

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

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August 10, 2021

Sonya Lui, Principal Planner
Department of Community Development
City of Whittier
13230 Penn Street
Whittier, CA 90602

Dear Sonya Lui:

RE: Review of the City of Whittier's 6th Cycle (2021-2029) Draft Housing Element

Thank you for submitting the City of Whittier's (City) draft housing element received for review on June 11, 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 July 27, 2021 with Sonya Lui, Principal Planner, and MIG. In addition, HCD considered comments from Abundant Housing L.A., Homes for Whittier, YIMBY law, and Mitchell M. Tsai, 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). In particular, the element must support its capacity assumptions for sites included in the sites inventory, address a variety of program requirements, and strengthen the analysis for the Affirmatively Furthering Fair Housing (AFFH) obligation. The enclosed Appendix describes these and other revisions needed to comply with State Housing Element Law.

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

Pursuant to Government Code section 65583.3, the City must submit an electronic, true-and-correct copy of the housing element site inventory when it submits its adopted housing element to HCD for review. The City must utilize standards, forms, and

definitions adopted by HCD. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance.

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 and http://opr.ca.gov/docs/Final_6.26.15.pdf.

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City should continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate.

HCD is 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 Colin Cross, of our staff, at (916) 820-1275 or colin.cross@hcd.ca.gov.

Sincerely,

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

Shannan West
Land Use & Planning Unit Chief

Enclosure

APPENDIX CITY OF WHITTIER

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).)

As part of the evaluation of programs in the past cycle, the element must provide an explanation of the 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 (AFFH) in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2...shall include an assessment of fair housing in the jurisdiction (Gov. Code, § 65583, subd. (c)(10)(A))*

Promote AFFH opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).) For more information, please contact HCD and visit <https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml>.

Integration and Segregation: Integration and segregation is addressed (Constraints, p. 29) and meets some requirements. However, while the element does include data on race and ethnicity, the element does not include relevant data, local knowledge, and historical context on the analysis of incomes, familial status, and persons with disabilities. The element includes dissimilarity data on the segregation between several ethnic groups; however, the element does not fully explain other data aspects that can be drawn from the dissimilarity data with local knowledge. This analysis

should also include maps of areas within the City that are highly segregated. In-depth analyses are required so that the local and regional trends and patterns can be identified and guided through meaningful goals and actions that address fair housing issues.

Racial/Ethnic Areas of Concentration of Poverty: The element (Constraints, p. 30) states that there are no Racially and Ethnically Concentrated Areas of Poverty (R/ECAP) in the City. However, the analysis must be supported and complemented by quantitative evidence for the local and regional comparisons. In addition, the element should identify any Racially Concentrated Areas of Affluence (RCAA) as it relates to areas of affluence if the City does not have areas of concentrated poverty. The combination of the R/ECAP and RCAA analyses will help guide goals and actions to address fair housing issues. The analysis should evaluate the patterns and changes over time and consider other relevant factors, such as public participation, past policies, practices, and investments and demographic trends.

Access to Opportunity: Access to opportunity is addressed (Constraints, p. 30) in the element. However, the housing element must identify and analyze local and regional significant disparities in access to opportunity by education, employment opportunity, transportation, environmental quality, and any additional factors through local, federal, and/or state data. While HCD recognizes the City's high opportunity designation in accordance with California Tax Credit Allocation Committee (TCAC)/HCD opportunity maps, a complete analysis is required. Please refer to page 34 of the AFFH guidebook (link: <https://www.hcd.ca.gov/community-development/affh/index.shtml#guidancev>) for specific factors that should be considered when analyzing access to opportunities as it pertains to educational, employment, environmental, transportation, and any factors that are unique to the City.

Disproportionate housing needs and Displacement Risk: The element (Constraints, p. 30) includes data on disproportionate housing needs of racial/ethnic groups; however, it must also include data and analyze cost burden and severe cost burden households, overcrowding, substandard housing conditions, homelessness, and also discuss displacement risks. It must also analyze the data including looking at trends, patterns, and other local knowledge, and conclude with a summary of issues. Please refer to pages 39 and 41 of the AFFH guidebook (link: <https://www.hcd.ca.gov/community-development/affh/index.shtml#guidancev>) for specific factors that should be considered when analyzing disproportionate housing needs and displacement risks.

