

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

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November 29, 2021

Henry Noh, Director  
Community Development Department  
City of San Dimas  
245 East Bonita Avenue  
San Dimas, CA 91773

Dear Henry Noh:

**RE: City of San Dimas 6<sup>th</sup> Cycle (2021-2029) Draft Housing Element**

Thank you for submitting the City of San Dimas (City) draft housing element received for review on September 30, 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 November 23, 2021 with Luis Torrico, Planning Manager, Ken Fichtelman, Associate Planner and Mark Hoffman, Consultant. In addition, HCD considered comments from Josh Albrektson 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.

As a reminder, the City's 6th cycle housing element was due October 15, 2021. As of today, the City has not completed the housing element process for the 6th cycle. The City's 5th cycle housing element no longer satisfies statutory requirements. HCD encourages the City to revise the element as described above, adopt, and submit to HCD to regain housing element compliance.

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 (October 15, 2021), then any rezoning to accommodate the regional housing needs allocation, including for lower-income households, shall be completed no later than one year from the statutory deadline. 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).

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.

Pursuant to Government Code section 65583.3, subdivision (b), the City 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.ca.gov/community-development/housing-element/index.shtml#element> or a copy of the form and instructions. The City can reach out to HCD at [sitesinventory@hcd.ca.gov](mailto:sitesinventory@hcd.ca.gov) for technical assistance. Please note, upon adoption of the housing element, the City must submit an electronic version of the sites inventory with its adopted housing element to [sitesinventory@hcd.ca.gov](mailto: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 City meets 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: [http://opr.ca.gov/docs/OPR\\_Appendix\\_C\\_final.pdf](http://opr.ca.gov/docs/OPR_Appendix_C_final.pdf) and [http://opr.ca.gov/docs/Final\\_6.26.15.pdf](http://opr.ca.gov/docs/Final_6.26.15.pdf).

HCD appreciates the commitment and cooperation of the housing element update team during the 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 Divya Sen, of our staff, at [Divya.Sen@hcd.ca.gov](mailto:Divya.Sen@hcd.ca.gov).

Sincerely,



Paul McDougall  
Senior Program Manager

Enclosure

## APPENDIX CITY OF SAN DIMAS

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

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

### **A. Review and Revision**

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

**Special Needs Populations:** As part of the review of programs in the past cycle, the element must provide an evaluation of the cumulative effectiveness of goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female-headed households, farmworkers, and persons experiencing homelessness).

### **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).)*

**Regional Patterns and Trends:** For all categories of analysis (e.g., segregation and integration, racially and ethnically concentrated areas of affluence, access to opportunity, and disproportionate housing needs, including displacement), the element addresses most requirements to analyze local patterns and trends. However, the element must also analyze regional patterns and trends for each category and subcategory of analysis. A regional analysis should compare conditions at the local level to the rest of the region. This analysis could compare the locality at a county level or other subregional geography.

**Disproportionate Housing Needs including Displacement Risks:** The element includes local data (pp. 3-28 to 3-30) on cost burden, overcrowding, substandard housing, and displacement, but it should also include local analysis on homelessness. The element should include complete local data for homelessness and analyze the data for trends and patterns, access to opportunity and disproportionate impacts on protected characteristics.

Local Data and Knowledge: 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, public comments, and service providers.

Other Relevant Factors: The element must include other relevant factors that contribute to fair housing issues in the jurisdiction. For instance, the element can analyze historical land use, zoning, governmental and nongovernmental spending including transportation investments, history of lending practices and demographic trends.

Sites: While the element includes analysis on sites related to improving or exacerbating conditions for segregation, displacement risk, and access to opportunity (p. 3-36), the analysis should indicate whether the sites are isolated by income group and should be supported by local data and knowledge.

Contributing Factors: Based on the outcomes of a complete analysis, the element should re-evaluate and prioritize contributing factors to fair housing issues as appropriate.

