aesthetic impacts the Update might create, asking if the Update would:

- Substantially alter existing viewsheds such as scenic highways, corridors, or vistas?
- In non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings?
- If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?
- Create a new source of substantial light, glare, or shadow that would result in safety hazards or adversely affect day or nighttime views in the area?

⁸ See *Leshner v. City of Walnut Creek* https://scholar.google.com/scholar_case?case=16049048215243896167

⁹ See Sacramento County Housing Element Update
<https://planning.saccounty.gov/applicants/Pages/HousingElement.aspx>

In Mt. Shasta's situation, all of these above-listed types of aesthetic impacts could be caused without environmental mitigation if the Housing Element Update is approved and inappropriate building designs are approved solely by a City Manager with no expertise in architectural design.



Many cities prepare Environmental Impact Reports (EIRs) and Negative Declarations (Neg Decl) when they update their Housing Elements because the changes do in fact potentially affect the environment:

The following cities prepared CEQA reviews for their housing element updates:

[Town of Ross Housing Element Update 2023](#) - EIR

[Town of Danville 2023-2031 Housing Element Update](#) - Program EIR (This programmatic EIR will address the environmental impacts associated with the adoption and implementation of the 2023-2031 Housing Element Update.)

[City of Berkeley Housing Element Update 2022](#) EIR

[City of Burbank Housing Element Update 2022](#) EIR

[City of West Hollywood Housing Element Update 2021](#) EIR

[City of Whittier General Plan Update and 2021-2029 Housing Element Update 2021](#) EIR

[City of Del Mar Housing Element Update and Program EIR 2020](#)

[City of Buellton General Plan Housing Element Update](#) EIR 2020

[City of Santa Maria Housing Element Update 2022](#) IS-ND (Neg Decl.)

[City of Hercules Housing Element Update 2022](#) Neg Decl.

[City of Arcadia Housing Element Update \(2021-2029\)](#) Neg Decl.

[City of Santa Clarita Housing Element Update 2021](#) Neg Decl.

[City of Glendora Housing Element Update 2021](#) Neg Decl.

[City of San Gabriel Housing Element Update 2021](#) Neg Decl.

[City of Torrance General Plan Housing Element Update 2021](#) Neg Decl.

[City of Laguna Woods Housing Element Update 2021](#) Neg Decl.

[City Norco Housing Element Update 2021-2029](#) IS-ND Neg Decl.

[City of Azusa Housing Element Update 2021-2029](#) Neg Decl.

[City of Galt Housing Element Update 2021-2029](#) Neg Decl.

[City of Camarillo Housing Element Update 2021](#) IS-ND Neg Decl.

[City of Bishop Housing Element Update 2021](#) Neg Decl.

[City of Oceanside Housing Element Update 2021](#) Neg Decl.

[City of Santee Housing Element Update](#) 2021 Neg Decl.
[City of San Luis Obispo Housing Element Update](#) 2021 Neg Decl.
[City of Shasta Lake Housing Element Update](#) 2020 Neg Decl.
[City of Canyon Lake Housing Element Update](#) 2020 Neg Decl.
[City of Needles Housing Element Update](#) 2019 Neg Decl.
[City of Rio Dell Housing Element Update](#) 2019 Neg Decl.

Those agencies went to the trouble to prepare CEQA review because their proposed housing element changes would have environmental impacts.

HOUSING ELEMENT UPDATE IS NOT CONSISTENT WITH GENERAL PLAN

The City claims the Housing Element Update is consistent with the General Plan. Yet that claim in the Staff Report is simply not true. The General Plan protects scenic views for many good reasons.¹⁰ The General Plan states that: “*Architectural guidelines and other provisions to address the visual impacts of development in the City are considered elsewhere in this General Plan.*” Yet the proposed Housing Element Update would allow large scale housing projects without any Architectural Design Review or compliance with the City’s Large Scale Building ordinance.¹¹ These local regulations are meant to help protect against adverse scenic impacts from large housing projects. But the Housing Element Update would entirely exempt such large housing projects from these specific protective design standards and guidelines.

