

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

2020 W. El Camino Avenue, Suite 500  
Sacramento, CA 95833  
(916) 263-2911 / FAX (916) 263-7453  
[www.hcd.ca.gov](http://www.hcd.ca.gov)



June 7, 2021

Eric Ceja  
Deputy Development Service Director  
City of Palm Desert  
73-510 Fred Waring Drive  
Palm Desert, CA 92260

Dear Eric Ceja:

**RE: Review of Palm Deserts 6<sup>th</sup> Cycle (2021-2029) Draft Housing Element**

Thank you for submitting the City of Palm Desert's (City) draft housing element received for review on April 8, 2021 along with revisions on May 24, 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 telephone conversations on May 7 and May 11, 2021 with Nicole Criste, the City's Consultant; Jessica Gonzalez, Senior Management Analyst; and Eric Ceja, Principal Planner.

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, to comply with State Housing Element Law, the element must provide a complete site inventory as well as provide a full analysis addressing the required components for Affirmatively Furthering Fair Housing (AFFH), among other items. The enclosed Appendix describes 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](http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sb375_final100413.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. This is particularly important since past participation efforts resulted in many meaningful comments that do not appear to be incorporated in the element.

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.

HCD appreciates the hard work and effort Eric Ceja, Principal Planner; Jessica Gonzalez; Senior Management Analyst, and Nicole Criste, consultant provided during the course of our review. We are committed to assisting the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Edgar Camero, of our staff, at [edgar.camero@hcd.ca.gov](mailto:edgar.camero@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 PALM DESERT

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. Housing Needs, Resources, and Constraints**

1. *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))*

Condition of Housing Stock (pg. III-24): The element identifies the age of the housing stock and uses census data to identify housing units lacking complete facilities. However, this data is insufficient to estimate the number of units in need of rehabilitation and replacement. The analysis could supplement this information with estimates from a recent windshield survey or sampling, estimates from the code enforcement agency, or information from knowledgeable builders/developers, including non-profit housing developers or organizations.

2. *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))*

The element includes the Assessment of Fair Housing (AFH) that was prepared in 2017; however, additional information is necessary to address the requisite affirmatively furthering fair housing analysis requirement, including local contributing factors to the fair housing issues and develop strong programs and strategies to address the identified fair housing issues.as follows:

Fair Housing Enforcement and Outreach: The element must include the City's ability to provide enforcement and outreach capacity which can consist of actions such as the City's ability to investigate complaints, obtain remedies, or the City's ability to engage in fair housing testing. The element currently states the number of housing discrimination complaints in Palm Desert filed between the years 2007-2016 but must be updated to include the most recent data and analyze the data for any patterns or trend by community area or census tract and include additional local knowledge, relevant factors, and a conclusion of summary of issues. In addition, the element states that the City works with the Fair Housing Council of Riverside County

(FHCRC) to provide anti-discrimination services; landlord-tenant mediation; fair housing training and technical assistance; enforcement of housing rights; administrative hearing; home buyer workshop; lead-based paint programs; and other housing related services for City residents. However, the analysis must also describe compliance with existing fair housing laws and regulations and include information on fair housing outreach capacity.

Racial/Ethnic Areas of Concentration of Poverty: The element includes information relative to Racially and Ethnically Concentrated Areas of Poverty (R/ECAP), but the analysis must be complemented by quantitative evidence for the local and regional comparison. In addition, the City should also analyze the racial concentrations as it relates to areas of affluence if the City does not have areas of concentrated poverty. The combination in the R/ECAP and areas of affluence analyses will help guide goals and actions to address fair housing issues. The analysis should 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: The element provides qualitative information (pg. III-33) on the access to opportunity but must include quantitative evidence to support such statements. A complete analysis should include the locally and regional disparities of the educational, environmental, and economic scores through local, federal, and/or state data. The element makes references to tables and maps however, none of these tables or maps are provided in the element. Please refer to page 35 of the AFFH guidebook (link: <https://www.hcd.ca.gov/community-development/affh/index.shtml#guidance>) 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 Palm Desert.

Integration and Segregation: The element includes some data on integration and segregation (pg. III-32) at the regional and local level; however, the comparison of segregation levels at the regional and local level must be complemented by data to support statements such as “[segregation] has remained in the low level category” and “the City has a low segregation level....compared to a moderate level segregation level for the bi-county”. The element must also analyze segregation and integration of familial status, income, and persons with disabilities locally and regionally complemented by data and concluding with a summary of issues.

