

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

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December 9, 2021

Pete Carr, City Manager
City of Orland
815 Fourth Street
Orland, CA 95963

Dear Pete Carr:

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

Thank you for submitting the City of Orland's (City) draft housing element received for review on October 13, 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 30, 2021, with Scott Friend, City Planner and consultants Sherry Morgado and James Coles.

The draft element addresses many statutory requirements; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). The enclosed Appendix describes the revisions needed to comply with State Housing Element Law.

As a reminder, the City's 6th cycle housing element was due November 30, 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 (November 30, 2021), then any rezoning to accommodate the regional housing needs allocation, (RHNA) 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.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: http://opr.ca.gov/docs/OPR_Appendix_C_final.pdf and http://opr.ca.gov/docs/Final_6.26.15.pdf

HCD appreciates the cooperation and hard work Scott Friend, City Planner and consultants Sherry Morgado and James Coles provided during the 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 Gianna Marasovich, of our staff, at Gianna.Marasovich@hcd.ca.gov.

Sincerely,



Paul McDougall

Senior Program Manager

Enclosure

APPENDIX CITY OF ORLAND

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 review of programs in the past cycle, the housing element must provide an evaluation 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).

In addition, Program HE 3.H (Housing for Special Needs Populations) committed to support the development of housing for persons with special needs. The element notes special needs housing was proposed but the City was unable to accommodate the housing due to concerns that "its location was not appropriate." Considering the Program's whole purpose was to support special needs housing, the element should include further discussion of why the location was inappropriate, whether a project was proposed, application of zoning and permit procedures and incorporate lessons learned into other required analyses (e.g., governmental constraints, zoning for a variety of housing types, affirmatively furthering fair housing (AFFH)) and policies and programs.

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).)*

Local Patterns and Trends: The fair housing analysis should include local patterns and trends within the City. The analysis looks at the City as a whole in comparison to the County, but the element should also analyze patterns throughout neighborhoods and areas within the City. In addition, the element states that the whole City is not included in the analysis. The analysis must address the socio-economic characteristics for the area that is not included in the four census blocks that are analyzed in the fair housing analysis.

Enforcement and Outreach: The element must describe the process and capacity to provide enforcement and outreach which can consist of actions such as capacity to investigate complaints, obtain remedies, or engage in fair housing testing. The element should describe the number and characteristics of housing discrimination complaints. The analysis could also evaluate data and the results from any fair housing testing. In addition, the analysis must address compliance with existing fair housing laws as well as any past or current fair housing lawsuits, findings, settlements, judgements, or complaints. The element should address whether there will be ongoing fair housing outreach throughout the planning period.

Integration and Segregation: The element must address racial segregation and integration within the City. The element may include the dissimilarity index or map racial distribution locally and regionally. The element should analyze whether there are concentrated areas of race, disability, familial status, and income or poverty within the City. In addition, the element must analyze whether single family households are concentrated in one area of the City or dispersed throughout the City.

Access to Opportunity: The element must include an analysis regarding access to opportunity for jobs and transit by protected groups. In addition, the element must examine patterns and trends at a local and regional level for access to opportunity for education and environmental quality. The element must also describe the access to opportunity for persons with disabilities.

Disproportionate Housing Needs, including Displacement Risk: While the element includes an analysis of housing problems within the City and Glenn County, the element must also address overcrowding, overpayment, homelessness, and displacement risk.

Sites Analysis: The element states that there is a concentration of Hispanics, subsidized apartments, farmworker housing, and mobile home parks within the City. This should be included in the analysis of location of sites by income group. In addition, while the element included an analysis of sites based on access to jobs and displacement, it should also analyze sites based on other factors of access to opportunity and disproportionate need. In addition, the sites identified for lower-income households are concentrated in existing lower-income areas with a concentration of affordable housing units. The element must identify sites and utilize programs to provide affordable housing in areas of high opportunity and provide services and place-based strategies in lower-resourced areas.

Contributing Factors: The element identifies many contributing factors to fair housing issues. The element should consider prioritizing these factors to better formulate policies and programs and carry out meaningful actions. In addition, Contributing Factor 1 should provide services to the area and incorporate housing for moderate and above-moderate income households to provide housing choice.

