

# **Comments from the Orange County Comprehensive Plan Coalition**

## **on the Land Use, Transportation, Economic Development and Housing Elements**

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**May 5, 2008**

The coalition's comments are based on the March 5, 2008 draft update. These comments are guided by two of our preferred outcomes. First, we want the plan to place a priority on the creation of new compact, walkable, mixed-use, transit-supportive growth and development within the county's planning jurisdiction. Second, we want the plan to make affirmative commitments to providing public sector infrastructure investments to stimulate such development. Coalition members believe that compact, mixed-use developments are critical to promoting economic prosperity, social equity and environmental health.

The coalition's comments focus on four plan elements because compact, mixed-use developments succeed when these planning elements complement each other and sensible implementing ordinances are adopted. We believe our recommendations enhance the positive linkages between these elements.

The comments fall into four categories. The first three comprise our most constructive criticism. These are:

1. Objectives the coalition recommends be added to the plan
2. Goal statements and objectives for which the coalition recommends major changes
3. Goal statements and objectives that the coalition recommends be removed from the plan

The final category addresses those goal statements and objectives which the coalition endorses either as written or with minor changes (for the purposes of clarification and specificity).

Coalition members have worked together since August 2007 in order to present a common voice for diverse stakeholders regarding the county's future. We present these comments in the hopes they will have a meaningful impact on the plan that is adopted. After all, the updated plan will be the key policy document to guide the county's growth and prosperity.

We are disappointed, however, that the second draft was not available for review much earlier in the process. Releasing the draft less than two weeks before the public hearing presents formidable challenges for concerned stakeholders to prepare thoughtful responses to such an important document. For instance, had the second draft been available sooner (at least 30 days in advance of the May 19 public hearing), the coalition would have had time to modify our comments. Still, we trust these comments will be useful to the planning board and ultimately the county commissioners in their efforts to craft a plan update that will promote sustainability and be widely-supported in the community.

Allan Rosen  
The Village Project Board of Directors  
For the Orange County Comprehensive Plan Coalition

# **I. Objectives the coalition recommends be added to the plan**

## **LAND USE**

“Objective LU-4.5: (Short Term): Amend the regulatory process to expedite the review and approval of residential cluster development forms throughout the County, including in the Rural Buffer and other areas zoned for low density residence.”

## **TRANSPORTATION**

Transportation Demand Management strategies should be added to Goal 1, 2 or 3.

Reduction in parking requirements should be added to Goal 1, 2 or 3.

Transit oriented development and mixed-use need to be mentioned in the transportation section (Goal 1 or 3) to provide access to services for those without an automobile and as a way to encourage the use of non-motorized modes of transportation.

“Objective T-1.7 (Short Term): Promote and protect existing smaller, narrower roads to reduce car speeds and preserve neighborhood safety.”

“Objective T-1.8 (Medium Term): Coordinate with Orange County schools to provide safe walking and biking routes within 1.5 miles of all schools for children during school hours and residents after hours.”

“Objective T-4.3 (Medium Term): Locate new Growth Opportunity Areas along transit corridors. Allocate density in GOAs that will support convenient, efficient, and reliable public transit. Incorporate Smart Growth planning principles into the zoning of these Growth Opportunity Areas.”

“Objective T-4.4 (Long Term): Implement the Special Transit Advisory Commission (STAC) recommendations for regional transit (including adding light rail, passenger/commuter rail, expanded bus and transit-oriented development at a future Orange County station in Hillsborough).”

## **ECONOMIC DEVELOPMENT**

“Objective ED-1.8 (Long Term): Develop an incentive policy to use in targeting companies and enterprises that will build upon and expand core assets & diversify the County's economic base. Incentives should be tied to the number and type of jobs created.”

“Objective ED-2.12 (Medium Term): Initiate a small-scale “community” sewer & water pilot project at one of the County's Rural Nodes to enable mixed commercial & residential development of greater intensity than would be supported by traditional well & septic systems.”

“Objective ED-2.13 (Long Term): Make the formation of locally-owned businesses that are creating products and services for regional use and export a strategy of the County's Economic Development; encourage import substitution to prevent externalized environmental & social impacts such as high transportation costs and pollution by overseas factories.”

“Objective ED-2.14: Establish a “one-stop” central permitting/license office for business and development applications.”

## **Objectives the coalition recommends be added, 2<sup>nd</sup> page**

“Objective ED-2.15: Work closely with UNC’s Office of Technology Development to identify commercial space needs of businesses created by UNC research, promote development of such space within the County, and actively encourage UNC businesses to stay in Orange County after leaving the university.”

