

**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



January 17, 2024

Heather Spurlock, City Planner
Planning Department
City of Ridgecrest
100 W California Avenue
Ridgecrest, CA 93555

Dear Heather Spurlock:

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

Thank you for submitting the City of Ridgecrest's (City) draft housing element that was received for review on October 23, 2023. Pursuant to Government Code section 65585, the California Department of Housing and Community Development (HCD) is reporting the results of its review. The review was facilitated by a conversation on December 19, 2023, with you, Bindu Philip, Amanda Philip, and Issac George (consultant). In addition, HCD considered comments from David Kellogg, 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 (Gov. Code, § 65580 et seq). The enclosed Appendix describes the revisions needed to comply with State Housing Element Law.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government does not adopt a compliant housing element within 120 days of the statutory deadline (December 31, 2023), then any rezoning to make prior identified sites available or accommodate the regional housing needs allocation (RHNA) shall be completed no later than one year from the statutory deadline pursuant to Government Code sections 65583, subdivision (c) and 65583.2, subdivision (c). Otherwise, the local government's housing element will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i). Please be aware, if the City does not adopt a compliant housing element within one year from the statutory deadline, the element cannot be found in substantial compliance until these rezones are completed.

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City should continue to engage the community, including organizations that

represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate. Please be aware, any revisions to the element must be posted on the local government's website and to email a link to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD.

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

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: <https://www.opr.ca.gov/planning/general-plan/guidelines.html>.

HCD appreciates the hard work and dedication you and the housing element update team 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 Helen Eldred, of our staff, at Helen.Eldred@hcd.ca.gov.

Sincerely,

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

Paul McDougall
Senior Program Manager

Enclosure

APPENDIX CITY OF RIDGECREST

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

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

A. 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).)

General: While the element includes some limited information on the progress in implementation from the previous element, it should complement that information to the extent possible then evaluate the effectiveness of programs to better make appropriate adjustments in the current element. For example, the prior element had a program to adopt inclusionary housing definitions. The element notes the definitions were adopted but should also discuss whether anything resulted from the program and whether the program was effective in accomplishing goals and objectives. Other examples of programs that should be evaluated for effectiveness include accessory dwelling units (ADU), Code Enforcement, Community Development Block Grants (CDBG), Mobile Home Improvement Program, Reduced Sewer Capacity Fees, Rehabilitation, Fair Housing Services, Special Needs Housing and Extremely Low-Income (ELI) Households. Based on the outcomes of this evaluation, programs should be revised as appropriate.

Special Needs: As part of the review of programs in the past cycle, the 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). Programs should be revised as appropriate to reflect the results of this evaluation.

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).)*

Enforcement and Outreach: The element must describe capacity to provide enforcement and outreach which can consist of actions such as the ability to investigate complaints, obtain remedies, or engage in fair housing testing. The element currently describes services provided by the Housing Authority of the County of Kern but should also describe the number and characteristics of housing discrimination complaints.

Segregation and Integration: The element provided some data on integration and segregation regarding persons with a disability by census tracts within the City. However, the element should also discuss and analyze this data for trends over time and evaluate patterns at a regional basis, comparing the City to the region.

Racially Ethnically Concentrated Areas of Poverty (R/ECAP): The element identifies census tract 53 as a R/ECAP. HCD data does not show an area of high concentration and poverty in this tract and the tract appears well beyond the City limits. However, the element should utilize local knowledge to complement this analysis, including discussing conditions and circumstances of the area compared to other areas. The element should add or modify programs based on the outcomes of this analysis.

Disproportionate Housing Needs: While the element provides regional/county-level data on disproportionate housing needs, the analysis must also describe local conditions relative to these factors. For instance, utilizing local data and knowledge, the element should evaluate trends and patterns within the City, such as any concentration of housing units in need of rehabilitation, concentrations of cost-burdened households, and areas that might have more persons experiencing homelessness such as homeless encampments.

Identified Sites and Affirmatively Furthering Fair Housing (AFFH): The element includes some general discussion and conclusions that identified sites are distributed throughout Ridgecrest, and do not “unduly burden existing racial or ethnic homogeneity, poverty, or other characteristics” (p. 38). However, an analysis should discuss identified regional housing need allocation (RHNA) by income group with respect to location (e.g., census tract, neighborhood, quadrant, planning area) then evaluate relative to fair housing components (e.g., race, income, TCAC, overpayment). If identified sites are isolated by income group or exacerbate conditions, the element should identify further program actions that will be taken to promote inclusive neighborhoods and equitable quality of life throughout the community (e.g., anti-displacement and place-based community revitalization strategies).

