

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

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October 11, 2021

Peter Gilli, Director  
Community Development Department  
City of Ventura  
501 Poli Street  
Ventura, CA 93001

Dear Peter Gilli:

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

Thank you for submitting the City of Ventura's (City) draft housing element received for review on August 12, 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 conversations with you and Matthew Raimi of Raimi and Associates as well as Veronica Tam and Alexis Bueno of Veronica Tam and Associates on October 2, 2021. In addition, HCD considered comments from Josh Albrektson, Sonja Flores of Homes for All, and a Ventura City Councilmember, pursuant to Government Code section 65585, subdivision (c).

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

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.

The City's statutory deadline to adopt a housing element is October 15, 2021. 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, 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).

For your information, some general plan element updates are triggered by housing element adoption. 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).

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, pursuant to Government Code section 65583.3, subdivision (b), the City must utilize standards, forms, and definitions adopted by HCD when preparing the sites inventory. 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. The City can reach out to HCD at [sitesinventory@hcd.ca.gov](mailto:sitesinventory@hcd.ca.gov) for technical assistance. Please note, upon adoption of the housing element, the City must submit an electronic version of the sites inventory with its adopted housing element to [sitesinventory@hcd.ca.gov](mailto:sitesinventory@hcd.ca.gov).

HCD appreciates the time and efforts that you, Veronica Tam, Alexis Bueno, and Matthew Raimi put into the housing element 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 Shawn Danino, of our staff, at [Shawn.Danino@hcd.ca.gov](mailto:Shawn.Danino@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 VENTURA

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

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

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

1. *Affirmatively furthering 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 Data and Knowledge and Other Relevant Factors: The element should incorporate local data and knowledge of the jurisdiction into the AFFH section. To assist in meeting this requirement, the element should provide local data not captured in regional, state, or federal data analysis and should incorporate feedback and expertise from the various organizations working on fair housing issues. In addition, the element must include other relevant factors that contribute to fair housing issues in the jurisdiction. For instance, the element should analyze historical land use and investment practices or other information and demographic trends. The element could also discuss its efforts to develop standards for Single Room Occupancy (SROs) and cohousing communities, as well as identify potential for permanent supportive housing where Project Homekey funds may be available.

Contributing Factors to Fair Housing Issues: The element identifies many contributing factors to fair housing issues. In addition, the element should prioritize these factors to better formulate and carry out meaningful actions to affirmatively further fair housing (AFFH).

Goals, Priorities, Metrics, and Milestones: The element does not include sufficient goals or action to overcome patterns of segregation and foster inclusive communities. Programs must be added as appropriate to sufficiently respond to contributing factors to fair housing issues. The element must be revised to add or modify goals and actions based on the outcomes of a complete analysis. Goals and actions must specifically respond to the analysis and 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 metrics and milestones as appropriate and must address housing mobility enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for community preservation and revitalization and displacement protection.

For further guidance, please visit HCD's Affirmatively Furthering Fair Housing in California webpage at <https://www.hcd.ca.gov/community-development/affh/index.shtml>.

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

Condition of the Housing Stock: The element identifies the age of the housing stock (p. 25). 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. For additional information, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/housing-stock-characteristics.shtml>.

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

Pending Projects: The element indicates more than 2,000 units in pending projects. However, it must also demonstrate the availability of the units in the planning period, including but not limited to remaining approvals necessary for project completion and expected timelines for completion of the entitlement process.

Realistic Capacity: The element currently assumes that all vacant sites for lower-income households will accommodate 38 to 51 dwelling units per acre (p. B13). However, the element must include an analysis to support the number of units estimated on each site in the inventory. The analysis must describe factors used to develop the capacity estimates such as how the City considered land use controls and development trends including typical density of existing or approved developments at similar affordability levels.

In addition, the element assumes residential development on sites zoned for non-residential uses. To support this assumption, the element must demonstrate the likelihood of residential uses on non-residentially zoned sites and adjust capacity calculations as appropriate. The demonstration should be based on factors such as development trends including 100 percent non-residential, performance standards requiring residential uses or other relevant factors such as enhanced policies and programs.