Disproportionate housing needs and Displacement Risk: The element does include data on overcrowded households, substandard housing conditions, and cost burdened households, but it must also analyze the data including looking at trends, patterns, and other local knowledge, and conclude with a summary of issues.

Site Inventory: The element includes a map of the site inventory and states that the proposed sites to meet lower-income regional housing needs allocation (RHNA) are geographically distributed which results in these sites affirmatively furthering fair housing (pg. III-33). However, the accompanying analysis shall also be reflective of

housing development at all income-levels and evaluate the sites relative to socio-economic patterns. The site inventory analysis should address how the sites are identified to improve conditions (or if sites exacerbate conditions, how a program can mitigate the impact), whether the sites are isolated by income group and should be supported by local data and knowledge.

Contributing Factors: The element 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.

Goals, Priorities, Metrics, and Milestones: Goals and actions must significantly seek to overcome contributing factors to fair housing issues. Currently, the element identifies program(s) to encourage and promote affordable housing; however, most of these programs do not appear to facilitate any meaningful change nor address affirmatively furthering fair housing requirements. Furthermore, the element must include metrics and milestones for evaluating progress on programs, actions, and fair housing results.

Given that most of the City is considered a high and highest resource community, the element could focus on programs that enhance housing mobility and encourage development of more housing choices and affordable housing. Programs also need to be based on identified contributing factors, be significant and meaningful. The element must add, and revise programs based on a complete analysis and listing and prioritization of contributing factors to fair housing issues. Furthermore, the element must include metrics and milestones for evaluating progress on programs, actions, and fair housing results. For more information, please see HCD's guidance at <https://www.hcd.ca.gov/community-development/affh/index.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 need allocation (RHNA) of 2,790 housing units, of which 1,135 are for lower-income households. To address this need, the element relies on pending projects and vacant sites. To demonstrate the adequacy of these sites and strategies to accommodate the City's RHNA, the element must include complete analyses:

Progress in Meeting the RHNA: The element indicates that 92 units affordable to

lower-income households have been built or are under construction or entitled, but the element provides no information documenting how affordability of the units was determined. As you know, the City's RHNA may be reduced by the number of new units built or entitled since June 30, 2021; however, the element must describe the City's methodology for assigning these units to the various income groups based on actual or proposed sales price or rent level of the units and demonstrate their availability in the planning period.

Pending Projects: The element identifies several proposed projects in the pipeline which the City expects to be built with housing affordable to low- and very low-income households (Sites LL-KK). However, the element is unclear whether projects have submitted applications for these sites, and what approvals remain necessary, expecting timelines for completion of the entitlement process, and demonstrate their availability in the planning period. In addition, the element must also describe the City's methodology for assigning these units to the various income groups based on actual or proposed sales price or rent level of the units.

In addition, Table III-48 includes a number of projects/sites that have been entitled for single family homes, condominiums, and townhomes affordable to above moderate-income households. However, it is unclear from the element if these "projects" are specific plans which require further approvals or actual entitled projects pending building permits. The element should clarify any additional approvals necessary prior to construction, and estimated buildout timelines to demonstrate availability of these units in the planning period. For example, the University Park project seems to have multiple phases. The element should identify if units for University Park are approved or pending; describe the status of the project, including any necessary approvals or steps prior to development; development agreements; and conditions or requirements such as phasing or timing requirements that impact development in the planning period.

Sites Inventory: 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 (for all income-levels). For example, sites to be consolidated should be listed by individual parcel numbers. Sites to be consolidated can then be indicated using the consolidated sites column. Please see HCD's housing element webpage at <https://www.hcd.ca.gov/community-development/housing-element/index.shtml> for 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).

Zoning for Lower-Income Households: Pursuant to Government Code section 65583.2, subdivision (c)(3)(A) and (B), the element must identify sites with zoning and densities appropriate to encourage and facilitate the development of housing for lower-income households based on factors such as market demand, financial feasibility and development experience within zones. For communities with densities that meet specific standards (at least 30 units per acre for Palm Desert), this analysis is not



required (Gov. Code, § 65583.2, subd. (c)(3)(B)). Based on Table III-47, it appears the City is relying on sites with densities ranging from 10-22 units per acre to accommodate the remaining need for lower-income. The element must include a complete analysis to demonstrate how this zoning encourages the development of units affordable for lower-income households.