Some of those City ordinance protections that would be erased by the Housing Element Update and currently exist are meant to “*ensure that large scale . . . multifamily developments are harmoniously integrated with their surroundings.*” And “*To promote and facilitate a safe and comfortable pedestrian scale environment.*” Also “*To encourage excellence in urban design and improvement in overall City appearance.*” As well “*To encourage quality of development.*”

Logically, if such protections are entirely removed as the Staff and their out-of-town planning consultants now recommend, it becomes obvious that the changes would allow the City Manager or Planning Director to secretly approve housing projects that are not “harmoniously integrated with their surroundings,” are not “excellent” in design, that do not improve the overall City appearance, and are not considered a “quality development.” This is strong evidence that the Housing Element Update’s provisions may cause significant aesthetic impacts. For that reason alone, this Housing Element Update is not exempt from CEQA review.

The City of course is allowed to change its Architectural Ordinance and its Large Scale Building Ordinance (Muni. Code § 18.70) if it goes through the proper procedures. But it is not allowed to make such dramatic changes via a Housing Element Update that will compel ordinance

¹⁰ See for example Mt. Shasta General Plan’s Open Space and Conservation Element, p. 5-28, where development of housing in sensitive viewshed areas may create one of the biggest threats to the loss of scenic quality. The General Plan seeks to protect such views, as stated in the General Plan, p. 5-25: “*Not only are the mountains and forested ridges around the City of Mt. Shasta very scenic, there are valuable picturesque resources in and around the City on a smaller scale. The pastoral setting of Strawberry Valley and other areas, even though largely intermixed with low-density residential and other development, provides a visually pleasing environment.*” The General Plan states that: “Architectural guidelines and other provisions to address the visual impacts of development in the City are considered elsewhere in this General Plan.” <https://mtshastaca.gov/wp-content/uploads/2016/01/5OpenSpaceandConservationElement.pdf>

¹¹ See the Housing Element Update’s **Program HO-2.3.4 (2)**, including its newly-disclosed provisions that the public has never before been shown now exempting multifamily development from the Municipal Code’s Chapter 18.70, the Large Scale Building ordinance.

changes and architectural design guidelines changes and that will potentially harm the community's design and appearance without CEQA review.

CONCLUSION

As discussed above, the draft Housing Element Update would lead to potentially significant environmental harm including serious aesthetic impacts. This draft Housing Element Update must be revised and subjected to CEQA review to protect our community and local environment.

Please notify our organization Mt. Shasta Tomorrow about any further opportunity to review this draft Housing Element Update.

Sincerely,



Dale La Forest
Director of Mt. Shasta Tomorrow

cc: State Of California - Business, Consumer Services And Housing Agency
Department Of Housing And Community Development
Division Of Housing Policy Development
2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
www.hcd.ca.gov



11.28.23 AGENDA Item 5: Review of the 2023-2031 Housing Element Update

1 me age

Johanna Windswept <[REDACTED]>

Tue, Nov 28, 2023 at 11:42 AM

To: planningcommission@mtshastaca.gov, Jeff Mitchem <jmitchem@mtshastaca.gov>

Cc Michelle Nielsen <michellen@planwestpartners.com>, tri tanzan@hcd.ca.gov, Vanessa Blodgett <vanessab@planwestpartners.com>, Kathryn Joyce <kjoyce@mtshastaca.gov>

Dear Planning Commission,

RE Agenda Item 5 Review of the 2023-2031 Housing Element Update and recommendation for City Council to make findings of CEQA Exemption and Adoption with findings that it substantially complies with State Housing Element Law, and direct staff to submit to the California Department of Housing and Community Development (HCD) for certification

Dear Planning Commission,

Regarding the Agenda Item 5 for the Housing Element (HE) I would like to ask you to postpone this review at the Planning Commission level so that the public can have enough time to review this. I only received this just before Thanksgiving and have not had an opportunity to properly review this important document.

