



" Jobs, Homes & Individual Rights "

rec'd 1/22/09
HE

January 21, 2009

Mr. Jeff Smith, Chairman
Planning Commission
County of Humboldt
825 Fifth Street, Room 111
Eureka, California 95501

Subject: Housing Element Update

Dear Chairman Smith and Members of the Commission:

We appreciate this opportunity to comment on the Housing Element Update.

We can understand how you and your fellow Commissioners would like to wrap up the discussions on the Housing Element update as soon as possible. However there are several areas where the County has not satisfied State of California mandates thus far.

In an attempt to keep our comments brief, we address the following issues:

- RHNA Distribution
- Public Participation
- HCD's Program Requirements
- Land Inventory
- Infrastructure
- State "Consistency" Mandates

I RHNA Distribution

In our January 6, 2009 letter to you, we referenced the State Government Code 65584.04 (a), Section 65588, 65584.04 (c), and 65584.05 (a) which require a minimum of 2 years of the public's participation in determining the RHNA (Regional Housing Needs Allocation) methodology and distribution. A couple of days ago, we received a January 14, 2009 Memorandum from HCAOG notifying us that the various groups (HAR, NCHB, Eureka Chamber, HELP, RREDC, Builders Exchange, and LAFCO) are being invited to the January 21, 2009 meeting, as "observers", not "participants".

We respectfully request that the County, as a member of the HCAOG Board, assure that the methodology and distribution established for the "RHNA / fair share housing" mandate, comply with State statutes.

II Public Participation

During your December 18, 2008 Planning Commission meeting we distributed copies of the State OPR (Office of Planning and Research) guidelines for Public Participation in General Plan updates, which includes Housing Elements. Reference page 142 at http://www.opr.ca.gov/planning/publications/General_Plan_Guidelines_2003.pdf

The State Housing and Community Development Department's website at http://www.hcd.ca.gov/hpd/housing_element2/index.php provides "Building Blocks for Effective Housing Elements" and includes instructions for Public Participation (see Attachment "A").

Unfortunately the public has not yet had an opportunity to participate in a meaningful way, in the development of the Housing Element. In Appendix A-1 of the draft Housing Element distributed to you and the public on December 29, 2008, there are a number of what is referred to as "Public Participation Events for the 2009 Housing Element Update". These meetings were not true workshops where an effective two-way dialog between members of the public and County planners took place.

Reference Attachment "B" for our notes regarding each of the meetings listed in Appendix A-1 of the draft Housing Element.

III HCD's Program Requirements

State Housing and Community Development Program requirements are described in Attachment "C", including:

- Program Overview and Quantified Objectives
- Adequate Sites
- Assist in the Development
- Conserve and Improve the Existing Housing Stock
- Preserve Units At-Risk of Conversion to Market Rate Uses
- Address and Remove or Mitigate Constraints
- Equal Housing Opportunities
- Analysis of Consistency with General Plan, Coastal Zone Requirements
- Priority for Water and Sewer
- Redevelopment Low/Mod-Income Housing Fund

IV Land Inventory

Hundreds of volunteer hours have been devoted over the past six (6) months, by a team of private citizens working with Planner Michael Richardson, to identify sites which meet the State criteria for inclusion in the Housing Element Land Inventory. We call ourselves the FOL (Find Our Lots) team. It has been a productive effort working with Michael Richardson and members of Housing-For-All, Realtors, NCHB, and HELP. A special "thank you" to Michael Richardson for the many evening hours he has worked with us to analyze several thousand sites.

We totally appreciate what a busy workload Michael has. He has not had the time to incorporate the FOL team's findings and conclusions in the draft Housing Element to date. It is our understanding he is currently working to accomplish that objective. Until such time that work product can be included in the Housing Element, it is somewhat premature to spend time reviewing the current draft document in detail.

Once again, we want to commend the County for its GIS system -- an extraordinarily powerful and useful tool, not only for the development of the land inventory, but to those in the private sector needing information about specific parcel zoning, constraints, etc.

