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Housing Stock Condition: The draft element was revised to state that the City reviewed Code Compliance Division case records for the period of 2014-2021 and found no open cases or citations issued for health and safety violations. However, the element still must estimate the number of units in needs of rehabilitation and replacement.

Note: The element currently states (emphasis added) at page III-26:

Another measure of potentially substandard housing is the number of housing units lacking adequate kitchen and plumbing facilities. In Palm Desert, there are 198 units (0.8% of all units) lacking complete kitchens and 67 units (0.3% of all units) lacking plumbing facilities. More rental units have deficiencies than homeowner units. These homes could potentially benefit from repair and rehabilitation programs, such as the HIP program described above. **As shown in Table III-46, Quantified Objectives, the City will use the HIP program to correct these deficiencies for the 67 units affected (see Program 2.A).**

In addition, the following text has been added to page III-27:

To further evaluate housing conditions in Palm Desert, the Code Compliance Division queried its records on three separate occasions for residential property code violations, such as structural deficiencies, general deterioration, dilapidation, and faulty plumbing or electrical systems. As of February 2021, there were only 5 active cases of dwelling units with building code violations, all of which were associated with unpermitted construction activity. None of the cases cited structural deficiencies in need of replacement or rehabilitation. Therefore, the City is not aware of any units requiring substantial rehabilitation, other than those described above, and has included those 67 units shown in Table III-16 in its Quantified Objectives (also see Program 2.A).

Progress in Meeting the RHNA: The revised element states that 310 units for Site DD will be affordable to moderate-income units but must also demonstrate affordability based upon actual or anticipated sale prices or rents.

The following language has been added to page III-87:

- *The Sands Apartments* (Site DD) on Hovley Lane is approved for a total of 388 multi-family rental units. Of those, 78 are required to be affordable for very low income households through an approved Development Agreement that requires that the units be deed restricted. The balance are expected to be market units which will be affordable to moderate income households based on the analysis provided in Table III-44, which shows that rental units are affordable to moderate income households.

Sites Inventory: The revised draft element provides data on the City's site inventory in Table III-47. However, the data is insufficient to determine the adequacy of all sites since the inventory aggregates available sites by Map Keys and APNs (Sites E, LL, A, D, F, P, QQ, and T). The inventory must provide a parcel listing of sites by APN, along

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with parcel size, zoning, general plan designation, describing existing uses for any nonvacant sites and include a calculation of the realistic capacity of each site.

Note: The Table is titled “Vacant Land Inventory...” so no “nonvacant sites” are included. Site A and F are each single parcel sites, and no change has been made. The other sites have been modified in Table III-47, as follows:

**Table III-47
Vacant Land Inventory of Sites for Extremely Low, Very Low, Low and Moderate
Income Units**

Map Key	Assessor's Parcel No.	GP	Zoning (all HOD)**	Acreage	Allowable Density	Realistic Density	Potential Units
Vacant Entitled Sites							
B	694-310-006	Town Center Neighborhood	P.R.-20	12 of 68.2	4 to 20	22.5	269
DD	624-040-037	Town Center Neighborhood	P.R.-17.5	17.66	17.5	17.5	78
DD*	624-040-037	Town Center Neighborhood	P.R.-17.5	17.66	17.5	17.5	310
E	694-520-019	Small Town Neighborhood; Employment Center	P.R.-19	5.62	19	18	17
	694-520-020	Small Town Neighborhood; Employment Center	P.R.-19	1.2	19		4
PP	624-441-014	Small Town Neighborhood	P.R.-6	0.16	3 to 10	1	1
	624-441-015	Small Town Neighborhood	P.R.-6	0.16	3 to 10	1	1
	624-441-016	Small Town Neighborhood	P.R.-6	0.16	3 to 10	1	1
	624-441-017	Small Town Neighborhood	P.R.-6	0.16	3 to 10	1	1
	624-441-018	Small Town Neighborhood	P.R.-6	0.16	3 to 10	1	1
	624-441-019	Small Town Neighborhood	P.R.-6	0.16	3 to 10	1	1
	624-441-020	Small Town Neighborhood	P.R.-6	0.16	3 to 10	1	1
	624-441-021	Small Town Neighborhood	P.R.-6	0.16	3 to 10	1	1
	624-441-022	Small Town Neighborhood	P.R.-6	0.16	3 to 10	1	1
QQ	624-440-032	Small Town Neighborhood	P.R.-6	0.14	3 to 10	1	1