Site Inventory: The element states sites are distributed throughout the City in the high or highest resource areas and no concentration of lower-income sites exists (Constraints, p. 30). However, the accompanying analysis must evaluate the site inventory's consistency with its obligation to AFFH by addressing improved and exacerbated conditions, isolation of the regional housing need allocation (RHNA), local data and knowledge, and other relevant factors. The site inventory analysis should address how the sites are identified to improve conditions (or if sites exacerbate conditions, how a program can mitigate the impact) relative to access to

opportunity, segregation and integration; racially and ethnically concentrated areas of poverty and affluence; displacement risk; and should be supported by local data and knowledge.

Contributing Factors: While using the City's analysis of impediments (Constraints, p. 33) is acceptable when identifying potential contributing factors to fair housing, the element should also be based on the summary of analyses resulting from this AFFH analysis. The element must list and prioritize contributing factors to fair housing issues. Contributing factors create, contribute to, perpetuate, or increase the severity of fair housing issues and are fundamental to adequate goals and actions. Examples include community opposition to affordable housing, housing discrimination, land use and zoning laws, lack of regional cooperation, location and type or lack of affordable housing and lack of public or private investment in areas of opportunity or affordable housing choices. The analysis shall result in strategic approaches to inform and connect goals and actions to mitigate contributing factors to affordable housing. Please refer to page 49 of the AFFH guidebook (link: <https://www.hcd.ca.gov/community-development/affh/index.shtml#guidancev>) for specific factors that should be considered when identifying and prioritizing contributing factors.

Goals & Actions: The element must be revised to identify and add or modify goals and actions based on the identified and prioritized contributing factors. Goals and actions must specifically respond to the analysis and identify and prioritize 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. For more information, please see HCD's guidance at <https://www.hcd.ca.gov/community-development/affh/index.shtml#guidancev>.

Local Data and Knowledge: While the element does include national data and knowledge to fair housing issues, the element also needs to reflect local data in the contributing factors section of the analysis. Data provided by regional advocates and service providers should help the City identify patterns and further evaluate trends and contributing factors to fair housing issues. For more information, please see HCD's guidance at <https://www.hcd.ca.gov/community-development/affh/index.shtml>.

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).)*

While the element quantifies existing and projected extremely low-income (ELI) households, it must also analyze their housing needs. The analysis of ELI housing needs could consider tenure and rates of overcrowding and overpayment. To assist the analysis, see the enclosed data and sample analysis at <http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/extremely-low-income-housing-needs.shtml>.

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).)*

The City has a Regional Housing Needs Allotment (RHNA) of 3,439 housing units, of which 1,562 are for lower-income households. To address this need, the element relies on vacant and nonvacant sites. To demonstrate the adequacy of these sites and strategies to accommodate the City's RHNA, the element must include complete analyses:

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 of 50 percent, 75 percent, and 100 percent buildout in the Uptown Core Specific Plan area; the 90 percent assumption for higher-density residential sites; and the assumptions of 50 percent, 75 percent, and 80 percent for mixed-use sites, among other realistic capacity estimates. The estimate of the number of units for each site may need to be adjusted based on the land-use controls and site improvements, typical densities of existing or approved residential developments at a similar affordability level, and on the current or planned availability and accessibility of sufficient water, sewer, and dry utilities. The element also needs to analyze the likelihood that the identified units will be developed as noted in the inventory in zones that allow nonresidential uses (e.g., mixed-use). This analysis should consider the likelihood of nonresidential, performance standards, and development trends supporting residential.

Suitability of Nonvacant Sites: The element must include an analysis demonstrating the potential for redevelopment of nonvacant sites. The analysis shall 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.

