

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

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January 18, 2024

Paul Mugan, Director
Community Development Department
City of Greenfield
599 El Camino Real
Greenfield, CA 93927

Dear Paul Mugan:

RE: City of Greenfield's 6th Cycle (2023-2031) Draft Housing Element

Thank you for submitting the City of Greenfield's (City) draft housing element received for review on October 20, 2023. Pursuant to Government Code section 65585, the California Department of Housing and Community Development (HCD) is reporting the results of its review. In addition, HCD considered comments from David Kellogg pursuant to Government Code section 65585, subdivision (c).

The draft element addresses many statutory requirements; however, revisions will be necessary to substantially comply with State Housing Element Law (Gov. Code, § 65580 et seq). The enclosed Appendix describes the revisions needed to comply with State Housing Element Law.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government fails to adopt a compliant housing element within 120 days of the statutory deadline (December 15, 2023), then any rezoning to make prior identified sites available or accommodate the regional housing needs allocation (RHNA) shall be completed no later than one year from the statutory deadline pursuant to Government Code sections 65583, subdivision (c) and 65583.2, subdivision (c). Otherwise, the local government's housing element will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i). Please be aware, if the City fails to adopt a compliant housing element within one year from the statutory deadline, the element cannot be found in substantial compliance until these rezones are completed.

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. Please be

aware, any revisions to the element must be posted on the local government's website and to email a link to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD.

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 Affordable Housing and Sustainable Communities program, 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 will meet housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the 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: <https://www.opr.ca.gov/planning/general-plan/guidelines.html>.

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 Clare Blackwell, of our staff, at Clare.Blackwell@hcd.ca.gov.

Sincerely,



Paul McDougall
Senior Program Manager

Enclosure

APPENDIX CITY OF GREENFIELD

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 <https://www.hcd.ca.gov/planning-and-community-development/hcd-memos>. Among other resources, the housing element section contains HCD's latest technical assistance tool, *Building Blocks for Effective Housing Elements (Building Blocks)*, available at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks> 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).)

While the element describes the accomplishments of a few programs for housing for persons with special needs (p. 6-19); a complete analysis must provide an evaluation of the cumulative effectiveness of these strategies in meeting the housing needs of all special needs populations. Programs should be revised as appropriate to reflect the results of this evaluation.

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).)*

Enforcement and Outreach: The element must describe capacity to provide enforcement and outreach, which can consist of actions such as the ability to investigate complaints, obtain remedies, or engage in fair housing testing. The analysis could also evaluate data and the results from any fair housing testing. In addition, the analysis must address compliance with existing fair housing laws as well as any past or current fair housing lawsuits, findings, settlements, judgements, or complaints.

Integration and Segregation: The element must include an analysis of segregation and integration patterns by disability and familial status. The element must discuss and analyze this data for trends over time, patterns across census tracts, as well as coincidence with other components of the assessment of fair housing. Additionally, it must evaluate segregation and integration patterns of disability and familial status at a regional basis, comparing the City to the region. Finally, while the element generally describes local

patterns and trends for income, it must also analyze segregation and integration patterns of income in Greenfield relative to the rest of the region.

Disparities in Access to Opportunity: While the element includes a brief description of access to transportation within the City, it must evaluate access to transportation across census tracts to analyze whether any local disparities exist. In addition, while the element provides regional information on access to opportunity through maps on Figures 6-8, it must also provide analysis and conclusions for this data.

Disproportionate Housing Needs: The analysis should evaluate those needs, impacts and patterns within the City for homelessness and housing conditions, such as areas of higher need. For homelessness, the element should examine patterns of need or areas with higher concentrations of persons experiencing homelessness, including access to transportation and services. For housing conditions, the element should discuss any areas of potentially higher needs of rehabilitation and replacement. The element should utilize local data and knowledge such as service providers and code enforcement officials to assist with this analysis.