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**Table III-47
Vacant Land Inventory of Sites for Extremely Low, Very Low, Low and Moderate
Income Units**

Map Key	Assessor's Parcel No.	GP	Zoning (all HOD)**	Acreage	Allowable Density	Realistic Density	Potential Units
	624-440-033	Small Town Neighborhood	P.R.-6	0.14	3 to 10	1	1
	624-440-034	Small Town Neighborhood	P.R.-6	0.14	3 to 10	1	1
	624-440-035	Small Town Neighborhood	P.R.-6	0.14	3 to 10	1	1
	624-440-036	Small Town Neighborhood	P.R.-6	0.14	3 to 10	1	1
Subtotal Entitled Sites							692
Vacant Sites in the Entitlement Process							
LL	627-122-003	Small Town Neighborhood	R-2, HOD	0.16	3 to 10	20	3
	627-122-013	Small Town Neighborhood	R-2, HOD	1.27	3 to 10	20	25
H	694-190-087	Town Center Neighborhood	P.R.22	14.97	22	22	44
H*	694-190-087	Town Center Neighborhood	P.R.22	14.97	22	22	286
C	694-120-028	Town Center Neighborhood; Suburban Retail Center	P.C.-(3), FCOZ	10 of 20.18	7 to 40	24	240
KK	622-370-014	Public Facility/Institutional	P	1.84	N/A	N/A	36
Subtotal Sites in Entitlement Process							634
Vacant Sites							
A	685-010-005	Regional Retail	P.C.-(3), P.C.D.	15 of 64.26	10 to 15	14	200
D	694-130-017	Town Center Neighborhood	P.R.-22	8.43	22	20	169
	694-130-018	Town Center Neighborhood	P.R.-22	2.52	22	20	50
F	694-510-013	Town Center Neighborhood	P.R.-22	16.32	22	20	326
PP	624-441-014	Small Town Neighborhood	P.R.-6	0.16	3 to 10	1	1
	624-441-015	Small Town Neighborhood	P.R.-6	0.16	3 to 10	1	1
	624-441-016	Small Town Neighborhood	P.R.-6	0.16	3 to 10	1	1
	624-441-017	Small Town Neighborhood	P.R.-6	0.16	3 to 10	1	1

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**Table III-47
Vacant Land Inventory of Sites for Extremely Low, Very Low, Low and Moderate
Income Units**

Ma p Ke y	Assessor's Parcel No.	GP	Zoning (all HOD)**	Acreag e	Allowab le Density	Realisti c Density	Potenti al Units
	624-441-018	Small Town Neighborhood	P.R.-6	0.16	3 to 10	1	1
	624-441-019	Small Town Neighborhood	P.R.-6	0.16	3 to 10	1	1
	624-441-020	Small Town Neighborhood	P.R.-6	0.16	3 to 10	1	1
	624-441-021	Small Town Neighborhood	P.R.-6	0.16	3 to 10	1	1
	624-441-022	Small Town Neighborhood	P.R.-6	0.16	3 to 10	1	1
QQ	624-440-032	Small Town Neighborhood	P.R.-6	0.14	3 to 10	1	1
	624-440-033	Small Town Neighborhood	P.R.-6	0.14	3 to 10	1	1
	624-440-034	Small Town Neighborhood	P.R.-6	0.14	3 to 10	1	1
	624-440-035	Small Town Neighborhood	P.R.-6	0.14	3 to 10	1	1
	624-440-036	Small Town Neighborhood	P.R.-6	0.14	3 to 10	1	1
Subtotal Vacant Sites							759
Total All Vacant Sites							2,071
* Moderate Income Site							
** All sites in this Table have been assigned the Housing Overlay District.							

Zoning for Lower-Income Households: Pursuant to Government Code section 65583.2, subdivision (c)(3)(A) and (B), the element must identify sites with zoning and densities appropriate to encourage and facilitate the development of housing for lower-income households based on factors such as market demand, financial feasibility, and development experience within zones. For communities with densities that meet specific standards (at least 30 units per acre for Palm Desert), this analysis is not required (Section 65583.2(c)(3)(B)). While the revised draft element provides some information on recent project densities, it does not discuss factors such as market demand or financial feasibility to support the densities identified on Table III-47. In addition, it appears that Site A, Site PP and Site QQ only allow a maximum of 10-15 units per acre but are being identified to accommodate the RHNA for lower-income households. As stated in the element, affordable housing projects in the City have had densities ranging from 15-28 units per acre. The element does not provide sufficient evidence that densities in the 10-15 range provide the financial feasibility needed to support housing affordable to lower-income households and should not identify sites within this density

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range as appropriate for the lower-income housing need. The element could reassign this capacity to the moderate-income housing need, or the City could rezone to higher density to continue utilizing those sites to accommodate the RHNA for lower-income households.