Objective ED-2.16: Develop marketing material promoting Orange County as a good place to operate a business and target distribution to desirable businesses.”

“Objective ED-3.6 (Long Term): Work in partnership with Durham Technical Community College-Orange County Campus and other training institutions to develop training programs for “green collar” jobs and enterprise creation. Other partners should be the Small Business Technology Development Center and the Service Corps of Retired Executives (SCORE).”

### **HOUSING**

“Objective H-2.4 (Medium Term): Develop strategies for supplying an adequate number of single adult housing units (rooming houses, boarding rooms, SRO’s, shared housing units, studio apartments, etc.) for persons with disabilities, service economy workers and special populations including the homeless.”

“Objective H-2.5 (Long Term): Embrace opportunities for alternative forms of land development and housing types (such as movable homes, manufactured homes, shared living arrangements, single-room occupancy units, apartments, efficiency/studio units, cottages, work exchange units, temporary units, group homes, Section 8, tax credit properties, public housing) to broaden the choice of housing options.”

“Objective H-4.5 (Long Term): Expedite the development approval process for projects that commit to providing workforce and special needs housing; for housing in rural nodes; and for cluster developments throughout rural areas.”

“Objective H-4.6 (Long Term): In Growth Opportunity Areas adopt zoning, subdivision regulations, and provide incentives to increase housing supply available to the County’s workforce, senior citizens, persons with disabilities, and people making between 30 and 140 percent of the area median income.”

“Objective H-4.7 (Long Term): In Growth Opportunity Areas adopt zoning and provide incentives to ensure a mixed-use development pattern putting employment, shopping and recreation within walking distance of an ample and diverse supply of housing.”

“Objective H-3.5 (Long Term): Promote innovative approaches to housing that are responsive to the needs of Orange County, maintain quality and human scale, increase energy efficiency, and reduce construction and maintenance costs.”

## II. Goals and objectives for which the coalition recommends major changes<sup>1</sup>

### LAND USE

LU-2.4: *“Evaluate the development potential in rural crossroad communities to identify whether current regulations permit inappropriate development that is out of character with these communities, and whether potential development in these areas would require significant expansions or cause depletions of public services.”* **Define *inappropriate development*.**

### TRANSPORTATION

Overarching Goal (rewrite): **“New development and redevelopment within the County are walkable, bikable, and transit-oriented. Local and regional destinations are accessible without use of automobiles. There is universal access for people with disabilities. Air, water, and soil quality are protected both locally and globally.”**

T-2.5 (rewrite): **“In order to foster developments that support non-automobile modes, especially walking and biking, the County will work actively to bring about changes to County, Municipal, and NCDOT regulations that prevent "walkable" street profiles.”**

Goal 3: *“A multi-modal transportation system that serves existing development, ~~supports~~ **focuses** future development into compact, walkable, mixed-use neighborhoods, and ~~preserves~~ **enhances** community character consistent with the county’s land use plans.”*

T-3.3 (rewrite): **“Discourage disconnected roads. Instead use traffic calming devices such as narrow streets, large trees, on-street parking, etc in order to maintain human scale and safety of neighborhoods. Avoid Cul-de-sacs, as they significantly inhibit connectivity.”**

### ECONOMIC DEVELOPMENT

Overarching Goal (rewrite): **“Economic Development in Orange County is actively addressing the challenges posed by fossil fuel price volatility and the externalities associated with its use. The County has a robust, resilient, and diverse commercial base achieved by recruiting, retaining and creating enterprises that utilize the County’s human and intellectual capital and the Triangle region’s economic assets. While responsive to County environmental and social objectives, commercial development and activity focus on growing high quality private sector jobs and raising wage levels, and yields a third or more of County tax revenue.”**

**ED-1.4. (comment only, no specific language at this time).** Objectives relating to job creation and increases in the commercial tax base for the 2008-2030 Comprehensive Plan Update should not reference verbatim the goals set in 2005-2010 Strategic Plan for Economic Development. While objectives for these two important measures should be specified in this update, growth rates should be a benchmark standard -- either as a substitute for or in addition to -- benchmarks sets a specific levels. Objectives relating to job creation and increases in the commercial tax base should be expressed in terms of sustainable, long-term growth levels. For example, create adequate jobs to accommodate anticipated population increases. Increase commercial tax base so that an appropriate ratio of commercial/residential tax base is maintained.

