

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

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September 1, 2021

John Hildebrand, Director
Planning Department
County of Riverside
4080 Lemon Street, 12th Floor
Riverside, CA 92502-1629

Dear John Hildebrand:

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

Thank you for submitting the County of Riverside's (County) draft housing element received for review on July 8, 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 conversation on August 11, 2021, with you; Robert Flores, Principal Planner; Michael Zornes, Administrative Services Manager; Paul Swancott, Contract Planner; and consultants Peter Minegar and Cynthia Walsh. In addition, HCD considered comments from the Leadership Council of Justice and Accountability, Public Interest Law Project, California Rural Legal Assistance, California Institute for Rural Studies, Consejo de Federaciones Mexicanas, and Pueblo Unido CDC pursuant to Government Code section 65585, subdivision (c).

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). The enclosed Appendix describes revisions needed to comply with State Housing Element Law.

To remain on an eight-year planning cycle, the County must adopt its housing element within 120 calendar days from the statutory due date of October 15, 2021 for Southern California Association of Governments (SCAG) 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.

Pursuant to Government Code section 65583.3, subdivision (b), the County must utilize standards, forms, and definitions adopted by HCD when preparing the sites inventory.

Please see HCD's housing element webpage at <https://www.hcd.gov/community-development/housing-element/index.shtml#element> for a copy of the form and instructions. The County can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance. Please note, upon adoption of the housing element, the County must submit an electronic version of the sites inventory with its adopted housing element to sitesinventory@hcd.ca.gov.

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

HCD appreciates the diligent efforts the housing element update team, particularly Robert Flores, provided during our review. We are committed to assisting the County in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Jamillah Williams, of our staff, at Jamillah.Williams@hcd.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Shannan West". The signature is fluid and cursive, with the first name "Shannan" and the last name "West" clearly distinguishable.

Shannan West
Land Use & Planning Unit Chief

Enclosure

APPENDIX COUNTY OF RIVERSIDE

The following changes are necessary to bring the County'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. Housing Needs, Resources, and Constraints

1. *Affirmatively further[ing] fair housing (AFFH) 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).)*

Concentrated Areas of Poverty and Affluence: The element includes information relative to Racially and Ethnically Concentrated Areas of Poverty (R/ECAP) but should evaluate the characteristics of these areas, changes over time, comparisons to other neighborhoods in terms of equitable quality of life and consider other relevant factors, such as public participation, past policies, practices, and investments and demographic trends. In addition, while the element states there are no racially concentrated areas of affluence, it should at least evaluate concentrated areas of affluence utilizing data, patterns, and trends for household incomes. The combination in the R/ECAP and areas of affluence analyses will help guide goals and actions to address fair housing issues. The analysis should also evaluate changes over time and consider other relevant factors, such as public participation, past policies, practices, and investments and demographic trends.

Access to Opportunity: The element includes information on the various components of access to opportunity but should also analyze the information by (1) describing any disparities in access to opportunity; and (2) discussing policies, practices, and investments that impact access to environmentally healthy neighborhoods.

Disproportionate Housing Needs, including Displacement: The element does include data and descriptions of substandard housing conditions, and cost burdened households, but must also address local and regional patterns and trends for overcrowded households, homelessness, and displacement.

Additionally, the element states that about 55 percent of the housing in the unincorporated County are greater than 30 years old and in need of rehabilitation. Local stakeholders also emphasized the poor housing conditions of farmworkers. The element should include additional analysis of these issues in the element such

as patterns and the severity of conditions and add or modify actions as appropriate based on a complete analysis.

Local Data and Knowledge, and Other Relevant Factors: The element must include local data, knowledge, and other relevant factors to discuss and analyze any unique attributes about the County related to fair housing issues. The element should complement federal, state, and regional data with local data and knowledge where appropriate to capture emerging trends and issues, including utilizing knowledge from local and regional advocates and service providers. While the element does include some of this information, given the volume of comments on AFFH, the element should include additional consideration from commenters on the housing element. Also, the element must include other relevant factors that contribute to fair housing issues in the jurisdiction. For instance, the element can analyze historical, present and anticipated land use and investment practices or other information and demographic trends. For example, the element describes the County's 300 or so specific plans and could discuss how those specific plans play a role in AFFH.

