

Comment No.	Gov. Code Section	HCD Finding/Comment	Prior HE Page #	Imperial Response (Jan. 2022)	Satisfied (Y/N)	Analyst's Evaluation	Imperial Response (March 2022)
A.	<i>Review the previous element to evaluate the appropriateness, effectiveness, and progress in implementation, and reflect the results of this review in the revised element. (Gov. Code, § 65588 (a) and (b).)</i>	The element must include an evaluation of the cumulative effectiveness of programs in addressing the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female-headed households, farmworkers, and persons experiencing homelessness).	113	Jan 2022 RESPONSE: Chapter 5.0 Review of Past Accomplishments includes a review of the previous Housing Element programs and special needs populations are specifically addressed in the evaluation of Goal #3 "Continue to promote housing for special needs groups". Additional text has been added to summarize the cumulative effectiveness of past programs. The City adds that due to lack of implementation, there is no cumulative impact.	N/~	The element must fully describe the cumulative impact of programs.	Review Section 5.0 updates for discussion with HCD; introductory language added to Section 6 describing the intent of this Cycle to implement more actions than the last cycle.
B1.	<i>Affirmatively further[ing] fair housing (AFFH) 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).)</i>	The element generally does not address this requirement. The housing element, among other things, must include outreach; an assessment of fair housing; identification and prioritization of contributing factors to fair housing issues; goals and actions sufficient to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity. Additionally, the element should discuss how identified sites AFFH. For further guidance, including HCD's AFFH Data Viewer, please visit AFFH in California webpage at https://www.hcd.ca.gov/community-development/affh/index.shtml .		Jan 2022 RESPONSE: The "Appendix D: Affirmatively Further Fair Housing" has been prepared and is included with the most recent draft of the Housing Element.	~	The element adds in AFFH analysis points, but primarily relies on data to support the sections. The AFFH section must also add analysis to the data points to establish meaningful conclusions from the information to facilitate the creation and ranking of contributing factors.	Table D-11 has been expanded to include additional information related to localized contributing factors and specific programs and actions that have been included in the HE to address these factors in a meaningful way.
B2.	<i>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 (ELI). (Gov. Code, § 65583, subd. (a)(1).)</i> <i>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).)</i>	Extremely Low-Income Households (ELI): The element includes some basic information regarding ELI households such as the number of households and projected housing needs. However, given the unique and disproportionate needs of ELI households, the element must include analysis to better formulate policies and programs. For example, the element should analyze tenure, cost burden, overcrowding and other household characteristics then examine the availability of resources to determine gaps in housing needs. For additional information, see the Building Blocks at http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/extremely-low-income-housing-needs.shtml .	22-23	Jan 2022 RESPONSE: An analysis of population and employment trends and documentation of projections is provided in Chapter 2 under the "Population Characteristics". And "Economic Characteristics" sections. Additionally, the "Housing Problems" section quantifies the existing and projected needs for all income levels, including extremely low-income households. Jan 2022 RESPONSE: The section titled "Housing Characteristics" addresses income, ability to pay (cost burden), housing characteristics, overcrowding, and housing stock. Jan 2022 RESPONSE: An "Extremely Low-Income Households" section was created under the "Households Characteristics" chapter to address the ELI topic. n/a	n	The element adds general information, but largely does not address this requirement. The City must analyze the unique housing needs of extremely low-income individuals.	The HE includes general information on tenure (pg. 19-20), cost burden (pg 21), and overcrowding (pg. 23); Pg. 27-28 discusses the vacancy rate in the city (i.e. housing availability); The "special needs housing" section has been adjusted to include a discussion of ELI (pg. 50 and 51); Pg. 99-101 details resources (in addition to the resources discussed in "special needs housing" subsections); Program 3 establishes actions for finding and securing subsidies.