V Infrastructure

The lack of infrastructure, especially sewer service, is of the utmost concern. In a City of Eureka letter to Humboldt Sunshine, Inc. dated October 9, 2008, Assistant City Manager of Operations Michael Knight states:

“The Facilities Plan will be completed in the summer of 2009. However, we have completed an initial analysis of the collection system and identified several locations that are at or near capacity based on modeling for a twenty-year recurrence storm, which is what the WWTP was designed for.”

Mr. Knight advises that we refer to Humboldt Community Services District for capacity in specific areas within their boundaries.

HCSO officials have provided extensive historical statistics regarding sewer hookups, however at this point in time, they are unable to provide a specific number of hookups projected over the coming five years. Current studies being conducted should enable HCSO to provide the needed projections within a few months.

VI State “Consistency” Mandates

The State OPR General Plan Guidelines at http://www.opr.ca.gov/planning/publications/General_Plan_Guidelines_2003.pdf address “Consistency” issues starting at page 12. It states:

Internal Consistency

“The concept of internal consistency holds that no policy conflicts can exist, either textual or diagrammatic, between the components of an otherwise complete and adequate general plan. Different policies must be balanced and reconciled within the plan. The internal consistency requirement has five dimensions, described below.

- Equal Status Among Elements*
- Consistency Between Elements*
- Consistency Within Elements*
- Area Plan Consistency*
- Text and Diagram Consistency”*

We have concerns about some inconsistencies we see in the current Housing Element draft issued December 29, 2008. One such example is found on Page 8-6 versus information presented on Appendix G-35. The number of projected dwelling units is inconsistent within these two sections of the Element.

Another example of apparent inconsistencies between elements relates to the statement on page 8-6 of the Housing Element draft making reference to: *“The gross residential development potential on resource lands in the County is approximately 16,000 units.”* This flies in the face of proposed policies found in other elements of the General Plan draft to limit residential development on certain rural lands, such as TPZ parcels / resource lands, as well as restricting residential development on sites outside Fire District boundaries.

These concerns are good examples of where a workshop allowing a free flow of comments and opinions between members of the public and the Planning staff, could result in better understanding and a Housing Element which meets State mandates.

Mr. Jeff Smith, Chairman 1-21-09, cont'd

Conclusion

It is our understanding that there has not been any legal review of the Housing Element draft thus far. It would be helpful if such an analysis could be accomplished without delay.

We appreciate your mentioning, at your January 8th Planning Commission meeting, that there will be public workshops scheduled before you finalize your deliberations and recommendations. We look forward to participating in those workshops.

HELP appreciates the opportunity to work in a public/private partnership-type relationship with other organizations and individuals to update not only the Housing Element, but the rest of the General Plan elements. It has been a privilege to work with Michael Richardson. We want to assist him and the other Planners in any way which could be productive.

Your leadership in assuring adequate public participation in this important process, is very much appreciated.

Sincerely,



Kay Backer, representing
Humboldt Economic & Land Plan

cc: Bruce Emad, Planning Commissioner
Mary Gearheart, Planning Commissioner
Richard Hansis, Planning Commissioner
Scott Kelly, Planning Commissioner
Mel Krebs, Planning Commissioner
Sef Murguia, Planning Commissioner
Supervisor/Chair Jimmy Smith, District 1
Supervisor Clif Clendenen, District 2
Supervisor Mark Lovelace, District 3
Supervisor Bonnie Neely, District 4
Supervisor Jill Duffy, District 5
Loretta A. Nickolaus, County Administrative Officer
Kirk A. Girard, Community Development Services Director
Michael Richardson, Senior Planner
Kathy Hayes, Clerk of the Board
Sharon Lodes, Planning Commission Clerk
Spencer Clifton, HCAOG Executive Director
Lynn Jacobs, HCD Director
Cathy Creswell, HCD Deputy Director

helpcountyjeffsmith18

ATTACHMENT "A"

Public Participation

The following are excerpts from the State of California HCD website at http://www.hcd.ca.gov/hpd/housing_element2/GS_publicparticipation.php :

Government Code 65583(c)(7) "The local government 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 program shall describe this effort."