Some of my concerns are:

- please do not remove CEQA review and Design review for multi family projects.
- not having public input for the e large project like this for our small mountain community is not a good idea. Why is the public and Planning Commission being left out of this important step?
- CEQA is very important as it impacts our viewsheds to Mt. Shasta, the Eddies, Black Butte etc. It impacts our water and drainage runoff from properties.
- not having Design Review when we have always had this does not even make sense. We need our project to fit in with our mountain theme - the lighting, the materials etc.
- Is this HE consistent with the General Plan which is the overall guide?
- It seems we have included some items the public was not in agreement with in an earlier version. Please consider all comment from the public in the recent year concerning this subject
- CEQA impacts our water quality and Mt. Shasta is the source for many water supplies in the State of CA. What we do impacts the many other communities downstream

I have not heard really anything much on this HE until it just came up for this special agenda. I would ask you to please postpone this important matter to December or January when the public has time to review properly. It feels like this is being rushed through. Yes, Mt. Shasta is late in submitting the HE, but so are many other cities. I do not believe there will be significant ramifications if this does not get approved tonight. Please get more input from the community for which this entire plan is for. The community lives here and cares but it is difficult to squeeze this last minute HE review into all the holiday activities and out of town guests.

Thank you for your consideration of the above,

Johanna Altorfer
Mt. Shasta

Comment letter C -- Ulbrich

From: [Kathryn Joyce](#)
To: [Melanie Findling](#); ["PC Chair, Belinda Higuera"](#); [Touson S.](#); ["Alan Pardee"](#); [beck paul](#); [Von Boyenger](#); [David McDowell](#)
Cc: [Jeff Mitchem](#); [michellen@planwestpartners.com](#); [Vanessa Blodgett](#)
Subject: FW: Letter
Date: Tuesday, November 28, 2023 1:12:59 PM

Good afternoon,

Please see public comment below pertaining to tonight's discussion.

Thank you,

Kathy Joyce, CMC
Deputy City Clerk/Administrative Assistant

305 N. Mt. Shasta Blvd
Mt. Shasta, CA 96067
(530) 926-7516

-----Original Message-----

From: barbara ulbrich [REDACTED]
Sent: Tuesday, November 28, 2023 12:16 PM
To: Kathryn Joyce <kjoyce@mtshastaca.gov>
Subject: Letter

Kathryn,
Could you please deliver and read allowed the following letter: thank you so much.

November 28, 2023

Dear Planning Commissioner, and Planning Director, It appears we are revisiting an already in-depth discussion the community had regarding the Housing Element. It also appears the commissioners and city staff are ignoring those concerns voiced regarding the harmful changes this Update would create for our entire environment.

I would like to suggest our new Planning Director review the letters, comments, and suggestions made by the community and city staff about this very issue and impacts this Update would pose.

Those of us who lived here for nearly a half a century live here for the very reasons you are trying to eliminate and destroy.

City staff addressed the major issues multi-family housing would impose on our already inadequate infrastructure in the city proper. What you are proposing is in direct violation of your own General Plan. There are proper procedures to make changes to ordinances which must be adhered to and not up to the city manager or planner to make changes upon their own discretion.

Again, this is a situation the city has tried to push through and ignore previously and was informed by a loud community voice that the guidelines, procedures, rules you have established must be followed and the community kept informed. This Updated Draft as stated would have an enormous detrimental impact on our community. A CEQA review is essential and mandatory.

Sincerely,
Barbara Ulbrich



Michelle Nielsen <michellen@planwestpartners.com>

Revised Draft Housing Element comments for Nov 28 Planning Commission meeting

3 months ago

Peggy Risch

Tue, Nov 28, 2023 at 7:59 AM

To: Kathryn Joyce <kjoyce@mtshastaca.gov>

Cc: Michelle Nielsen <michellen@planwestpartners.com>, Vanessa Blodgett <vanessa@planwestpartners.com>, Jeff Mitchem <jmitchem@mtshastaca.gov>, tristan.lanza@hcd.ca.gov

Please forward these comments to the Planning Commissioners and send me a confirmation of that action. Thank you!

Dear Planning Commissioner,

Thank you for receiving these timely submitted comments on the revised Draft Housing Element. Like you, I received the Agenda packet just a few days before the Thanksgiving holiday last week. The Housing Element would govern the City for the next 8 years from 2024 to 2031, it is the template for what Mt Shasta will look like and how it will grow in the future based on regulation and policy, and most importantly, who will be making those decisions.