To address this requirement, the element notes that the existing commercial centers were identified "based on property owner interest, location near development catalyst uses, and the redesignation under the new general plan to allow for the addition of higher density residential uses". These factors alone are not adequate to demonstrate the potential for redevelopment in the planning period. First, the element should consider additional indicators such as age and condition of the existing structure; presence of expiring leases; expressed developer interest; low improvement to land value ratio; and other factors. Second, the element should describe and support (through development trends) the thresholds used to identify

sites for redevelopment. For example, the element could show how new development potential under the general plan update compares to existing development potential for each of these sites, and what threshold was used to determine whether a site was viable for redevelopment. Third, the element should include a specific discussion of recent trends in redevelopment and how the site characteristics of recent redevelopments align with identified nonvacant sites in the inventory. Finally, since the element relies on nonvacant sites for more than 50 percent of the lower-income RHNA, it must make findings of substantial evidence that the existing use does not constitute an impediment to development, and that the existing use is likely to discontinue.

Accessory Dwelling Units (ADUs): The element calculates ADU potential for the planning period by considering an annual growth rate of 7.5 percent based on a window of time that is not clarified. However, the analysis and programs do not support the assumption that 624 ADUs will be permitted during the planning period. Specifically, in addition to other methods, HCD accepts the use of trends in ADU construction since January 2018 to estimate new production. Based on past production between 2018 to 2020, the City is averaging 16 units per year, which puts the element's assumption of 621 ADUs during the planning period considerably out of reach. As a result, the element should be revised to reduce the number of ADUs assumed per year. The City can increase this estimate if it includes additional analysis that includes information such as how community needs and demand are likely to increase production and include programs that aggressively promote, incentivize, and monitor ADU construction.

Small Sites: The element identifies several sites consisting of aggregated small parcels. The element must 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's 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. Please be aware sites smaller than a 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 lower-income housing units as projected for the site or unless the housing element describes other evidence to HCD that the site is adequate to accommodate lower-income housing (Gov. Code, § 65583.2, subd. (c)(2)(A).). As a reminder, in order for these sites to be included in a rezone program, each site must have the capacity to accommodate 16 units.

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

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).) In particular, the element should address concerns related to the location of sites within Very High Fire Hazard Severity Zones and the potential impacts this may have on development during the planning period.

Zoning for a Variety of Housing Types:

- *ADUs:* The element indicates (Constraints, p. 6) that ADUs are excluded from some zones which allow residential. The City may need to evaluate its ADU ordinance for compliance with state law and revise the element accordingly.
 - *Emergency Shelters:* The element indicates that emergency shelters are allowed without discretionary review in the M zone but should also provide analysis of the M zone's suitability for accommodating emergency shelters. This analysis could discuss the proximity of services, transit, and other indicators that would make the zone appropriate for this use.
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. The analysis shall also demonstrate local efforts to remove governmental constraints that hinder the locality from meeting its share of the regional housing need in accordance with Government Code section 65584 and from meeting the need for housing for persons with disabilities, supportive housing, transitional housing, and emergency shelters identified pursuant to paragraph (7). Transitional housing and supportive housing shall be considered a residential use of property, and shall be subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. (Gov. Code, § 65583, subd. (a)(5).)*

Land-Use Controls: The element must identify and analyze the impacts from all relevant land-use controls as potential constraints on a variety of housing types (e.g., multifamily rental housing, mobile homes, transitional housing). The analysis must also evaluate the cumulative impacts of land-use controls on the cost and supply of housing, including the ability to achieve maximum densities. In particular, minimum lot sizes should be evaluated, especially the requirement of 20,000 square feet for the R4 zone. Parking standards and minimum unit sizes should also be analyzed for their impact as a potential constraint on housing. In addition, the analysis should clarify the standards for mixed-use zones, including whether 100 percent residential development is allowed and how the maximum density can be achieved under existing standards such as the floor area ratio (FAR) of 1.0. The element should include programs to address or remove identified constraints.

Design Review: The element 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. The element

generally describes some of the City's design review process but does not provide adequate information or analysis. This analysis should describe required findings for the typical single-family and multifamily development, identify whether guidelines are subjective or objective, and discuss whether objective 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.

Constraints on Housing for Persons with Disabilities: The element currently details that residential care facilities serving six or fewer persons are permitted in all residential zones. However, residential care facilities serving seven or more persons are limited to the same zones with the approval of a conditional use permit. The element should analyze the process 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.