Identified Sites and Affirmatively Furthering Fair Housing (AFFH): While the element includes a brief evaluation of the location of sites relative to the general fair housing issue areas, (e.g., segregation and integration, access to opportunity), an analysis should address the income categories of identified sites with respect to location; the number of sites and units by all income groups and how that affects the existing patterns for all components and sub-components of the assessment of fair housing. For example, while Table 44 includes information on the distribution of units by income group for each of the City's census tracts, the table should be expanded to analyze the location of sites in relation to each relevant indicator (e.g., overcrowding, cost burden, income, displacement risk, etc.). The element should also discuss whether the distribution of sites improves or exacerbates conditions. If sites exacerbate conditions, the element should identify further program actions that will be taken to promote equitable quality of life throughout the community (e.g., anti-displacement and place-based community revitalization strategies).

Contributing Factors to Fair Housing Issues: The element should re-assess contributing factors upon completion of analysis and make revisions as appropriate.

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).)*

Overpayment: The element must identify the total number of households overpaying for housing, quantify and analyze the number of lower-income households overpaying for housing by tenure (i.e., renter and owner). While the element provided percentages for these factors (p. 6.-64), it should also quantify the number of households to better understand the magnitude of the housing needs. The element may need to add or modify policies and programs based on a complete analysis.

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).)

Progress toward the Regional Housing Need Allocation (RHNA): The element appears to rely on pipeline projects to meet its RHNA. The element identifies several pipeline projects in Table 54 but provides no information documenting how affordability of the units was determined. As you know, the City's RHNA may be reduced by the number of new units built since June 30, 2023; however, the element must describe the City's methodology for assigning these units to the various income groups based on actual sales price or rent level of the units and demonstrate their availability in the planning period (likelihood of completion). Availability should address the status, anticipated completion, any barriers to development and other relevant factors such as build out horizons, phasing, and dropout rates to demonstrate the likelihood of development in the planning period.

Realistic Capacity: While the element provides assumptions of buildout for sites included in the inventory, it must also provide support for these assumptions. For example, the element should demonstrate what specific trends, factors, and other evidence led to the assumptions. The estimate of the number of units for each site must be adjusted as necessary based on the land use controls and site improvements; typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction; and on the current or planned availability and accessibility of sufficient water, sewer, and dry utilities.

In addition, the element appears to assume residential development on sites with zoning that allows 100 percent nonresidential uses, but to support this assumption the element must analyze the likelihood of residential development in zoning where 100 percent nonresidential uses are allowed. This is particularly relevant for Site 10 (1294 Oak Avenue) and Site 16 (22 4th Street); which has also been utilized in the prior housing element as a site to accommodate the lower-income RHNA. The element should include analysis based on factors such as development trends, performance standards or other relevant factors. For example, the element could analyze all development activity in this nonresidential zone; how often residential development occurs and adjust residential capacity calculations, policies, and programs accordingly. Further and for your information, the element describes actions to rezone Site 10 as R-M (p. 6-156), but no corresponding program was found, and the element should be revised with an appropriate program to rezone the property.

Large Sites: Sites greater than ten acres are deemed inadequate to accommodate housing for lower-income households unless it is demonstrated, with sufficient evidence, that sites of equivalent size with affordability were successfully developed during the prior planning period or other evidence demonstrates the suitability of these sites. Dependent on the results of a complete sites analysis, the element may need to include an analysis demonstrating the potential for development on large sites.

Zoning for Lower-Income Households: The element must demonstrate densities appropriate to accommodate housing for lower-income households. For communities with densities that meet specific standards (at least 20 units per acre for Greenfield), no

analysis is required. (Gov. Code, § 65583.2, subd. (c)(3).) Otherwise, an analysis must demonstrate appropriate densities based on factors such as market demand, financial feasibility, and development experience within identified zones.