Goals, Priorities, Metrics, and Milestones: As mentioned above, the element identifies concentrations of various groups; this finding should be incorporated into the programs to ensure the City is affirmatively furthering fair housing. Goals and actions must significantly seek to overcome contributing factors to fair housing issues. Programs should address

enhancing housing mobility strategies; encouraging development of new affordable housing in high resource areas; improving place-based strategies to encourage community conservation and revitalization, including preservation of existing affordable housing; and protecting existing residents from displacement. Furthermore, the element must include metrics and milestones to target meaningful and significant outcomes and for evaluating progress on programs, actions, and fair housing results.

2. *Include an analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition. (Gov. Code, § 65583, subd. (a)(2).)*

Overpayment: While the element identifies the total number of households overpaying for housing (p.101), it must quantify and analyze the number of lower-income households overpaying for housing by tenure (i.e., renter and owner).

Large Households: The element includes data for large households as four or more. The element must be revised to include data for large households as five or more. This data can be pulled from the U.S. Census, table B25009.

Housing Conditions: The element identifies the age of the housing stock. However, it must include analysis of the condition of the existing housing stock and estimate the number of units in need of rehabilitation and replacement. For example, the analysis could include 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.

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).)*

Pending and Approved Projects: Many sites in the sites inventory list “pending project” for sites identified to accommodate the lower-income RHNA. In addition, all sites identified to meet the lower-income RHNA have different density assumptions. The element must clarify if the sites identified for lower-income households are being counted as sites or pending projects. The element must include information about the status of these pending projects, such as how far along the projects are, when the projects will be complete, affordability restrictions, etc. Additionally, parcel 041-081-002 lists the same density for maximum and assumed densities. The City indicated that this is a project; therefore, this should be clarified in the element and the element must also demonstrate affordability based on actual or projected sales prices, rent levels, or other mechanisms establishing affordability in the planning period.

Previously Identified Nonvacant and Vacant Sites: 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).)

Parcel Listing: The element lists parcels by various factors such as size, zoning, and general plan designation. However, the element must clarify whether sites are vacant or nonvacant. If sites are nonvacant, the inventory must include a description of existing use with sufficient detail to facilitate an analysis of the potential for addition development on nonvacant sites. In addition, page 116 states parcels APN 045-100-131 and APN 045-100-097 to develop 32 affordable units per site but the sites inventory on page 117 list 20 units and 12 units for these sites, respectively. The element must clarify the number of units that will be accommodated on each site. In addition, Figure 88 (p. 120) shows four lower-income sites clustered in one area. It is unclear if all four parcels are listed in the sites inventory.

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 City lists maximum density allowed in a zone multiplied by the size of the parcel. The estimate of the number of units for each site must be adjusted as necessary, based on the land use controls and site improvements, typical densities of existing or approved residential developments at a similar affordability level.

In addition, calculation capacities must account for the likelihood of 100 percent nonresidential uses. The element should include analysis based on factors such as development trends, performance standards or other relevant factors. For example, the element could analyze all development activity in nonresidential zones; how often residential development occurs and adjust residential capacity calculations; policies and program accordingly.

Infrastructure: The element describes infrastructure limitations in the City (p. 153). However, the element must demonstrate sufficient total water and sewer capacity (existing and planned) to accommodate the RHNA in the planning period.

Zoning for a Variety of Housing Types:

- *Emergency Shelters:* The element should describe the development standards of the R-3 and Downtown Mixed-Use zones that allow emergency shelters by-right and should provide an analysis of proximity to transportation and services for these sites. In addition, the element should describe how emergency shelter parking requirements comply with AB139/Government Code section 65583, subdivision (a)(4)(A) or include a program to comply with this requirement. In addition, the element describes a conditional use permit requirement for more than four families.

The element must analyze the four-family limit as a potential constraint for the development of emergency shelters and include programs as appropriate.