Site Inventory: The element includes a map of the site inventory and states that the proposed sites to meet lower-income regional housing needs allocation (RHNA) are geographically distributed which results in these sites AFFH (pp. 89-90, 122). However, the accompanying analysis should also be reflective of housing development at all income levels and evaluate the sites relative to all components of the assessment of fair housing (e.g., segregation and integration, racially and ethnically concentrated areas of poverty). The site inventory analysis should address how the sites are identified to improve conditions (or if sites exacerbate conditions, how a program can mitigate the impact), whether the sites are isolated by income group and should be supported by local data and knowledge.

Contributing Factors: The element identifies many contributing factors to fair housing issues. In addition, the element should consider prioritizing these factors to better formulate policies and programs and carry out meaningful actions to AFFH.

Goals, Priorities, Metrics, and Milestones: The element must be revised to add or modify goals and actions based on the outcomes of a complete analysis. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have metrics and milestones as appropriate and must address housing mobility enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for community preservation and revitalization and displacement protection.

2. *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).)*

Housing Conditions: The element identifies the age of the housing stock (p. 59). However, it must include analysis of the condition of the existing housing stock and estimate the number of units in need of rehabilitation and replacement. For example,

the analysis could include estimates from a recent windshield survey or sampling, estimates from the code enforcement agency, or information from knowledgeable organizations. This analysis should consider differences between eastern and western County.

In addition, the element notes that a strong proportion of the housing stock in eastern County is manufactured homes and mobilehomes and that this structure type ages more rapidly than other structure types. The element should include more discussion and analysis on these housing conditions to better formulate policies and programs. For example, the element could discuss characteristics of conditions, including infrastructure, whether located in mobilehome parks or other situations, intersections with AFFH, past effectiveness of programs in addressing needs, available resources such as the Mobilehome Park Rehabilitation and Resident Ownership Program (MPRRP), an assessment of any gaps in resources, and proposed policies, programs, and funding to help address those gaps.

Vacancy Rates: The element identifies a vacancy rate of approximately 42 percent in eastern County and 9 percent in western County. The vacancy rate in eastern County appears to be associated with seasonal, recreation and occasional use for migrant workers or other vacancy situations. A vacancy rate of 42 percent is atypical even in areas with significant seasonal influences. The element should include analysis of this vacancy rate and add or modify policies and programs as appropriate.

3. *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).)*

Specific Plans and Progress toward the RHNA: The County's RHNA may be reduced by the number of new units approved, permitted and built since July 1, 2021; however, the element must demonstrate affordability based on actual or anticipated sales prices, rents or other mechanisms ensuring affordability (e.g., deed restrictions). The element must also demonstrate the availability of the units in the planning period. Specifically, the element should address the following:

- *Availability of Specific Plans:* While many of the listed projects and specific plans can reasonably be built in the planning period, based on HCD and County communications, some specific plans have an anticipated horizon longer than the 8-year planning period. As a result, the element should include discussion and adjustments to the anticipated number of units.
- *Specific Plans and Affordability:* The element notes, except for Valante and Travertine Point Specific Plans, the affordability of specific plans is based on zoning and general plan densities. If utilizing zoning and general plan densities as a proxy for affordability, the element should list parcels by various statutory requirements such as parcel number, acreage, zone and general plan designation. If these specific plans have not been parceled

according to the approved land uses, then the element should include additional information such as describing acreages and planned uses by sub-areas to demonstrate the suitability of sites. If utilizing these specific plans as projects, the element should demonstrate affordability based on actual or anticipated sales prices, rents or other mechanisms ensuring affordability.