Note: As the finding above relates to Sites PP and QQ, they are specifically described in the Element as being sold to the Coachella Valley Housing Coalition for self-help housing (page III-88), and are entitled. Since the Element was submitted to HCD, CVHC has closed escrow, and construction will begin in April of 2022. This is substantial evidence that the density range is appropriate for affordable housing. The paragraph on that project under “Entitled Projects” has been modified as follows:

- In May 2020, the City conveyed 14 vacant parcels on Merle Street to the *Coachella Valley Housing Coalition* (CVHC) for the development of 14 detached single-family, self-help ownership homes for very low and low income households. CVHC will deed restrict the homes when they are developed. The parcels closed escrow in December of 2021, and construction will start in April of 2022. CVHC will deed restrict 3 homes for very low income households, and 11 lots for low income households for a period of 45 years. These lots are shown on the inventory as sites PP and QQ.

As it relates to Site A, the land is part of a larger Specific Plan being prepared by a private developer. The City wishes to see 200 of the 1500± units developed for affordable housing, and has made that clear to the developer. It does not, however, have the ability to rezone the property in the absence of the developer’s willingness to do so. Table III-47 shows that there is capacity for 2,071 units. Of those, 1,326 are either entitled or pending entitlement (730 for lower income units and 596 for moderate income units). The City’s RHNA for lower income units is 1,135, and 461 for moderate income units. There is a need for an additional 405 lower income units under the RHNA, after the entitled and pending entitlement sites are deducted. Table III-47 shows capacity for an additional 745 units on vacant land. So Table III-47 provides for 340 more units than the City requires to meet the RHNA. As already stated in the Element:

These entitled and pending entitlement projects will result in a total of 730 units affordable to very low and low income households, and 596 units affordable to moderate income households. With completion of these projects, the City will need to accommodate an additional 405 units for very low and low income households, and would have an excess of 135 moderate income units when all entitled and pending entitlement sites in Table III-47 are developed. Table III-47 also shows that the City has capacity for 745 units on vacant sites, almost double the 405 needed during the planning period to complete the RHNA.

Large Sites: Table III-47 includes sites larger than ten acres and states that these sites are not constrained from development based on proposed projects on ten acres or more being developed. While the draft element was slightly revised to account for densities and to add the Carlos Ortega Villas project (p. III-87), the analyses must demonstrate developments of equivalent size were successfully developed during the prior planning period for an equivalent number of lower-income housing units as projected for these

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large sites or provide other evidence that the site is adequate to accommodate lower-income housing. (Gov. Code §65583.2, subd. (c) (2) (A) Additionally, the analysis should state whether larger sites such as Site A and Site F have the potential for being split and, if so, the element should contain a program or programs to facilitate the splitting of larger lots.

The Element does provide evidence of existing development (entitled projects). In addition, the language on page III-85 has been modified as follows:

Lands provided in the inventory have been calculated at a density of 15 to 23 units per acre. The density range assumes that 80% intensity will be achieved based on: an average unit size of 1,000 square feet, 28 units per acre can be achieved with 3-story buildings, which is the current height limit in the Planned Residential (PR) zone. This also assumes common area open space in compliance with Zoning requirements, and surface parking. As this zone allows building coverage of 40%, there is more than sufficient space to accommodate the density assumed in the inventory. Further, the density assumptions are conservative compared to typically built densities in each of the zones. The most recent affordable housing projects built in the City were constructed at densities of 15 to 28 units per acre, including Carlos Ortega Villas, at 13 units per acre, and the City currently has entitled or proposed affordable housing projects at densities of 17.5 to 27 units per acre on parcels of 10 acres or more:

- The Sands, Site DD: 388 units on 17.5 acres (22/acre);
- Pacific West, Site B, 269 units on 12 acres (23/acre);
- Millennium private site, Site H, 330 units on 15 acres (22/acre), and
- Millennium City site, Site C, 240 units on 10 acres, 24/acre).