In the current version, many of those decisions would by-pass not only the public, but also you as the Planning Commissioners. This is because the City Manager and City Planner have been delegated as the decision-makers. This seems contrary to a transparent process for the scenic small town we love. I would ask you look very closely at each of these new revisions where you as Planning Commissioners and the public have been excluded from the process. There are many. Please know that these new revisions of who decides behind closed doors step way beyond what the State requires in a Housing Element. For example, the Planning Commission could still be involved in discretionary design review without violating State law.

As you may also recall, it was not that long ago that there was a very large public outcry to the proposed 2045 General Plan that was abandoned, but now many of those proposals have been inserted into the *revised* Draft Housing Element at the last minute. It's unfortunate that there has been very little time to review the *revised* Draft Housing Element, but also so very little outreach to the community in this *revised* Draft.

In closing, I would ask you to *make a Motion to Continue the Planning Commission review of this revised Draft Housing Element* before making any recommendation to the City Council. This would give more time for a transparent process, public review, and public input. It would also give the City the opportunity to properly notice that future Planning Commission meeting about the proposed CEQA exemption.

Please notify me of any future opportunity to comment.

Sincerely,

Peggy Risch, Mt Shasta resident

Cc:

Jeff Mitchem, Planning Director

Michelle Nielsen, Planwest Partners

Vanessa Blodgett, Planwest Partners

Kathy Joyce, City Clerk

Tristan Lanza, HCD

Note: As you know, there are 5 Appendixes (A-E), the Cover & TOC & Chapters 1-3 in addition to the Staff Report, and the full Housing Element.

The link to the November 28, 2023 Planning Commission agenda can be found at: <https://www.siskiyou-housing.com/mt-shasta/>

Planning Commission Staff Report

Cover & TOC & Chapters 1-3

Appendix A

Appendix B

Appendix C

Appendix D

Appendix E

Housing Element (FULL)

FINAL

Kathryn Joyce <kjoyce@mtshastaca.gov>

Tue, Nov 28, 2023 at 8:27 AM

To: Peggy Ri ch [REDACTED]

Cc: Michelle Nielsen <michellen@planwestpartners.com>, Vanessa Blodgett <vanessab@planwestpartners.com>, Jeff Mitchem <jmitchem@mtshastaca.gov>, "tristan.lanza@hcd.ca.gov" <tristan.lanza@hcd.ca.gov>

Hi Peggy,

Your comments have been forwarded to the Planning Commissioners for consideration.

Kindest regards,

Kathy Joyce, CMC

Deputy City Clerk/Administrative Assistant



305 N Mt Sha ta Blvd

Mt Sha ta, CA 96067

(530) 926 7516

[Quoted text hidden]

Jeff Mitchem <jmitchem@mtshastaca.gov>

Tue, Nov 28, 2023 at 8:48 AM

To: Michelle Nielsen <michellen@planwestpartners.com>, "vanessab@planwestpartners.com"
vane ab@planwe tpartner com

FYI Public Comment for the record Already forwarded to the PC

Jeff Mitchem

Planning Director



305 N. Mt. Shasta Blvd

Mt. Shasta, CA 96067

C: (971)400-1840

FINAL

E2 - 16

December 2023

From: Peggy Risch <[REDACTED]>
Sent: Tuesday, November 28, 2023 7:59 AM
To: Kathryn Joyce <kjoyce@mtshastaca.gov>
Cc: Michelle Nielsen <michellen@planwestpartners.com>; Vanessa Blodgett <vanessab@planwestpartners.com>; Jeff Mitchem <jmitchem@mtshastaca.gov>; tristan.lanza@hcd.ca.gov
Subject: Revised Draft Housing Element comments for Nov 28 Planning Commission meeting

Please forward these comments to the Planning Commissioners and send me a confirmation of that action. Thank you!

[Quoted text hidden]

Comment Letter E -- Gold

From: [Jeff Mitchem](#)
To: [Jeff Mitchem](#)
Cc: [Michelle Nielsen](#); vanessab@planwestpartners.com
Subject: FW: Brief Letter of Comment on Housing Element of General Plan 11/28/23 PC agenda 5
Date: Tuesday, November 28, 2023 11:53:35 AM

Good Morning, Planning Commissioners!

Please see the forwarded Public Comment on tonight's public hearing item: the 2023-31 Housing Element Adoption.