- *Valente and Travertine Specific Plans*: Based on the HCD and County conversation, the affordability levels of Valente is ensured through approvals. As a result, the element should clarify the mechanisms ensuring affordability. Affordability for Travertine has not yet been determined, so the element should either (1) include additional information or policies to demonstrate current affordability assumptions, (2) rescale affordability assumptions to be conservative, or (3) count the affordability based on approved densities and list sites according to statutory requirements.

Parcel Listing: While the element lists sites by parcel number or unique reference, parcel size, zoning, general plan designation, existing use and realistic capacity, it must also list the anticipated affordability level on each parcel.

Realistic Capacity: While the element assumes 75 percent of maximum allowable densities to calculate residential capacity, the element should include additional and clear supporting information on typical densities of existing or approved residential developments at a similar affordability level. For example, the element could clearly list other recent projects, the zone, acreage, built density, allowable density, level of affordability and presence of exceptions such as a density bonus.

Infrastructure Capacity: The element must demonstrate sufficient existing or planned water, sewer, and other dry utilities' supply capacity to accommodate the County's regional housing need. (Gov. Code, § 65583.2, subd. (b).) While the element includes a summary table of infrastructure capacity by district and planned capacity, that table must still be completed (Table P-53). In addition, the parcel listing (starting on page P-98) identifies the water provider per site but should also identify the sewer provider. Based on the outcomes of a complete analysis, the element should add or modify programs as appropriate.

Suitability of Nonvacant Sites: While the element identifies minimal capacity for the lower-income RHNA on nonvacant sites (2.1%), it must still demonstrate the potential for additional development and evaluate the extent to which existing uses may impede additional residential development. Specifically, several sites indicate large portions of the site as vacant, used for parking or can be consolidated with other sites to form a larger and more valuable project. Another site has an existing use as a duplex with only a capacity for nine units. In all cases, the element must include additional description of the existing uses to demonstrate whether the uses impede additional development. The element should address past experience with converting similar existing uses to higher density residential development, the current market demand for the existing use, an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards.

Replacement Requirements: The element identifies sites with existing residential uses. Absent a replacement housing policy, these sites are not adequate sites to accommodate lower-income households. The replacement housing policy should comply with same requirements as set forth in Government Code section 65915, subdivision (c)(3).

In addition, the inventory identifies mobilehome parks (pp. P-115 and P-120) with potential for redevelopment in the planning period and should include specific discussion and programs given the importance of this housing type in addressing a variety of housing needs. For example, the element should discuss if the mobilehome parks are likely to be redeveloped or units are being added to the existing sites and should include specific programs for replacement. Further, the element should consider impacts on residents, consistency with County program goals, Government Code section 66427.5 and provisions related to AB 2782 (Chapter 35, Statutes of 2020). AB 2782 requires, among other things, noticing to homeowners prior to local approval of change in use and a replacement and relocation plan and steps to mitigate impacts on displaced residents.

Sites with Zoning for a Variety of Housing Types:

- *Emergency Shelters:* Zoning may impose development standards on emergency shelters including sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone. The County's parking standards require one space per six beds in addition to staff parking and as a result, appear inconsistent with statutory requirements. The element should add or modify programs as appropriate.
- *Supportive Housing:* Government Code section 65651 requires jurisdictions to allow supportive housing by right in zones allowing multifamily housing, including mixed-use and nonresidential zones when the development meets certain requirements. The element should describe compliance with these requirements or add or modify programs as appropriate.

Accessory Dwelling Units (ADU): ADUs may be counted toward the RHNA based on past permitted units and other factors. In the element, the County projects 1,328 ADUs to be constructed over the planning period, averaging 166 units per year. This projection was based on doubling the average of ADUs permitted in 2018 and 2019 (83 ADUs). However, HCD's records indicate 23, 93 and 33 ADUs for 2018, 2019, and 2020, respectively. The element should reconcile these figures and adjust assumptions as appropriate. In addition, while HCD appreciates the County's efforts to promote ADUs, these efforts do not support a doubling of permitted units, especially a magnitude over 150 ADUs per year, and assumptions should be adjusted accordingly.

