

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

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May 17, 2023

Ricky Caperton, Planning Manager
Planning Division
City of Napa
1600 First Street
Napa, CA 94559

Dear Ricky Caperton:

RE: City of Napa's 6th Cycle (2023-2031) Draft Housing Element Update

Thank you for submitting the City of Napa's (City) draft housing element that was received for review on February 16, 2023. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. In addition, HCD considered comments from Napa Families Working Coalition, David Kellogg, and Nick Rossi, pursuant to Government Code section 65585, subdivision (c).

The draft element addresses many statutory requirements; however, revisions will be necessary to substantially comply with State Housing Element Law (Gov. Code, § 65580 et seq.). The enclosed Appendix describes the revisions needed to comply with State Housing Element Law.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government fails to adopt a compliant housing element within 120 days of the statutory deadline (January 31, 2023), then any rezoning to make prior identified sites available or accommodate the regional housing needs allocation (RHNA) shall be completed no later than one year from the statutory deadline pursuant to Government Code sections 65583, subdivision (c) and 65583.2, subdivision (c). Otherwise, the local government's housing element will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i). Please be aware, if the City fails to adopt a compliant housing element within one year from the statutory deadline, the element cannot be found in substantial compliance until rezones to accommodate a shortfall of sites pursuant to Government Code section 65583.2, subdivision (c) are completed.

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City should continue to engage the community, including organizations that

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represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate. Please be aware, any revisions to the element must be posted on the local government's website and to email a link to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant, the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities program, and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: <https://www.opr.ca.gov/planning/general-plan/guidelines.html>.

HCD appreciates the hard work and dedication the housing element update team provided during the review and update. We are committed to assisting the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Chelsea Lee, of our staff, at Chelsea.Lee@hcd.ca.gov.

Sincerely,



Paul McDougall
Senior Program Manager

Enclosure

APPENDIX CITY OF NAPA

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

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

A. 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).)*

Disproportionate Housing Needs: The element includes some general information on persons experiencing homelessness and housing conditions but should also evaluate those needs, impacts and patterns within the City, such as areas of higher need. For homelessness, the element should examine patterns of need or areas with higher concentrations of persons experiencing homelessness, including access to transportation and services. For housing conditions, the element should discuss any areas of potentially higher needs of rehabilitation and replacement. The element should utilize local data and knowledge such as service providers and code enforcement officials to assist this analysis.

Identified Sites and Affirmatively Furthering Fair Housing (AFFH): The element includes some discussion of the number of sites by concentrations of socio-economic characteristics. However, this approach to whether identified sites AFFH should account for where the sites are located. The analysis should address the number of units by all income groups, and location (e.g., neighborhood, planning area, census tract), discuss any isolation of the regional housing need allocation (RHNA) by income group and evaluate the magnitude of the impact on existing concentrations of socio-economic characteristics by area. The analysis should be supported by local data and knowledge and other relevant factors and address overlapping fair housing issues with other components of the assessment of fair housing (e.g., segregation and integration, concentrated areas of poverty, disparities in access to opportunity).

Contributing Factors to Fair Housing Issues: Based on the outcomes of a complete analysis, the element should re-assess and prioritize contributing factors to fair housing issues.

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).)*

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

Analyze any special housing needs such as elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. (Gov. Code, § 65583, subd. (a)(7).)

Extremely Low-Income (ELI) Households: While the element quantifies existing and projected ELI households, it must also analyze their housing needs. The analysis of ELI housing needs could consider tenure, overpayment, overcrowding, resources and the effectiveness of strategies and the magnitude of housing need.

Overpayment: While the element identifies the total number of households overpaying for housing, it must quantify and analyze the number of lower-income households overpaying for housing by tenure (i.e., renter and owner) and add or modify policies and programs as appropriate.

Special Housing Needs: The element reports data on households and persons with special housing needs. However, for persons with disabilities, female-headed households and large households, it must also describe the resources available and effectiveness of strategies to these special housing needs groups, then determine the magnitude of housing needs to better formulate policies and programs.

In addition, given the importance of the viticulture industry and the disproportionate housing needs of farmworkers, the element should closely examine the housing needs of farmworkers. For example, the analysis could address household characteristics, income, challenges faced by the population, the existing resources to meet those needs, an assessment of any gaps in resources, and the effectiveness of past policies, programs, and funding to help address those gaps.

The analysis may utilize past farmworker housing studies and other studies generally applicable to their special housing needs. For example, the element could utilize a recent study conducted by University California at Merced that is available at https://clc.ucmerced.edu/sites/clc.ucmerced.edu/files/page/documents/fwhs_report_2.2.2383.pdf. Based on the outcomes of the analysis, the element should add or modify programs to address this significant special housing need in the region.