In addition, the element indicates that the City has a reasonable accommodation procedure, but the element does not describe or analyze the procedure and findings. The element should analyze the City's reasonable accommodation findings from Chapter 18.51.060 of the Municipal Code for their impact as a potential constraint.

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

While the element quantifies the City's special needs populations, it must also analyze their special housing needs. For a complete analysis of each population group, the element should discuss challenges faced by the population, the existing resources to meet those needs (availability of senior housing units, number of large units, number of deed restricted units, etc.), an assessment of any gaps in resources, and proposed policies, programs, and funding to help address those gaps.

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. Programs to be revised include the following:

- 1.4 (ADUs): Specify timing for creation of pre-approved ADU plans and development of public outreach program.
- 1.6 (Density Bonus Ordinance): As the City's density bonus ordinance is out of compliance with state law, the program should be revised to sooner in the planning period such as within one year of adoption.
- 2.4 (Affordable Housing Technical Assistance): Provide specific timeframes for consultation with local affordable housing developers and describe how the City will encourage multifamily housing development at key catalyst sites.
- 3.2 (Development Process Streamlining): As the provisions of SB 35 sunset in 2026, this action to comply with State law should be completed earlier than three years to have a beneficial impact within the planning period.
- 3.6 (Special Needs Housing Law): As the City's zoning ordinance is out of compliance with State law, the program should be revised to sooner in the planning period such as within one year of adoption.

Additionally, several programs still require clear, meaningful, and specific actions and objectives. Programs containing unclear language (e.g., "Continue to facilitate"; "Explore"; "Consider"; "Encourage"; etc.) should be amended to include more specific and measurable actions.

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 was 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:

- 1.1 (Adequate Sites): In addition to other requirements, pursuant to Government Code section 65583.2, subdivisions (h) and (i), the program to rezone a shortfall of sites to accommodate the lower-income RHNA must commit to accommodating at least 50 percent of the lower-income need on sites designated for residential use only or on sites zoned for mixed uses that accommodate all of the very low- and low-income housing need, if those sites

allow 100 percent residential use, and require residential use occupy 50 percent of the total floor area of a mixed-use project.

- 3.1 (Lot Consolidation): If the City anticipates lot consolidation for sites intended to accommodate the lower-income RHNA, this program should be strengthened to include specific actions to facilitate lot consolidation on sites identified in the inventory and timeframes for enacting additional incentives and subsidies.

Replacement Housing Requirements: The housing element must include a program to provide replacement housing. Nonvacant sites identified in the sites inventory with existing, vacated, or demolished residential uses and occupied by, or subject to an affordability requirement for, lower-income households within the last five years, require a replacement housing program for units affordable to lower-income households (Gov. Code, § 65583.2, subd. (g)(3)). Absent a replacement housing program, 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)(3).

State Density Bonus Law: The Housing Plan, as indicated in Program 1.5 (Housing Plan, p. 7), currently relies on State Density Bonus Law as the primary incentive for encouraging construction on specific plan sites and sites to be redeveloped during the planning period. The element should provide additional sites strategies and incentives that strengthen the likelihood of development on these sites.

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).)*

While the element includes programs to assist in the development of very low-, low-, and moderate-income households, it must also include a program(s) to assist in the development of housing affordable extremely low-income (ELI) households. For example, Program 2.3 (Special Needs Housing) should clarify the specific incentives offered towards the development of ELI housing and specify timeframes for expansion of incentives.

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 B4, 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.

5. *Promote AFFH opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry,*

national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)

As noted in Finding B1, the element must include a complete analysis of AFFH. Based on the outcomes of that analysis, the element must add or modify programs.

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 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 must also include objectives for extremely low-income households.

E. 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, the element should include additional efforts to include a broad spectrum of individuals and representative organizations and consider language access barriers. The element should describe the efforts to circulate the housing element among low- and moderate-income households and organizations that represent them and to involve such groups and persons in the element throughout the process. In addition, the element must summarize the public comments and describe how they were considered and incorporated into the element.