

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

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January 6, 2023

Lisa Porras, Planning Manager
Community Development Department
City of San Carlos
600 Elm Street
San Carlos, CA 94070

Dear Lisa Porras:

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

Thank you for submitting the City of San Carlos' (City) draft housing element received for review on October 14, 2022. 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 December 22, 2022 with yourself, Megan Wooley, and consultants Lisa Brownfield and Jackie Martinez. In addition, HCD considered comments from David Tuzman 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 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 (January 31, 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 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 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>.

HCD appreciates the dedication of the housing element team provided during the course of our review. We are committed to assist the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Hillary Prasad, of our staff, at Hillary.Prasad@hcd.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul McDougall", with a stylized flourish at the end.

Paul McDougall
Senior Program Manager

Enclosure

APPENDIX CITY OF SAN CARLOS

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. 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).)*

Income and Racial Concentration of Affluence (RCAA): The element briefly mentions incomes in the City compared to the region and includes a map showing the entire City as a RCAA; however, the element should include specific analysis of income and RCAA at a regional level (City compared to the broader region). The analysis should at least address trends, conditions, coincidence with other fair housing factors (e.g., race, highest resource, overpayment), effectiveness or absence of past strategies (e.g., lack of publicly assisted housing), local data and knowledge and other relevant factors. The element must add or modify meaningful programs based on the outcomes of this analysis, including actions to improve housing mobility within and beyond City boundaries.

Disproportionate Housing Needs Including Displacement: The element includes some general information on persons experiencing homelessness and housing conditions but should also evaluate those needs, impacts and patterns within the City, 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 may utilize local data and knowledge such as service providers and code enforcement officials to assist this analysis.

Affirmatively Furthering Fair Housing (AFFH) and Identified Sites: The element must analyze how the identified sites contribute to or mitigate fair housing issues. The element must identify and analyze sites throughout the community to foster inclusive communities and AFFH. An analysis should address all the income categories of identified sites with respect to location, the number of units by all income groups and how that affects the existing patterns for all components of the assessment of fair housing (e.g., segregation and integration, access to opportunity).

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). For more information, See HCD's guidance at <https://www.hcd.ca.gov/planning-and-community-development/affirmatively-furthering-fair-housing>.

Local Data and Knowledge: The element must include local data, knowledge, and other relevant factors to discuss and analyze any unique attributes about the City 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, City staff and related local and County planning documents.

Other Relevant Factors: While the element includes some general background on exclusionary practices, it should relate these situations to the City and complement data and mapping with other relevant factors that contribute to fair housing issues in the City. For instance, the element can analyze historical land use; zoning and barriers to housing choices; investment practices; seeking investment or lack of seeking investment to promote affordability and inclusion; information about redlining/greenlining, restrictive covenants and other discriminatory practices; land use related lawsuits; local land use initiatives; demographic trends, or other information that complements the state and federal data.

Contributing Factors to Fair Housing Issues: The currently listed contributed factors do not appear significantly related to the assessment of fair housing. For example, the element notes the City as a whole is highest resource, highest median income, a concentrated area of affluence and does not have publicly assisted housing. Yet, the element does not identify the lack of housing choices and affordability as a contributing factor to fair housing issues. Based on the outcomes of a complete analysis, the element should re-assess contributing factors and prioritize those factors then formulate appropriate policies and programs.

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).)*

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).)

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).)

Extremely Low-Income (ELI) Households: While the element quantifies existing and projected ELI households, it must also analyze their housing needs. The analysis of ELI

housing needs should consider tenure, overpayment, overcrowding, resources and the effectiveness of strategies and the magnitude of housing need.

Overpayment: While the element quantifies the number of households overpaying, it must also provide an analysis of their housing needs.

Farmworkers: The element must quantify and analyze the number of permanent and seasonal farmworkers within the County and analyze their special housing needs. For a complete analysis of this population group, the element should discuss challenges this population faces, the existing resources to meet those needs, an assessment of any gaps in resources, and proposed policies, programs, and funding to help address those gaps.

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 City's RHNA may be reduced by the number of new units built, approved, or pending since June 30, 2022; however, the element must demonstrate their affordability and availability in the planning period. The availability or likelihood the units will be built in the planning period should account for any barriers to development, phasing, anticipated buildout horizons, market conditions, and other relevant factors. The analysis should also specifically clarify that the units counting toward meeting the RHNA have not completed construction prior to June 30, 2022.