Suitability of Nonvacant Sites: The element must include an analysis demonstrating the potential for redevelopment of nonvacant sites. To address this requirement, the element provides a site-by-site descriptions of the existing uses of nonvacant sites with brief discussions of their potential for redevelopment. However, the element must provide additional analysis to demonstrate the likelihood that these sites will redevelop in the planning period. For example, the element includes sites identified as single-family residences, a multifamily residential development, and vineyards but no analysis was provided to demonstrate whether these existing uses would impede development of these sites within the planning period. The element can summarize past experiences converting existing uses to higher density residential development, include current market demand for the existing use, provide analysis of existing leases or contracts that would perpetuate the existing use or prevent additional residential development and relate those trends to the sites identified. The element could also consider indicators such as age and condition of the existing structure, expressed developer interest, low improvement to land value ratio, and other factors.

In addition, specific analysis and actions are necessary if the housing element relies upon nonvacant sites to accommodate more than 50 percent of the RHNA for lower-income households. For your information, the housing element must demonstrate existing uses are not an impediment to additional residential development and will likely discontinue in the planning period. (Gov. Code, § 65583.2, subd. (g)(2).) Absent findings (e.g., adoption resolution) based on substantial evidence, the existing uses will be presumed to impede additional residential development and will not be utilized toward demonstrating adequate sites to accommodate the RHNA.

Finally, the element utilizes sites with existing residential uses. Absent a replacement housing policy, these sites are not adequate sites to accommodate lower-income households. The replacement housing program must adhere to the same requirements as set forth in Government Code section 65915, subdivision (c), paragraph (3).

Availability of Infrastructure: The element describes infrastructure availability in the City (p. 6-134). However, it must also demonstrate sufficient total water and, sewer capacity (existing and planned) to accommodate the regional housing need.

In addition, the element includes Program 6.6B to prioritize water and sewer services for lower-income housing developments should a meter limit be enacted in the City (p. 6-40). However, this program should be modified to include commitments, irrespective of any anticipated meter moratoriums. 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 <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/priority-water-and-sewer>.

Environmental Constraints: The element must describe any known environmental constraints within the City that could impact housing development on identified sites in the planning period. This analysis should also address any other known conditions that could preclude development on identified sites in the planning period. Examples of other conditions include shape, public right of way access, easements, title conditions, Williamson Land Act contracts, contamination, environmental overlays, and compatibility with airports. For additional information and sample analysis, see the Building Blocks at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/analysis-sites-and-zoning>.

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

Zoning for a Variety of Housing Types:

- *Emergency Shelters:* Firstly, the element notes that emergency shelters are allowed by-right in the C-R and I-L districts, it should also analyze total capacity, proximity to transportation and services for these sites, and any conditions inappropriate for human habitability in the C-R and I-L districts. Secondly, the element should describe how emergency shelter parking requirements comply with statute which generally only allows sufficient parking for staff or include a program to comply with this requirement. Lastly, Chapter 654, Statutes of 2022 (AB 2339), adds additional specificity on how cities and counties plan for emergency shelters and ensure sufficient and suitable capacity. The housing element must be revised to address these statutory requirements. For additional information, please see HCD's memo at <https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/ab2339-notice.pdf>.
- *Transitional and Supportive Housing:* Transitional housing and supportive housing must be permitted as a residential use in all zones allowing residential uses and only subject to those restrictions that apply to other residential dwellings of the same type in the same zone. The element must demonstrate compliance with these requirements and add or modify programs as appropriate.
- *By-Right Permanent Supportive Housing:* Permanent supportive housing shall be a use by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses pursuant to Government Code section 65651. The element must demonstrate compliance with these requirements and add or modify programs as appropriate.
- *Low-Barrier Navigation Centers:* Program 6.2.S should be amended to specifically allow low barrier navigation centers by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses, pursuant to Government Code section 65660.

- *Employee Housing*: The element must demonstrate zoning is consistent with the Employee Housing Act (Health and Safety Code, § 17000 et seq.) or add or modify programs. Applicable sections include Health and Safety Code section 17021.5, 17021.6 and 17021.8. For example, section 17021.5 requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. Also, section 17021.6 requires employee housing consisting of no more than 12 units or 36 beds to be permitted in the same manner as other agricultural uses in the same zone. For additional information and sample analysis, see the Building Blocks at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/farmworkers>.

