

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

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November 19, 2021

Alexa Smittle, Director
Department of Community Development
City of Seal Beach
211 Eighth Street
Seal Beach, CA 90740

Dear Alexa Smittle:

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

Thank you for submitting the City of Seal Beach's (City) draft housing element received for review on September 21, 2021. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. Our review was facilitated by a conversation on November 17, 2021 with you and Marco Cuevas, Assistant Planner. In addition, HCD considered comments from People for Housing Orange County; the Kennedy Commission' and Schelly Sustarsic of the Seal Beach City Council; District 4, 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.

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 the statutory deadline (October 15, 2021), then any rezoning to accommodate the regional housing needs allocation (RHNA), including for lower-income households, shall be completed no later than one year from the statutory deadline. Otherwise, the local government's housing element will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i).

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City should continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City 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: http://opr.ca.gov/docs/OPR_Appendix_C_final.pdf and http://opr.ca.gov/docs/Final_6.26.15.pdf.

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 Mashal Ayobi, of our staff, at Mashal.Ayobi@hcd.ca.gov.

Sincerely,



Paul McDougall
Senior Program Manager

Enclosure

APPENDIX CITY OF SEAL BEACH

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 review requirement is one of the most important features of the element update. The review of past programs should analyze the City's accomplishments over the previous planning period. This information provides the basis for developing a more effective housing program.

The element must evaluate the appropriateness of the goals, objectives, policies, and programs. While the element states if a program is to be continued in the 6th cycle housing element, it should also indicate if modifications are necessary to achieve better results in the new housing element cycle. The element must provide a narrative describing what has been learned based on the analysis or effectiveness of the previous element.

In addition, as part of the evaluation of programs in the past cycle, the element must provide an explanation of the effectiveness of goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female-headed households, farmworkers and persons experiencing homelessness). For more information, See HCD's Building Blocks at <https://www.hcd.ca.gov/community-development/building-blocks/getting-started/review-revise.shtml>.

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).)*

The element has some basic information and maps on racial demographics, poverty status, and TCAC opportunity areas. However, the element generally does not address this requirement. The element, among other things, must include outreach relevant to affirmatively furthering fair housing (AFFH), a full assessment of fair housing, identification, and prioritization of contributing factors to fair housing issues and goals

and actions sufficient to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity, as detailed below.

For more information, please visit <https://www.hcd.ca.gov/community-development/affh/index.shtml>.

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).)*

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.

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. 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 builders/developers/property managers, including non-profit housing developers or organizations.

Overpayment by Tenure: While the element identifies the total number of overpaying households, it must quantify and analyze the number of overpaying households by tenure (i.e., renter and owner), including lower-income households. In addition, the element must identify and analyze median housing prices for rental units in addition to for-sale units.

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).)*

The City has a regional housing need allocation (RHNA) of 3,236 housing units, of which 1,293 are for lower-income households. To address this need, the element relies on underutilized sites. To demonstrate the adequacy of these sites and strategies to accommodate the City's RHNA, the element must include complete analyses:

Parcel Listing: The element must list sites, including candidate sites for rezoning, by parcel number or unique reference and describe existing uses for any nonvacant sites with sufficient detail to facilitate an analysis of the potential for additional development. In addition, Table B-3, which shows candidate sites to rezone, must be revised to identify proposed general plan designation, zoning district and affordability levels.

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.

Realistic Capacity: The element must include an estimate of the number of units that can be accommodated on each site in the inventory. The estimate may rely on established minimum density standards or include analysis demonstrating how the number of units for each site was determined. (Gov. Code, § 65583.2, subd. (c).) 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, and on the current or planned availability and accessibility of sufficient water, sewer, and dry utilities. The element should describe the methodology used for calculating realistic capacity and should support for those assumptions.

For sites zoned for nonresidential uses (e.g., commercial, and mixed-use zones), the element must describe how the estimated number of residential units for each site was determined. The estimate must also account for land-use controls such as allowing 100 percent nonresidential uses. To demonstrate the likelihood for residential development in nonresidential zones, the element could describe any performance standards mandating a specified portion of residential and any factors increasing the potential for residential development such as incentives for residential use, and residential development trends in the same nonresidential zoning districts.

Suitability of Nonvacant Sites: The element must include an adequate methodology to demonstrate the potential for additional development on nonvacant sites. For example, the element identifies the Leisure World Community, an established senior community, and several commercial sites, but it must also analyze whether the existing uses on these sites would impede residential development within the planning period. Specifically, the methodology shall consider factors including the extent to which existing uses may constitute an impediment to additional residential development, the City's past 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 nonvacant sites.

In addition, 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 they 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 has 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.

Availability of Infrastructure: The element must demonstrate sufficient existing or planned water, sewer, and other dry utilities supply capacity to accommodate the RHNA in the planning period. (Gov. Code, § 65583.2, subd. (b).) The element should also demonstrate access (existing or planned) to infrastructure and utility for identified sites.