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. The element also should analyze the likelihood that the identified units will be developed as noted in the inventory in zones that allow 100 percent nonresidential uses (e.g., mixed-use). This analysis should consider the likelihood of 100 percent nonresidential development, performance standards, and development trends supporting residential development. While the element assumes a realistic capacity assumption of 85 percent maximum buildout in mixed-use zones, it must include an analysis to support these assumptions including project examples with similar affordability levels, as well as a description of whether 100 percent commercial or residential developments are allowed in mixed-use zones. In addition, the element could analyze average development buildout without including density bonus units within the realistic capacity calculation.

Suitability of Nonvacant Sites: The element identifies nonvacant sites to accommodate the regional housing need for households of all incomes. A complete analysis should describe

the methodology used to determine the additional development potential within the planning period. The methodology must consider factors including the extent to which existing uses may impede additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites. (Gov. Code, § 65583.2, subd. (g).) For sites with residential uses, the inventory could also describe structural conditions or other circumstances and trends demonstrating the redevelopment potential to more intense residential uses. For nonresidential sites, the inventory could also describe whether the use is operating, marginal or discontinued, and the condition of the structure or could describe any expressed interest in redevelopment.

In addition, as noted in the housing element, 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.

SB 9 Sites: The element identifies SB 9 as a strategy to accommodate the part of the City's need of above-moderate RHNA. To support these assumptions, the analysis must include experience, trends and market conditions that allow lot splits. The analysis must also include a nonvacant sites analysis demonstrating the likelihood of redevelopment and the existing use will not constitute as an impediment for additional residential use. The analysis should describe how the City determined eligible properties, whether the assumed lots will have turnover, if the properties are easy to subdivide, and the condition of the existing structures. The analysis should also describe interest from property owners as well as experience. The analysis should provide support for the assumption of eligible properties being developed within the planning period. Based on the outcomes of this analysis, the element should add or modify programs to establish zoning and development standards early in the planning period and implement incentives to encourage and facilitate development as well as monitor development every two years with and identify additional sites within six months if assumptions are not being met. The element should support this analysis with local information such as local developer or owner interest to utilize zoning and incentives established through SB 9.

Small Sites: While the element includes an analysis of small sites and describes programs to address small lot development, it must analyze and support assumptions for small lot consolidation. Sites smaller than a half-acre in size are deemed inadequate to accommodate housing for lower-income households unless it is demonstrated, with sufficient evidence, that sites are suitable to accommodate housing for lower-income households. The element must also provide specific examples with the densities, affordability and, if applicable, circumstances leading to consolidation. The element should relate these examples to the sites identified to accommodate the RHNA for lower-income households to demonstrate that these sites can adequately accommodate the City's lower-income housing need. Based on a complete analysis, the City should add or revise programs to include incentives for facilitating development on small sites.

Shortfall of Adequate Sites: If the element does not identify adequate sites to accommodate the regional housing need for lower-income households, it must include a program(s) to identify sites with appropriate zoning to accommodate the regional housing need within the planning period. The program should identify the shortfall by income group, acreage, allowable densities, appropriate development standards and meet all by right requirements pursuant to Government Code section 65583.2, subdivisions (h) and (i), including but not limited to permitting multifamily uses by-right for developments in which 20 percent or more of the units are affordable to lower-income households. Currently, the element is utilizing assumptions that sites will be rezoned prior to the start of the planning period. The revised zoning must be adopted by City Council prior to the start of the planning period, or the City must identify additional sites or meet by-right requirements listed above.

AB 725: For jurisdictions that are considered Metropolitan, the element must identify at least 25 percent of the remaining moderate and above moderate RHNA on sites that allow at least four units of housing (e.g., four plex or greater). (Gov. Code, § 65583.2, subd. (c)(4).)

Environmental Constraints: While the element generally describes a few environmental conditions within the City, it must relate those conditions to identified sites and describe any other known environmental or other constraints (e.g., shape, easements, contamination) that could impact housing development on identified sites in the planning period.

