

**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)



January 3, 2022

John Ramirez, Director  
Community Development Department  
City of Norwalk  
12700 Norwalk Boulevard, Room 12  
Norwalk, CA 90650

Dear John Ramirez:

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

Thank you for submitting the City of Norwalk's draft housing element received for review on November 5, 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 December 22, 2021 conversation with you and Beth Chow, Senior 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). The enclosed Appendix describes revisions needed to comply with State Housing Element Law.

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

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government fails to adopt a compliant housing element within 120 days of this statutory deadline, 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.

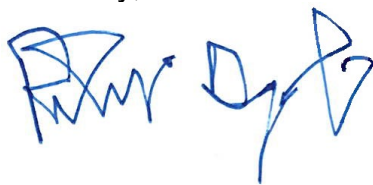
Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; 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](http://opr.ca.gov/docs/OPR_Appendix_C_final.pdf) and  
[http://opr.ca.gov/docs/Final\\_6.26.15.pdf](http://opr.ca.gov/docs/Final_6.26.15.pdf).

HCD appreciates the dedication of the housing element team during the update. 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 Dulce Ochoa, of our staff, at [dulce.ochoa@hcd.ca.gov](mailto:dulce.ochoa@hcd.ca.gov).

Sincerely,



Paul McDougall

Senior Program Manager

Enclosure

## APPENDIX CITY OF NORWALK

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).)*

The element must provide an evaluation of the effectiveness of past goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female headed households, farmworkers, and persons experiencing homelessness).

### **B. Housing Needs, Resources, and Constraints**

1. *Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2...shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)*

Outreach: The element must describe outreach activities specific to affirmatively furthering fair housing (AFFH), summary of comments and how comments were considered and incorporated into the analysis, contributing factors to fair housing issues and goals and actions.

Enforcement and Outreach Capacity: While the element uses the 2020 Analysis of Impediments to Fair Housing Choice to report information on fair housing enforcement and outreach capacity (p. 40), it must address compliance with existing fair housing laws and regulations. In addition, the element should include a summary of fair housing issues related to enforcement and outreach capacity and relationship to other fair housing issue areas (e.g., segregation and integration, racially and ethnically concentrated areas of poverty, etc.).

Integration and Segregation: While the element meets most requirements, it must include an analysis discussing levels of segregation and integration for familial status at the regional level.

Disparities in Access to Opportunity: While the element uses the TCAC/HCD Opportunity Maps to identify areas of higher and lower resources to evaluate access to opportunity (p. 51), it must also independently address disparities in access to opportunity variables including education, transportation, economic development, and environment. This analysis must be conducted at a regional and local level and should address substantial differences in access to education, transportation, economic, environment and other important opportunities based on socio-economic characteristics (e.g., race, income, familial status, disability, income, poverty).

Disproportionate Housing Needs including Displacement Risk: While the element provides some information on cost burden and overcrowding at a local level (neighborhood to neighborhood), it must analyze these conditions at a regional level (city to region). Specifically, for cost burden, the element must cover cost burden and severe cost burden. In addition, the element must also provide a local and regional analysis for substandard housing, homelessness, and displacement (i.e., disinvestment-driven, investment-driven, and disaster-driven). The element may utilize data from the Urban Displacement Project at <https://www.urbandisplacement.org/maps/los-angeles-gentrification-and-displacement/>.

Sites Inventory: While the element provides some information on the location of regional housing needs allocation RHNA sites relative to TCAC Opportunity Areas (p. 60), it must include data on the location of RHNA sites relative to all fair housing components. The analysis should address the number of units by income group and location, any isolation of the RHNA by income group, magnitude of the impact on existing concentrations of socio-economic characteristics and discuss how the sites improve fair housing conditions. The analysis should be supported by local data and knowledge and other relevant factors.

Local Data and Knowledge: The element should complement federal, state and regional data with local data and knowledge where appropriate to capture emerging trends and issues, including utilizing knowledge from local and regional advocates, public comments, and service providers.

Other Relevant Factors: The element must include relevant factors that contribute to fair housing issues in the jurisdiction. For instance, the element can analyze historical land use, zoning and investment practices, presence of redlining, restrictive covenants, neighborhood investment or disinvestment, federal investment such as transportation infrastructure, demographic trends or any other information that supplements the reported data and assists in a complete analysis.