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

Progress in Meeting the RHNA: The element indicates that 337 units affordable to lower-income households and 135 units affordable to moderate-income households have been built or are under construction or approved (p. B-6) but provides minimal information documenting how affordability of the units was determined. The element must describe the City's methodology for assigning these units to the various income groups based on actual sales price or rent level of the units and demonstrate their availability in the planning period. Availability should address the status, anticipated completion, any barriers to development, and other relevant factors such as build-out horizons, phasing, and dropout rates to demonstrate the availability or likelihood of development in the planning period.

Parcel Listing: The element lists parcels by various factors such as size, zoning, and general plan designation. However, the element must also include a sufficient description of existing uses to facilitate an analysis of the potential for additional development on non-vacant sites. For example, the inventory could describe the use as offices, structure(s) older than 50 years in poor condition, vacancies present, existing floor area of 0.1 versus allowable floor area. Alternatively, the inventory could utilize various data layers with similar information.

Zoning for Lower-Income Households: The element must demonstrate densities appropriate to accommodate housing for lower income households. The element notes that its zones or General Plan designations allow for development at the default density of 20 units per acre or higher (p. B-19). However, Table B-15 only specifies GPLU maximum densities allowed and some General Plan designations in Table E-1, notably Medium and High Density Residential and Residential Mixed Use appear to have minimum densities between 8-18 units per acre. The element should address this inconsistency. Otherwise, an analysis must demonstrate appropriate densities based on factors such as market demand, financial feasibility and development experience within identified zones.

Small and Large Sites: The element currently discusses how development might occur on small and large sites, but it must still provide analysis of past trends or present other evidence to demonstrate the suitability of these sites. For example, the analysis could describe the City's role or track record in consolidating or subdividing parcels and identify policies or incentives offered or proposed to ensure parcels are suitable and ready for residential development or intensification.

Suitability of Nonvacant Sites: While the element identifies the methodology used to screen parcels for inclusion and describes its realistic capacity assumptions for nonvacant sites (pp. B-17-22), it provides minimal description of their potential for redevelopment. The element must include an analysis demonstrating the potential for redevelopment of nonvacant sites. To address this requirement, the element should analyze the existing

uses of nonvacant sites to demonstrate the potential for redevelopment in the planning period. The description of existing uses should be sufficiently detailed to facilitate an analysis demonstrating the potential for additional development in the planning period. In addition, the element needs to also analyze the extent that existing uses may impede additional residential development. The element can summarize past experiences converting existing uses to higher density residential development, include current market demand for the existing use, provide analysis of existing leases or contracts that would perpetuate the existing use or prevent additional residential development and include current information on development trends and market conditions in the City and relate those trends to the sites identified. The element could also consider indicators such as age and condition of the existing structure expressed developer interest, low improvement to land value ratio, and other factors.

Adequate Sites Alternative: The City is crediting 142 units affordable to lower-income households towards its RHNA through Project Homekey and rehabilitation. To credit these units toward the City's housing need, the element must demonstrate compliance with all the statutory requirements (Gov. Code, § 65583.1, subd. (c)(2)(D)). For example, the element must demonstrate that the affordability for the units determined will be maintained for at least 55 years, units be made available for people experiencing homelessness as defined in Section 578.3 of Title 24 of the Code of Federal Regulations and will be affordable to very-low and low-income households at the time the units were identified for preservation, among other things. For additional information and an Alternative Sites Checklist, see the Building Blocks at https://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/adequate-sites-alternatives/docs/adequate_site_alt_checklist.pdf.

Accessory Dwelling Units (ADU): The element projects 366 ADUs to be constructed over the planning period, averaging approximately 46 units per year. This projection was based on annual permit data from 2018-2021 (p. 30). However, Annual Progress Reports submitted by the City indicate building permit figures of 20, 34, 45, and 60 for 2018, 2019, 2020, and 2021, respectively. The element should reconcile these figures and adjust assumptions as appropriate.

Availability of Infrastructure: The element includes discussion on water, sewer, and dry utilities capacity. However, it also describes potential limitations to sewer infrastructure that will require capacity improvements (pp. B-30-31). The element must clarify whether there is sufficient total sewer capacity (existing and planned) to accommodate the RHNA and identify programs to address needed improvements and capacity, as necessary.

Water/Sewer Priority: For your information, water and sewer service providers must establish specific procedures to grant priority water and sewer service to developments with units affordable to lower-income households. (Gov. Code, § 65589.7.) Local governments are required to immediately deliver the housing element to water and sewer service providers. HCD recommends including a cover memo describing the City's housing element, including the City's housing needs and regional housing need. For additional information and sample cover memo, see the Building Blocks at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/priority-water-and-sewer>.

Environmental Constraints: The element notes that identified sites are not constrained by any known environmental factors (p. B-18) but should also discuss any other known conditions that preclude development in the planning period. Examples include parcel shape, easements, property conditions, contamination and airport compatibility.

