

**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



June 3, 2021

Greg Gubman, Community Development Director
Community Development Department
City of Diamond Bar
21810 Copley Drive
Diamond Bar, CA 91765

Dear Greg Gubman:

RE: Review of Diamond Bar's 6th Cycle (2021-2029) Draft Housing Element

Thank you for submitting the City of Diamond Bar's (City) draft housing element received for review on April 8, 2021, along with revisions received on May 17, 2021. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. Our review was facilitated by a telephone conversation on May 10, 2021 with your consultant John Douglas.

The draft element addresses many statutory requirements; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). In particular, to comply with State Housing Element Law the element must provide a complete sites inventory, including full analyses of the nonvacant sites, as well as provide a full analysis addressing the required components for Affirmatively Furthering Fair Housing, among other items. The enclosed Appendix describes these requirements and other revisions needed to comply with State Housing Element Law.

To remain on an eight-year planning cycle, the City must adopt its housing element within 120 calendar days from the statutory due date of October 15, 2021 for Southern California Association of Government localities. If adopted after this date, Government Code section 65588, subdivision (e)(4) requires the housing element be revised every four years until adopting at least two consecutive revisions by the statutory deadline. For more information on housing element adoption requirements, please visit HCD's website at: http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sb375_final100413.pdf

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City should continue to engage the community, including organizations that

represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate.

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 City meets housing element requirements for these and other funding sources.

We are committed to assisting the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact John Buettner, of our staff, at (916) 841-4756.

Sincerely,

A handwritten signature in black ink, appearing to read 'Megan Kirkeby', with a small dot at the end.

Megan Kirkeby
Deputy Director
Division of Housing Policy Development

Enclosure

APPENDIX CITY OF DIAMOND BAR

The following changes are necessary to bring the City's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD's website at <http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml>. Among other resources, the housing element section contains HCD's latest technical assistance tool, *Building Blocks for Effective Housing Elements (Building Blocks)*, available at <http://www.hcd.ca.gov/community-development/building-blocks/index.shtml> and includes the Government Code addressing State Housing Element Law and other resources.

A. Review and Revision

Review the previous element to evaluate the appropriateness, effectiveness, and progress in implementation, and reflect the results of this review in the revised element. (Gov. Code, § 65588 (a) and (b).)

The element does not fully review the previous element and evaluate the appropriateness and effectiveness in implementation. Specifically, the element must be revised to analyze the effectiveness of prior programs. For example, Housing Program 14 states that the City was to encourage production of housing through the provisions of incentives but does not state if incentives were developed, offered, or provided to developers. The element must provide a more detailed narrative describing the actual results or outcomes of the prior housing element's goals, objectives, policies, and programs.

In addition, the element must evaluate the appropriateness of the goals, objectives, policies, and programs. For example, while the element states if program is to be continued in the 6th cycle housing element, it does not indicate if modifications are necessary to achieve better results in the new housing element cycle. The element must provide narrative describing what has been learned based on the analysis or effectiveness of the previous element, as described above.

B. Housing Needs, Resources, and Constraints

1. *Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2...shall include an assessment of fair housing in the jurisdiction (Gov. Code, § 65583, subd. (c)(10)(A))*

Program H-14 speaks to fair housing policies, entitlement reviews and fairness in approving development applications, accommodations for persons with disabilities, public outreach, and stakeholder engagement. This is not sufficient to cover the AFFH area. In addition to the provisions in H-14, the assessment of fair housing must include an analysis related to racially and ethnically concentrated areas of poverty, disparities in access to opportunities and disproportionate housing needs, including displacement risks. Further, the element contains no analysis to

adequately identify and prioritize contributing factors to fair housing issues and formulate meaningful and significant goals and actions. An analysis generally will identify all the above fair housing areas, evaluate patterns and trends, analyze other relevant factors, and summarize findings to better inform and prioritize contributing factors to fair housing issues and formulate goals and actions. Specifically, the element must include:

- Identification and analysis of integration and segregation on protected characteristics, including race, disability, familial status, and income. Identification and analysis must also fully address disproportionate housing needs, including overpayment, overcrowding and substandard housing and access to opportunities for persons with disabilities.
- For all analysis categories (e.g., fair housing enforcement, segregation, and integration, racially and ethnically concentrated areas of poverty, disparities in access to opportunities and disproportionate housing needs), discuss patterns and trends relative to the region.
- For all analysis categories, analyze other relevant factors, including demographic trends relative to the region, and any other relevant policy or program areas. The City must also consider relativity to the region as well as other relevant factors and address a summary of fair housing issues based on the outcomes of a complete analysis.
- The element must analyze whether sites are located throughout the community to affirmatively further fair housing. For example, the element should analyze identified sites relative to access to opportunity segregation and integration, racially and ethnically concentrated areas of poverty and affluence and displacement risk. The element should also discuss whether the identified sites serve the purpose of replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity.
- The element must list and prioritize contributing factors to fair housing issues. Contributing factors create, contribute to, perpetuate, or increase the severity of fair housing issues and are fundamental to adequate goals and actions. Examples include community opposition to affordable housing, housing discrimination, land use and zoning laws, lack of regional cooperation, location and type or lack of affordable housing and lack of public or private investment in areas of opportunity or affordable housing choices.
- Goals and actions must significantly seek to overcome contributing factors to fair housing issues. These actions are not limited to the regional housing need. For example, the element may need to consider zoning or land use changes regardless of the regional housing need allocation (RHNA). The element must add, and revise programs based on a complete analysis and listing and prioritization of contributing factors to fair housing issues.

For further information about AFFH requirements, please refer to HCD's [Affirmatively Further Fair Housing guidance memo](#).

2. *Include an analysis of population and employment trends and documentation of projections and a quantification of the locality's existing and projected needs for all income levels, including extremely low-income households. (Gov. Code, § 65583, subd. (a)(1).)*

Population and employment trends are important to understanding the diversity of the City's residents and economic growth patterns in the City. This data is integral in determine housing needs at various levels and aids in determining actions and programs the City can implement to address various issues. Additionally, race and ethnicity are important in addressing the City's AFFH obligations. The draft element provides data on the City's population trends but should also provide data or analysis on race and ethnicity.

3. *Include an analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition. (Gov. Code, § 65583, subd. (a)(2).)*

The draft element includes data on household characteristics, level of payments compared to ability to pay, overcrowding, and general housing stock condition. However, data for extremely low-income (ELI) households does not consider tenure as seen in Table 9-4, nor does the analysis provide information on potential housing problems and specific housing needs of this economic group. These analyses are vital to determining the needs of all households, including ELI, so that the City can address any deficiencies and implement actions and programs that address their needs.

4. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

The City has a (RHNA) of 2,521 housing units, of which 1,281 are for lower-income households. To address this need, the element relies on nonvacant and underutilized sites in the newly designated Town Center, Neighborhood Mixed-use, and Transit-Oriented Mixed-Use Focus Areas. All sites listed for all income ranges in the sites inventory need rezoning consistent with the newly revised general plan. Additionally, over fifty percent of the sites are being used to accommodate the City's lower-income RHNA, which requires additional analysis. To demonstrate the adequacy of these sites and strategies to accommodate the City's RHNA, the element must include complete analyses of the following:

Sites Inventory: While the sites inventory lists the address, APN, existing zoning, parcel size, allowable density, whether or not the sites are publicly owned, income categories, and estimated total units, it must also identify the site's general plan designations and provide a more detailed description of the existing uses of the

nonvacant sites beyond a general description of “commercial”. For additional information, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/inventory-of-land-suitable.shtml>.

Please note, Pursuant to SB 6 (Chapter 667, Statutes of 2019), for a housing element or amendment adopted on or after January 1, 2021, the planning agency shall submit to HCD an electronic copy of its inventory of these parcels using standards, forms, and definitions adopted by HCD. For further information, refer to HCD’s [Housing Element Site Inventory Guidebook](#).

Map of Sites: While the element has general land use map (figure B-1), the map must identify the location of the sites within the sites inventory.

Realistic Capacity: The element does not fully analyze the City’s methodology for calculating realistic capacity for sites listed in the sites inventory. For sites zoned for nonresidential uses, e.g. commercial and mixed-use zones, the element must describe how the estimated number of residential units for each site was determined. To demonstrate the likelihood for residential development in nonresidential zones, the element could describe any performance standards mandating a specified portion of residential and any factors increasing the potential for residential development such as incentives for residential use, and residential development trends in the same nonresidential zoning districts. For additional information, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/analysis-of-sites-and-zoning.shtml#analysis>.