Contributing Factors to Fair Housing Issues: Upon a full analysis of the AFFH section, the element should re-evaluate contributing factors to fair housing issues. In addition, the element lists several contributing factors, but it should also prioritize those contributing factors.

Goals and Actions: The element must be revised to add or modify goals and actions based on the outcomes of the analysis described above. Goals and actions must specifically respond to the analysis and prioritize contributing factors to fair housing issues. Actions must have metrics and milestones as appropriate and address housing mobility enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for community preservation and revitalization and displacement protection.

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).)*

Overpayment: The element must analyze the number of overpaying lower-income households by tenure (i.e., renter and owner).

Employment Trends: The element provides some information on employment trends, but it should include additional data and analysis to better formulate policies and programs. For example, the element could examine local jobs and wages relative to affordability, employment by industry, major employers and relationship to housing, proximity to jobs, predominant modes of transportation and opportunities for improvement. The element could utilize data available through Local Housing Data prepared by the Southern California Association of Governments at <https://scag.ca.gov/local-housing-data>.

Extremely Low-Income (ELI) Households: While the element quantifies the existing housing needs of extremely low-income (ELI) households, it must still quantify projected ELI housing needs. The projected housing need for ELI households can be calculated by using available census data to determine the number of very low-income households that qualify as ELI households or presume that 50 percent of very low-income households qualify as ELI households. In addition, the element should analyze the unique and disproportionate housing needs of ELI households, including evaluating tenure, overpayment and other household characteristics, resources and strategies available to address housing needs and the magnitude of the gap in addressing housing needs to better formulate appropriate policies and programs. For additional information, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/extremely-low-income-housing-needs.shtml>.

3. *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).)*

Housing Conditions: The element identifies the age of the housing stock and estimates rehabilitation needs based on the age of the housing stock. In addition, the 2019 American Community Survey (ACS) is used to estimate the number of units in need of replacement. However, the age of the housing stock and ACS data alone may underestimate the units in need of rehabilitation and replacement. The element should include

additional information to estimate the number of units in need of rehabilitation and replacement. For example, the analysis could include estimates from the code enforcement agency, or information from knowledgeable organizations and could address AFFH analysis requirements by describing varying conditions across neighborhoods.

4. *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).)*

Parcel Listing: In addition to the other factors listed for identified sites (e.g., zoning, general plan), the element must sufficiently describe existing uses of nonvacant sites to facilitate an analysis of the potential for redevelopment in the planning period.

Realistic Capacity: 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 that jurisdiction. While the element includes some discussion of recent projects and densities, it should specifically list all recent projects by zone, allowable density, built density, presence of exceptions, including those through State Density Bonus Law and affordability.

In addition, for sites with nonresidential zoning, the element should account for the likelihood of 100 percent nonresidential development in the calculation of residential capacity. This analysis should consider the likelihood of 100 percent nonresidential uses, performance standards for residential development and development trends supporting residential. For example, the element could analyze all development activity in these nonresidential zones, how often residential development occurs and adjust residential capacity calculations, policies, and programs accordingly.

Suitability of Nonvacant Sites: The element must include an analysis demonstrating the potential for redevelopment of nonvacant sites. The analysis shall consider factors including the extent to which existing uses may constitute an impediment to additional residential development, the City's experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites.

In addition, if the housing element relies upon nonvacant sites to accommodate more than 50 percent of the RHNA for lower-income households the housing element must demonstrate existing uses are not an impediment to additional residential development and will likely discontinue in the planning period (Gov. Code, § 65583.2, subd. (g)(2)). Absent findings (e.g., adoption resolution) based on substantial evidence, the existing

uses will be presumed to impede additional residential development and will not be utilized toward demonstrating adequate sites to accommodate the RHNA.

Finally, if element utilizes sites with existing residential uses. Absent a replacement housing policy, these sites are not adequate sites to accommodate lower-income households. The replacement housing policy has the same requirements as set forth in Government Code section 65915, subdivision (c) (3).