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B3.	<i>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).)</i>	Large Sites: Sites larger than ten acres in size are deemed inadequate to accommodate housing for lower-income households unless analysis demonstrates the suitability of the sites for the development of housing affordable to lower-income households. The element describes the approximately 19-acre site as part of the Morningstar subdivision, but it does not analyze the suitability of the site. For example, typical developments utilizing state funding consist of approximately 50 to 150 units, yet the 19-acre site is anticipated for 440 units. To address this requirement, the element could discuss opportunities for phasing or lot splits to facilitate developments comparable to the typical state funded development. For additional information, see HCD's Sites Inventory Guidebook at https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml .	90-91	Jan 2022 RESPONSE: Per the HCD's Sites Inventory Guidebook, the analysis was updated to include evidence that the site will be adequate to accommodate lower income housing by providing a low-income affordability assessment and comparing that to rental rates of recently built apartments (2020) in the City. Additionally, the large site analysis includes information related to the feasibility of the site's development. The Morningstar Subdivision is a 177.05 acre planned subdivision located at the north end of the city to the west of Highway 86 and south of Ralph Road. The subdivision is planned for 21.15 acres of commercial, 6.66 acres of parkland, 9.81 acres of open space/water and sewer utilities, 120.65 acres of single family residential and 18.78 acres of multi-family residential as shown in Appendix C: Morningstar Subdivision Phasing Plan. The 18.78 acres of planned multi-family is contained in Assessor Parcel Number 063-010-080 (72.3 acres) and is proposed to include 440 multi-family units at a density of approximately 23 units per acre. Although the parcel has a current land use and zoning designation for single-family residential, due to the approved subdivision plans and proposed density, the units associated with this portion of the parcel have been allocated toward the low-income RHNA. To demonstrate the feasibility of lower income development on this site, this analysis will provide information that the Morningstar apartment units will be affordable to lower income and that the lot is likely to be developed.	~	The element should further detail the feasibility of development of high-density housing during the planning period. The information is limited to phasing in the planning period, but does not describe area sizes, any dates/timeline/updates for development during the planning period and should include a program to facilitate parcellation at appropriate sizes.	Appendix B lists 1 site (Morningstar) that is greater than 10 acres and contributing low-income units towards the RHNA allocation; nothing else being counted towards RHNA would require parcellation; Pg 93 discusses the feasibility of developing Morningstar (in addition to evidence in Appendix B) and gives an example with Morningside; Additional evidence has been included in the text detailing project development progress to date (pg. 93) Pg. 94-98 details small lot availability and feasibility; Program 4 addresses lot consolidation; Program 2 includes an action to allow different housing types in lower density designations (which would create flexibility in how larger lots can be developed).
B3. cont.		Emergency Shelters: The element indicates (Table 11) emergency shelters are permitted in the C2 zone, but it should also clearly identify which zones permit emergency shelters without discretionary action. <i>For your information, the element cannot be found in compliance unless zoning is available to permit emergency shelters without discretionary action.</i> If a zone is already available, the element should discuss available acreage in the zone, including typical parcel sizes and the presence of reuse opportunities, proximity of capacity to transportation and services and any conditions inappropriate for human habitability. In addition, the element should describe how emergency shelter parking requirements comply with AB 139 (Chapter 335, Statutes of 2019) or include a program as appropriate.	?	No Jan 2022 RESPONSE provided	N	The element does not add additional information regarding the permitting of emergency shelters without discretionary action, or other information.	Added information on pages 45-47; included information related to City Ordinance 781 (adopted 2014) and references to AB 139 and provided cross referencing to Program 7 and Program 15
B4.	<i>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).)</i>	Local Processing and Permit Procedures: While the element provides a general description of the processing and permit procedures, it should describe and analyze approval findings for impacts on cost, timing, supply, and approval certainty.	66-69	Jan 2022 RESPONSE: The Development Permit Procedures section has been revised to address this comment. The element adds information regarding site plan review, conditional use permits, lot line adjustments, subdivision and processing time frames but no analysis of site plan review.	N	list site plan review findings and evaluate for approval certainty	The Site Plan Review Section of the Housing Element (pg 68) has been updated to include language related to the Site Plan Review process.