Goals, Priorities, Metrics, and Milestones: Based on the outcomes of a complete analysis, the element must be revised to add or modify goals and actions. Goals and actions must specifically respond to the analysis and prioritized contributing factors to fair housing issues. Actions must have metrics and milestones as appropriate and 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. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

The City has a regional housing need allocation (RHNA) of 1248 housing units, of which 604 are for lower-income households. To address this need, the element relies on vacant sites and nonvacant. To demonstrate the adequacy of these sites and strategies to accommodate the City's RHNA, the element must include complete analyses:

Previously Identified Nonvacant and Vacant Sites: HCD understands some identified sites were previously identified in past housing elements. If nonvacant sites identified in a prior adopted housing element or vacant sites identified in two or more consecutive planning periods, the sites are inadequate to accommodate housing for lower-income households unless:

- The site's current zoning is appropriate for the development of housing affordable to lower-income households by either including analysis or meeting the appropriate density; and
- The site is subject to a housing element program that requires rezoning within three years of the beginning of the planning period to allow residential use by-right for housing developments in which at least 20 percent of the units are affordable to lower-income households. (Gov. Code, § 65583.2, subd. (c).)

Affordable Housing Overlay (AHO): Program 18 states that the City will extend the AHO designation to sites in the downtown and if needed other sites in the City. The element should specify which sites within the sites inventory will be zoned to the AHO.

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 land use controls, site improvements and typical densities of existing or approved residential developments at a similar affordability level.

For sites zoned for nonresidential uses, e.g., commercial, and mixed-use zones, the element must account for the likelihood of 100 percent nonresidential uses. To demonstrate the likelihood for residential development in nonresidential zones, the element should describe any performance standards mandating a specified portion of residential, any factors increasing the potential for residential development, such as incentives for residential use, and residential development trends in the same nonresidential zoning districts.

Zoning for Lower-Income Households: HCD understands sites will need to be rezoned for lower-income households to different designations. However, the element is not clear if the sites designated for lower-income will be rezoned with densities appropriate to facilitate housing for lower-income households. The element must identify the proposed density range for each site and demonstrate densities appropriate to accommodate housing for lower income households. For communities with densities that meet specific standards (at least 30 units per acre for San Dimas), 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: While the element includes analysis on nonvacant sites (Appendix B), it must also describe the methodology used to demonstrate the potential the additional development. The analysis should consider factors including the extent to which existing uses may constitute an impediment to additional residential development, the City's past experience with converting 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 to encourage additional residential development on these sites. For example, the element could clarify if any economic or market trends suggest that existing uses on industrial sites will be discontinued.

The element identifies 288 units on an existing project called The Trails. The City assumes an additional 80 moderate units will be built during the planning period. However, the element provides no information to support the assumption and solely relies on the fact that the site has not been developed to the maximum capacity. The element must provide additional analysis demonstrating the likelihood of additional development through current market trends, financial feasibility, or 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.

Small Sites: The element lists most sites consisting of aggregated small parcels (p. 4-11 & Appendix C). The element must clarify and describe whether these aggregated parcels are expected to develop individually or consolidated with the other small parcels. *For parcels anticipated to be consolidated*, the element must demonstrate the potential for lot consolidation. For example, analysis describing the City role or track record in facilitating small-lot consolidation, policies or incentives offered or proposed to encourage and facilitate lot consolidation, conditions rendering parcels suitable and ready for redevelopment, recent trends of lot consolidation, and information on the owners of each aggregated site. *For parcels anticipated to develop individually*, sites smaller than an half acre in size are deemed inadequate to accommodate housing for lower-income housing unless it is demonstrated that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of housing units affordable to lower-income households as projected for the site unless the housing element describes other evidence demonstrating the site is adequate to accommodate housing for lower income households. (Gov. Code, § 65583.2, subd. (c)(2)(A).)

If the element relies on consolidated small sites to accommodate the RHNA for lower-income households, it should include a program(s) to facilitate lot consolidation and development of housing on small sites. For example, the program could commit to (1) granting density bonuses above state density bonus law. (Gov. Code, § 65915.); (2) deferring fees specifically for consolidation; (3) expediting permit processing; (4) identifying and targeting specific financial resources; and (5) modifying development standards.