Housing issues affect the entire community – residents, employers and the public and private sectors. The public participation requirement of housing element law presents an opportunity to engage constituents in a dialogue – defining problems and creating solutions. The inclusion of community stakeholders in the housing element public participation process helps ensure appropriate housing strategies are more efficiently and effectively evaluated, developed, and implemented. An inadequate public participation process may lead to community conflict or in worse case scenarios, anti-development initiatives, and NIMBYism. Successful public participation is important because a diverse cross section of the population can be engaged in defining the housing problem and in crafting community sensitive solutions. Another benefit of broad participation and true engagement of the public is that when it is time to adopt housing strategies and approve housing developments, a greater portion of the community has been involved and participated in the plan and more frequently will support its implementation. Meaningful participation creates stakeholders in the ultimate outcome of the process.

- The jurisdiction must make a diligent effort to include all economic segments of the community and/or their representatives in the development and update of the housing element.
- The element should clearly describe how public participation was encouraged (types of outreach, meetings, etc.) throughout the development and implementation of the housing element process.
- Describe who was invited to participate, which groups actually participated, general comments received and how comments were incorporated into the housing element.
- Describe any ongoing efforts to engage the public and stakeholders in the implementation of the housing element.

CITY OF RICHMOND

To announce workshops on the update of the City's general plan the City of Richmond mailed over 32,000 newsletters to households, placed ads and announcements in local newspapers, on the radio and the [project website](#). In addition, the General Plan Team provided a mobile planning department – known as the "Plan Van." The Plan Van made stops in the community on several Saturdays, at neighborhood events and made daily stops throughout the City to provide residents with information, encouraging them to share their ideas for the City and learn more about the General Plan Update.

- Photos of the Plan Van courtesy of the City of Richmond Planning Department

ATTACHMENT “A” – cont’d

Public Participation

http://www.hcd.ca.gov/hpd/housing_element2/GS_publicparticipation.php

Who Should Participate?

- Involve low- and moderate- income residents to discuss problems faced and resources needed.
- Seek housing needs and conditions information from a wide variety of housing consumers and service providers such as tenants in units at-risk of conversion, health and human service providers, homeless shelter and mental health service providers, places of worship, seniors, farmworkers, and non-and for-profit affordable housing developers.
- Invite other stakeholder groups into the housing element development and implementation processes. These might include local or regional business groups such as the Chamber of Commerce which are concerned about the availability of housing for employees and how housing availability affects regional economic growth. Other stakeholders could include grass roots community based organizations, neighborhood associations, homeowner/resident organizations and civic groups such as the League of Women Voters, Rotary Clubs, etc.
- By including development and finance professionals in the housing element process, the constraints to housing development (land availability, regulatory environment, and financing concerns, etc.) can be identified based on real world experience. Appropriate responses and strategies can then be collaboratively developed.
- Local governments should promote involvement of all appropriate local departments to ensure interdepartmental issues are addressed in a comprehensive and efficient manner. The public works department may be able to provide information about infrastructure issues, the codes department may have information about the condition of the housing stock, and effective strategies to housing problems may require more participation than the planning department.

Approaches to Public Participation

- Identify key individuals who can represent their constituent communities during all stages of the housing element process.
- Be proactive by reaching out to the community by visiting neighborhoods and participating in local events. Establish an ongoing housing element update and implementation committee using an appointed, ad-hoc, or volunteer citizen advisory committee to oversee the update and implementation of the housing element.
- Direct mail, radio spots (PSAs) and local print media such as a neighborhood newsletter can be used to communicate opportunities to engage in the housing element process.
- Always consider the ethnic composition of the target audience and use communication tools that are language-appropriate and culturally sensitive.
- Design and post a website to provide an easy-to-access interactive platform for the housing element process, especially during the update process. The website can include a survey which is easy to complete by participants, and their responses easy to convert into a form for analysis. The website can also include a housing element public participation blog. A “blog” is a web-log, an on-line written conversation allows for a user to record a larger amount of comments than a simple survey; this can reveal a greater sense of emotion towards housing needs and plans for development.