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<sup>1</sup> *Use of italics indicates language taken directly from the draft update. Use of boldface language indicates substitute language proposed the coalition.* These instructions apply to sections II, III, and IV of the comments.

## Goal and objectives for which the coalition recommends major changes, 2<sup>nd</sup> page

Goal 2: “~~Infrastructure that supports desired development~~ is strategically provided along transit corridors to support integration of local businesses into walkable, mixed-use developments incorporating energy efficient & water conservation design principles and affordable housing.”

ED-3.1, “Develop and nurture partnerships that support workers and their families at all stages of their lives and provide opportunities for lifelong learning and retraining in response to changing economic conditions,” and ED-3.2, “Promote access to living wage jobs that offer benefits and career advancement potential,” are commendable but not specific enough to incite any type of action. What types of partnerships should be developed? **How will access to living wage jobs be promoted?**

Goal 4, “Partnerships that ensure the county remains a great place in which to live and work,” is very vague and should be revised to identify the types of appropriate partnerships to achieve this.

### HOUSING

H-1.4: “~~Coordinate with the municipalities to Maintain an adequate supply of residentially designated land to accommodate sustainable levels of population growth and a diversity of housing types county-wide~~ **beyond municipal boundaries.**”

H-1.4 (rewrite alternate): “**Encourage greater municipal/county collaborations regarding the allocation, efficient use and adequate provision of affordable housing dollars to both safeguard and expand the number of housing units for underserved populations and service economy workers.**”

H-1.5: “Ensure that a variety of housing types can be developed **in appropriate locations (Growth Opportunity Areas) throughout the county in a sustainable manner that efficiently uses resources and existing and planned public services, including water & sewer infrastructure, transit options, and social, health, educational and emergency services.**”

Goal 3: “The preservation, repair, and replacement of **targeted segments** of the existing housing supply.” The preservation, repair, and replacement of existing housing supply is the responsibility of the private sector. What criteria would be used to identify existing housing supply that should be targeted for such preferential treatment and what funding source would be used to do this?

H-3.3: “~~Expand~~ **Provide** assistance ~~in the~~ **for** retrofitting, repair, and maintenance of existing homes owned by financially challenged households, ~~particularly those that are senior citizens.~~”

H-3.4: “~~Provide additional housing and rehabilitation~~ **financial and technical** assistance that targets ~~and prevents the physical decline of stable neighborhoods~~ **low wage households in danger of becoming homeless.**”

Goal 4: “~~Development ordinances~~ **Zoning, subdivision regulations, and incentives that** increase housing supply available to the County’s workforce, senior citizens, and households earning between 30 and 140 percent of the area median income ~~promote inclusionary practices and housing options for all income levels.~~”

## Goal statements and objectives that the coalition recommends be removed

### LAND USE

LU 3.4: *“Recognize the right to farm and discourage the location of new non-farm development, particularly more intensive residential development, within farming areas to minimize the incidence of complaints and nuisance suits against farm operations.”*

**Define and encourage Rural Node development. Let people who choose to move there deal with what comes with a rural lifestyle (noise, smell, etc.).**

Goal 5: *“Life, health, and property safe from natural hazards.”* **The Orange County Hazard Mitigation Plan addresses this objective.**

### TRANSPORTATION

None.

### ECONOMIC DEVELOPMENT

ED-2.6: *“Accommodate office facilities in areas that are desirable and attractive to major corporate users and others who seek high prestige areas.”*

ED-4.2: *“Provide lifelong learning opportunities, from early childhood through senior citizens.”* It is redundant with objective

ED-3.1.

ED-4.3: *“Welcome and promote greater inclusiveness and diversity.”*

ED-4.4: *“Promote hipness by focusing on the uniqueness of each municipality and the county as a whole.”*

### HOUSING

H-3.2: *“Require that all new housing built or located in Orange County meet the minimum standards specified in the State of North Carolina’s Building Code, as well as Department of HUD and Farmer’s Home Administration’s standards, when required.”* **What outcome is sought by this objective? Would coalition-proposed objective H-3.5 achieve a similar result. HUD code and Farmer's Home Administration regulations are sometimes incompatible. A home cannot be built to meet the HUD code and the NCRBC. FHA standards are probably at or below minimum NCRBC and are intended to apply only when an FHA loan is involved. Compliance with NCRBC is not optional and is mandated in other regulatory documents.**

H-4.2: *“Expand tax assistance for elderly households who have difficulty affording their home property tax.”*

# Goal statements and objectives the coalition endorses with minor changes or as is

## LAND USE – minor changes recommended

Goal 1: Avoid language such as *high quality of life* that can be defined differently by each person.