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).)*

Land Use Controls: The element must identify and analyze all relevant land use controls impacts as potential constraints on a variety of housing types. The analysis should analyze land use controls independently and cumulatively with other land use controls. Among other things, the analysis should address limits on heights, allowable densities, and parking requirements. The analysis should address any impacts on cost, supply, housing choice, affordability, timing, approval certainty and ability to achieve maximum densities and include programs to address identified constraints.

Local Processing and Permit Procedures: While the element briefly describes typical processing times (p. 6-124), it should describe processing and permit procedures for a typical development that is consistent with zoning and the general plan. The analysis should address the approval body; the number of public hearings 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.

Further, the element briefly describes the Planned Development process (p. 6-123) but should also analyze this process for impacts on supply, cost, financial feasibility, timing and approval certainty. For example, the analysis should clearly state whether the Planned Development process is mandatory or optional. If mandatory, the analysis should address whether the burden of establishing zoning and development standards typically rests with the City or developers, any absence of fixed development standards, any additional legislative approvals and any other requirements or mechanisms that may act as a constraint.

Finally, the element should address public comments on this initial draft submittal and discuss compliance with the Permit Streamlining Act and intersections with CEQA and

timing requirements, including streamlining determinations and add or modify programs as appropriate.

Design Review: The element notes that most new development requires design review and approval (p. 6-124). The element must clarify which types of projects require design review and describe and analyze the design review guidelines and process, including approval procedures and decision-making criteria for their impact as potential constraints on housing supply and affordability. In particular, the element should analyze its compatibility and findings of approval for impacts on surrounding property as potential constraints. 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 or it must include a program to address this permitting requirement, as appropriate.

Inclusionary Housing: The element describes the City's inclusionary ordinance as a constraint on development on the development of housing for all income levels (p. 6-132). In addition, the element includes Program 6.2.I to allow reductions in development standards for projects with inclusionary component. While the Program currently commits the City to "consider reductions in development standards on a case-by-case basis," the Program should be amended to add specific commitments to grant reductions to development standards and include the types of options and incentives offered. In addition, the element includes Program 6.2.J to review the City's inclusionary housing ordinance and update it as necessary to ensure it is consistent with state law. However, the Program should be amended to review the inclusionary ordinance midway through the planning period and commit to provide additional incentives or remove the requirement if the ordinance is determined to be a constraint on development of sites in the inventory.

Constraints on Housing for Persons with Disabilities: The element should address potential constraints on housing for persons with disabilities, as follows:

- *Definition of a Family/Household:* While the element states that the City does not impose any particular definition of family (p. 6-80), Program 6.3.F commits the City to maintain its definition of family. The element should reconcile this information and, if necessary, analyze the definition as a potential constraint on housing for persons with disabilities and add or modify programs as appropriate.
- *Group Homes:* The element states that the City's zoning ordinance is somewhat ambiguous regarding permitting of group homes. However, the element must clarify how the City currently permits group homes for six or fewer persons and seven or more persons and include programs as appropriate to amend the zoning code to comply with state law. In addition, the element states (p. 6-78) that use permits are required for the development of large care facilities "for the purpose of assuring compatibility with adjacent properties." The element should specifically analyze the conditional use permit (CUP) process for impacts on housing supply and choices and approval certainty and objectivity for housing for persons with disabilities and include programs as appropriate. In addition, the element states that the City imposes a 1,000-foot separation restriction on residential care homes (p. 6-80), and Program 6.4.E is included to remove this requirement. However, the element must also identify whether any other standards for group homes exist or clarify that group

homes are otherwise permitted in single-family zones in the same way as the underlying residential zoning.

5. *An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including... ..the price of land... (Gov. Code, § 65583, subd. (a)(6).)*

Nongovernmental Constraints: The element must include a discussion of the availability of financing for housing development. In addition, while the element generally states that property values are lower in Greenfield compared to other areas of the County and state, the element must still quantify the average cost of land in Greenfield.

