

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

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April 12, 2023

Vicki Parker, Community & Economic Development Director
Department of Community Development
City of Novato
922 Machin Avenue
City of Novato, CA 94945

Dear Vicki Parker:

RE: City of Novato 6th Cycle (2023-2031) Draft Housing Element

Thank you for submitting the City of Novato's (City) draft housing element received for review on February 10, 2022. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. HCD considered comments from David Kellogg, Greenbelt Alliance; Jenny Silva, Campaign for Fair Housing Elements; Karen Andresen, Sidharth Kapur, Riley Hurd and Amanda Locke, AMG and Associates, LLC; 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.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government fails to adopt a compliant housing element within 120 days of the statutory deadline (January 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) (1) 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 fails to 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 must continue facilitating and engaging 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 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 meets 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 commitment and cooperation of the housing element update team during the update and our review. We are committed to assist the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Irvin Saldana, of our staff, at Irvin.Saldana@hcd.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Melinda Coy', with a long horizontal stroke extending to the right.

Melinda Coy
Proactive Housing Accountability Chief

Enclosure

APPENDIX CITY OF NOVATO

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).)

Special Housing Needs: The element must provide an evaluation of the cumulative 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) and revise programs as appropriate. In addition to evaluating progress or effectiveness of programs to address special needs groups, the element can also discuss the results, success, or lack of, challenges and opportunities from outreach, coordination, application for funding, incentives or other activities and then discuss potential strategies set forth in the current element to meet the need.

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).)*

Patterns and Trends: While the element reports general information and data, it must analyze this data for trends over time, patterns across census tracts, and coincidence with other components of the assessment of fair housing (i.e., Integration and Segregation, Access to Opportunity). Moreover, the element must supplement existing data with local data and knowledge and other relevant factors were applicable. Lastly, the element provides an evaluation of fair housing data on a regional basis that is generally limited, comparing only a few fair housing topics within Marin County, and providing no analysis to the surrounding Bay area region. Once complete, the assessment of fair housing must include appropriate programmatic responses to

encourage housing mobility and promote new affordable housing opportunities throughout the City, regardless of the regional housing need allocation (RHNA).

Racially Concentrated Areas of Affluence (RCAA): The element identifies seven of twelve existing census tracts within City that qualify as RCAA; however, and as mentioned above, element provides limited analysis on the factors that contribute to this outcome. This analysis should utilize local data and knowledge and other relevant factors to achieve a comprehensive analysis. For example, the element could examine past land use practices, investments, quality of life relative to the rest of the City and region and then formulate appropriate programs to promote more inclusive communities and equitable quality of life. For example, the City should consider additional actions (not limited to the RHNA to promote housing mobility and improve new housing opportunities throughout the City.

Disparities in Access to Opportunity: The element provides datapoints and a general analysis on accesses opportunity including, education, economic, transportation and environmental outcomes; however, the element should analyze these data points for trends and patterns throughout the City, and any concentrations or coincidences with other components of the fair housing analysis. A complete analysis should revise and or provide additional policies and programs that meet the need of each of the components mentioned above.

Disproportionate Housing Needs including Displacement: The element provides some analysis on overcrowding, overpayment, substandard housing, homelessness, and displacement risk; however, the element must provide additional analysis on local and regional patterns for overcrowding, overpayment, and substandard housing including any identified trends and coincidence with other components of the fair housing assessment. In addition, the element briefly mentions persons experiencing homelessness, but should provide additional information on the need, including, impacts and patterns within the City. For instance, the element should examine disproportionate impacts on protected characteristics (e.g., race, disability) and patterns of need, including access to transportation and services. Lastly, the analysis of housing conditions should discuss any areas of potentially higher need of rehabilitation and replacement. The element may utilize local data and knowledge such as service providers and code enforcement officials to assist this analysis.

Identified Sites and Affirmatively Furthering Fair Housing (AFFH): The element must include data on the location of RHNA sites (including projects in the pipeline) by income group 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 and programs should be added or modified as appropriate to promote inclusive and equitable communities.

Local Data and Knowledge and Other Relevant Factors: As noted in the prior findings, the element must supplement the analysis and complement state and federal data with

local data and knowledge to capture emerging trends and issues, including utilizing knowledge from local and regional advocates, public comments, and service providers. Additionally, the element should analyze historical land use, zoning, governmental and nongovernmental spending including transportation investments, demographic trends, historical patterns of segregation, or other information that may have impeded housing choices and mobility.