Manufactured Homes: The element may utilize the potential for manufactured housing toward the RHNA based on permitted trends, anticipated affordability, and other relevant factors. The element assumes an average of 233 mobile/manufactured homes based on 2018 and 2019 records. However, given the magnitude of these assumptions, the element should include additional records of permitted units back to the beginning of the planning period (2013) and other evidence as appropriate. The element further assumes approximately 60 percent of these units will be affordable to lower-income households. The element must include additional analysis to demonstrate the appropriate affordability. In addition to accounting for sales prices, the analysis should also address costs related to land (residential), entitlement, transportation, foundation, installation, utilities, financing, and other costs. Based on the outcomes of a complete analysis, the element should adjust affordability assumptions.

4. *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... (Gov. Code, § 65583, subd. (a)(5).)*

Processing and Permit Procedures: While the element includes information about processing times, it should also describe the procedures for a typical single family and multifamily development. The analysis should address the approval body, the number of public hearing if any, approval findings and any other relevant information. The analysis should address impacts on housing cost, supply, timing, and approval certainty. For example, the element should identify and analyze approval findings for impacts on approval certainty, the presence of processes or guidelines to promote certainty and add or modify programs as appropriate.

5. *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).)*

Special Needs Populations: While the element quantifies and analyzes special needs populations, it should consider distinguishing between eastern and western County for large households and female headed households. In addition, given the housing needs of farmworkers in the eastern Coachella Valley, the element should expand the discussion and analysis of housing needs of farmworkers. For example, the element could contain more information and evaluation from the 2007 Coachella Valley Farm Worker Survey, effectiveness of past programs, lessons learned and potential for future solutions. HCD will send additional resources under separate cover.

B. 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 have a beneficial impact in the planning period and address the goals of the housing element, programs must be revised with discrete timelines, specific commitment and lessons learned from the prior planning period. For example, programs needing revisions with discrete timelines include but are not limited to H20 (Persons with Disabilities) and H28 (Homeless Collaboration). Programs needing revisions with specific commitment or based on lessons learned from the prior planning period include but are not limited to H13 (Code Enforcement) which should explicitly link rehabilitation financing and other resources to mitigate displacement.

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 Finding A3, the element does not include a complete site analysis; therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the County may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition, the element should be revised as follows:

- *Program H-2 (Infrastructure Availability and Coordination):* The program should be modified based on the outcomes of a complete analysis and lessons learned from the prior planning period. In addition, program actions should go beyond discussing plans for expansion and could consider actions such as pursuing improvements with a schedule of steps.
- *Program H-3 (Large Lot Development):* For Program 1.2e in the prior planning period, the element describes large lot developments but based on the conversation between HCD and the County, the program did not appear to be well utilized to facilitate developments at appropriate sizes to encourage

housing for lower-income households. As a result, Program H-3 should be adjusted in some manner to address the lack of effectiveness in the prior planning period and the unique circumstances of identified sites. For example, the program could reach out to developers of affordable housing and incorporate necessary strategies such as ministerial lot splits or other incentives.

- *Replacement Housing Requirements:* The housing element must include a program to provide replacement housing (Gov. Code, § 65583.2, subd. (g)(3)). The replacement housing program must adhere to the same requirements as set forth in Government Code section 65915, subdivision (c)(3).

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-18 (Farmworker Assistance) should be modified as appropriate based on the outcomes of the complete analysis noted under Finding A5. In addition, the program should be modified as appropriate based on the lessons learned from past actions and should include steps to address needs upon completion of the survey.

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 A4, the element requires a complete analysis of potential governmental constraints. Depending upon the results of that analysis, the County may need to revise or add programs and address and remove or mitigate any identified constraints. In addition, Program H-7 (Land Use Amendments) should go beyond processing amendments and make a clear commitment to amend zoning. Further, provisions for reasonable accommodation should make a clear commitment to revise or remove findings of approval (beyond reviewing) and provisions for group homes for seven or more persons should make a clear commitment to revise zoning as appropriate to promote certainty and objective procedures regardless of state licensing requirements and should not be limited to the specified health and safety codes.