Realistic Capacity: The element estimates that vacant sites will be built out using an estimate of 80 percent of the allowable density but does not describe the methodology for that determination. The element must describe the methodology for determining capacity 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. For sites zoned for nonresidential uses (e.g., commercial and mixed-use zones), the element must describe how the estimated number of residential units for each site was determined. To demonstrate the likelihood for residential development in nonresidential zones, the element could describe any performance standards mandating a specified portion of residential and any factors increasing the potential for residential development such as incentives for residential use, and residential development trends in the same nonresidential zoning districts. 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#analysis>.

Large Sites: Table III-47 includes two sites larger than 10 acres (Map Key D and F) and states that larger sites are not constrained from development due two proposed projects being developed; however, those sites are being developed with a mix of market and lower-income housing. In order to demonstrate that these sites can accommodate the lower-income need, the element must demonstrate 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).). For example, the element could estimate the same proportion of lower-income housing similar to entitled and approved projects could be accommodated on Sites D and F. 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#analysis>.

Small Sites: The element identifies two sites (Map Key BB and CC) at less than a half-acre and includes several sites that appear to require consolidation. 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 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 the element appears to rely on consolidated small sites to accommodate the RHNA for lower-income

households, it should also provide analysis demonstrating the potential for consolidation. For example, the analysis could describe 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 lot consolidation, or information from the owners of each aggregated site.

Zoning for a Variety of Housing Types: The element must demonstrate zoning for a variety of housing types, as follows:

Emergency Shelters: The element describes a zone to permit emergency shelters without discretionary action and describes the capacity to accommodate the need for emergency shelters. The City must ensure that the zoning adheres to the new parking requirement standards per AB 139 (Chapter 335, Statutes of 2019). AB 139 requires that the zone for emergency shelter allows for sufficient parking for the staff of the emergency shelter. The element must include programs as appropriate based on the outcomes of this analysis.

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, local processing and permit procedures, and any locally adopted ordinances that directly impact the cost and supply of residential development. 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 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). (Gov. Code, § 65583, subd. (a)(5).)*

Local Processing and Permit Procedures: The element provides a general overview of the City's processing and permit procedures and states that that all multifamily must requires a precise plan for multifamily projects. In addition, the element states the Architectural Review Commission review is required for all projects. The element must describe and analyze the precise plan and architectural review requirements 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. It could also provide examples of recent timeframes for recent projects that have been approved by the City. The element must demonstrate this process is not a constraint and include a program to address this permitting requirement, as appropriate.

Fees and Exactions: While the element includes many fees typically charged to a multifamily and single-family project, it does not consider all planning required for a project. For example, the element describes that a precise plan is required for



multifamily development, but Table III-21 does not include the fee charged for processing the precise plan nor consider the cost associated with architectural review. Table III-21 should describe and analyze all fees charged to a typical project. The element could use recent examples of projects to help support this analysis.

5. *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).)*

Nongovernmental Constraints: The element contains information on nongovernmental constraints such as land and construction costs; the availability of financing; economic constraints; and requests to develop at densities below the density identified in the sites inventory (pg. III-50). However, the element must also include analysis regarding local efforts to address non-governmental constraints that create a gap in the jurisdiction's ability to meet RHNA by income category.

## **B. Housing Programs**

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

To address the program requirements of Government Code section 65583, subdivision (c)(1-6), and to facilitate implementation, all programs should be revised to include: (1) a description of the City's specific role in implementation including meaningful actions the city will take to achieve the identified goals, policies, and program objectives; (2) definitive implementation timelines (e.g., December 31, 2021); (3) objectives, quantified where appropriate; and (4) identification of responsible agencies and officials (e.g., Planning Assistant, Community Development, etc.). In addition, the following programs required additional revisions.

**Program 1.E:** The program should be revised to state how the City plans on maintaining inventory of the sites proposed in the site inventory for the PR-20 and R-3 zones. For example, the program could include a commitment to post the inventory on its website, or as projects are submitted perform the calculations outlined in HCD's No Net Loss Memorandum which can be found <https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/SB-166-final.pdf>. The efforts shall be proactive and must include a timeline to monitor the progress of the sites and whether they are being built at the given densities.