Contributing Factors: The element identifies many contributing factors to fair housing issues but must prioritize these factors to better formulate policies and programs and carry out meaningful actions to AFFH.

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).)*

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).)

Housing Conditions: The element provides some information on age of the housing stock. However, it must 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 organizations.

Special-Needs Populations: Currently the element mentions 310 individuals experiencing homelessness were identified through a point in time count survey (PIT) in 2019 (p. F-42). However, the element also mentions a recent PIT uncovered a net increase of 8.4 percent of individuals experiencing homelessness county-wide. This increase should be applied to the City's 2019 count for a more accurate estimate on those experiencing homelessness.

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: As you know, the City's RHNA may be reduced by the number of new units built since June 30, 2022; however, the element must demonstrate the affordability of units in the planning period based on actual sales price, rent level, or other mechanisms ensuring affordability (e.g., deed restrictions). This analysis should specifically address listed pipeline projects on (Table B-3) (p. B-5) of the element. The element must also discuss availability or likelihood the units will be built in the planning period and should account for any barriers to development, phasing, anticipated build out horizons, market conditions and other relevant factors to demonstrate their availability in the planning period.

In addition, HCD received multiple public comments on the status of several sites listed on (Table B-3). Particularly, there are projects that have not yet submitted applications, projects that may be infeasible, and projects that may not attain approval. In addition to the required analysis above, the City will need to demonstrate that projects listed on this table are feasible and that their existing status is accurate. Given the element's reliance on pipeline projects, the element must include significant programs with actions and timelines that commit to facilitating development and monitoring approvals of the projects (e.g., coordination with applicants to approve remaining entitlements, supporting funding applications, expediting approvals, rezoning or identification of additional sites should the applications not be approved).

Lastly, If the above analyses necessitate identifying additional sites to accommodate the RHNA, including by income group, the identification of sites and analysis must meet all requirements pursuant to Government Code section 65583.2, including but not limited to parcel listing, map of identified sites, identified sites and AFFH, environmental and other constraints, infrastructure, size of sites, nonvacant sites, calculation of realistic residential capacity and appropriate zoning to accommodate housing for lower-income households. For more information, please see the Building Blocks at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks>.

Nonvacant Analysis: While the element generally analyzes 1682 Novato Blvd for the extent of which existing uses may impede additional residential development, the element must still include an analysis of development trends, market conditions, and regulatory or other incentives or standards that facilitate and encourage residential development on nonvacant sites (Gov. Code, § 65583.2, subd. (g)).

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. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance.

Zoning for a Variety of Housing Types:

- Emergency Shelters: The element currently identifies emergency shelters are permitted by-right in the City's Industrial Park as set forth in the City's Industrial Park Precise Development and Master Plan. However, the element must clarify if emergency shelters are allowed by-right and without discretionary action. In addition, the element will need to evaluate development standards for consistency with state law, for example, parking standards listed on (p. C-20) are not in compliance with AB 139. Lastly, the element must include an analysis outlining reuse and redevelopment opportunity, proximity to transportation and services, hazardous conditions, and the appropriateness for human habitability.

Chapter 654, Statutes of 2022 (AB 2339), adds additional specificity on how cities and counties plan for emergency shelters and ensure sufficient and suitable capacity including allowing emergency shelters in zones that allow for residential use. Future submittals of the housing element may need to address these statutory requirements. For additional information and timing requirements, please see HCD's memo at <https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/ab2339-notice.pdf>.

- ***By-Right Permanent Supportive Housing (AB 2162)***: 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 these requirements and include programs as appropriate (p. C-22).
 - ***Manufactured Housing***: Manufactured homes that are built on a permanent foundation must be allowed in the same manner and in the same zones as conventional or stick-built structures. Specifically, manufactured homes on a permanent structure should only be subject to the same development standards as a conventional single-family residential dwelling. The element must demonstrate compliance with this requirement or add or modify programs as appropriate (p. C-17, C-23).
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 the impact of all relevant land use controls as potential constraints on a variety of housing types in all zones that allow residential uses. The analysis should analyze land use controls independently and cumulatively with other land use controls. The analysis should address any impacts on cost, supply, housing choice, feasibility, timing, approval certainty and ability to achieve maximum densities and include programs to address identified constraints. The analysis must specifically describe and analyze, max lot coverage, allowable floor area ratio (FARs), setbacks, heights, and the ability to achieve maximum densities including open space requirements imposed on multifamily development (p. C-18). In addition, the element must evaluate how development standards are assigned to zones allowing densities sufficient to accommodate affordable housing (p. C-10). Lastly, the element must analyze parking requirements for studio, 1-bed units, and 2-bed units (Table C-5, p. C-14).