Infrastructure: While the element references a future study of water and sewer capacity, it must demonstrate sufficient existing or planned water and sewer capacity to accommodate the RHNA for the planning period and add or modify programs if necessary.

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:* While the element lists some development and management standards for emergency shelters, it must clarify the maximum number of beds allowed, analyze it as a constraint, and add a program as needed.
- *Manufactured Housing:* Manufactured homes that are built on a permanent foundation must be allowed in the same manner and in the same zones as conventional or stick-built structures. Specifically, manufactured homes on a permanent structure should only be subject to the same development standards as a conventional single-family residential dwelling. The element must demonstrate consistency with this requirement or add or modify programs as appropriate.

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. The analysis should specifically address requirements related to parking, heights, lot coverage and limits on allowable densities. 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. The element must specifically analyze the 35-foot height limit in RM-20 as a potential constraint on multifamily development. In addition, Table 4.4-2 (page 64) lists allowed densities associated with each zone but appears to lack a variety of densities and housing types such as densities between 6 and 15 dwelling units an acre. The element should analyze whether the allowed densities are considered a constraint on a variety of multifamily housing types and add a program to address the constraint.

Parking: While the element lists standard parking requirements for single-family and multifamily developments, it noted that developers identify parking as a constraint to development. The element should analyze this potential constraint and add or modify programs as appropriate. In addition, the element states that additional parking is required for group residential and residential care facilities above what is required for residential uses. The parking requirements should not impose additional constraints, and a program should be added to address the constraint.

Local Processing and Permit Procedures: While the element includes information about processing times, it demonstrates that the approval process for multifamily and mixed-use developments take substantially longer than approvals for single-family developments. The element must analyze this as a constraint and address impacts on housing cost, supply, timing and approval certainty and add or modify programs as appropriate. In addition, the element should analyze the conditional use permit (CUP) findings as a potential constraint and add or modify programs as appropriate.

Design Review: While the element describes the design review guidelines and process, it must analyze 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. In particular, the design review process for multifamily and mixed-use projects appears to take up to an additional 12 months. The element must evaluate the process as a constraint, particularly on timing and feasibility and include a program to address identified constraints.

On/Off-Site Improvements: While the element includes an analysis of on/off-site improvements, it must identify typical subdivision level improvement requirements, such as minimum street widths (e.g., 40-foot minimum street width).

Codes and Enforcement: While the element describes the City's building code modifications, it must analyze whether they are a constraint on development. In addition, the element must describe the City's building and zoning code enforcement processes and procedures, including whether code enforcement is targeted or complaint based, and analyze the impact as potential constraints on housing supply and affordability.

Constraints on Housing for Persons with Disabilities: While the element describes the City's reasonable accommodation procedure and lists required findings of approval, several findings appear to be constraints and the element must analyze those findings as potential constraints on housing for persons with disabilities. For example, the procedure appears to have a variance finding as well as other potentially burdensome findings such as provision in the RS District. In addition, while the element allows for group homes of six or fewer residents in all zones allowing residential uses, the City imposes additional constraints including, but not limited to, spacing requirements and licensing. The element should evaluate these requirements as constraints and include specific commitment to amend zoning and permit procedures to allow these uses in all residential zones with objectivity to facilitate approval certainty.

Other Local Ordinances: While the element analyzes the City's affordable housing ordinance, it must analyze any other locally adopted ordinances that directly impacts the cost and supply or residential development (e.g., short term rentals, growth controls, crime free ordinances).

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... (Gov. Code, § 65583, subd. (c).)*

To address the program requirements of Government Code section 65583, subdivision (c)(1-6), and to facilitate implementation, programs should include: (1) a description of the City's specific role in implementation; (2) definitive implementation timelines (e.g., at least annually, by 2025); (3) objectives, quantified where appropriate; and (4) identification of responsible agencies and officials. Programs to be revised include the following:

- *Program HOU-1.2 (Residential Rehabilitation Programs)*: The program should be revised to include proactive outreach throughout the planning period.
- *Program HOU-1.3 (Preservation of At-Risk Housing)*: The program timeframe should be revised to include annual monitoring.