- *Transitional and Supportive Housing:* The housing element must demonstrate that transitional housing and supportive housing are permitted as a residential use and only subject to those restrictions that apply to other residential dwellings of the same type in the same zone. The element must demonstrate that transitional and supportive housing is allowed in commercial and mixed-use zones in the same way as other residential uses or include a program to comply with this requirement.
- *Employee Housing:* While the element states that housing for six or fewer agricultural workers could be allowed in all residential zones, the element must demonstrate whether zoning is explicitly in compliance with the Employee Housing Act (Health and Safety Code, § 17000 et seq.), specifically, sections 17021.5 and 17021.6, and include programs as appropriate.
- *Manufactured Housing:* While the element includes some information on mobile homes and factory-built housing on page 142, it must demonstrate the City's zoning code permits manufactured housing in the same manner and in the same zone(s) as conventional or stick-built structures are permitted. Specifically, manufactured homes should only be subject to the same development standards that a conventional single-family residential dwelling on the same lot would be subject to, with the exception of, architectural requirements for roof overhang, roofing material, and siding material (Gov. Code § 65852.3, subd. (a)).

4. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures... (Gov. Code, § 65583, subd. (a)(5).)*

Land-Use Controls: The element must identify and analyze all relevant land-use controls impacts as potential constraints on a variety of housing types (e.g., multifamily rental housing, mobilehomes, 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 and cost and supply of housing. The analysis should also describe past or current efforts to remove identified governmental constraints. The analysis should include how the population per acre assumptions (p. 135) interact with the allowed densities, lot coverage requirements in the R2 and mixed-use zones, whether the height limit of 35 feet in R2 allows for three story multifamily housing developments, describe public safety height restrictions, minimum lot size requirements for mobile home parks, and whether the conditional use permit (CUP) requirement in the Planned Development zone is a constraint. The element should include programs to address or remove the identified constraints.

Parking Requirements: The element must analyze the parking requirements for duplexes and triplexes in the R2 zone for impacts on housing cost, supply, and ability to achieve maximum densities. Programs should be added as appropriate.

Streamlining Provisions: The element should clarify whether the City has procedures consistent with streamlining procedures pursuant to Government Code section 65913.4 and include programs as appropriate.

Processing and Permit Procedures: While the element includes information about permit processing procedure, it should also describe the average processing times for typical single family and multifamily developments.

On/Off-Site Improvements: The element must identify actual subdivision level improvement standards, such as minimum street widths (e.g., 40-foot minimum street width); analyze their impact as potential constraints on housing supply and affordability.

Constraints on Housing for Persons with Disabilities: While the element states care facilities for six or fewer residents are allowed in R1, R2, and R3 zones by-right, on the same page it also states that “Other than a required CUP, no special design or permitting standards have been established for care facilities for persons with disabilities”. The CUP is a constraint and must be removed. In addition, the element must describe how group homes for seven or more residents are allowed in residential zones. If large group homes are not allowed, the element should include a program to allow group homes in all residential zones. Finally, the element must describe the City’s definition of family and analyze whether it is a potential constraint on housing for persons with disabilities and add or modify programs as appropriate.

Local Ordinances: The element must specifically analyze locally adopted ordinances such as inclusionary ordinances or short-term rental ordinances that directly impact the cost and supply of residential development. The analysis should demonstrate local efforts to remove governmental constraints that hinder the locality from meeting its share of the regional housing need and from meeting the need for housing for persons with disabilities, supportive housing, transitional housing, and emergency shelters.

Zoning and Fees Transparency: The element must clarify its compliance with new transparency requirements for posting all zoning and development standards for each parcel on the jurisdiction’s website pursuant to Government Code section 65940.1, subdivision (a)(1).

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).)*

Approval Time and Requests Lesser Densities: The element must include analysis of requests to develop housing at densities below those identified, the length of time between receiving approval for a housing development and submittal of an application for building permits that potentially. The element must address any hinderance on the development of housing and include programs as appropriate.

6. *Analyze existing assisted housing developments that are eligible to change to non-low-income housing uses during the next ten years due to termination of subsidy contracts, mortgage prepayment, or expiration of use restrictions. (Gov. Code, § 65583, subd. (a)(9) through 65583(a)(9)(D).)*

The element includes some information about Orland Apartments, stating the units will expire during the planning period. However, HCD's data shows the units won't expire until 2060. The jurisdiction should confirm the LIHTC restrictions apply to all the USDA units in Orland Apartments. If the jurisdiction cannot confirm these units will be covered, a complete at-risk analysis is required. For more information on analysis requirements, see HCD's Building Blocks.