Small Sites: Sites smaller than a half-acre in size are deemed inadequate to accommodate housing for lower-income housing unless it is demonstrated that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower-income housing units as projected for the site or unless the housing element describes other evidence to HCD that the site is adequate to accommodate lower-income housing. (Gov. Code, § 65583.2, subd. (c)(2)(A).) The element includes several sites less than half an acre in size and if necessary, to accommodate the RHNA for lower-income households, it must include analysis as described above.

Environmental Constraints: While the element describes that identified sites do not have environmental constraints that preclude development in the planning period, it should also discuss any other known conditions that may preclude development on identified sites and if necessary, reconsider identified sites or include programs as appropriate. For example, regarding the high school site, the element should specifically discuss the availability of the site for development in the planning period.

Infrastructure: The element must clarify whether there is sufficient existing or planned dry utility and water capacity to accommodate the City's RHNA or include programs, if necessary.

For your information, 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.) Local governments are required to immediately deliver the housing element to water and sewer service providers. The element should demonstrate compliance with these requirements and include programs if necessary. For additional information and sample cover memo, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/other-requirements/priority-for-water-sewer.shtml>.

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/community-development/housing-element/index.shtml#element> for a copy of the form and instructions.

Accessory Dwelling Units (ADUs): ADUs may be counted toward the RHNA based on past permitted units and other factors. In the element, the City projects 296 ADUs to be constructed over the planning period, averaging 37 units per year. This projection was



based on figures provided based on the City permitting 148 ADUs between 2018 and 2021 (p. 73). However, HCD records indicate 1 ADU for 2018, 16 ADUs for 2019 and 26 ADUs for 2020. The element should reconcile these figures, adjust assumptions based on permitted units or add analysis based on other relevant factors and policies and programs as appropriate.

Zoning for a Variety of Housing Types (Emergency Shelters): The element indicates emergency shelters for up to 50 persons are permitted without discretionary action in the M-1 and M-2 zones (p. 33). Although the element includes approximately 300 acres of land are available, it must also demonstrate the zone(s) have sufficient capacity to accommodate the identified housing need for emergency shelters. (Gov. Code, § 65583, subd. (a)(4).) For example, the element should describe typical parcels sizes, whether the sites are nonvacant, and the potential for reuse opportunities. Additionally, the element must describe proximity to services and transportation, presence of any hazardous conditions unfit for human habitation and identify actual development standards and analyze those standards as potential constraints. For example, the element should describe how emergency shelter parking requirements comply with AB 139 or include a program to comply with this requirement.

5. *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 multifamily parking requirements, including garage requirements. The analysis should address any impacts on cost, supply, housing choice, affordability, timing, approval certainty and ability to achieve maximum densities. This analysis should also consider comments as a result of outreach (Appendix A) and revise programs to specifically respond to identified constraints.

Fees and Exaction: The element must list and analyze planning fees and required fees for typical single family and multifamily housing development, including impact fees, and analyze their impact as potential constraints on housing costs. For example, the analysis should identify the total amount of fees and their proportion to the development costs for both single family and multifamily housing. For additional information and a sample analysis and tables, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/constraints/fees-and-exactions.shtml>.

On/Off-Site Improvements: While the element provides some broad information about on and off-site improvements (p. 32), it should identify actual standards for typical



developments such as street widths, sidewalks and curbs and analyze their impact as potential constraints on housing cost, supply, and affordability.

Zoning, Development Standards and Fees: The element must clarify whether the community complies with new transparency requirements for posting all zoning, development standards and fees or include programs as appropriate.

6. *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).)*

Persons with Disabilities: The element identifies 25.9 percent of the population having a disability. However, the element should also identify and analyze the people with disabilities by type (e.g., ambulatory, hearing difficulty).

Large Households: The element should analyze the needs of large households, including tenure rates.

Female-Headed Households: The element could address the poverty levels of this special needs group to better evaluate the unique and disproportionate housing needs and better formulate policies and programs.

Persons Experiencing Homelessness: The element could describe the characteristics of persons experiencing homelessness (e.g., race, disability) to better formulate policies and programs. This information could be utilized to address AFFH requirements.