Fees and Exaction: Table (C-9) of the element provides the City's planning and development fee schedule. While most fees listed on this table seem reasonable the element must evaluate fees associated with the City's density bonus process and SB 35/AB 2162 streamlined review process (p. C-33) for impacts on housing the cost and supply. In addition, the fee related to SB 35 projects should be evaluated for

consistency with Government Code Section 65913.4, subdivision (h)(1), which prohibits a local government imposing any requirement, including, but not limited to, increased fees or inclusionary housing requirements, that applies to a project solely or partially on the basis that the project is eligible to receive ministerial or streamlined approval pursuant to SB 35.

Zoning and Fee Transparency: The element must clarify its compliance with new transparency requirements pursuant to Government Code sections 65940.1(a)(1)(A) and (GC 65940.1(a)(1)(B)).

Local Processing and Permit Procedures: While the element includes information on the City's permit process and processing time frames, these timeframes range from less than a month to over 13 months. While information on two recently approved and built projects in the City are provided on (p. C-30), a complete analysis must evaluate the processing and entitlement procedures for potential constraints on housing supply, cost, timing, financial feasibility, approval certainty and ability to achieve maximum densities. Specifically, the element must describe the procedures for a typical single-family and multifamily development. As most projects require discretionary approvals, the analysis must describe the decision-making framework for discretionary approvals related to all permits and entitlements listed on (Table C-7) of the element. The analysis must include the number of public hearings, the actual approval findings, and all other relevant information. Based on the outcomes of a complete analysis, the element must add or modify programs as appropriate.

In addition, the element should discuss the City's planned development process (PUD). As the PUD process is described as a constraint on the achievement of maximum densities, the element must describe and analyze approval procedures, decision-making criteria on housing supply and affordability, particularly for residential development affordable to lower-income households and provide policies and programs to mitigate and/or remove constraints resulting from the lack of transparency and predictability.

Finally, the element should discuss compliance with the Permit Streamlining Act and intersections with CEQA and timing requirements, including streamlining determinations and add or modify programs as appropriate.

On/Off-Site Improvements: While the element mentions some required site improvements (C-37), the element must analyze their impact as potential constraints on housing supply and affordability.

Codes and their Enforcement: While the element describes the City's current building code (p. C-28), The element must describe any local amendments to the building code, and analyze their impact as potential constraints on housing supply and affordability.

Inclusionary Ordinance: While the element describes the framework of inclusionary requirements and available alternatives, it must also analyze their impact as potential constraints on the development of housing for all income levels, specifically housing supply and affordability. For example, the element must analyze the existing required

percentage of affordable housing required for each unit count listed on (p. C-27) of the element. The element should also evaluate the impacts of the discretionary approval process for requesting alternatives on development timing, predictability, and certainty.

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).)*

Developed Densities and Permit Times: The element must be revised to include analysis of requests to develop housing at densities below those anticipated, and the length of time between receiving approval for a housing development and submittal of an application for building permits that potentially hinder the construction of a locality's share of the regional housing need.

6. *Analyze existing assisted housing developments that are eligible to change to non-low-income housing uses during the next 10 years due to termination of subsidy contracts, mortgage prepayment, or expiration of use restrictions. (Gov. Code, § 65583, subd. (a)(9) through 65583(a)(9)(D).)*

The element provides some information of units at-risk on p. A-66 of the housing element; however, the analysis must be revised to include the following:

- Listing of each development by project name and address.
- Type of governmental assistance received and the earliest date of change from low-income use.
- Total number of units for senior vs. non-senior residents.
- Estimated total cost for producing, replacing, and preserving the at-risk units.
- Identification of public and private nonprofit corporations known to the City to have the legal and managerial capacity to acquire and manage at-risk units.
- Identification and consideration of use of federal, state, and local financing and subsidy programs.

C. Housing Programs

1. *Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the Housing Element... (Gov. Code, § 65583, subd. (c).)*

To have a beneficial impact in the planning period and achieve the goals and objectives of the housing element, programs must have discrete timing (e.g., at least annually or by 2025) and specific commitment to housing outcomes and refrain from language such as “consider” while also having discrete timing (e.g., at least annually or by January 2024).