Local Data and Knowledge and Other Relevant Factors: The element includes some data outlining disparities in rehabilitation throughout the City and overpayment for both renters and homeowners across census tracts (p. 33). Because census tracts and City limits do not coincide, the data must be complemented by local data, knowledge, and other relevant factors to better understand local patterns of socio-economic characteristics. The element should complement federal, state, and regional data with local data and knowledge where appropriate to capture emerging trends and issues, including utilizing knowledge from City officials, past studies, assessments, local and regional advocates, and service providers. Also, the element must include other relevant factors that contribute to fair housing issues in the jurisdiction. Other relevant factors should include a variety of factors that help better

understand the local patterns such as land use, zoning, annexations, conditions, covenants and restrictions, housing development cycles, local, state, and federal investment or lack of investments, including transportation and military.

Contributing Factors to Fair Housing Conditions: Upon a complete analysis, the element should re-assess and re-prioritize contributing factors to fair housing conditions.

2. *Include an analysis of population and employment trends and documentation of projections and a quantification of the locality's existing and projected needs for all income levels, including extremely low-income households. (Gov. Code, § 65583, subd. (a)(1).)*

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

Extremely Low Income: The element includes some basic information regarding ELI households, such as the projected housing needs (p. 3-16). However, given the unique and disproportionate needs of ELI households, the element must include analysis to better formulate policies and programs. For example, the element should analyze existing household characteristics, trends and comparisons to other income groups, disproportionate needs, resources, and other household characteristics then examine the availability of resources to determine gaps in addressing housing needs. For additional information, see the *Building Blocks* at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/extremely-low-income-housing-needs>.

Special Housing Needs: The element includes some general quantification; however, the element should include analysis of households with special housing needs. The analysis should include, but is not limited to, factors such as trends, household income, tenure, housing types, zoning, and available resources. In addition, the element should address and analyze the total number of seasonal and permanent farmworkers (e.g., USDA county level data) and female headed households (quantify by poverty and analyze). For farmworkers, the analysis may utilize past farmworker housing studies and other studies generally applicable to their special housing needs. For example, the element could utilize a recent study conducted by University California at Merced that is available at https://clc.ucmerced.edu/sites/clc.ucmerced.edu/files/page/documents/fwhs_report_2.2.23_83.pdf. For additional information and a sample analysis, see the *Building Blocks* at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/large-families-and-female-headed-house>.

3. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

Progress toward the RHNA: The element may utilize pending, approved, permitted, and completed projects (pipeline) since June 30, 2023 (projection period baseline) toward the

RHNA. To utilize pipeline projects, the element should clarify pipeline projects occurred after June 30, 2023, and demonstrate affordability and availability or likelihood of development in the planning period. Affordability should be based on actual or anticipated rents; sales prices or other mechanisms (e.g., deed restrictions) ensuring affordability. Availability should account for the status, remaining steps and known barriers to development in the planning period. The element mentions the Mojave View Apartments (p. 4-3) but, if utilizing pipeline projects toward the RHNA, the element should provide analysis as described above.

Sites Inventory: The element lists sites by various factors (Table 4-6) such as size, general plan designation and zoning; however, the element should also clarify listed sites are vacant and lists sites by affordability level (e.g., lower-, moderate- and above moderate income).

Realistic Capacity: The element (p. 4-4) mentions an assumption of 80 percent of maximum allowable densities to calculate residential capacity on identified sites to account for infrastructure, access, and other constraints. However, the element should also support this assumption based on typical densities of existing or approved residential developments at a similar affordability level. For example, the element could clearly list other recent projects in the City or surrounding area by zone, allowable density, built density, level of affordability and presence of exceptions such as a density bonus.

Small and Large Sites: Sites smaller than half an acre or greater than ten acres are deemed inadequate to accommodate housing for lower-income households unless it is demonstrated, with sufficient evidence, that sites of equivalent size and affordability were successfully developed during the prior planning period or other evidence demonstrates the suitability of these sites. The element must provide analysis of past trends or present other evidence to demonstrate the suitability of these sites. For example, for large sites, the element could analyze large sites based on past TCAC approvals in the 50–150-unit range and potential for two phases of development, then supplement analysis with programs. For small sites, the element could identify sites toward the moderate- and above moderate income RHNA.

Infrastructure: While the element provides an overview of water and sewer infrastructure, it must clarify there is sufficient water and sewer capacity to accommodate the RHNA.

In addition, the element mentions the housing element will be delivered to water providers. The element should also be delivered to sewer providers. Further, water and sewer service providers must establish specific procedures to grant priority water and sewer service to developments with units affordable to lower-income households. (Gov. Code, § 65589.7.) The element should demonstrate compliance with this requirement or add and modify programs as appropriate. For additional information and sample cover memo, see the *Building Blocks* at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/priority-water-and-sewer>.