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... (Gov. Code, § 65583, subd. (c).)*

Beneficial Impact: To have a beneficial impact in the planning period and address the goals of the housing element, programs must be revised with discrete timelines, including for Programs 6.2.A (Small Lots), 6.4.L (Funding for Special Housing Needs), 6.5.A (Pursue Funding), 6.5.B (Cooperate with the Housing Authority), 6.5.C (First Time Homebuyer Assistance), 6.5.D (Self Help Housing), and 6.8.L (Land Availability). In addition, the element includes several programs lacking specific commitments (e.g., “encourage,” “consider,” etc.). While the element can include programs to study certain topics, it includes a preponderance of programs that do not go beyond studying or exploring a particular action. Programs should be amended, as appropriate to include more specific and measurable actions. This includes but is not limited to Programs 6.2.A (Small Lots), 6.2.F (Fee Waivers), 6.2.I (Inclusionary Information), 6.2.Q (Transitional and Supportive Housing near Transit), 6.3.A (Fair Housing Information), 6.4.B (Housing for Agricultural Workers), 6.4.D (Infill Special Needs Housing), 6.4.K (Facilities for Single Parent Households), 6.5.B (Cooperate with the Housing Authority), and 6.7.M (Impacts on the Supply of Land).

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 B3, 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 City 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 6.4F (ADU Incentives)*: The element includes Program 6.4F that promotes and incentivizes accessory dwelling unit (ADU) development for very low-, low-, and moderate-income households. However, the program should be modified with specific actions to incentivize ADUs. Examples of incentives include pursuing funding opportunities, modifying development standards, and reducing fees beyond state law, increasing awareness, pre-approved plans, and homeowner/applicant assistance tools. Other strategies could include developing information packets to market ADU construction, targeted advertising of ADU development opportunities or establishing an ADU specialist within the planning department.
- *Program 6.4L (Funding for Farmworker Housing)*: While the element includes Program 6.4.L to identify potential funding sources and work with nonprofit developers to facilitate the development of affordable farmworker housing, the program should be revised to commit to additional proactive actions to facilitate the development and conservation of farmworker housing. For example, the element could commit to explore regulatory incentives to assist in the development of farmworker housing or coordinate with employers and other related organizations to explore funding and incentives and to identify specific development opportunities. The program should include measurable metrics or objectives, definitive deadlines, dates, or benchmarks for implementation.
- *Sites Identified in Prior Planning Periods*: While Program 6.2.H was included to allow by-right approval for housing developments that include 20 percent or more of its units affordable to lower-income households on sites identified in previous planning periods, the program must also commit to zoning that will meet the density requirements for housing for lower-income households pursuant to Government Code section 65583.2 (c). For more information on program requirements, please see HCD's Housing Element Sites Inventory Guidebook at https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sites_inventory_memo_final06102020.pdf.

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).)*

The element must include a program(s) with specific actions and timelines to assist in the development of housing for extremely low-income (ELI) 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 extremely low-income households; assisting, supporting, or pursuing funding applications; and outreach and coordination with affordable housing developers.

For additional information, see the Building Blocks at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/assist-development-housing>.

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 Findings B4 and B5 the element requires a complete analysis of potential governmental and nongovernmental 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... (Gov. Code, § 65583, subd. (c)(5).)*

As noted in Finding B1, the element requires a complete AFFH analysis. Depending upon the results of that analysis, the City may need to revise or add programs. 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. Given that most of the City is considered a low resource community, the element could focus on place-based strategies for economic and community revitalization, protecting residents from disaster-driven and investment-driven displacement, and enhancing housing mobility to encourage the development of more housing choices and affordable housing. Furthermore, the element must include geographic targeting, metrics, and milestones toward AFFH outcomes. For your information, metrics (where applicable), should be targeting beneficial impacts for people, households, and neighborhoods (e.g., number of people or households assisted, number of housing units built, number of parks or infrastructure projects completed).

D. Quantified Objectives

Establish the number of housing units, by income level, that can be constructed, rehabilitated, and conserved over a five-year time frame. (Gov. Code, § 65583, subd. (b)(1 & 2).)

The element must include quantified objectives to establish an estimate of housing units by income category, including ELI households that can be constructed, rehabilitated, and conserved over the planning period.