Suitability of Nonvacant Sites: The element must analyze the extent to which existing uses may impede additional residential development and include 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 (Gov. Code, §

65583.2, subd. (g)(1).) For example, the Pacific View mall has existing uses, including a recently completed Target store and ongoing parking demand. The element should analyze these uses for impediments to additional residential development in the planning period.

In addition, specific analysis and actions are necessary if the housing element relies upon nonvacant sites to accommodate more than 50 percent of the RHNA for lower-income households. For your information, 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.

Replacement Housing Requirements: If the sites inventory identifies sites with existing residential uses, it must identify whether the current residential uses are affordable to lower-income households or describe whether the additional residential development on the site requires the demolition of the existing residential use. For nonvacant sites with existing, vacated, or demolished residential uses and occupied by, or subject to an affordability requirement for, lower-income households within the last five years there must be a replacement housing program for units affordable to lower-income households. (Gov. Code, § 65583.2, subd. (g)(3).) Absent a replacement housing program, these sites are not adequate sites to accommodate lower-income households. The replacement housing program must have the same requirements as set forth in Government Code section 65915, subdivision (c)(3). The housing element must be revised to include such analysis and a program, if necessary.

Small and Large Sites: Sites smaller than a half-acre and larger than ten acres in size are deemed inadequate to accommodate housing for lower-income households 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 suitable to accommodate housing for lower-income households.

*Small Sites:* As the element relies on consolidated small sites to accommodate the RHNA for lower-income households, it should also provide analysis demonstrating the potential for consolidation. For example, the analysis could describe the City's role or track record in facilitating small-lot consolidation and how that experience relates to the sites identified in the inventory to meet the lower-income needs, policies or incentives offered or proposed to encourage and facilitate lot consolidation, conditions rendering parcels suitable and ready for lot consolidation, or information from the owners of each aggregated site. In addition, it should include a program to facilitate lot consolidation and development of housing on small sites relative to the sites identified in the inventory.

*Large Sites:* Some sites to accommodate the City's housing need for lower-income households are large parcels between 11 and 13.5 acres (p. B28). For example, the

element appears to identify sites for lower-income households as part of potentially larger mixed income developments. While this approach is generally acceptable, additional analysis is necessary to demonstrate the appropriateness of these sites. For example, the element could discuss how identified sites facilitate typical developments with units affordable to lower-income households that range in size from 50 to 150 units. Additionally, the analysis could describe opportunities for specific-plan development and further subdivision or other methods to facilitate the development of housing affordable to lower-income households on large sites. The element should add or modify programs as appropriate based on the outcomes of this analysis.

Availability of Infrastructure: The element describes infrastructure limitations (pp. 69 and 71) in the City. However, it must also demonstrate sufficient total water and sewer capacity to accommodate the regional housing need allocation. Additionally, the element it must also demonstrate sufficient existing or planned dry utilities supply capacity, including the availability and access to distribution facilities to accommodate the City's regional housing need for the planning period. (Gov. Code, § 65583.2, subd. (b).)

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 clarify consistency with these requirements and include programs as appropriate. 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>.

### Zoning for a Variety of Housing Types

*Emergency Shelters:* The element describes the zones in which emergency shelters are permitted without discretionary action. However, the element must also describe the total acreage in the M-1 zone, proximity to services and habitability for humans such as absence of hazardous conditions.

*Manufactured Housing:* The element must clarify how manufactured housing on permanent foundations are allowed and ensure consistency with Government Code section 65852.3.

*Single Room Occupancies (SROs):* The element indicates the City's efforts to facilitate SROs and describes past approved projects (pp. 54 and A33.) However, the element should outline the development standards and describe the zones in which SROs is permitted.

*Accessory Dwelling Units (ADUs):* The element indicates the City modifies its zoning code to ease barriers to the development of ADU's. However, after a cursory review of the City's ordinance, HCD discovered several areas which were not consistent with State ADU law. This includes, but is not limited to, zones where ADUs are allowed and permitting ADUs on multifamily properties, among others. Therefore, the City

must update the ADU ordinance to comply with state law. For more information, please consult HCD's ADU Guidebook, published in December 2020, which provides detailed information on new state requirements surrounding ADU development. Please also note that any applications for an ADU/JADU permit must be permitted in accordance with current state law, regardless of the City's adopted ordinance.