Zoning for a Variety of Housing Types:

- *Emergency Shelters:* While housing element law does allow a jurisdiction to limit the number of beds or persons permitted to be served nightly by a facility, standards must be designed to encourage and facilitate the development of, or conversion to, an emergency shelter. The element must analyze the 25-bed limit as a potential constraint for the development of emergency shelters and must amend its emergency shelter parking requirements to comply with AB 139/Government Code section 65583, subdivision (a)(4)(A)).
 - *Accessory Dwelling Units (ADU):* After a cursory review of the City's ordinance, HCD discovered several areas which are not consistent with State ADU Law. This includes, but is not limited to, height restrictions, requirement of setbacks for junior accessory dwelling units (JADUs), restricting bedroom count, open space requirements, among others. HCD will provide a complete listing of ADU noncompliance issues under a separate cover. As a result, the element should add a program to update the City's ADU ordinance to comply with state law. For more information, please consult HCD's ADU Guidebook, <https://www.hcd.ca.gov/policy-research/accessorydwellingunits.shtml>.
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 two-story height limits in the RHD-20 zone, flood zone heights, minimum unit sizes for studio and one-bedroom multifamily units and development standards for residential in commercial zones. The analysis should address any impacts on cost, supply, housing choice, affordability, timing, approval certainty and ability to achieve maximum densities and include programs to address identified constraints. Possible examples include, but are not limited to, whether 100 percent residential developments are allowed in mixed-use areas, 950 square foot minimum unit size requirements for one-bedroom units in the RHD-20 zone, parking standards for studio and one bedroom units and maximum lot coverage of less than 50 percent for multifamily housing. The element should include programs to address or remove the identified constraints.

Local Processing and Permit Procedures: While the element provides some general permit processing information, it must describe and analyze the City permit processing and approval procedures by zone and housing type (e.g., multifamily, mobile homes, housing for agricultural employees, supportive housing). Specifically, the element must clarify what types of development fall under the definition of “conventional residential uses” on page IV-22 and if there are any size or other limitations related to multifamily projects that can or cannot be approved at the directorate level. 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 family and multifamily developments, including type of permit, level of review, approval findings, any discretionary approval procedures and number of hearings.

Streamlined Ministerial Approval Permit Procedures: The element should describe the City’s SB 35 (Chapter 366, Statutes of 2017) streamlined ministerial approval procedure and include programs if appropriate.

Building Codes and Their Enforcement: The element must describe the City’s building and zoning code enforcement processes and procedures, any local amendments to the building code and analyze their impact as potential constraints on housing supply and affordability

Zoning, Development Standards, and Fees: The element must clarify its compliance with new transparency requirements for posting all zoning, development standards, and fees on the City’s website and include programs if appropriate.

Constraints on Housing for Persons with Disabilities: The element must include a description and analysis of potential constraints on housing for persons with disabilities, as follows:

- *Definition of Family:* The element defines a family as “or more persons living together as a single nonprofit housekeeping unit and sharing common living, sleeping, cooking, and eating facilities. Members of a “family” need not be related by blood but are distinguished from a group occupying a hotel, club, fraternity, or sorority house. (p. IV-14).” The element should analyze any requirement subjecting housing for persons with disabilities to families being related by blood as a constraint on housing for persons with disabilities and add or modify programs as appropriate.
- *Residential Care Facilities for Seven or More Persons:* The element is unclear on how and where residential care facilities for seven or more persons are permitted. The element should analyze requirements for these types of housing, and if they do require a Conditional Use Permit (CUP) or are excluded from residential zones, specifically analyze these constraints for impacts on housing choices, approval certainty and objectivity for housing for persons with disabilities and include programs as appropriate.
- *Residential Care Facilities with Six or Fewer Persons:* Table IV-3 distinguishes between two types of housing where “Group Homes” are only allowed with a minor use permit in the RHD zone and “Residential Care Facilities- Limited” are allowed in all residential zones. The City should clarify the differences between the definitions for “Group Homes” and “Residential Care Facilities” identified in the municipal code, analyze any constraints on housing for persons with disabilities and add or modify programs as appropriate.

6. *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... (Gov. Code, § 65583, subd. (a)(6).)*

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

7. *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).)*

While the element quantifies the number of the elderly, persons with disabilities, large families, farmworkers, families with female heads of households, and families and persons in need of emergency shelter, it should complete the analysis and discuss available resources and the magnitude of need to better inform appropriate policies and programs. Local officials, special needs service providers or County social and

health service providers may be able to assist with information to complete the analysis.