ATTACHMENT "A" – cont'd

Public Participation

http://www.hcd.ca.gov/hpd/housing_element2/GS_publicparticipation.php

COUNTY OF SACRAMENTO

In order to ensure the broadest range of input during its community outreach process the County used a combination of workshops, targeted focus groups, and internet outreach. The County's internet tool provided a status update for the housing element project, invited users to receive e-mail updates and comment on the draft, and provided information on the housing element process, location of meetings, and copies of draft documents.

- Once initial community input has been received, provide draft copies of the housing elements to all stakeholders.
- Use creative methods to communicate the importance of all stages of the housing element process.
- Use attractive direct-mail brochures and surveys to capture information.
- Consider mobile resources (e.g, the City of Richmond's "Plan Van") with interactive presentations during the input and implementation stages. This is a good way to be present in different neighborhoods and engage participation.
- Consider having barbeques or set up information displays at community events throughout the process to enhance interaction with the public. It is very important to "show up" at community functions both to make connections at the neighborhood level, but also to create opportunities to engage people in their own community.
- Conduct guided tours of both market-rate and affordable housing developments to show visual comparisons and generate housing project ideas.
- Conduct training and education workshops; workshop participation will identify key individuals who may be interested in taking a community leadership role in the housing element process, and can be used to gather community input.
- Create computer simulations of housing project proposals showing all types and locations of "virtual housing."
- Encourage ongoing participation by conducting annual public meetings to discuss housing needs and priorities, development successes and the need for additional resources. Continuing involvement emphasizes the importance of the public's role in effective implementation.

ATTACHMENT “A” – cont’d

Public Participation

http://www.hcd.ca.gov/hpd/housing_element2/GS_publicparticipation.php

Helpful Hints

During Outreach and Implementation



- Anticipate logistical concerns. Public participation can be impeded by language barriers, transportation, meeting times and child care. Minimize these barriers by anticipating concerns in advance of events scheduled to encourage participation. Plan to address as many concerns as possible. For example:
 1. plan some meetings in the evening and/or on weekends;
 2. provide childcare;
 3. plan the meetings in locations accessible by public transit or assist in transportation; and
 4. provide translation services.
- Seek input to the housing element early in the development, implementation and oversight stages.
- Follow-up is important. After holding a public forum or activity, establish a procedure to follow-up with concrete action to address the community's concerns. Be sure that all information relevant to the process is made available, either at regular meetings or by posting to a website. This will help to establish and maintain the jurisdiction's credibility.

ATTACHMENT "A" – cont'd

Public Participation

http://www.hcd.ca.gov/hpd/housing_element2/GS_publicparticipation.php

Facilitate Meaningful Participation

- Develop a public participation infrastructure that includes the following resources to promote sustainable community involvement in the housing element planning, review and implementation process:
 1. A contact person who is available to the public to answer questions, respond to concerns and provide information about resources.
 2. An interactive website where stakeholders could access information and voice ideas and concerns.
 3. Annual meetings where stakeholders can gather to celebrate successes in housing development, learn about local land-use and development issues, voice concerns and develop a vision for future housing development.
- Conduct effective meetings and establish rapport early. Build consensus among stakeholders, the public, professionals, and local decision-makers. Help the group move from decision-making based on personal experience alone, and toward making decisions that are in the interest of the



whole community. Effective meetings with the public will:

1. Maintain integrity by demonstrating willingness to follow-up on concerns and incorporating input.
2. Develop rules for engagement. Every participant should agree to the same set of rules and protocols.
3. Respect community values and concerns. Acknowledge the sincerity of expressed views.
4. Bring directly affected stakeholders into the process as soon as possible. This facilitates the creation of teamwork earlier in the process and communicates the process is inclusive.
5. Be willing to listen. Being patient and listening to all viewpoints, especially when the process breaks down, is valuable to restart the process and gain credibility with the participants.
6. Demonstrate willingness to consider and incorporate stakeholder input. The public participation process should not be used to "rubber stamp" a predetermined objective or policy.
7. Present all information and data in a format that is easily understood. Take time to ensure the public understands critical information. Encourage questions.