Accessory Dwelling Units (ADU): The element assumes an ADU buildout of 39 ADUs per year for a potential buildout of 350 units within the planning period. Given that the City has permitted 0 ADUs in 2018 and 2019, 9 in 2020 (for an average of three units

per year), it is not clear if a production level of 39 ADUs per year will be achievable over the planning period. As a result, the element should be updated to reduce the number of units projected or include supporting analysis for potential ADU production. Depending on the analysis, the element must revise Program 6 to monitor ADU production throughout the course of the planning period and implement additional actions if not meeting target numbers anticipated in the housing element. In addition to monitoring production, this program should also monitor affordability. Additional actions, if necessary, should be taken in a timely manner (e.g., within six months). Finally, if necessary, the degree of additional actions should be in stride with the degree of the gap in production and affordability. For example, if actual production and affordability of ADUs is far from anticipated trends, then rezoning or something similar would be an appropriate action. If actual production and affordability is near anticipated trends, then measures like outreach and marketing might be more appropriate.

Environmental Constraints: The element must describe any known environmental constraints within the City that could impact housing development in the planning period. (Gov. Code, § 65583.2, subd. (b).) Specifically, the element should specify any remediation necessary for site numbers 1, 2, and 3 to be available for residential development within the planning period.

Zoning for a Variety of Housing Types:

- *Single Room Occupancy (SRO) Units:* The element states SRO units are allowed with conditional use permit (CUP) in MF-30 zone but there is no MF-30 zoned land in the City (p. 3-12). The element must address where SROs can be built.
  - *Emergency Shelters:* Emergency Shelters parking requirements should be updated pursuant to AB 139 (Chapter 335, Statutes of 2019).
  - *Low Barrier Navigation Centers and Permanent Supportive Housing:* Low barrier navigation centers and permanent supportive housing shall be a use by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones. The element should either demonstrate compliance with these requirements or add or modify program as appropriate.
  - *Employee Housing:* Regardless of whether the City has a specific agricultural designation, the City must have zoning to permit employee housing in compliance with the Employee Housing Act, specifically, Health and Safety Code section 17021.5.
3. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures. The analysis shall also demonstrate local efforts to remove governmental constraints that hinder the locality from meeting its share of the regional housing need in accordance with Government Code section 65584 and from meeting the need for housing for persons*

*with disabilities, supportive housing, transitional housing, and emergency shelters identified pursuant to paragraph (7).*

Land Use Controls: The element must identify and analyze all relevant land use controls impacts as potential constraints on a variety of housing types (e.g., multifamily rental housing, mobilehomes, transitional housing). For example, the element must describe and analyze the general plan designation for MF-30 zone. Furthermore, the element describes parking requirements (p. 3-14) for multifamily as “two covered spaces per unit, plus one uncovered space for each additional bedroom beyond two bedrooms per unit, plus one uncovered guest space for every three units.” The element must analyze the parking requirements for its impact as a potential constraint on housing and clarify if it is addressed by Program 10. The analysis should also describe past or current efforts to remove identified governmental constraints. The element should include programs to address or remove the identified constraints.

Affordable Housing Overlay (AHO): While the element includes general information on the AHO, it must include a complete description and analysis of the AHO such as affordability requirements, processing procedures and whether accessing densities allowed under the AHO requires discretion.

Fees and Exaction: While the element describes most of the fees (pp. 3-5 & 3-5), it must describe all required fees for single family and multifamily housing development, including impact fees, and analyze their impact as potential constraints on housing supply, cost and affordability. For example, the analysis identifies the total amount of fees but should also identify their proportion to the development costs for both single-family and multifamily housing and whether fees are a constraint.

Design Review: While the element includes Program 8 to review and revise design guidelines, to better inform programs, it must 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. 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.

Zoning, Development Standards and Fees: The element must clarify its compliance with new transparency requirements for posting all zoning, development standards on the jurisdiction's website.

Constraints on Housing for Persons with Disabilities: The element currently details that residential care facilities serving six or less are permitted in S-F, SF-H, SF-D, MF, MF-D, MF-30 zones (p. 3-8). However, group homes serving seven or more are not permitted in any zones. The element should analyze the residential care facilities serving seven or more as a potential constraint on housing for persons with disabilities and add or modify programs as appropriate to ensure zoning permits group homes objectively with approval certainty.