Suitability of Nonvacant Sites: Appendix B, Methodology for the Sites Inventory Analysis, offers high-level analysis of the Town Center, Neighborhood Mixed Use, and Transit-oriented Mixed-Use focus areas. However, the element must include an analysis to demonstrate the potential for redevelopment. The analysis shall consider factors including, but not limited to, the extent existing uses constitute an impediment, recent developments, development trends and market conditions. In addition, as the element appears to rely on nonvacant sites to accommodate 50 percent or more of the housing needs for lower-income households, this triggers requirements to make findings based on substantial evidence that the existing use is not an impediment and will likely discontinue in the planning period. For additional information and sample analysis, see the *Building Blocks* at <http://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/analysis-of-sites-and-zoning.shtml#analysis>.

Second Units: The element incorrectly calculates accessory dwelling unit (ADU) potential for the planning period by considering a rate of 8 ADUs per year based on the most recent (2020) production. Specifically, in addition to other methods, HCD accepts the use of trends in ADU construction since January 2018 to estimate new production. Based on past production between 2018 to 2020, the City is averaging 5 units per year. The City can increase this estimate if it includes addition analysis that includes information such as how community needs and demand are likely to increase production and include programs that aggressively promote and incentivize ADU construction.

Infrastructure: While the element describes water and sewer infrastructure, it must also demonstrate sufficient existing or planned dry utilities supply capacity, including the availability and access to distribution facilities to accommodate the City's regional housing need for the planning period (Gov. Code, § 65583.2, subd. (b)). For additional information, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/analysis-of-sites-and-zoning.shtml#environmental>.

Water Sewer Priority: The element does not address water and sewer priority. For your information, water and sewer service providers must establish specific procedures to grant priority water and sewer service to developments with units affordable to lower-income households. (Gov. Code, § 65589.7.) Local governments are required to immediately deliver the housing element to water and sewer service providers. HCD recommends including a cover memo describing the City's housing element, including the City's housing needs and regional housing need. For additional information and sample cover memo, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/other-requirements/priority-for-water-sewer.shtml>.

5. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures. The analysis shall also demonstrate local efforts to remove governmental constraints that hinder the locality from meeting its share of the regional housing need in accordance with Government Code section 65584 and from meeting the need for housing for persons with disabilities, supportive housing, transitional housing, and emergency shelters identified pursuant to paragraph (7). Transitional housing and supportive housing shall be considered a residential use of property and shall be subject only to those restrictions that apply to other residential dwellings of the same type in the same zone (Gov. Code, § 65583, subd. (a)(5)).*

Land Use Controls: While the element lists parking requirements at 2 spaces per unit for multifamily uses, it must also analyze the requirements as a potential constraint on the cost and supply of housing and ability to achieve maximum densities.

The City must address whether it has complied with new transparency laws requiring all zoning and development standards for each parcel to be provided on the jurisdiction's website (Gov. Code 65940.1 (a)(1)(B)).

Fees and Exactions: The element must describe all required fees for single family and multifamily housing development, including impact fees, and analyze their impact as potential constraints on housing supply and affordability. For example, the analysis could identify the total amount of fees and their proportion to the development costs for both single family and multifamily housing. The element lists

the basic fees and exactions for development projects across the board. However, it should also demonstrate typical costs for Multifamily and Single-Family Residence construction. Additionally, the element should also address whether the City has complied with the new transparency laws requiring fees and inclusionary requirements to be provided on a jurisdiction's website (GC 65940.1(a)(1)(A)). For additional information and a sample analysis and tables, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/constraints/fees-and-exactions.shtml>.

Local Processing and Permit Procedures: The element provides a general overview of the City's processing and permit procedures. However, the element should provide average processing times for single-family and multifamily developments. The element also acknowledges that single-family residences and multifamily developments are permitted by-right in their respective zones but require "Development Review" (page 9-41). In addition, according to the City's website, Diamond Bar has adopted design guidelines. The element must describe and analyze the development application process and design review requirements including approval procedures and decision-making criteria for their impact as potential constraints on housing supply and affordability. For example, the analysis could describe required findings and discuss whether objective standards and guidelines improve development certainty and mitigate cost impacts. The element must demonstrate this process is not a constraint and include a program to address this permitting requirement, as appropriate.