C. Housing Programs

1. *Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the housing element through the administration of land use and development controls, the provision of regulatory concessions and incentives, and the utilization of appropriate federal and state financing and subsidy programs when available. The program shall include an identification of the agencies and officials responsible for the implementation of the various actions. (Gov. Code, § 65583, subd. (c).)*

To address the program requirements of Government Code section 65583, subdivision (c)(1-6), and to facilitate implementation, programs must demonstrate that they will have a beneficial impact within the planning period. Beneficial impact means specific commitment to deliverables, measurable metrics or objectives, definitive deadlines, dates, or benchmarks for implementation. Deliverables should occur early in the planning period to ensure actual housing outcomes. The element must provide discrete timing for all programs (e.g., month and year) to account for how often the action will occur as well as to ensure a beneficial impact throughout the planning period and quantify objectives where feasible. Additionally, all programs should be evaluated to ensure meaningful and specific actions and objectives. Programs containing unclear language (e.g., “Evaluate”; “Consider”; “Encourage”; etc.) should be amended to include specific and measurable actions. Examples of programs to be revised include but are not limited to:

- *Program 1E (Innovative Land Use and Construction Techniques):* The Program should describe how the City will encourage the use of innovative techniques and how the City will provide flexibility.
- *Program 2B (Affordable Housing Resources):* This program lists specific actions the City will take but must also include definitive timeframes. The Program could describe if the City is part of the Orange County Trust Fund. In addition, the Program should describe how a developer would access the affordable housing incentives, what incentives are offered and incentives beyond State Density Bonus Law (Gov. Code § 65915).
- *Program 2C (Land Write Downs and Assistance with Off-Site Improvements):* The Program should detail how and with what resources the City will subsidize the cost of land and off-site improvements.
- *Program 3D (Local Coastal Program):* The Program requires a definitive timeframe (e.g., month or quarter).
- *Program 4C (Housing Conditions Monitoring):* Specific timing is needed for actions.
- *Program 6B (Smart Growth):* The actions of this program should be specific and have a discrete timeframe.

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 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 describes a shortfall of sites and indicates rezoning will occur to accommodate the RHNA. While the element includes Program 1 (Adequate Sites), it must specifically commit to acreage, allowable densities, and anticipated units. In addition, if necessary, to accommodate the housing needs of lower-income households, the program should specifically commit to rezoning pursuant to Government Code section 65583.2, subdivisions (h) and (i). Specifically, the Program must commit to:

- permit owner-occupied and rental multifamily uses by-right for developments in which 20 percent or more of the units are affordable to lower-income households. By-right means local government review must not require a CUP, planned unit development permit, or other discretionary review or approval;
- accommodate a minimum of 16 units per site;
- require a minimum density of 20 units per acre; and
- at least 50 percent of the lower-income need must be accommodated on sites designated for residential use only or on sites zoned for mixed uses that accommodate all the very low and low-income housing need, if those sites:
 - allow 100 percent residential use, and
 - require residential use occupy 50 percent of the total floor area of a mixed-use project.

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).)*

ELI and Special Needs Households and Individuals: While the element includes Program 2B (Affordable Housing Resources), the element must include program(s) to assist in the development of housing affordable to ELI households. Programs must be revised or added to the element to assist in the development of housing for ELI

households. In addition, the element should include specific actions to address the housing needs of special needs households. Program actions could include prioritizing some funding for housing developments affordable to ELI households or households with special needs and offering financial incentives or regulatory concessions to encourage the development of housing types, such as multifamily, single-room occupancy (SRO) units, to address the identified housing needs for ELI households.

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 B5 and B6, 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.

5. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)*

As noted in Finding B1, 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 and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have specific commitment, 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. Currently the element only, and insufficiently, addresses affirmatively furthering fair housing in Program 5A. The element could revise other program actions to address the City's obligation to AFFH including how programs address housing mobility enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for community preservation and revitalization and displacement protection. In addition, Program 5A should also describe how all the City's housing programs comply with and further the requirements and goals of Government Code section 8899.50, subdivision (b).

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

The element is required to include a program that incentivizes or promotes ADU development for very low-, low-, and moderate-income households. While element include Program 1C (Accessory Dwelling Units), the program could 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, increasing awareness, pre-approved plans, and homeowner/applicant assistance tools. Other strategies could include developing information packets to market ADU construction, targeted advertising of ADU development opportunities or establishing an ADU specialist within the planning department.

D. Quantified Objectives

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

While the element includes quantified objectives for construction and conservation on page V-15, it must also include quantified objectives for rehabilitation by income group.

E. Public Participation

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

While the element includes a general summary of the public participation process (p. C1), it must also demonstrate diligent efforts to involve all economic segments of the community in the development of the housing element. The element should be revised to discuss outreach to lower-income and special needs groups during the public participation efforts, solicitation efforts for survey responses, and participation in community workshops, and if translation services were provided. In addition, the element should describe when the element was made available to the public and summarize the public comments and describe how they were considered and incorporated into the element. Particularly, HCD received many valuable comments during the review of the housing element (provided under a separate cover) and encourages the City to evaluate these comments and incorporate revisions where appropriate.