Examples of programs to be revised with discrete timing include Program 2.D (Seek Outside Funding for Affordable Housing That Leverages Local Resources), Program 3.C (Adopt Marin County Objective Design Standards for Multi-family Housing), Program 3.H (Parking Reduction Incentive Program to Facilitate Transit Oriented Developments), 5.E (Support Volunteer Efforts), 5.F (Preserver Mobile Home Parks)

Examples of programs to be revised with specific commitments Program 1.A (Rezone for RHNA Shortfall), Program 3.B (Revised Hillside and Ridgeline Protection Regulations), Program 3.C (Adopt Marin County Objective Design Standards for Multi-family Housing), Program 3.F (Evaluate and Adjust Impact Fees), Program 3.H (Parking Reduction Incentive Program to Facilitate Transit Oriented Developments), Program 5.F (Preserve Mobile Home Parks), Program 5.K (Assist In The Rehabilitation and Production of Housing for Lower-Income Households) Program 6.D (Implement General Plan Policies Related To The Northwest Quadrant Neighborhood),

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

As noted in Finding B3, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. Please be aware that any program needed to accommodate a shortfall of sites for the lower-income RHNA must meet the requirements of Government Code section 65583.2, subdivision (h) and (i).

- 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).)*

Several actions commit to “partner” and “encourage” housing or other programmatic action. While these efforts are important and meaningful, these efforts should be complimented by additional steps that lead to housing outcomes. In addition, programs

should commit to a numerical target and evaluate and adjust efforts as necessary every other year.

In addition, the element must include a program to assist in the development of adequate housing to meet the needs of lower and moderate-income households, including extremely low income (ELI) and Special Needs households. These actions should be significant and specific, for example, actions can include proactive an annual outreach to developers of affordable housing, assisting with funding, supporting funding applications, land acquisition, priority processing, fee waivers, concessions and incentives beyond State Density Bonus Law, assistance with infrastructure and site improvements and monitoring and adjustment at least annually. Programs should also address overcrowding, overpayment and the City's student and female-headed household population.

4. *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)*

As noted in Finding 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. In addition, the element should be revised as follows:

- Program 3.G (Multi-Family Residential Parking Standards): This program should provide additional parking amendments in accordance to current parking standards on (Table C-5, p. C-14).

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... (Gov. Code, § 65583, subd. (c)(5).)*

As noted in Finding B1, the element must include a complete analysis of AFFH. The element must be revised to add goals and actions based on the outcomes of a complete analysis.

Goals, Priorities, Metrics, and Milestones: Goals and actions must significantly seek to overcome contributing factors to fair housing issues and must include quantifiable metrics and milestones for evaluating progress on programs, actions, and fair housing results. Programs must generally address enhancing housing mobility, increasing housing opportunities in high resourced areas, place-based strategies for community revitalization, and addressing displacement risks. Programs also need to be based on identified contributing factors, be significant and meaningful. The element must add,

and revise programs based on a complete analysis and listing and prioritization of contributing factors to fair housing issues.

6. *The housing program shall preserve for low-income household the assisted housing developments identified pursuant to paragraph (9) of subdivision (a). The program for preservation of the assisted housing developments shall utilize, to the extent necessary, all available federal, state, and local financing and subsidy programs identified in paragraph (9) of subdivision (a), except where a community has other urgent needs for which alternative funding sources are not available. The program may include strategies that involve local regulation and technical assistance. (Gov. Code, § 65583, subd. (c)(6).)*

As noted in Finding B6, the element must list and analyze any affordable units that are at risk of conversion to market rate during the planning period. If at-risk units are identified, the element should include a program to preserve affordability that includes a clear commitment to financial assistance or support of funding applications, coordination with qualified entities and support, education, and assistance for tenants of those units considered at-risk and include all noticing requirements in accordance to (Government Code Section 65863.10 (a)).

D. Quantified Objectives

Establish the number of housing units, by income level, that can be constructed, rehabilitated, and conserved over a five-year time frame. (Gov. Code, § 65583, subd. (b)(1 & 2).)

The element must include quantified objectives for new construction, rehabilitation, and conservation by income group. In addition, conservation objectives should not be limited to at-risk preservation and can include broader efforts to conserve the existing housing stock such as code enforcement programs, rental assistance or housing choice vouchers, weatherization, tenant protections, and mobile home park preservation ordinances.