Environmental Constraints: While the element broadly states there are “no environmental constraints” (p. 4-4), it should support this conclusion with discussion and describe how these constraints relate to identified sites. In addition, the element should discuss whether there are any other known constraints or conditions that would preclude development on

identified sites in the planning period. Examples of other conditions include shape, public right of way access, easements, title conditions, Williamson Land Act contracts, contamination and compatibility with airports and military installations.

Sites Identified in Prior Planning Periods: Sites identified in prior planning periods shall not be deemed adequate to accommodate the housing needs for lower-income households unless a program, meeting statutory requirements, requires rezoning within three years. The element should clarify if sites were identified in prior planning periods and if so, which sites and include a program if utilizing previously identified sites in the current planning period to meet requirements pursuant to Government Code section 65583.2, subdivision (c). For more information on program requirements, please see HCD's Housing Element Sites Inventory Guidebook at https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sites_inventory_memo_final06102020.pdf.

Electronic Sites Inventory: For your information, pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD. Please see HCD's housing element webpage at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements> for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance.

Zoning for a Variety of Housing Types:

- *Housing for Agricultural Employees:* The element explains the City complies with the Employee Housing Act but should clarify inconsistent information in Table 5-5 (p. 5-7) that shows employee housing is subject to a conditional use permit (CUP). The element must demonstrate zoning is consistent with the Employee Housing Act (Health and Safety Code, § 17000 et seq.), specifically, sections 17021.5 and 17021.6. Section 17021.5 requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. Section 17021.6 requires employee housing consisting of no more than 12 units or 36 beds to be permitted in the same manner as other agricultural uses in the same zone. For example, the element should also discuss whether there are any zones allowing agriculture uses and if so, how Section 17021.6 is met. If needed, programs should be added to address these statutory requirements. For additional information and sample analysis, see the *Building Blocks* at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/farmworkers>.

- **Emergency Shelters:** While the City permits emergency shelters without discretionary review in the R-3 and R-4 district, it must also comply with recent changes to statute pursuant to Chapter 654, Statutes of 2022 (AB 2339). Specifically, the element should discuss whether the current definition of emergency shelters complies with statute, proximity of identified sites to transportation and services, development standards and any constraints and parking standards. For your information, parking standards should be limited to only the number of spaces necessary for staff and no more than other permitted uses in the zone. For more information, see HCD's AB 2339 memorandum at <https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/ab2339-notice.pdf>.
 - **Permanent Supportive Housing:** Supportive housing shall be a use by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses pursuant to Government Code section 65651. The element must demonstrate compliance with this requirement and include programs as appropriate.
4. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures... (Gov. Code, § 65583, subd. (a)(5).)*

Land Use Controls: The element must identify and analyze all relevant land use controls impacts as potential constraints on a variety of housing types. The analysis should analyze land use controls independently and cumulatively with other land use controls. The analysis should specifically address requirements related to parking, including guest parking requirements, and multifamily heights, including the number of stories allowed. The analysis should address any impacts on cost, supply, housing choice, affordability, timing, approval certainty and ability to achieve maximum densities and include programs to address identified constraints.

On/Off-Site Improvements: The element includes a generic description of on and off-site improvements but should also identify and analyze actual improvement requirements, such as minimum street widths (e.g., 40-foot minimum street width) and off-site improvements for a typical project. The analysis should address impacts on housing supply and costs. For additional information and a sample analysis, see the *Building Blocks* at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/codes-and-enforcement-and-onsite-offsite-improvement-standards>.

Local Processing and Permit Procedures: The element describes the Site Plan and Design Review process for most development including intent related to compatibility and findings of approval for impacts on surrounding property. However, the element should analyze

these standards for impacts on timing, cost, supply, and approval certainty and include programs to address identified constraints. For example, the analysis should specifically address approval findings and impacts on approval certainty.

In addition, 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.

Finally, the element should address public comments on this revised draft submittal and discuss compliance with the Permit Streamlining Act and intersections with CEQA and timing requirements, including streamlining determinations and add or modify programs as appropriate.

Constraints on Housing for Persons with Disabilities: While the element provides a general overview of housing for persons with disabilities, it generally does not meet the requirement. First, the element must describe the City's reasonable accommodation procedure, including application requirements, fees, decision-making body, approval findings, and applicable appeals process. Next, the City must describe the City's definition of family and evaluate for impacts on persons with disabilities, including the number of people and relationship. Finally, the element should identify which zones allow group homes for seven or more persons; what process is used to permit the use and analyze constraints on housing for persons with disabilities. For example, the element should amend Program 15 to remove the CUP requirement and ensure group homes of seven or more persons are permitted in all zones allowing residential uses and only subject to objective requirements similar to other residential uses of the same type in the same zone.