Persons with Disabilities: While the element briefly describes its reasonable accommodation procedures, it should further explain its reasonable accommodation criteria and process. In addition, the element must analyze its conditional use permit process for residential care facilities for seven or more persons as a potential barrier to housing for persons with disabilities and include programs as necessary to address this constraint. For additional information and sample analysis, see the *Building Blocks* at <http://www.hcd.ca.gov/community-development/building-blocks/constraints/constraints-for-people-with-disabilities.shtml>.

Codes and Code Enforcement: While the element states that the City building codes are based upon the California Building, Plumbing, Mechanical and Electrical Codes, it must also describe its code enforcement processes and procedures. For additional information and a sample analysis, see the Building Blocks at <https://www.hcd.ca.gov/community-development/building-blocks/constraints/codes-and-enforcement-on-offsite-improvement-standards.shtml>.

6. *An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, the cost of construction, the requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Government Code section 65583.2, and the length of time between receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality's share of the regional housing need in accordance with Government Code section 65584. The analysis shall also demonstrate local efforts*

to remove nongovernmental constraints that create a gap between the locality's planning for the development of housing for all income levels and the construction of that housing. (Gov. Code, § 65583, subd. (a)(6)).

Price of land, Cost of Construction, and Availability of Financing: While, the element includes a high-level analysis of availability of financing, the price of land, the cost of construction, it should be revised to analyze quantifiable cost data and its impact on the supply of housing.

Requests for Lower Density, Permit Times, and Efforts to Address Non-Governmental Constraints: The element must include analysis regarding local efforts to address non-governmental constraints that create a gap in the jurisdiction's ability to meet RHNA by income category, an identification and analysis of requests to develop at densities below the density identified in the site inventory, and a description of the length of time between project approval and request for building permit that hinders the jurisdiction's ability to accommodate RHNA by income category. For example, the City can look at recent developments in the jurisdiction and identify any non-governmental constraints.

7. *Analyze any special housing needs such as elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. (Gov. Code, § 65583, subd. (a)(7).)*

Elderly: While the element provides some data on elderly households by income and tenure and list programs amenable to this category of special needs, it should also include an analysis of potential housing problems and unmet needs to better target programs to address housing needs.

Persons with Disabilities including Developmental Disabilities: While the element provides some data for persons with disabilities by type and age and list programs, it should also include an analysis of potential housing problems and unmet needs to better target programs to address housing needs.

C. Housing Programs

1. *Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the housing element through the administration of land use and development controls, the provision of regulatory concessions and incentives, and the utilization of appropriate federal and state financing and subsidy programs when available. The program shall include an identification of the agencies and officials responsible for the implementation of the various actions. (Gov. Code, § 65583, subd. (c).)*

To address the program requirements of Gov. Code section 65583, subd. (c)(1-6), and to facilitate implementation, all programs should be revised to include: (1) a

description of the City's specific role in implementation; (2) definitive implementation timelines (e.g., December 31, 2021); (3) objectives, quantified where appropriate; and (4) identification of responsible agencies and officials (e.g., Planning Assistant, Community Development, etc.). In addition, the following programs required additional revisions.

Program H-1, Residential Neighborhood Improvement Program: Program H-1 quantifies how many eligible homes the City is targeting to assist, which is 5-6, but should be revised to clarify if that will be over the 8-year period or annually.

Program H-2, Home Improvement Program: Program H-2 speaks to the use of CDBG funds the City uses for the program but does not address the City's specific role in administration or identify responsible agencies and officials.

Program H-3, Section 8 Rental Assistance Program: Programs should describe the City's specific role in implementation and identify responsible agencies and officials. Program H-3 states that the Home improvement program utilizes CDBG funds, but it does not address the City's specific role in implementation.

2. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing (Gov. Code, § 65583, subd. (c)(1)).*

As noted in the Finding B4, the element does not include a complete sites inventory or analysis; as a result, the adequacy of sites and zoning has not been established. Based on the results of a complete sites inventory and analysis, programs may need to be added, or revised, to address a shortfall of sites and zoning for a variety of housing types.