**Program 3.D:** The program states that the City will “strive to maintain ownership and/or long-term affordability” of the rental housing units but shall indicate what striving for looks like for this goal. The City can describe the system that is in place, if such system exists. If not, the City must describe what action will help them achieve this goal.

**Program 3.E:** The program should state how the City plans on coordinating between affordable housing developers and social services agencies to ensure there is a system to integrate that successfully will integrate such social services resources to new housing.

**Program 4.A:** The program currently has a list of areas it has brochures and flyers. However, this narrative must be moved to the program description and shall consider ways it plans to be inclusive to all community members.

**Program 4.B:** The program says that it will work with agencies in the housing of disabled residents. However, the program must specify the capacity to which the City plans to work with the agencies because it is unclear if the City is working collaboratively with the agencies to provide trainings, if the agencies are providing the trainings, or if the City is facilitating the trainings.

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 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 the Finding A3, the element does not include a complete sites inventory or analysis; as a result, the adequacy of sites and zoning has not been established. Based on the results of a complete sites inventory and analysis, programs may need to be added, or revised, to address a shortfall of sites and zoning for a variety of housing types.

**Programs 1.A-1.D:** These programs are intended to facilitate the development of the entitled and pending projects outlined from Table III-47 of the element. All programs need to be revised to include specific timeframes (e.g. month, year) and should include benchmarks for completion. In addition, programs relating to proposed projects without entitlements (1.B and 1.C) must also include a monitoring program with specific actions the City will take to identify or rezone sites to accommodate the shortfall for lower-income should the proposed projects not receive the necessary entitlements within the specified timeframes. Any additional sites or rezones must meet the requirements of Government Code section 65583.2.

3. *Assist in the development of adequate housing to meet the needs of extremely low, very low, low-, and moderate-income households. (Gov. Code, § 65583, subd. (c)(2).)*

The element must include a program(s) with specific actions and timelines to assist in the development of housing for extremely low-income households and households and individuals with special needs (e.g., farmworkers, persons experiencing homelessness, persons with disabilities, including developmental). The program(s) could commit to adopting priority processing, granting fee waivers or deferrals, modifying development standards, granting concessions and incentives for housing developments that include units affordable to lower and moderate-income households; assisting, supporting or pursuing funding applications; and working with housing developers coordinate and implement a strategy for developing housing affordable to lower and moderate income 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. Supportive housing, as defined in Section 65650, shall be a use by right in all zones where multifamily and mixed uses are permitted, as provided in Article 11 (commencing with Section 65650). (Gov. Code, § 65583, subd. (c)(3).)*

As noted in Findings A4 and A5, the element requires a complete analysis of potential governmental and non-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 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 A1, the element must include a complete analysis of affirmatively furthering fair housing. Based on the outcome of that analysis, the element must add or modify programs. Additionally, programs and actions need to be significant, meaningful, and sufficient to overcome identified patterns of segregation and affirmatively further fair housing.

### **C. Public Participation**

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

While the element includes a general summary of the public participation process (pages III-777), it must also demonstrate diligent efforts were made to involve all economic segments of the community in the development of the housing element. The element describes that only one community workshop was held in preparation of the housing element which members of the public and organizations were invited to attend. The availability of a single workshop does not demonstrate a diligent effort in public participation. The element could describe the efforts to circulate the housing element draft among low- and moderate-income households and organizations that represent them prior to submittal to HCD, the availability of materials in multiple languages, surveys, or other efforts to involve such groups and persons in the element throughout the process. 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.

For your information, some general plan element updates are triggered by housing element adoption. For example, a jurisdiction must address environmental justice in its general plan by the adoption of an environmental justice element, or by the integration of environmental justice goals, policies, and objectives into other general plan elements upon the adoption or next revision of two or more elements concurrently on or after January 1, 2018. (Gov. Code, § 65302, subd. (h).) In addition, the safety and conservation elements of the general plan must include analysis and policies regarding fire and flood hazard management and be revised upon each housing element revision. (Gov. Code, § 65302, subd. (g).) Also, the land-use element must identify and analyze disadvantaged communities (unincorporated island or fringe communities within spheres of influence areas or isolated long established legacy communities) on, or before, the housing element's adoption due date. (Gov. Code, § 65302.10, subd. (b).) HCD reminds the city of Palm Desert 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).