In addition to these projects, the City of La Quinta, east of Palm Desert, developed the Coral Mountain Apartments in 2018, providing 176 units on 11 acres of land, at a density of 16 units per acre. All four of the projects in the City and the La Quinta project are on large sites (10 acres or more), and have been built, entitled or are in the entitlement process. Significantly, the two most recent projects in which the City is participating, the Pacific West and Millennium City site, are 10 acres or more. Large sites are also included in Table III-47, sites A and F are both planned for larger sites. Although the sites are feasible at 15 and 16 acres, respectively, Program 1.F is also provided to encourage subdivision of these parcels to smaller sites, with the provision of incentives.

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Program 1.F

Although the affordable housing projects currently approved or being entitled in the City occur on parcels of 10 acres or more, the City will encourage further land divisions resulting in parcel sizes that facilitate multifamily development affordable to lower income households in light of state, federal and local financing programs (50-100 units) as development proposals are brought forward for sites A and F. The City will discuss incentives available for land divisions (2-5 acres) encouraging the development of housing affordable to lower income households with housing developers as proposals are brought forward. The City will offer incentives for land division encouraging the development of affordable housing including, but not limited to:

- priority to processing subdivision maps that include affordable housing units,
- expedited review for the subdivision of larger sites into buildable lots where the development application can be found consistent with the Specific Plan,
- financial assistance (based on availability of federal, state, local foundations, and private housing funds).

Responsible Agency: Planning Department

Schedule: As projects are proposed

Small Sites: The initial draft element identified sites at less than a half-acre and included several sites that appear to require consolidation. The revised draft element now states that site LL is City-owned and will be developed for 28 units and that the City will consolidate the lots when development occurs. However, the element still requires analysis to demonstrate the lot consolidation potential of other sites within the inventory such as Site D, Site PP, Site QQ, and Site T. For example, the analysis should describe the City's role or track record in facilitating small-lot consolidation by affordability level, policies or incentives offered or proposed to encourage and facilitate lot consolidation, conditions rendering parcels suitable and ready for redevelopment, recent trends of lot consolidation, and information on the owners of each aggregated site.

Site D is comprised of two lots of 8.4 and 2.5 acres – neither of these lots qualify as small sites. In regards to sites PP and QQ, as shown above, those sites are now owned by CVHC, and are scheduled for construction in April of 2022. Site T has been removed from the inventory.

Processing and Permit Procedures: While the draft element was revised to describe approval procedures for the architectural review process, the element must still describe approval procedures for the Precise Plan review including a description of the approval bodies. The analysis must be revised to evaluate the Precise Plan processing and permit procedures and their impacts as potential constraints on housing supply and affordability.

The description of the Precise Plan process was already in the Element at page III-53. The paragraph has been modified for clarity:

The City requires tract map review and approval for all single-family home tracts and a precise plan for multi-family projects, both of which can be processed concurrently with any other permit

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that might be required. For either, the review process is a simple analysis that assures that the project's design meets the requirements of the zone in which it occurs. Applications for Precise Plans, when complete, are circulated to other City departments for comments. The Precise Plan is then reviewed by the Architectural Review Commission (ARC) and approved by the Planning Commission. The ARC provides technical review of the Precise Plan application, including the provision of parking, trash enclosures and similar standards, and reviews the landscaping plans for water efficiency. The ARC meetings are public, but are not noticed hearings. ARC review is scheduled within two to three weeks of an application being found complete, and usually precedes Planning Commission hearing by three to four weeks. The ARC provides recommendations on the Precise Plan to the Planning Commission, which takes action on Precise Plan applications. Public notice and mailings are made 10 days prior to a Planning Commission hearing.

The findings needed for approval of either a tract map or precise plan pertain to the project's consistency with State law; the General Plan and Zoning Ordinance; public health and safety; and the site's physical ability to accommodate the project. The findings focus on General Plan and Zoning consistency, are not subjective and do not pose a constraint to development. The average processing time for a typical application is 4 to 6 months, including the recently approved Montage single family homes, which received approval in 6 months, which is generally consistent with most Valley cities, and does not represent a constraint. The City also has a building permit streamlining process, for a fee, and allows "at risk" building permit applications, which can be submitted immediately following ARC review, and prior to Planning Commission approval. As described above, neither the process for a Precise Plan review, nor the time required are constraints to the development of housing.

General: The revised element continues to include programs without specific metrics or objectives. 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.

Specific programs are addressed individually below. Without additional information, we are unable to guess whether this statement intends us to modify any others.