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 Gov. Code section 65583, the element must provide discrete timing for programs (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. Programs to be revised include the following:

- *HQL 1.2.1 (Housing Rehabilitation Program)* should describe how often the City will apply for funds as well as whether outreach will occur to potential recipients.
- *HQY 1.1.1 (No Net Loss/Unit Production Evaluation)* should include annual review of available sites to meet the RHNA.
- *AH 1.2.1 (Funding for Affordable Housing Development)* should describe proactive outreach to developers and include how often the City will apply for funding.
- *AH 1.2.3 (Large Household Housing)* should include timing of when incentives will be implemented.
- *FH 1.4.1 (Fair Housing Information)* should describe how often outreach will occur.

2. *Identify actions that will be taken to make sites available during the planning period with*

appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (Gov. Code, § 65583, subd. (c)(1).)

As noted in Finding B3, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types.

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).)*

Extremely Low-Income Households: The element must include a program(s) with specific actions and timelines to assist in the development of housing for extremely low-income households. The program(s) could commit the City to adopting priority processing, granting fee waivers or deferrals, modifying development standards, granting concessions and incentives for housing developments that include units affordable to extremely low-income households; assisting, supporting or pursuing funding applications; and outreach and coordination with affordable housing developers.

Special Needs: While the element includes program AH 1.2.2 (Housing for Special Needs Populations), the Program should clarify what special needs groups are included in the program (e.g., elderly, homeless, farmworkers, persons with disabilities, female-headed households). In addition, program actions should include assistance to non-profit service providers and developers, prioritizing some funding for housing developments affordable to special needs households and offering financial incentives or regulatory concessions to encourage a variety of housing types.

Density Bonus: As noted on page 139, the element should include a program to update the density bonus ordinance pursuant to Government Code section 65915.

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) B4 and B5, 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. In addition, the element should be revised as follows:

- *HQY 1.2.1 (Medium and High-Density Residential Sites Amendment to Families per Structure Requirement)*: While the element includes a program that removes the requirement to limit development to no more than four families per structure in the R2 and R3 zones, the program should specifically remove the conditional use permit requirement.
 - *By-Right Permanent Supportive Housing*: While the element includes Program HQY 1.2.4 (Low Barrier Navigation Centers), the element must also include a program to address by-right permanent supportive housing (AB 2162).
 - *Constraints on Housing for Persons with Disabilities*: While the element includes program HQY 1.2.3 (Removal of Governmental Constraints to Housing Development for Persons with Disabilities) to develop a procedure for reasonable accommodation, the Program could be modified to remove the requirement of fees associated with the process.
 - *Program to Mitigate Non-Governmental Constraints*: The element must be revised to include a program that mitigates non-governmental constraints that create a gap in the jurisdictions ability to meet RHNA by income category.
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, programs should be revised to address enhancing housing mobility strategies; encouraging development of new affordable housing in high resource areas; improving place-based strategies to encourage community conservation and revitalization, including preservation of existing affordable housing; and protecting existing residents from displacement. The programs must include metrics and milestones toward targeted outcomes.

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).)*

While the element includes Program AH 1.1.1 to monitor affordable units at-risk, the element should incorporate proactive outreach to owners of affordable properties to ensure State Preservation Notice Law is being met (Gov. Code, § 65863.10, 65863.11, 65863.13). In addition, the program should include how often projects will be monitored and how often outreach will occur.

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, it should also summarize public comments and describe how they were considered and incorporated into the element. Further, the element should employ additional methods for public outreach efforts in the future, particularly to include lower-income and special needs households and neighborhoods with higher concentrations of lower-income households. For example, the City could conduct targeted stakeholder interviews or establish a committee representative of lower-income households in future public outreach efforts. Finally, the availability of the document to the public and opportunity for public comment prior to submittal to HCD is essential to the public process and HCD's review. The element must include the date the draft was made available to the public to ensure the element was available for public comment.