Best,

[Jeff Mitchem](#)
Planning Director



305 N. Mt. Shasta Blvd
Mt. Shasta, CA 96067
C: (971)400-1840

From: Vicki Gold [REDACTED]
Sent: Tuesday, November 28, 2023 11:05 AM
To: Jeff Mitchem <jmitchem@mtshastaca.gov>; Teresa Spade <tspade@mtshastaca.gov>
Cc: michellen@planwestpartners.com; vanessab@planwestpartners.com; Kathryn Joyce <kjoyce@mtshastaca.gov>
Subject: Brief Letter of Comment on Housing Element of General Plan 11/28/23 PC agenda 5

Dear Planning Commissioners, Staff and Consultants,

In reviewing the Staff Recommendation to approve the Final Draft Housing Element (HE) of the General Plan I am again reminded of the City's mission statement present on all City Council Agendas:

"Our mission is to maintain the character of our "small town" community while striking an appropriate balance between economic development and preservation of our quality of life. We help create a dynamic and vital City by providing quality, cost-effective municipal services and by forming partnerships with residents and organizations in the constant pursuit of excellence."

This HE is an important document and it deserves the full attention of the Community, transparency and adherence to CEQA guidelines. There are changes in the HE that are in conflict with both the mission statement and the General Plan. Few are likely to catch the nuances unless they, like you,

have invested great time and effort in exploring City Codes, Guidelines and Ordinances and the General Plan. However we know that the community cares deeply about protection of the environment, natural beauty and vistas unique to Mt. Shasta.

This plan as written goes far beyond the State mandates or recommendations. Why are all multifamily projects exempted from discretionary review and architectural and design review? This removes a significant piece of the Planning Commission's responsibility. This should be very concerning to you and to all. Although I have read the document because I receive agendas, I doubt that most of the community is aware of the importance of recommendation to exempt the HE from CEQA. The community needs more time to evaluate and comprehend the contents and the direction this would inevitably lead in future development of Mt Shasta.

Often those attending and submitting comments feel their concerns are dismissed. I hope this time letters received will encourage you to postpone any decision until the perhaps unintended consequences of the action of approval are explored fully.

While affordable housing is desirable, the DANCO and Carmen projects substantially comply with the State requirements. The multifamily projects approval By Right and with no hearings required allowing public input on aesthetics and design is a grave mistake for our beautiful community. There is potential for significant visual impact and update of the HE should not be exempt from CEQA, especially here in Mt Shasta. These proposed changes will be in effect for 8 years until 2031. What motivates the City to bow so low to the State? Compliance with what is required is one thing. All Cities and Counties must comply with CHD mandates. But this is a step too far.

Thank you for considering the potential for adverse effects on our quality of life.

Respectfully,

Vicki Gold



Mt Shasta CA 96067



Michelle Nielsen <michellen@planwestpartners.com>

Comment on Housing Element of General Plan 11/28/23 PC agenda 5

2 me age

Beverly Harlan [REDACTED]

Tue, Nov 28, 2023 at 1:10 PM

To: Jeff Mitchem <jmitchem@mtshastaca.gov>, Teresa Spade <tspade@mtshastaca.gov>, michellen@planwestpartners.com, vane ab@planwestpartner.com, Kathryn Joyce <kjoyce@mtshastaca.gov>
Cc: Beverly Harlan [REDACTED]

Dear People,

I have read several of the emails to you from Dale LaForest, Vicki Gold, and others,
and

I am in full agreement with what they have all said on this subject.

I hope that you take all of their concerns into your full consideration.

Sincerely yours,

Beverly Harlan

Beverly Jean Harlan
1020 Kingston Road, Apt. 3K
Mt Shasta, CA 96067 2265

Jeff Mitchem <jmitchem@mtshastaca.gov>

Tue, Nov 28, 2023 at 3:20 PM

To: Jeff Mitchem <jmitchem@mtshastaca.gov>

Cc: Kathryn Joyce <kjoyce@mtshastaca.gov>, Michelle Nielsen <michellen@planwestpartners.com>, "vane ab@planwestpartner.com" vane ab@planwestpartner.com

Good Afternoon, Planning Commissioner !

Please see the forwarded Public Comment on tonight's public hearing item the 2023 31 Housing Element Adoption

Best,

Jeff Mitchem

Planning Director
FINAL