LU-1.1: “Coordinate the location of higher intensity / high density residential and non-residential development with existing or planned locations of public transportation, commercial and community services, protected natural and cultural resources, and adequate supporting infrastructure (i.e., water and sewer, ~~high-speed internet access~~, streets, and sidewalks). This could be achieved by increasing allowable densities and creating new mixed-use zoning districts where adequate public services are available.”

LU-1.2: “Evaluate and report on whether existing and approved locations for future residential and non-residential developments are coordinated with the location of public transportation, commercial and community services, and adequate supporting infrastructure (i.e., water and sewer services, ~~high-speed internet access~~, streets and sidewalks).”

LU-1.3: Avoid language such as *enhance community character* that can be defined differently by each person.

Goal 2: Define *community character*.

LU-2.2: Specify for what purpose, and for the benefit whom (the land owner, the public, etc.) the County will protect valuable resource lands.

LU 2.3: “Require non-residential and higher-density residential developments within Transition Areas to use Best Management Practices (BMP’s) for stormwater control, as outlined within the Orange County Zoning Ordinance and Sedimentation Control Ordinance, to ensure that potential adverse impacts on the water quality of existing and proposed reservoir sites **are avoided.**”

LU-2.7: “Develop Green Building Standards to guide the design, siting, construction and management of public buildings and public housing in a manner that conserves energy and/or uses nonpolluting renewable energy sources. **Provide incentives for those developers who choose to follow such guidelines for private developments.**”

LU-2.10: “Develop design standards or guidelines that address scale **and** density, ~~and aesthetic considerations~~ for residential, mixed-use, industrial, and commercial land uses to promote ~~community aesthetics and~~ the protection of the visual and cultural environment of the county.”

LU-3.7: “~~Determine whether~~ Ensure that development standards for Rural Community, Rural Neighborhood, **Rural Village**, Rural Industrial, Commercial, and Commercial/Industrial Nodes encourage a clustered, **walkable** development pattern ~~and discourage strip development.~~”

LU-3.9 (second LU-3.8 in the draft plan): “Create new zoning district(s) which allow for a mixing of commercial and residential uses, a mixing of housing types, and creates a more pedestrian friendly development pattern **where appropriate.** New districts should be applied in areas where public services exist or are planned for in the future, in areas that promote higher intensity and high density uses on the Future Land Use Plan map.”

## LAND USE – endorsed as is

Overarching Goal: “Coordination of the amount, location, pattern and designation of future land uses, with availability of county services and facilities sufficient to meet the needs of Orange County’s population and economy consistent with other Comprehensive Plan element goals and objectives.”

LU-2.1: “Maintain the rural, low-density land surrounding Transition Areas as Rural Buffer lands, as designated by the Future Land Use Plan. Future consideration should be given to designating Rural Buffer areas around other municipalities where such interest exists.”

LU-2.5: “Adopt and implement policies that specify appropriate land uses and intensities of development in Protected and Critical Water Resource Areas that will not have potential adverse impacts on water resources.”

LU-2.6: “Designate and then periodically review prime reservoir sites, based on an evaluation of water resources throughout the county, to protect those areas from adverse development impacts and to ensure that regulations for these areas are appropriate.”

LU-2.8: “Develop performance standards for development on lands with non-renewable resources to ensure a sufficient level of environmental protection for these resources.”

LU-2.9: “Evaluate the carrying capacity of groundwater and surface water resources of the 15 watersheds in Orange County.”

Goal 3: “A variety of land uses that are coordinated within a program and pattern that limits sprawl, preserves community and rural character, minimizes land use conflicts, supported by an efficient and balanced transportation system.”

## Goal and objectives the coalition endorses with minor changes or as is, 2<sup>nd</sup> page

### LAND USE – endorsed as is, continued

LU-3.1: “Discourage urban sprawl, encourage a separation of urban and rural land uses, and direct new development into areas where necessary community facilities and services exist through periodic updates to the Future Land Use Plan.”

LU-3.2: “When revising the Future Land Use Plan, coordinate land use patterns to facilitate the expanded use of non-auto modes of travel, the increased occupancy of automobiles, and the development and use of energy-efficient transportation systems.”