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. While the element does provide some information on residential development standards (p. 47), it should analyze requirements such as parking minimums and lot coverage requirements as possible constraints to infill development. In addition, the element should analyze height limits for residential development (pp. 44 and 45), specifically in Transect zones T4.1, T4.2, and T4.4, and in comparison, to the height limits in the commercial zones. Then, the element must 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.

Building Codes and Their Enforcement: While the element discusses the City's inclusionary housing ordinance (Page B9), it must also describe the City's building and zoning code enforcement processes and procedures, including any local amendments to the building code, and analyze their impact as potential constraints on housing supply and affordability.

Fees and Exactions: While the element describes the typical required fees for single family and multifamily housing development (pp. 60 and 61), the cumulative fees presented show a higher total of fees for each single-family unit versus each multifamily unit. These fees may deter multifamily housing development. Therefore, the City must analyze their impact as potential constraints on housing supply and affordability.

Onsite Improvements/Offsite Improvements: The element must identify subdivision level improvement requirements, such as curbing requirements, circulation improvements, minimum street widths (e.g., 40-foot minimum street width), and analyze their impact as potential constraints on housing supply and affordability.

Local Processing and Permit Procedures: The element describes several permit processing procedures with significant levels of discretion. For example, the City has discretion over minimum lot area and maximum building coverage requirements in giving Residential Planned Development permits (p. 49). The analysis must evaluate the processing and permit procedures' impacts as potential constraints on housing

supply and affordability. For example, the analysis should consider processing and approval procedures and time for typical single and multifamily developments, including type of permit, level of review, approval findings and any discretionary approval procedures.

Housing for Persons with Disabilities: The element briefly describes its reasonable accommodation procedures; however, it must also analyze the procedure for potential constraints such as approval findings and impacts on approval certainty and objectivity. In addition, the element must analyze its conditional use permit process and parking requirements (p. 55) for residential care facilities for seven or more persons as potential barriers to housing for persons with disabilities. The element must include programs, as appropriate, to address any identified constraints depending on the outcomes of this analysis.

5. *An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, the cost of construction, the requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Government Code section 65583.2, and the length of time between receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality's share of the regional housing need in accordance with Government Code section 65584. The analysis shall also demonstrate local efforts to remove nongovernmental constraints that create a gap between the locality's planning for the development of housing for all income levels and the construction of that housing. (Gov. Code, § 65583, subd. (a)(6).)*

Developed Densities and Permit Times: The element describes several approved projects (Table B-5), but it must still include information and analysis to meet this requirement. The element must provide analysis of requests to develop housing at densities below those anticipated and could include the density level of these approved projects. The analysis should also address the length of time between receiving approval for a housing development and submittal of an application for building permits. Each analysis must address any hinderances on the construction of a locality's share of the regional housing need and programs should be added or modified as appropriate.

## **B. Housing Programs**

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

*identification of the agencies and officials responsible for the implementation of the various actions. (Gov. Code, § 65583, subd. (c).)*

To address the program requirements of Government Code section 65583, subdivision (c)(1-6), and to facilitate implementation, programs should include: (1) a description of the City's specific role in implementation; (2) definitive implementation timelines; (3) objectives, quantified where appropriate; and (4) identification of responsible agencies and officials. Programs to be revised include the following:

Program 1 (Housing Conservation Program): Program 1 commits the City to creating a new amnesty program for unpermitted Accessory Dwelling Units (ADUs), among other activities. The program should be revised to include discrete timing on described activities including landlord training and neighborhood canvassing.

Program 8 (Workforce Housing): Program 8 commits the City to facilitating workforce housing. However, the program should be revised to include discrete timing.

Program 12 (Non-traditional Housing): Program 12 commits the City to facilitating non-traditional housing types, including but not limited to cohousing communities and Single Room Occupancies (SROs). However, the program should be revised to clearly describe how the City facilitates permitting of these units.

Program 20 (Employee Housing): Program 20 commits the City to revising its zoning code to accommodate for employee housing, pursuant to the Employee Housing Act. However, the current date specified will not be until after the General Plan update to be completed by the first half of 2023. Given this requirement has been in effect over a decade, the timing of the program should be moved to earlier in the planning period (e.g., mid-2022).