Program 5.C (CDBG for Homelessness): The Program should be revised to state how the City will encourage organizations to apply and the role the City plays in delivering the funds.

The program has been modified as follows:

Program 5.C

The City will continue to make direct appeals to encourage local organizations, such as the Coachella Valley Rescue Mission, Martha's Village and Catholic Charities, to apply to the City for the award of CDBG funds for homeless services, including announcements on its website and social media of the availability of funds, the schedule for applications, and the award schedule, as

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it has for many years. The City Council will continue to allocate available funds to these and other organizations that apply from its annual City allocation.

Responsible Agency: Finance Department

Schedule: Annually with CDBG funding cycle

Program 8.A (Housing Overlay and ADUs): The Program should be revised to state what standards are being maintained and if there are any potential revisions to the zoning code that need to be implemented. If revisions are needed to comply with state law, then the program should commit to a definitive timeframe for implementation of those revisions.

The intent of the Program was to provide policy support to assure that HOD and ADU were addressed in the Zoning Ordinance. The program has been modified regardless, to address the finding.

Program 8.A

The City shall maintain the Housing Overlay District to include flexible development standards, density bonuses, design criteria, and parking reductions for the development of a wide variety of housing products which provide a minimum of 20% of all units at income-restricted rents, or at least one unit for smaller residential projects, and to eliminate the public hearing requirements and waive City plan check/inspection fees and potentially other fees. The Accessory Dwelling Unit standards shall be maintained consistent with State law in the Zoning Ordinance.

Responsible Agency: Community Development Department

Schedule: Annually review with state General Plan report

Program 11.B (Transit Agency): The Program should be revised to clarify how the City will coordinate and specific actions the City will take to ensure that transit is and will be available to residents with limited access.

For HCD's information, SunLine is a JPA over which the City has limited authority. A member of Council sits on the Board, as does a member of each of the member agencies' Council. The program has been modified to the extent it can be.

Program 11.B

Continue to coordinate with SunLine Transit Agency by continuing to provide it with all development applications, to encourage it to expand services that provide reliable transportation options to low income, disabled, senior, and other residents with limited access.

Responsible Agency: Community Development Department

Schedule: 2022-2029

As noted in Finding A-3, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition, the element should be revised as follows:

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With the changes proposed herein, we believe that the analysis is sufficient. Individual programs are addressed below.

Program 1.A (Affordable Housing Developers): This Program should be revised with specific timeframes (e.g., month and year) and benchmarks for the Village (KK) and Millennium (F) projects. The Program should be revised to provide specific timeframes and benchmarks for these developments and monitor these developments.

The program has been modified as follows:

Program 1.A

The City shall work with affordable housing developers, non-profit agencies and other stakeholders to implement the following affordable housing projects for extremely low, very low, low and moderate income households during the planning period.

- 21 units at Palm Desert 103 (Site E): annually contact the landowner and provide them with current City programs and incentives for the construction of the remaining units within the project. Meet with the land owner annually, and provide the requirements of the Development Agreement for the site to encourage its development.
- 36 units at Arc Village (Site KK): For this Housing Authority-owned site, the Housing Authority and City will continue to work with Desert ARC and affordable housing developers to secure funding for these units with priority to developmentally disabled persons. The Housing Authority and City will participate in the preparation of applications for State funding and reinstate funding assistance when an application is prepared. The Housing Authority and City will promote the site to developers through its website, and annually meet with Desert ARC to encourage development.
- 66 units at Millennium (Site F): the City will continue to work with the developer to process the pending entitlements and finalize the affordable housing covenants consistent with the existing Development Agreement. The application is expected to be reviewed by the Planning Commission by March of 2022.

Responsible Agency: Community Development Department and Housing Authority

Schedule: Continuous as these projects move forward

Program 1.B (Public/Private Partnerships): The program should be revised to monitor these developments and offer specific schedules for these monitoring activities. Additionally, the Program should be revised to provide back-up measures if any projects are subsequently denied.

The programs have been modified to address scheduling. As regards monitoring, all three projects in 1.B are under existing agreements with the City, as described on page III-89 of the Element. The agreements are the monitoring tools and their provisions have been replicated below. There is no evidence provided by HCD that the projects will be denied, nor does the City have any evidence that denial is possible. No change can be made to address such a speculation.

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Program 1.B

The City shall pursue the planning and implementation of the following projects for extremely low, very low, low and moderate income households during the planning period. The City will utilize public-private partnerships, grants and third party funding for these projects, and density bonus incentives.