The element identifies sites in the Town Center, Neighborhood Mixed Use, and Transit-Oriented Mixed-Use Focus Areas which, while identified in the 2019 General plan, still require zoning and development code updates to be available to for housing development. This represents a shortfall of sites to accommodate the City's share of the regional housing need. While the element includes Program H-8 to complete the amendments to the development code within three years of housing element adoption, the program must be amended to demonstrate a commitment to accommodate 100 percent of the shortfall of sites necessary to accommodate the remaining housing need for housing for very low- and low-income households during the planning period and include the following components:

- Permit owner-occupied and rental multifamily uses by right for developments in which 20 percent or more of the units are affordable to lower income households. By right means local government review must not require a conditional use permit, planned unit development permit, or other discretionary review or approval.
 - Permit the development of at least 16 units per site.
 - Require a minimum density of 20 units per acre; and
 - Ensure a) at least 50 percent of the shortfall of low- and very low-income regional housing need can be accommodated on sites designated for exclusively residential uses, or b) if accommodating more than 50 percent of the low- and very low-income regional housing need on sites designated for mixed-uses, all sites designated for mixed-uses must allow 100 percent residential use and require residential use to occupy at least 50 percent of the floor area in a mixed-use project.
3. *The housing element shall contain programs which assist in the development of adequate housing to meet the needs of extremely low-, very low-, low- and moderate-income households. (Gov. Code, § 65583, subd. (c)(2).)*

Program H-7, Senior and Workforce Housing Development, encourages the development of senior and workforce housing, including very-low (VL) and extremely low-income (ELI) persons. However, this program alone is insufficient in encouraging and facilitating the development of housing for ELI and VL income categories. The element must include a program(s) with specific actions and timelines to assist in the development of housing for extremely low-, very low-, low-, and moderate-income households. The program(s) could commit the City to adopting priority processing, granting fee waivers or deferrals, modifying development standards, granting concessions and incentives for housing developments that include units affordable to lower and moderate-income households; assisting, supporting or pursuing funding applications; and working with housing developers coordinate and implement a strategy for developing housing affordable to lower and moderate-income households. For additional information, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/program-requirements/assist-in-development-housing.shtml> and for financial assistance programs, see HCD's website at http://www.hcd.ca.gov/fa/LG_program_directory.pdf.

4. *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)*

As noted in Finding(s) B5 and B6, the element requires a complete analysis of potential governmental and non-governmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.

5. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)*

As noted in Finding B1, the element must include a complete analysis of affirmatively furthering fair housing. Based on the outcome of that analysis, the element must add or modify programs. Additionally, programs and actions need to be significant, meaningful, and sufficient to overcome identified patterns of segregation and affirmatively further fair housing.

D. Public Participation

Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element, and the element shall describe this effort. (Gov. Code, § 65583, subd. (c)(8).)

While the element includes a general summary of the public participation process (page 9-80, Appendix C), it must also demonstrate diligent efforts were made to involve all economic segments of the community in the development of the housing element. For example, according to the American Communities Data, the City is made up of multiple ethnic groups. The element could describe how these groups were reached and if materials and meetings were offered in multiple languages.

For your information, some general plan element updates are triggered by housing element adoption. For example, a jurisdiction must address environmental justice in its general plan by the adoption of an environmental justice element, or by the integration of environmental justice goals, policies, and objectives into other general plan elements upon the adoption or next revision of two or more elements concurrently on or after January 1, 2018. (Gov. Code, § 65302, subd. (h).) In addition, the safety and conservation elements of the general plan must include analysis and policies regarding fire and flood hazard management and be revised upon each housing element revision. (Gov. Code, § 65302, subd. (g).) Also, the land-use element must identify and analyze disadvantaged communities (unincorporated island or fringe communities within spheres of influence areas or isolated long-established legacy communities) on, or before, the housing element's adoption due date. (Gov. Code, § 65302.10, subd. (b).) HCD reminds the City 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: http://opr.ca.gov/docs/OPR_Appendix_C_final.pdf and http://opr.ca.gov/docs/Final_6.26.15.pdf.