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B4. cont.		On/Off-site Improvements: While the element provides a general description of site improvements, it should also identify the actual standards and analyze their impact as potential constraints on housing supply, cost, and affordability.		Jan 2022 RESPONSE: The Public Infrastructure Improvements, Service Constraints and Development Impact Fees and Exactions, and Infrastructure and Environmental Constraints sections have been revised to improve the analysis.	n/~	The element did not fully analyze this in the review. The element should be revised and must describe the potential impact of on/off-site improvements on housing supply, cost, and affordability.	Public Infrastructure Improvements and Service Constraints (pg 61), Development Impact Fees and Exactions (pg. 62-63), and the Infrastructure and Environmental Constraints section (beginning Pg. 76) all include discussion and analysis of on and off-site impacts to housing supply, cost, and affordability. Program 3 is in place to address site improvement costs. Program 8 is in place to monitor and adjust development impact fees as needed.
B6.	<i>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).)</i>	Persons with Developmental Disabilities: While the element provides general information regarding persons with disabilities, it must also identify and analyze persons with developmental disabilities in the jurisdiction and include programs as appropriate. HCD will send additional data under separate cover.		Jan 2022 RESPONSE: The Disability Living section has been updated with additional data and Program 12 has been revised with an additional action aimed at persons with developmental disabilities.	N	The element does not quantify or thoroughly analyze persons with developmental disabilities.	Please see Disability Living (pg. 47-48), Program 3 (pg. 123) and Program 12 (pg. 131)
C1.	<i>Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the housing element through the administration of land use and development controls, the provision of regulatory concessions and incentives, and the utilization of appropriate federal and state financing and subsidy programs when available. The program shall include an identification of the agencies and officials responsible for the implementation of the various actions. (Gov. Code, § 65583, subd. (c).)</i>	To have a beneficial impact in the planning period and address the goals of the housing element, programs must be revised with discrete timelines, objectives, and specific commitments, including: Programs to be revised with a discrete timeline include Program 1 (Residential Sites Inventory), Program 2 (Residential Sites Monitoring Program) and Program 12 (Special Needs Populations).	129	Jan 2022 RESPONSE: Programs have revised with the above recommendations. The element makes changes to dates for Programs 1-2, but does not make changes for Program 12	~	Program 12 should clarify the frequency of monitoring and assistance actions.	Program 12 (pg 131) has been updated to clarify the frequency of monitoring and assistance actions
C1. cont.		Programs to be revised with specific commitment include Program 2 (Residential Sites Monitoring Program), Program 7 (Zoning Ordinance), Program 9 (Expedited Project Review), Program 10 (Flexibility in Development Standards) and Program 15 (Supportive and Transitional Housing Program).		Jan 2022 RESPONSE: Programs have revised with the above recommendations.	~	Program 7 – what is date for EHA update? How often will code monitoring occur?	Program 7 (pg. 127-128) has been updated to clarify the frequency of monitoring
C1. cont.		Programs to be revised with specific objectives include Program 3 (Affordable Housing Development), Program 4 (Lot Consolidation), Program 6 (ADU Fee Waiver Program), Program 9 (Expedited Project Review), Program 12 (Housing for Special Needs Populations) and Program 16 (Alternative Housing).		Jan 2022 RESPONSE: Programs have revised with the above recommendations.	N	The element does not have quantifiable objectives. Where possible, the element should provide numerical outcomes for program actions.	Where feasible, program action items have been updated to include quantitative success criteria. In addition, all program actions have been updated to include monitoring frequency and/or completion due dates.