ATTACHMENT “B”
Public Participation Events
Housing Element draft – Appendix A-1

(HELP’s comments in **bold print**)

	Date	Comments
Board of Supervisors kick-off meeting	September 25, 2007	Public hearing to review Housing Element work plan and policy alternatives. Noticed to the public and invitations sent to the public, stakeholders, cities and special districts. NOTE: Staff report identifies “Review & negotiate Regional Housing Needs” to be concluded by Dec 2007. HCAOG noted in their Dec 2008 Annual meeting that they would be starting again, establishing the RHNA quotas. State laws adopted in 2004, calls for a 2-year public participation process.
Stakeholder Scoping Meeting (1)	January 15, 2008	Public meetings to discuss Housing Element issues, opportunities and alternatives with stakeholders. Notices to all housing stakeholders, cities and service districts. NOTE: This meeting was not a public meeting....it was attended by invitation only.
Stakeholder Scoping Meeting (2)	February 6, 2008	Second in the series of scoping meetings. NOTE: This meeting was not a public meeting....it was attended by invitation only.
Stakeholder Scoping Meeting (3)	March 11, 2008	Third in the series of scoping meetings. NOTE: This meeting was not a public meeting....it was attended by invitation only.
Board of Supervisors Public Workshop	March 11, 2008	Public workshop to explore inclusionary zoning and other options for addressing very low income housing needs. Noticed to the public and invitations sent to the public, stakeholders, cities and special districts. NOTE: This workshop was limited to the discussion of Inclusionary zoning & very low income housing.
Housing Summit	March 14, 2008	Full-day community meeting at the Red Lion Inn with multiple panel discussions on tools and approaches to create workforce housing. Publicly noticed through brochures, public service announcements, sponsorship and invitations. Policy and programs referred to Housing Element for implementation. NOTE: This meeting was primarily dominated by panel presentations with some time devoted to public questions but very little opportunity for the public to provide input on housing policy. Its focus was workforce housing.
Board of Supervisors Public Meeting	April 1, 2008	Public meeting to discuss plans for a workshop on meeting very low income housing needs with regional approaches. NOTE: Very low income housing was the focus. The Board of Supervisors agenda read: <u>Plans for Additional Workshops to Address the Shortfall between the Number of Very Low Income Housing Units Needed and Produced.</u>RECOMMENDATION: That the Board of Supervisors receive staff report and receive public comment; discuss alternative workshop content and design; schedule a workshop with the Humboldt County Association of Governments staff and representative from city councils and their staff to discuss the allocation of projected housing needs among the cities and the

		<p><i>County and ways to address the affordable housing issue in a regional context; provide direction to staff for other Housing Element related workshop(s).</i></p> <p>NOTE: State law requires a 2-yr public participation process establishing RHNA quotas. This makes no mention of public participation and in fact, public participation has yet to occur. Certain stakeholders received letters in May 2008 stating they would be invited to “witness” the negotiations, but would not be allowed to participate. This violates State Codes:</p> <ul style="list-style-type: none"> • California Government Code 65584.04 (a) states, “At least two years prior to scheduled revision required by Section 65588 [Housing Element revision], each council of governments, ..., shall develop a proposed methodology for distributing the existing and projected regional housing need to cities, counties...”; • 65584.04 (c) states “Public participation and access shall be required in the development of the methodology and in the process of drafting and adoption of the allocation of the regional housing needs.” • 65584.05 (a) states, “At least one and one-half years prior to the scheduled revision required by Section 65588, each council of governments ... shall distribute a draft allocation of regional housing needs to each local government in the region of subregion, where applicable, based on the methodology adopted pursuant to Section 65584.04.”
Board of Supervisor Public Meeting	May 6, 2008	<p>Public meeting to finalize Housing Element workshop plans.</p> <p>NOTE: This was not a workshop. Members of the public had 3 minutes each to comment. For future workshops, Staff recommended 3 panels presentations followed by “Board-directed 30-minute deliberation”. No mention of public input -- just limited time allowed for questions from the public.</p>
Housing Element Workshop	June 16, 2008	<p>Half-day community meeting at the Wharfinger moderated by the League of Women Voters on approaches to meeting low income housing needs. Publicly noticed through brochures, public service announcements and invitations. Policy and programs referred to Housing Element for implementation.</p> <p>NOTE: This meeting was a panel format with limited time allotted to questions from the public. It was not a true “workshop” where the public had ample time for 2-way dialogue with public officials.</p>
Board of Supervisor Public Meeting	August 26, 2008	<p>Report on Housing Element Workshop and implications for the Housing Element.</p> <p>NOTE: This was not a workshop. Members of the public had 3 minutes each to comment.</p>
Staff Meetings with Stakeholder Groups	May 22; June 11; July 9, 11, 21, 22, 24 & 31; Aug 5; Sep 4, 9, 10, 29, 30; Oct 14, 23; Nov 13;	<p>Small group discussions with stakeholder groups representing homeless, low income, real estate, building and tribal communities.</p> <p>NOTE: These meetings were not open to the public. HELP has not had the opportunity to participate in such meetings. We would welcome that opportunity.</p>