Zoning for a Variety of Housing Types:

- Emergency Shelters:* The element discusses zoning and capacity for emergency shelters (pp. E-25-26) but must also identify and analyze any development standards (e.g., spacing, parking, concentration requirements) and other requirements imposed on emergency shelters. Secondly, the element must include analysis that describes whether areas within the district may be unfit for human habitation. The element may need to add or modify programs based on the outcomes of a complete analysis. Thirdly, the element must describe compliance with Government Code section 65583, subdivision a)(4)(A) or modify Program H2-2.1 (Zoning Ordinance Updates) to comply with this requirement. For your information, pursuant to Government Code section 65583, subdivision (a)(4)(A), parking requirements should be limited to allowing sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone. Lastly, for your information, while the City allows emergency shelters by-right in the PQ-P district, subsequent draft submissions must comply with the requirements of Chapter 654, Statutes of 2022 (AB 2339). Please note, these requirements became effective on January 1, 2023 and apply to any housing element submitted after January 1, 2023 if a jurisdiction failed to submit the initial draft before the due date of the housing element. As the City's initial draft was submitted on February 16, 2023, after the January 31, 2023 due date, these provisions will apply. Among other changes, these amendments to Government Code section 65583, subdivision (a)(4) expand the definition of "emergency shelters," specifies the type of zoning designations that must be identified to allow emergency shelters as a permitted use without a conditional use or other discretionary permit and demonstrate the appropriateness of sites to accommodate emergency shelters. For more information and applicable timing, see HCD's AB 2993 memorandum at <https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/ab2339-notice.pdf>.
- Transitional and Supportive Housing:* The element states supportive and transitional housing are permitted throughout its residential zones. Additionally, the element included Table E-2 listing allowable uses per zoning district. However, this table did not reflect whether supportive housing is a permitted use in all zones allowing residential uses. The element should reconcile this information and specifically clarify whether the City permits transitional and supportive housing as a residential use and only subject to those restrictions that apply to other residential dwellings of the same type in the same zone pursuant to Government Code section 65583 (a)(5).

Additionally, supportive housing shall be a use by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses pursuant to Government Code section 65651. The element must demonstrate compliance with these requirements and modify Program H2-2.1 (Zoning Ordinance Updates) as appropriate.

- *Low-Barrier Navigation Centers (LBNCs)*: Low-Barrier Navigation Centers shall be a use by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses pursuant to Government Code section 65660. Program H2-2.1 (Zoning Ordinance Updates) should be modified to explicitly identify program commitments to meet these statutory requirements.
- *Housing for Agricultural Employees*: The element must demonstrate zoning is consistent with the Employee Housing Act (Health and Safety Code, § 17000 et seq.), specifically, sections 17021.5 and 17021.6. Section 17021.5 requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. In addition, 17021.6 requires employee housing consisting of no more than 12 units or 36 beds to be permitted in the same manner as other agricultural uses in the same zone. To address this, the element includes Program H2-2.1 (Zoning Ordinance Updates) but must explicitly identify program commitments to meet these statutory requirements.
- *Accessory Dwelling Units (ADUs)*: A cursory review of the City's last submitted ADU ordinance submitted to HCD in 2017 identified areas which appear to be inconsistent with State ADU Law. In addition, ADUs appear to be restricted in several nonresidential zones that allow residential uses, as identified in Table E-2. The element should address these inconsistencies and add or modify a program to update the City's ADU ordinance in order to comply with state law. For more information, please consult HCD's ADU Guidebook, updated in July 2022, which provides detailed information on new state requirements surrounding ADU development.
- *Manufactured Homes*: The element identifies notes that mobilehomes are currently prohibited in several residential districts and undefined in the City's Zoning Ordinance. As such, Program H2-2.1 (Zoning Ordinance Updates) should be modified to explicitly identify program commitments to meet statutory requirements to permit manufactured homes similar to single family uses.

Electronic Sites Inventory: Pursuant to Government Code section 65583.3, subdivision (b), the City must utilize standards, forms, and definitions adopted by HCD when preparing the sites inventory. Please see HCD's housing element webpage at <https://www.hcd.ca.gov/housing-elements-hcd> for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance. Please note, upon adoption of the housing element, the City must submit an electronic version of the sites inventory with its adopted housing element to sitesinventory@hcd.ca.gov.

4. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures... (Gov. Code, § 65583, subd. (a)(5).)*

Land Use Controls: While the element lists some development standards for each zone, it should also list lot coverage requirements for each zone. In addition, the element should independently and cumulatively evaluate the impact of development standards on housing supply (number of units), cost, feasibility and ability to achieve maximum densities. For example, the analysis should address the combination of floor area ratios, setbacks, heights, lot coverage and other bulk standards for impacts on achieving maximum densities. The element may utilize input from the development community and past projects to address these requirements.