C3.	<i>The housing element shall contain programs which assist in the development of adequate housing to meet the needs of extremely low-, very low-, low- and moderate-income households. (Gov. Code, § 65583, subd. (c)(2).)</i>	The element must include programs to assist in the development of housing for lower- and moderate-income households, including special needs households. Specifically, programs should be added or modified to address the needs of farmworkers and persons with developmental disabilities. For example, the element could commit to proactive actions to coordinate with non-profit developers, employers or service providers, and other related organizations, to explore funding and incentives and to identify specific development opportunities.		Jan 2022 RESPONSE: Program 3 was revised to include additional objectives to proactively coordinate with special needs developers. Program 7 was updated to reflect revisions to the zoning ordinance for farmworker housing. Program 12 adds language	N	While the element's Program 12 adds in language regarding farmworker and developmental disabilities, it should add proactive outreach with developers, employers, funding, etc with timelines	Please see Program 3 (pg. 123-124) related to proactive outreach to developers and Program 19 (pg. 136-137) related to equitable employment; Program 12 (pg. 131) updated to include monitoring and frequency

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C2.	Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (Gov. Code, § 65583, subd. (c)(1).)	As noted in Finding B3, the element does not include a complete site analysis ; therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types.		Jan 2022 RESPONSE: As stated in the response for Finding B3, the analysis of the large site for the Morningstar site was revised to meet the criteria of the Sites Inventory Guidebook. Therefore, no additional sites analysis is required.	TBD	Continue	Appendix B only lists 1 site that is greater than 10 acres and claiming low-income units (Morningstar); nothing else being counted towards RHNA would require parcellation; Pg 93 discusses the feasibility of developing Morningstar (in addition to evidence in Appendix B) and gives an example with Morningside; Additional evidence has been included in the text detailing project development progress to date. Pg 91-96 details small lot availability and feasibility; Program 4 addresses lot consolidation; Program 2 includes an action to allow different housing types in lower density designations (which would create flexibility in how larger lots can be developed).
C4.	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 B4 and B5, the element requires a complete analysis of potential governmental and nongovernmental constraints . Depending upon the results of that analysis, the City must revise or add programs and address and remove or mitigate any identified constraints. In addition, as noted on page 42, the element must have specific action to address heights for multifamily uses and the Planning Commission approval of maximum densities as potential constraints . While the element includes Program 10 (Flexibility in Development Standards), this program must go beyond "consider" with specific commitment to revise heights and should be revised with an additional action to address the Planning Commission approval regarding maximum densities.		Jan 2022 RESPONSE: Programs have been updated and specifically, Program 10 has been revised to "implement" rather than "consider".	TBD	Continue	No new programs or actions have been drafted. However, where feasible, program action items have been updated to include quantitative success criteria. In addition, all program actions have been updated to include monitoring frequency and/or completion due dates.
C5.	Promote AFFH opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)	As noted in Finding B1, the element does not include a complete assessment of fair housing . Depending on a complete analysis, the element must add or revise programs as appropriate.		Jan 2022 RESPONSE: Appendix D includes the AFFH assessment.	TBD	Continue	Table D-11 has been expanded to include additional information related to localized contributing factors and specific programs and actions that have been included in the HE to address these factors in a meaningful way.
B2. cont.		Vacancy Rate: Of all vacancies, approximately 81 percent are categorized as "other". This figure is significantly disproportionate to the rest of the region (28 percent) and as a result the element should include analysis and add or modify policies and programs as appropriate.	120	The element clarifies the data discrepancy by adding a program action to Program 1 to research this Census discrepancy.	Y	Program action has a time commitment within 2 years of due date, with implementation items as necessary.	This item is understood to be satisfied. No additional response required.
B3. cont.		Site Map: The element does not include a map of available sites. The element must provide a map of sites listed in the inventory.	App. B	The element adds in a site map, and the Morningstar subdivision site plan.	Y		This item is understood to be satisfied. No additional response required.

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B3. cont.		<u>Electronic Site Inventory</u> : 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/community-development/housing-element/index.shtml 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 .	Excel	The City submitted an electronic sites inventory.	Y		This item is understood to be satisfied. No additional response required.
B3. cont.		<u>Transitional and Supportive Housing</u> : Transitional and supportive housing must be permitted as a residential use in all zones and only subject to those restrictions that apply to other residential dwellings of the same type in the same zone. The element indicates (Table 11) transitional and supportive housing is only permitted like other residential uses if occupied by six or fewer persons. However, these uses should be permitted as residential uses regardless of occupancy. The element must demonstrate consistency with these statutory requirements and include a program, as appropriate.	131	Program 15 commits to amending zoning code to allow T&S housing by October 2023	Y	Program 15 actions in line with what HCD is looking for.	This item is understood to be satisfied. No additional response required.