- 240 units at Millennium City Site (Site C): the City shall enforce the terms of its existing agreement with the developer of this project, including maintaining project schedules and expediting processing of applications. A minimum of 15% of the units will be reserved for extremely low income residents. Entitlement applications are expected in 2022, financing will be secured in 2023, and construction is expected in 2024.
- 28 units at Sagecrest Apartments (Site LL): the Housing Authority will complete the RFP process in 2022, and establish an agreement with the successful developer for construction of the units by 2024. A minimum of 15% of the units shall be reserved for extremely low income residents. The DDA for the project includes a requirement that the units be built by 2024.
- 269 units at Gerald Ford, west of Portola (Site B): the City will maintain the schedule established in the existing agreement with the developer, participate in funding applications, and participate in the funding through the existing land sale agreement, to reach completion of construction by 2024. The project was approved by the Planning Commission in July of 2021. The developer is actively involved in securing CDLAC/TCAC and other funding, and expects to begin construction in 2023.

Responsible Agency: Community Development Department and Housing Authority

Schedule: As described above, 2022-2025

Program 1.C (Encourage Housing for Lower-income Households): The Program should be revised to monitor these developments and offer specific schedules for these monitoring activities. The Program should also offer a definitive timeline other than the entire planning period and back-up measures if any projects are subsequently denied.

Site I has been removed from the inventory, and deleted in the program. For the other two sites, the following modifications have been made. We do not have any reason to think that either project would be denied.

Program 1.C

The City shall encourage and facilitate the development by private parties of the following projects for extremely low, very low, low and moderate income units:

- 200 units at Key Largo (Site A): the City will continue to work with the land owner in the completion of entitlement applications for the site, including the provision of Density Bonus incentives, fee waivers and other incentives as appropriate. The City will meet with the developer annually, and encourage the completion of the Specific Plan by December of 2024, and construction beginning in January of 2026.

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- 78 units at the Sands (Site DD): the City will maintain contact with the land owner and participate in funding efforts as the developer applies for TCAC and other funds for the project. The City will process the pending application amendments by June of 2022, and assist in the preparation of funding applications by March of 2023, and construction beginning by June of 2024.

The City will offer incentives, including Density Bonus, fee waivers and reduced building permit fees for those projects including a minimum of 15% of units affordable to extremely low income households.

Responsible Agency: Planning Department

Schedule: As provided above.

Program 9.A (Density Bonus): The Program should be revised with a specific date for completing amendments.

The program has been modified as follows:

Program 9.A

Revise the Zoning Ordinance to ensure compliance with State law as it pertains to density bonus by October of 2022 to address the changes contained in AB 2345, and as State law changes throughout the planning period.

Responsible Agency: Community Development Department

Schedule: at regular Zoning Ordinance update

As noted in Finding A4, the element requires a complete analysis of potential governmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints. In addition:

Program 1.H (SB 35): The Program should be revised to offer a definitive date for implementation of the SB 35 requirements (e.g., June 30, 2022).

As it relates to Finding A4, the analysis of Precise Plan processing has been modified above. No constraint exists. As it relates to the program, it has been amended as follows:

Program 1.H

The City shall establish an SB 35 planning application and process that contains the requirements of the law, the required objective development standards, and the processing requirements for these projects.

Responsible Agency: Planning Department.

Schedule: June 2022

Public Participation: The draft element includes a revised summary of the public participation process (page III-93), which now states that the City held additional study sessions. However, it does not demonstrate that diligent efforts were made to involve all

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economic segments of the community in the development of the housing element, especially low- and moderate-income groups, nor does it address the availability of materials in multiple languages, surveys, or other efforts to involve such groups and persons in the element throughout the process. In addition, HCD understands the City made the element available to the public in June of 2021 prior to an additional study session on September 9, 2021. The element also states that following the September study session the revised draft element was posted on the City's website. However, the element should indicate when the revised draft was made available for comments prior to submitting to HCD on September 28, 2021, if comments were received, and how those comments were incorporated.

The text has been modified as follows:

The Housing Element was posted on the City's website in June of 2021. The City also held an additional Study Session with the City Council on amendments to the Housing Element on September 9, 2021. Following that Study Session, on September 10th, the revised Draft Element was posted on the City's website, and notices sent to community organizations, all of the participants in the City's previous workshops, and all those to whom workshop invitations had been sent to invite comments on the revised Element, prior to its resubmittal to HCD on September 28th. No comments were received during this time.