Farmworkers: The element indicates a minimal need for farmworkers according to the ACS 2014-2018 5-year estimate. However, farmworkers from the broader area and those employed seasonally may have housing needs, including within the City's boundaries. As a result, the element should at least acknowledge the housing needs of permanent and seasonal farmworkers at a county-level (e.g., using USDA county-level farmworker data) 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 B4, 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:

- *Program 1.1 (Site Availability)*: This Program includes components that are crucial to the City's housing strategy. Upon review of effectiveness, including affordability, the Program should commit to when alternative strategies will be completed (e.g., within one year). In addition, the City should consider establishing development standards to better promote mixed-use developments earlier in the planning period (e.g., within one year).
- *Program 1.3 (Land Use Policy Changes)*: This Program should consider timing earlier in the planning period for establishing development standards to better promote mixed use and higher density development. In addition, commitment to revise parking standards should be more specific to reduce and address identified constraints. For example, the action states "if necessary" review and update parking requirements. However, as part of outreach, the development community has emphasized this constraint. Commitment should be clear to revise parking requirements and be responsive to the analysis as noted in Finding B5.
- *Replacement Provisions*: As noted in Finding B4, if utilizing sites with existing residential uses, the element should include a policy replacing units on sites with existing residential uses pursuant to Government Code section 65583.2, subdivision (g).
- *Emergency Shelters*: As noted on page 34, the proximity requirements for emergency shelters are inconstant with state law and the element should include specific and clear commitment to address the identified constraint.
- *Group Homes*: The element explains that zoning does not explicitly permit these uses, including group homes for six or fewer persons and seven or more persons. The element also commits to add a definition of group homes to comply with fair housing laws (Program 5.2 – Affirmatively Furthering Fair Housing). However, Program 5.2 should specifically commit to allow these uses in all residential zones and only subject to permit procedures that promote objectivity and approval certainty.

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).)*

While the element includes several actions to assist in the development of housing for lower-income households, include ELI and special needs households, these actions should be revised with specific commitment, including proactive measures and discrete timelines. For example, on Program 2.1 (Special Needs Housing), in addition to establishing incentives for special needs households, actions should reach out to developers on an annual basis to identify development opportunities and apply the established incentives. Other examples of programs that should be revised with specific

commitment, proactive measures and discrete timelines include Programs 2.2 (Affordable Housing Technical Assistance), 2.5 (Addressing Homelessness) and 2.7 (COVID Pandemic Emergency Rental Assistance).

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

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

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

5. *Develop a plan that incentivizes and promotes the creation of accessory dwelling units that can be offered at affordable rent, as defined in Section 50053 of the Health and Safety Code, for very low, low-, or moderate-income households. For purposes of this paragraph, “accessory dwelling units” has the same meaning as “accessory dwelling unit” as defined in paragraph (4) of subdivision (i) of Section 65852.2. (Gov. Code, § 65583, subd. (c)(7).)*

Program 1.4 Accessory Dwelling Units: The element is required to include a program that incentivizes or promotes ADU development for very low-, low-, and moderate-income households. Currently, the program commits to “consider creating a one-step assistance center...implement a program to assist in creating and using ADU prototypes...explore a program for City assistance in creating ADUs... and identify and implement additional incentives or other strategies ... (p. 91).” However, it should include specific commitment to complete an action that will have a beneficial impact. In addition, programs must be expanded to include incentives to promote the creation and affordability of ADUs. Examples include exploring and pursuing funding, modifying development standards, and reducing fees beyond state law, pre-approved plans and homeowner/applicant assistance tools. In addition, this Program should commit to discrete timing for each of these activities, including monitoring every other year for affordability and production and timing related to what action the City will take if ADU assumptions are not realized.

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

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

While the element describes some workshops, survey, and public meetings for the Housing Element update (p. 3), moving forward, the City should employ additional methods for public outreach efforts, 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. Although the element provides some information on the public comments received, the element should also describe how they were considered and incorporated into the element. For additional information, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/getting-started/public-participation.shtml>.

#### **E. Consistency with General Plan**

*The Housing Element shall describe the means by which consistency will be achieved with other general plan elements and community goals. (Gov. Code, § 65583, subd. (c)(7).)*

The element must describe how the housing element is internally consistent with the rest of the general, including any information to demonstrate what was conducted to achieve internal consistency as part of this update. The element must also include more specific discussion on how internal consistency will be maintained throughout the planning period. For additional information and a sample program, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/other-requirements/analysis-consistency-general-plan.shtml>.