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 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 A3, 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 must be revised, as follows:

- *Program 14 (Shortfall of Sites)*: The element describes a shortfall of sites and indicates rezoning will occur to accommodate the RHNA. While the element includes Program 14 (Rezone Program to Accommodate the RHNA), it must specifically commit to rezoning pursuant to all the provisions outlined in Government Code section 65583.2, subdivisions (h) and (i).
  - *Program 17 (Lot Consolidation)*: While Program 17 commits the City to facilitating lot consolidations, it must commit to specific actions to facilitate the lot consolidation of the sites in the inventory. For example, the element could commit to fee deferrals, providing ministerial “over the counter” processing of lot line adjustments, granting density bonuses above state density bonus law (Gov. Code, § 65915.), identifying and targeting specific financial resources, and modifying development standards.
  - *Program 19 (Farmworker Housing)*: Program 19 commits the City to updating zoning regulations pursuant to the Employee Housing Act. However, the City also currently has a 40-acre minimum lot size to accommodate for a maximum of twelve beds of farmworker housing. The program should specifically commit to remove this requirement and to amend the zoning to ensure consistency with the Employee Housing Act.
  - *Program 22 (Use of City-Owned and Publicly Owned Land)*: Program 22 commits the City to considering the use of City owned or publicly owned land for housing development. However, the program should include a schedule for making the sites available, including determination of the zoning, entitlements and other actions to facilitate development. In addition, the City should also commit to following the Surplus Lands Act. For more information, please consult HCD’s Surplus Lands Act guidelines, published in April 2021, which provides detailed information on new state requirements at [https://www.hcd.ca.gov/community-development/docs/sla\\_guidelines\\_final.pdf](https://www.hcd.ca.gov/community-development/docs/sla_guidelines_final.pdf).
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).)*

Program 16 (Ten Year Strategy to End Homelessness) describes the City’s ten-year plan for addressing homelessness. However, the element should include specific actions to facilitate housing for the 386 unsheltered homeless residents identified in the City’s Point in Time count. Further, programs should be added or modified to assist in the development of housing for extremely low-income and all special needs households (e.g., elderly, homeless, farmworkers, persons with disabilities, female-headed households). Program actions could include identifying site candidates for Project Homekey, applying for funding by a specified date, 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.

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 Findings A4 and A5, the element requires a complete analysis of potential governmental and non-governmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints. In addition, the element must be revised, as follows:

- *Program 23 (Affordable Housing Overlay):* Program 23 describes the City’s plan to establish additional regulatory incentives and flexibility for affordable housing. However, the program should be revised to include discrete timing and dates by which this update will occur. The program should also commit to analyzing and addressing the fees on multifamily development as a possible constraint, as discussed in Finding A4.
5. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)*

As noted in Finding A1, the element must include a complete analysis of AFFH. Based on the outcomes of that analysis, the element must add or modify programs as appropriate.

6. *Develop a plan that incentivizes and promotes the creation of ADUs 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 11 (ADUs): Program 11 describes the City’s strategies and timelines related to ADUs and the adoption of an ADU ordinance that complies with state law. However, the Program should also commit to proactively facilitate ADU production, specifically for lower-income households. The City may, for example, conduct outreach and marketing that highlights the \$25,000 predevelopment grant from the California Housing Finance Authority (CalHFA) available to lower-income homeowners. For more information on this grant program, please see the information bulletin at <https://www.calhfa.ca.gov/homebuyer/programs/adu.htm>.

### **C. Public Participation**

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

While the element includes a summary of the public participation process (p. 2), it must also demonstrate diligent efforts were made to involve all economic segments of the community in the development of the housing element. The element includes a list of stakeholders that were invited to participate in the housing element update. However, the list did not demonstrate diligent effort to reach out to all economic segments of the community. While the City engaged many organizations, it should also include groups representing special needs populations and consider and respond to comments received by HCD. During the period between the date of this review letter and the adoption of the final housing element, the City should continue its diligent public participation efforts to include all economic segments of the community. The element should be updated to describe additional efforts to circulate the revised housing element among low- and moderate-income households and organizations that represent them and consider and respond to comments received by HCD. In addition, the element should also summarize additional public comments and 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>.