ATTACHMENT “C”

HCD’s Housing Element Guidelines

http://www.hcd.ca.gov/hpd/housing_element2/CON_home.php

Constraints

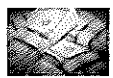
The element must identify and analyze potential and actual governmental constraints to the maintenance, improvement, or development of housing for all income levels, including housing for persons with disabilities. The analysis should identify the specific standards and processes and evaluate their impact, including cumulatively, on the supply and affordability of housing. The analysis should determine whether local regulatory standards pose an actual constraint and must also demonstrate local efforts to remove constraints that hinder a jurisdiction from meeting its housing needs.

Land-Use Controls



The constraint analysis must identify all relevant land-use controls such as zoning, development standards, and any growth controls and analyze impacts on the cost and supply of housing. An adequate evaluation must assess the cumulative impacts of standards, including whether such requirements impede the ability to achieve maximum allowable densities.

Fees and Exactions



The element must identify permit processing and planning fees and development and impact fees and exactions for impacts on the cost, feasibility, and affordability of housing. The analysis should include an estimate of the average fees for typical multifamily and single-family developments.

Processing and Permit Procedures



Permit processing requirements must be identified and analyzed for their impacts on housing supply, affordability and development certainty. The element must describe and analyze the types of permits required, by housing type, extent of discretionary review including required approval findings, procedures, and processing time required for residential development by zoning district and housing type.

HCD’s Housing Element Guidelines

http://www.hcd.ca.gov/hpd/housing_element2/CON_home.php

Codes and Enforcement and On/Off-Site Improvement Standards



The element must describe the building code adoption and enforcement process, including identification of any local amendments to the Uniform Building Code (UBC) and how building code enforcement is carried out by the jurisdiction. The element must also describe and analyze the impact of on- and off-site improvement standards including street widths, curb, gutter, and sidewalk requirements, landscaping, circulation improvement requirements and any generally applicable level of service standards or mitigation thresholds.

Constraints-Housing for Persons with Disabilities



The housing element must identify governmental constraints to the development, improvement and maintenance of housing for persons with disabilities including identifying local efforts to remove any such constraints and identifying procedures for reasonable accommodations for persons with disabilities in zoning.

Non-Governmental Constraints



Although non-governmental constraints are primarily market-driven and generally outside direct local government control, localities can significantly influence and offset the negative impact of non-governmental constraints. The element must analyze the impacts of the cost of land, construction costs, and the availability of financing.

HCD's Housing Element Program Requirements

http://www.hcd.ca.gov/hpd/housing_element2/index.php

Program Requirements

Programs are the specific action steps each locality will take to implement policies and achieve stated goals and objectives. Programs must include time frames, an identification of agencies and officials responsible, a description of the local government's specific role in implementation and whenever possible, specific measurable outcomes. Programs and policies should reflect the results of the local government's evaluation of existing and projected housing needs.