Zoning, Development Standards, and Fees Transparency: The element must clarify compliance with new transparency requirements for posting all zoning, development standards and fees on the City's website and add a program to address these requirements, if necessary.

5. *An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including... 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... (Gov. Code, § 65583, subd. (a)(6).)*

Approval Time and Requests Lesser Densities: The element must include analysis of recent requests (last eight years) to develop housing at densities less than those assumed in the sites inventory (80 percent of maximum allowable density), and the length of time between receiving approval for a housing development and submittal of an application for building permits. The element must address any hinderance on the development of housing and include programs as appropriate.

C. Housing Programs

1. *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. In addition, the element should be revised, as follows:

Shortfall of Sites: The element includes several sites in Table 4-6 "Land Inventory" (pg. 5-21) that appear to have inconsistent General Plan Land Use and Zoning designations. If necessary, to accommodate the housing needs of lower-income households, a program should be added specifically commit to rezoning and meet all by-right requirements pursuant to Government Code section 65583.2, subdivisions (h) and (i) such as permitting multifamily without discretionary action with 20 percent affordability, minimum densities, permitting 16 units per site and meeting residential performance standards.

Program 15 (Update Zoning and Subdivision Ordinances): The Program commits to permit housing for a variety of housing types, including low barrier navigation centers. However, the Program should clarify zoning will be amended to permit the use by-right (without discretionary action) in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses pursuant to Government Code section 65660.

2. *The Housing Element shall contain programs which assist in the development of adequate housing to meet the needs of extremely low-, very low-, low- and moderate-income households. (Gov. Code, § 65583, subd. (c)(2).)*

Program 3 (Community Development Block Grants (CDBG)/HOME): The Program should add a specific commitment to annually reach out to affordable housing developers to identify development opportunities, including assisting with site identification, funding, incentives, and entitlements.

Program 16 (Extremely Low-Income Households): The element includes Program 16 (Extremely Low-Income Households) to prioritize funding and/or offer concessions to

encourage the development of single-room occupancy units and other affordable units. The element should add a specific commitment to conduct proactive outreach to identify development and funding opportunities every other year.

Special Housing Needs: 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 for all special needs households (e.g., elderly, homeless, farmworkers, persons with disabilities, female-headed households). Pending a complete analysis of past actions, program actions could include proactive outreach and 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.

3. *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 Findings B4 and B5, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.

4. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics... (Gov. Code, § 65583, subd. (c)(5).)*

As noted in Finding B1, the element requires a complete AFFH analysis. Depending upon the results of that analysis, the City may need to revise or add programs. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have specific commitment, milestones, geographic targeting and metrics or numerical targets and, as appropriate, address housing mobility enhancement (housing choices and affordability across geographies), new housing choices and affordability in higher opportunity or income areas (throughout the City), place-based strategies for community preservation and revitalization, and displacement protection.

5. *The housing program shall preserve for low-income household the assisted housing developments identified pursuant to paragraph (9) of subdivision (a)... (Gov. Code, § 65583, subd. (c)(6).)*

Program 1 (Monitor Assisted Units): The Program should be modified to comply with noticing requirements within 3 years, 1 year, and 6 months of the affordability expiration

dates, in addition to assisting qualified entities such as non-profit organizations (beyond informing).

6. *Develop a plan that incentivizes and promotes the creation of accessory dwelling units that can be offered at affordable rent... (Gov. Code, § 65583, subd. (c)(7).)*

Programs must be expanded to establish incentives to promote the creation and affordability of ADUs. Examples include exploring and pursuing funding, modifying development standards, reducing fees beyond state law, increasing awareness, pre-approved plans, and homeowner/applicant assistance tools.

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).)

While the element includes quantified objectives for new construction and rehabilitation by income group for extremely low-, very low-, low-, moderate- and above-moderate income, it must also include quantified objectives for conservation by income group. Examples of programs that could be utilized include Programs 2 (Code Enforcement), 4 (Fair Housing Services), 6 (Kern County Housing Authority) and 13 (Energy Conservation).

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)(9).)

While the City invited stakeholders to workshops and sent surveys; moving forward, the City 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. For additional information, see the *Building Blocks* at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/public-participation>.

In addition, the element should summarize any public comments received regarding the draft housing element and future iterations of the housing element and describe how they were incorporated into the housing element.