LU-3.5: “Encourage energy efficient industries to locate or expand in the County in Rural Industrial, Commercial/ Industrial, and Economic Development Nodes as delineated on the Future Land Use Map.”

LU-3.6: “Establish consistency with the Future Land Use Plan and the Water and Sewer Management Planning and Boundary Agreement and Map.”

LU-3.7: “Determine whether development standards for Rural Community, Rural Neighborhood, Rural Industrial, Commercial, and Commercial/ Industrial Nodes encourage a clustered development pattern and discourage strip development.”

LU-3.8: “Develop a process for implementing small area plan recommendations through the revision of county policies and regulations.”

Goal 4: “Land development regulations, guidelines, techniques and/ or incentives that promote the integrated achievement of all Comprehensive Plan goals.”

LU-4.1: “Support the use of individual mobile homes as a useful housing resource in the county by increasing the opportunities where these units can locate by-right.”

LU-4.2: “Review and amend the Orange County Zoning and Subdivision Ordinances to identify and eliminate existing regulatory impediments to objectives identified in the Comprehensive Plan. Such objectives include the development of energy efficient buildings within the county, development of affordable housing, and permitting of solid waste management facilities in appropriate locations.”

LU-4.3: “Determine how best private developments can accommodate or provide public and private commercial recreational facilities to serve Orange County’s residents.”

LU-4.4: “Encourage the provision of a range of affordable and suitable low and moderate income housing by means of development incentives in order to provide a balanced housing stock for the residents of Orange County.”

Goal 6: “A land use planning process that is transparent, fair, open, efficient, and responsive.”

LU-6.1: “Undertake a comprehensive effort to inform and involve the citizens of Orange County in the land use planning process.”

LU-6.2: “Maintain a cooperative joint planning process among the county municipalities and those organizations responsible for the provision of water and sewer services to guide the extension of service in accordance with the Comprehensive Plan and the policies of municipalities.”

### TRANSPORTATION – minor changes recommended

Goal 1: “An efficient and integrated multimodal transportation system that supports the environment and public health and minimizes negative impacts on the quality of our air, water and soil. Transit and pedestrian-oriented development is a critical nexus of transportation and land use.”

T-1.1: “Coordinate land use planning and transportation planning to facilitate the increased occupancy of automobiles, the expanded use of public transit (including intercity passenger rail), walking, and biking as primary modes of travel, and the overall development and use of a more energy-efficient transportation system.”

T-1.2: “Develop new transportation facilities in a manner that minimizes negative impacts on the environment, on air, water and soil quality, on historical or cultural assets, and on existing neighborhoods, and that enhances the overall rural character in Orange County.”

T-2.3: “Update applied site design and labeling standards for new development to include pedestrian- and bicycle-friendly road design standards that ensure adequate emergency vehicle access to the development and appropriate street naming and building numbering to improve the response times of emergency vehicles.”

T-2.4: “Improve Orange Public Transportation (OPT) transit services and the county’s emergency disaster transit provision for the elderly; ensure that those without automobiles are served during emergencies.”

## Goals and objectives the coalition endorses with minor changes or as is, 3<sup>rd</sup> page

### TRANSPORTATION – minor changes recommended, continued

T-3.2: “Develop and adopt a Comprehensive Transportation Plan that addresses and maps future strategies for all transportation modes, including bicycle/pedestrian facilities, highways (including a functional classification of roads and a Collector Street Plan), and transit facilities (including **intra-city and intercity rail**).”

T-3.4: “Make necessary multi-modal transportation improvements to service lands that are slated for future intense development, such as Economic Development Districts – **with emphasis on investments for non-automobile accessibility**.”

T-4.2: “Improve coordination of all **greenways, bikeways, and public transit routes and services within Orange County and the Triangle Region**.”

### TRANSPORTATION – endorsed as is

T-1.3: “Increase safety on existing Orange County bicycle transportation routes.”

T-1.5: “Expand the availability and use of public transportation throughout the county to provide better access between employment centers, shopping and service locations, and other key points of interest, particularly for the county’s senior and disabled populations.”

T-1.6: “Construct bicycle facilities in Orange County that will make cycling for transportation purposes safer, more convenient, and more efficient.”

Goal 2: “A multi-modal transportation system that is affordable, available, and accessible to all users.”

T-2.1: “Increase the provision of bikeways, walkways, and supportive facilities such as bicycle parking zones.”

Goal 4: “A regionally-integrated, multi-modal transportation planning process.”