- *Program HOU-3.4 (First-time Homebuyer Programs)*: The program should address how often outreach and education to residents will occur throughout the planning period.
 - *Program HOU-3.8 (Replacement of Units on Sites)*: The program should be revised to specify when the program will be implemented.
 - *Program HOU-3.10 (Anti-Displacement Strategies)*: The program should commit to implementation actions beyond “explore” to ensure beneficial impact during the planning period.
 - *Program HOU-3.12 (Reduce costs of Affordable and Special Needs Housing)*: The program must clarify whether the fee waivers are in place. If the City needs to implement the fee waivers, a specific timeframe for implementation must be included.
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 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 HOU-2.1 (Small Lot Development Incentives – Citywide)*: The program should be revised to include specific implementation for small lot incentives and list potential incentives to be implemented. In addition, the program should include proactive outreach to developers.
 - *Program HOU-2.2 (Small Lot Development Incentives – Downtown)*: The timeframe should be revised to be specific (e.g., by 2025) because there is such a strong reliance on small lot consolidation and especially given the apparent lack of effectiveness in the prior planning period. In addition, the program should clarify whether the City will offer incentives to consolidate small lots.
 - *Program HOU-3.11 (Access to Opportunity)*: The program should be revised to amend the ordinance as necessary to comply with state law and include proactive outreach to owners and developers to promote SB 9.
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 HOU-3.1 (Funding Low, Very Low, and ELI and Special Needs Housing): While the program states it will address special needs groups, it should specify what actions will be taken to assist ELI and special needs households. In addition, the program should commit to how often the City will apply for funding as well as include proactive outreach.

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 City may need to revise or add programs and address and remove or mitigate any identified constraints. In addition, the element should be revised as follows:

- *Program HOU-3.3 (Facilitate the Legalization and Construction of ADUs)*: HCD's records indicate that the City has not updated its Accessory Dwelling Unit (ADU) ordinance to comply with recent state law from 2020-2023. The element must include a specific commitment to update the City's ADU ordinance to be compliant with state law.
- *Program HOU-4.1 (Adequate Sites)*: While this program seems to commit to actions to rezone to accommodate the RHNA, the program timing is ongoing. The program must include specific implementation dates for establishing the new multifamily residential zone and upzoning of the mixed-use zones. In addition, the program must clarify actions that will be taken to encourage senior housing and housing for persons with special needs.
- *Program HOU-4.2 (Zoning Ordinance Revisions)*: The program should clarify whether the proposed building heights along East San Carlos Avenue and in the RS district will allow three story developments regardless of the 35-foot height limit.
- *Program HOU-4.4 (Objectivity and Streamlining in Development Regulations)*: The timing of this program should be revised to implement SB 35 requirements earlier in the planning period.
- *Program HOU-5.3 (Residential Care Facilities and Group Homes)*: While this program commits to allowing group homes for seven or more residents, it must include specific commitment to amend zoning and permit procedures to allow these uses in all residential zones with objectivity to facilitate approval certainty similar to other residential uses.
- *Persons with Disabilities*: as noted in Finding A4, the City should revise the reasonable accommodations procedure to mitigate identified constraints on housing for persons with disabilities.

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 A1, the element requires a complete AFFH analysis. Depending upon the results of that analysis, the City may need to revise or add or modify goals and actions. 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 specific commitment, milestones, geographic targeting and metrics or numerical targets and, as appropriate, address housing mobility enhancement, new housing choices and affordability in higher opportunity or higher income areas, place-based strategies for community preservation and revitalization and displacement protection.

In addition, Program HOU-6.1 (Affirmatively Furthering Fair Housing) must include specific timing for outreach and updating the City's website regarding AFFH information. The table must also include metrics, milestones, and geographic targeting for each action as appropriate to address identified fair housing constraints.

C. 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 that can be constructed, rehabilitated, and conserved over the planning period. While the element includes these objectives by income group for very low-, low-, moderate- and above-moderate income, the element should also disaggregate objectives for extremely low-income households.

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)(9).)

While the element includes a summary of the public participation process, it should also demonstrate diligent efforts were made to involve all economic segments of the community in the development of the housing element. The element could describe the efforts to circulate the housing element among lower- and moderate-income households and organizations that represent them and to involve such groups and persons in the element throughout the process. In addition, while the element included a general statement that public comments were incorporated, it should describe how the City considered and addressed public comments in the element.