5. *Promote AFFH 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 A1, the element must include a complete analysis of AFFH. Based on the outcomes of that analysis, the element must add or modify programs.

6. *The housing program shall preserve for low-income household the assisted housing developments identified pursuant to paragraph (9) of subdivision (a). The program for preservation of the assisted housing developments shall utilize, to the extent necessary, all available federal, state, and local financing and subsidy programs identified in paragraph (9) of subdivision (a), except where a community has other urgent needs for which alternative funding sources are not available. The program may include strategies that involve local regulation and technical assistance. (Gov. Code, § 65583, subd. (c)(6).)*

While the element includes a program to preserve the at-risk units, Program H-23 should be strengthened by committing to add funding assistance or assist with funding applications. For additional information and a sample program, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/assisted-housing-developments.shtml>.

7. *Develop a plan that incentivizes and promotes the creation of ADUs that can be offered at affordable rent, as defined in Section 50053 of the Health and Safety Code, for very low, low-, or moderate-income households. For purposes of this paragraph, “accessory dwelling units” has the same meaning as “accessory dwelling unit” as defined in paragraph (4) of subdivision (i) of Section 65852.2. (Gov. Code, § 65583, subd. (c)(7).)*

While the element includes a program that incentivizes or promotes ADU development for very low-, low-, and moderate-income households, Program H-9 should go beyond “exploring” options for establishing a loan program and commit to its implementation. Additionally, this program should commit to subsequent monitoring every two years and back up actions within a specified time.

C. 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).)

HCD understands the County did not make the element available to the public with sufficient time to comment prior to submittal to HCD. By not providing an opportunity for the public to review and comment on a draft of the element in advance of submission, the County has not yet complied with statutory mandates to make a diligent effort to encourage the public participation in the development of the element and it reduces HCD’s ability to consider public comments in its review. The availability of the document to the public and opportunity for public comment prior to submittal to HCD is essential to the public process and HCD’s review. The County must proactively make future revisions available to the public, including any commenters, prior to submitting any revisions to HCD and diligently consider and address comments, including revising the document where appropriate. HCD’s future review will consider the extent to which the revised

element documents how the County solicited, considered, and addressed public comments in the element. The County's consideration of public comments must not be limited by HCD's findings in this review letter.

D. Consistency with General Plan

The housing element shall describe the means by which consistency will be achieved with other general plan elements and community goals. (Gov. Code, § 65583, subd. (c)(7).)

The element notes the County is updating its safety element to comply with recent changes to the law and will ensure internal consistency as updates occur throughout the general plan. HCD also understands the County is preparing analysis to address requirements related to unincorporated disadvantaged communities in the land use element. HCD encourages the County to consider all the various other elements of the general plan that may be triggered by the housing element update, including provisions related to environmental justice, fire and flood risk and climate adaptation. For example, HCD received several comments (commenters noted above) related to other elements of the general plan including flood and fire risks and encourages the County to harmonize these objectives as part of this housing element update such as addressing any known conditions and issues that might impact the suitability of sites. HCD further encourages the County to make appropriate adjustments as part of future updates to the general plan to better harmonize environmental and equity goals and promote an integrated general plan. For additional information, please see technical advisories issued by the Governor's Office of Planning and as follows: SB 244 Disadvantaged Unincorporated Communities Technical Advisory (https://www.opr.ca.gov/docs/SB244_Technical_Advisory.pdf [opr.ca.gov]), updated Fire Hazard Planning Technical Advisory (Nov 2020 draft) (http://opr.ca.gov/docs/20201109-Draft_Wildfire_TA.pdf), and the 2017 General Plan Guidelines (<http://opr.ca.gov/planning/general-plan/guidelines.html>).