Program Overview and Quantified Objectives



To make adequate provision for the housing needs of all income levels, a jurisdiction must, identify programs to: (1) identify adequate sites, with appropriate zoning and development standards; (2) assist in the development of adequate housing to meet the needs of extremely low-, very low-, low- and moderate-income households; (3) address, and remove governmental constraints, including housing for persons with disabilities; (4) Conserve and improve the condition of the existing affordable housing stock; (5) Preserve assisted housing developments at-risk of conversion to market-rate; and (6) promote equal housing opportunities for all persons. Quantified objectives should estimate, by income level, the number of units likely to be constructed, rehabilitated or conserved/preserved during the planning period.

Adequate Sites



(Where the element does not demonstrate appropriately zoned sites sufficient to accommodate the regional housing need by income level, a program must be included to identify sites that can be developed within the planning period. Program actions to identify sites to accommodate a jurisdiction's regional housing need for lower-income households shall be zoned to permit owner-occupied and rental multifamily uses by-right and be zoned with minimum density and development standards that permit at least 16 units per site. In addition, zoning must be identified 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, emergency shelters, and transitional housing.

HCD's Housing Element Program Requirements
http://www.hcd.ca.gov/hpd/housing_element2/index.php

Assist in the Development



Having assessed, identified, and prioritized the housing needs of extremely low-, very low-, low-, and moderate-income households, including special needs, the element must include program actions to assist in developing adequate housing to meet those needs.

Conserve and Improve the Existing Housing Stock



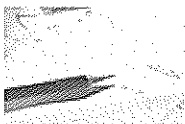
The existing affordable housing stock is a valuable resource and the element must include programs to conserve and improve the existing affordable housing stock. Improvement includes physical activities that improve the housing stock such as rehabilitation. Conservation includes maintenance activity such as code enforcement and other actions, policies or programs to conserve the affordability of housing such as a mobilehome park preservation ordinance.

Preserve Units At-risk of Conversion to Market Rate Uses



Many units of privately-owned, federally, State and locally assisted multifamily rental housing are at-risk of converting to non low-income uses. These at-risk units are occupied by elderly persons and families with lower-income who cannot afford to pay market-rate rents and could be displaced if the project converts. If the housing element has identified units at-risk, programs must be included to assist in the preservation of this important housing stock.

Address and Remove or Mitigate Constraints



For each policy, procedure or requirement identified as a governmental constraint, the element must include programs to address and remove or mitigate the constraint..

HCD's Housing Element Program Requirements
http://www.hcd.ca.gov/hpd/housing_element2/index.php

Equal Housing Opportunities



A local equal housing opportunity program should provide a means for the resolution of local housing discrimination complaints and disseminate fair housing information and resources throughout the community. The element should also address any zoning or other land-use laws or practices that either expressly discriminate against a group protected by the fair housing laws or have the effect of discriminating against a protected group.

Analysis of Consistency with General Plan, Coastal Zone Requirements



As part of the housing element update, the goals, policies, and objectives of the housing element should be reviewed in the context of the rest of the elements of the general plan including the land-use, circulation, and open space elements, as well as zoning, and/or redevelopment and capital improvement plans to ensure the general plan is internally consistent. Communities located within coastal zones are required to review coastal zone affordable housing obligations including the preservation of existing occupied units affordable to low- or moderate-income households and where feasible include low- and moderate-income housing in new developments.

Priority for Water and Sewer



Local public and/or private water and sewer providers must adopt written policies and procedures to grant a priority for service hook-ups to developments that help meet the community's share of the regional need for lower-income housing. Local governments should consult with water and sewer providers during the development and update of the housing element and immediately distribute a copy of the element to area water and sewer providers upon completion of an amended or adopted housing element.

Redevelopment Low/Mod-Income Housing Fund



The housing element must include an estimate of the amount of funds expected to accrue to the Low and Moderate Income Housing Fund (LMIHF) and describe the planned uses for those housing funds over the current planning period. In addition, to the degree possible, for each program in the housing element where the Redevelopment Agency is the responsible agency for implementation, include the amount of redevelopment funds allocated or planned to be allocated to that program.