Local Processing and Permit Procedures: While the element includes some information about permit processing procedures and processing times (pp. E-28-33), it should also describe approval procedures including the number of public hearings, approval findings, and any other relevant information for a typical single-family and multifamily development.

In addition, the element should address public comments on this draft submittal and discuss compliance with the Permit Streamlining Act and intersections with CEQA and timing requirements, including streamlining determinations and add or modify Programs H3-1.2 (Design Standards) and H3-2.2 (Design Review Guidelines) as appropriate.

Finally, the element should discuss whether procedures and provisions comply with Senate Bill (SB) 9 (Chapter 162, Statutes of 2021) which generally, among other provisions, requires ministerial approval of a subdivision of a parcel in a single-family zone into two parcels.

Code Enforcement: The element includes a discussion of the City's code enforcement procedures (p. E-27) but could also describe resources provided to residents and typical citations and complaints received.

Zoning and Fees Transparency: The element references compliance with new transparency requirements for the posting of all zoning and development standards on its website (p. E-5), but it must also clarify its compliance with the posting of all fees.

Constraints on Housing for Persons with Disabilities: While the element included some information on the City's reasonable accommodation procedures (pp. C-79-80), it must also analyze the approval findings in Chapter 17.65 of the Napa Municipal Code for potential constraints on housing for persons with disabilities. As an example, the analysis should identify who approves requests, identify any fees charged by the City in processing

requests, and indicate whether there is an appeals process. The element may need to add or modify programs as appropriate based on the outcomes of this analysis.

5. *An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including... 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 and identify 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.

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

The element identifies the Napa Creek Manor development as being at-risk of conversion during the next ten years. Given this observation, the element must include an analysis such as a comparison of costs for replacement versus preservation of the at-risk units. For more information and a sample analysis, see the Building Blocks at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/assisted-housing-developments-risk-conversion>.

B. Housing Programs

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

To have a beneficial impact and achieve the goals and objectives of the housing element, programs must have specific commitment and discrete timelines (e.g., at least annually or by 2025), as follows:

- *Program H1-1.1 (Housing to Populations with Special Needs):* The Program should commit to annual outreach to identify development opportunities.

- *Program H2-2.4 (Infill Housing Prototypes)*: The Program should commit to how often the City will work with developers.
 - *Program H2-3.1 (Low Income and Special Needs Funding)*: The Program should commit to how often the City will utilize funding.
 - *Programs H2-4.4 and H5-1.1 (Anti-displacement)*: The Program should commit to a timeline earlier in the planning period and consider potential options for addressing displacement risk.
 - *Program H3-3.1 (Code Enforcement)*: The Program should commit to a timeline earlier in the planning period.
 - *Program H4-2.3 (Transportation Options)*: The Program should commit to how often the City will work with the transportation authority.
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 A3, the element does not include a complete site analysis; therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition, the element should be revised as follows:

- *Publicly Owned Sites*: If the element identifies City-owned sites to accommodate a portion of the RHNA, the element must include a program or modify Program H2-2.2 (Conversion of Publicly Owned Lands for Housing) that ensures compliance with the Surplus Lands Act. The program should also include numerical objectives and provide incentives and actions, along with a schedule, to facilitate development of City-owned sites. Actions could include outreach with developers, financial assistance and incentives, issuing requests for proposals, final entitlements, building permits issues and alternative actions, including rezoning other sites, if developments do not progress as anticipated.
- *Sites Identified in Prior Planning Periods*: Sites identified in prior planning period(s) are generally deemed inadequate unless a program rezones prior identified sites. If necessary, the Program must commit to permit development with 20 percent affordability by right at appropriate densities (e.g., 20 units per acre). If, that are currently identified to accommodate housing for lower income.

- *Replacement Housing Requirements:* Absent a replacement housing program, sites with existing residential uses meeting specified requirements are not adequate sites to accommodate lower-income households. The replacement housing program should commit to 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.

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

As noted in Findings A4 and A5, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.

4. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics... (Gov. Code, § 65583, subd. (c)(5).)*

As noted in Finding A1, the element requires a complete AFFH analysis. Depending upon the results of that analysis, the element may need to revise or add programs. Goals and actions must specifically respond to the analysis and 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, milestones, geographic targeting and metrics or numerical targets and, as appropriate, address housing mobility enhancement, new housing choices and affordability in higher opportunity or higher income areas, place-based strategies for community revitalization and displacement protection.

C. Quantified Objectives

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

The element includes quantified objectives in Section 5, but it did not consistently identify objectives by all income groups. This requirement could be addressed by utilizing a matrix like the one illustrated below:

Income	New Construction	Rehabilitation	Conservation/ Preservation
Extremely Low-			
Very Low-			
Low-			
Moderate-			
Above Moderate-			
TOTAL			