T-4.1: “Work with nearby jurisdictions to integrate Orange County plans with regional goals and objectives for an intermodal transportation system to meet projected travel demand that reduces congestion and reliance on single occupancy vehicles.”

### ECONOMIC DEVELOPMENT – minor changes recommended

ED-1.3: “Develop clear criteria defining desirable **socially, economically and ecologically sustainable** businesses for the next five years.”

ED-2.5: “~~Provide for a sufficient amount of~~ **Designate** suitable land to accommodate the expansion and growth of commercial and industrial uses ~~in the county~~ **in areas that are desirable and attractive to corporate users**.”

ED-2.7: “Select industrial sites in Economic Development Areas ~~on the basis of the capacity of~~ **based on present and planned supporting systems, such as water and sewer lines capacity, presence of a local workforce, and good highway or rail access, and the absence of minimize detrimental local and global environmental impacts or negative social impacts outcomes**.”

ED-3.3: “Form partnerships with Durham Tech, UNC-Chapel Hill, Chapel Hill/Carrboro Schools, Orange County Schools, and others to provide adequate training and education to enable County workers to obtain ~~high quality~~ **jobs that pay a living income and benefits**.”

### ECONOMIC DEVELOPMENT – endorsed as is

ED-1.1 Focus public education efforts on sustainability issues, looking at the social, economic and environmental contributions of local businesses,”

ED-1.6: “Provide outreach, recognition and/or expedited service to new and existing businesses that meet development criteria.”

ED-2.1: “Encourage compact and higher density development in areas served by water and sewer.”

ED-2.2: “Encourage mixed use projects that support walkable communities.”

ED-2.3: “Promote public transportation, alternative modes of transportation, and encourage carpooling and park-and-ride participation.”

ED-2.10: “Extend water and sewer into all three Economic Development Districts.”

Goal 3: “Effective systems to train and support residents and those who work in Orange County.”

## Goals and objectives the coalition endorses with minor changes or as is, 4<sup>th</sup> page

### ECONOMIC DEVELOPMENT – endorsed as is, continued

ED-3.5: “Ensure County workers and those preparing for the workforce have access to transportation, child care, elder care, and affordable housing.”

### HOUSING – minor changes recommended

Overarching Goal: Use a different word than *citizens*; county housing availability should also include those who work in Orange County but do not yet live here.

Goal 1: “A wide range of types and densities of quality housing affordable to ~~potential residents~~ **those who live or work in Orange County as appropriate to surrounding land uses.**”

H-1.1: “~~Implement the county-wide Housing and Community Development Consolidated Plan to Assist in the rehabilitation and development of affordable housing and community development programs in the county~~ **using multiple strategies including implementation of the county-wide Housing and Community Development Consolidated Plan.**”

H-1.2: Define the process that will be used to identify areas that have *severe housing and community development needs*.

H-1.3: “Increase the provision of housing ~~assistance~~ **resources for financially-challenged households in need through technical assistance and coordination** ~~coordinate~~ **with public and non-profit organizations responsible for providing community services and housing in the county.**”

H-1.5: Define *in a sustainable manner, and existing and planned public services*.

Goal 2: “**An adequate supply of accessible and affordable housing is available for special needs populations, including the elderly.**”

H-2.1: “Accommodate the development of group homes, ~~and~~ **foster care facilities, and transitional housing facilities and other housing types** in appropriate locations to provide increased opportunities for social interaction, a de-institutionalized lifestyle, and gainful employment. **‘Appropriate’ in this case includes siting residences in compact, mixed-use developments that are within walking distance of office and retail districts.**”

H-2.2: “Develop a plan to ~~implement the strategies of the Orange County Ten Year Plan to end chronic homelessness~~, **utilizing multiple strategies including the Orange County Ten Year Plan to End Chronic Homelessness, Inter-Faith Council’s plans for relocating its men’s residential facility to a new location, and sustaining on-going HomeStart and Community House programs.**”

H-2.3: Include elsewhere another objective that encompasses other types of housing for the elderly, not just *multi-family housing units* and also multi-family housing for households other than the elderly. See proposed H-4.6 below.

H-3.1: “Achieve residential neighborhoods that are ~~attractive~~ **livable, walkable, safe and well-maintained.**”

H-4.1: “~~Allow mobile homes~~ **Allow HUD code-compliant manufactured housing** *the same locational opportunities as state building code-compliant single-family units.*”

H-4.3: “~~Evaluate the feasibility of~~ **Explore new public/private development incentives to stimulate the production of needed affordable low income housing.**”