4. *An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, the cost of construction, the requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Government Code section 65583.2, and the length of time between receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality's share of the regional housing need in accordance with Government Code section 65584. The analysis shall also demonstrate local efforts to remove nongovernmental constraints that create a gap between the locality's planning for the development of housing for all income levels and the construction of that housing. (Gov. Code, § 65583, subd. (a)(6).)*

Developed Densities and Permit Times: The element must be revised to analyze the length of time between receiving approval for a housing development and submittal of an application for building permits that potentially hinder the construction of a locality's share of the regional housing need.

## **C. Housing Programs**

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

To address the program requirements of 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; (3) objectives, quantified where appropriate; and (4) identification of responsible agencies and officials. All programs must be evaluated to provide discrete timing (e.g., month and year) to account for how often the action will occur as well as to ensure a beneficial impact throughout the planning period and quantify objectives where feasible. In addition, all programs must be evaluated to ensure that meaningful actions are taken. Programs containing unclear commitment (e.g., "Continue to facilitate"; "Explore"; "Consider"; "Encourage"; etc.) should be amended to include more specific and measurable actions. Finally, additional programs to be revised include the following:

- *Program 1 (Housing Code Compliance):* Describe when actions will be taken and how often.
- *Program 2 (Home Rehabilitation):* Clarify when and how often the City will provide Mobile Home program assistance.

- *Program 3 (Historic Preservation)*: Provide when the Town Core Design Guidelines will occur and how often the City will encourage applications and market the Mills Act program.
  - *Program 4 (Neighborhood Beatification)*: Provide when the City will identify areas for improvement.
  - *Program 15 (Housing Choice Voucher (Section 8))*: Provide when and how often advertising will occur.
  - *Program 16 (Mobile Home Preservation)*: Provide when the City will renew the Mobile Home Accord.
  - *Program 22 (Homelessness Plan)*: Provide specific timeframes for the City to implement each action.
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 B2, 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:

Shortfall of Adequate Sites: Currently the element demonstrates a shortfall of adequate sites with zoning currently in place to accommodate the RHNA within the planning period. In order to provide sufficient sites to accommodate the RHNA, Program 5 (Housing Sites Inventory), Program 10 (MF- 30 Zone Development Standards), Program 18 Affordable Housing Overlay must commit to, among other things, amend the zoning to increase densities, extend the Affordable Housing Overlay on certain sites, and provide by-right housing at a minimum density of 30 units per acre. However, in order to accommodate the lower-income need, programs must demonstrate compliance with Government Code 65583.2 (h) and (i). For example, programs must commit to:

- permit owner-occupied and rental multifamily uses by-right for developments in which 20 percent or more of the units are affordable to lower-income households. By-right means local government review must not require a CUP, planned unit development permit, or other discretionary review or approval;
- accommodate a minimum of 16 units per site; and
- meet residential only requirements.

Program 6 Accessory Dwellings (ADU): The element must include specific commitments and actions to incentivize the production of ADU and include specific dates and actions for monitoring the development of ADU per the ADU projection assumptions in the sites inventory.

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) to assist in the development of housing affordable to low-very low- and Extremely Low-Income (ELI) households. Programs must be revised or added to the element to assist in the development of housing for ELI households. Program actions could include prioritizing some funding for housing developments affordable to ELI households and offering financial incentives or regulatory concessions to encourage the development of housing types, such as multifamily, SRO units, to address the identified housing needs for ELI households.

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

As noted in Finding(s) B3 and B4, 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 protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)*

As noted in Finding B1, the element must include a complete analysis of 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).)*

Program 17 Preservation of Assisted Housing: The program should (1) reference state preservation notice law and to start reaching out to owners at least 3 years prior to the expiration date, (2) City to reach out to qualified entities who may be interested in purchasing the property to preserve it as affordable housing prior to expiring property, and (3) to revise the timeframe to include reaching out to the at-risk properties.

#### **D. Public Participation**

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

While the element includes a general summary of the public participation process (p. 1-4, Appendix A), it must also demonstrate diligent efforts were made to involve all economic segments of the community in the development of the housing element, specifically lower-income households. The element could describe the efforts to provide translation services and to circulate the housing element among low- and moderate-income households and organizations that represent their interest and to involve such groups and persons in the element throughout the process. In addition, the element should also summarize the public comments and describe how they were considered and incorporated into the element. For additional information, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/getting-started/public-participation.shtml>.