B3. cont.		<u>Low Barrier Navigation Centers</u> : 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. The element must demonstrate compliance with this requirement and include programs as appropriate.	126	Program 7 commits to amending the zoning code to allow LBNC by October 2023	Y	Program 7 actions have commitment, outcomes, and timeline in accordance with what HCD is looking for.	This item is understood to be satisfied. No additional response required.
B3. cont.		<u>Accessory Dwelling Units (ADU)</u> : The element states the City's Zoning Ordinance currently defines accessory dwelling units as "guest dwellings" or "accessory living quarters with no kitchen". This is not consistent with the definition in Government Code section 65852.2 (ADU law). Furthermore, the City must allow for ADUs in all zones allowing residential uses, not just residential zones, as noted in the element. The element must describe whether the City complies with current ADU law and include a program as appropriate to comply with law.	124-125	Program 5 commits to updating the City's definition of ADU into compliance with State ADU law.	Y	Program 5 actions have commitment, outcomes, and timeline in accordance with what HCD is looking for.	This item is understood to be satisfied. No additional response required.
B4. cont.		<u>Constraints on Housing for Persons with Disabilities</u> : The element must include an analysis of potential constraints on housing for persons with disabilities. Specifically, the City must have a written procedure to provide reasonable accommodation in zoning and land use. The element should either describe compliance with this requirement or include a program to establish a written procedure early in the planning period (e.g., one year). This is particularly critical given the enactment of these requirements since 2002 and importance of this procedure in addressing barriers to housing for persons with disabilities.	58-59	The analysis of RA suffices.	Y	Element adds Program 15 to establish a written procedure	This item is understood to be satisfied. No additional response required.
B4. cont.		<u>Zoning and Fees Transparency</u> : The element must clarify its compliance with new transparency requirements for posting all zoning and development standards for each parcel on the jurisdiction's website pursuant to Government Code section 65940.1, subdivision (a)(1).	127		Y		This item is understood to be satisfied. No additional response required.

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B4. cont.		Local Ordinances: The element must specifically analyze any other locally adopted ordinances such as inclusionary ordinances or short-term rental ordinances that directly impact the cost and supply of residential development	70		Y		This item is understood to be satisfied. No additional response required.
B5.	<i>An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, the cost of construction, the requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Government Code section 65583.2, and the length of time between receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality's share of the regional housing need in accordance with Government Code section 65584... (Gov. Code, § 65583, subd. (a)(6).)</i>	Approval Time and Requests for Lesser Densities: The element must include analysis of requests to develop housing at densities below those identified, the length of time between receiving approval for a housing development and submittal of an application for building permits that potentially. The element must address any hinderance on the development of housing and include programs as appropriate.	72-73	Markets can also constrain the timing between project approval and requests for building permits. In some cases, this may be due to developer's inability to secure financing for construction. In Imperial, the average time between project approval and request for building permit is typically two to four weeks. By nature, development projects typically tend to be proposed at or close to the maximum available density. As the City offers incentives for projects to achieve maximum density (or exceed it), projects that propose to develop below the allowable density or the density described in the sites inventory are rare.	Y		This item is understood to be satisfied. No additional response required.
B6. cont.		Elderly Households: To better formulate policies and programs, the element should analyze tenure (i.e., owners and renters) rates for elderly households.	49-50	The element adds a 'housing tenure by age' chart.	Y	Given the overwhelming majority of seniors are homeowners, programs and policies are crafted to support these homeowners, while providing additional options to rent/own with increased RHNA and ongoing projects.	This item is understood to be satisfied. No additional response required.
B6. cont.		Persons Experiencing Homelessness: The element currently uses 2010 Census data and states the region wide 2019 Point-in-Time count does include the number of homeless individuals in the jurisdiction. However, the element must include a local and current estimate of the number of persons experiencing homelessness. For more information, please see the Building Blocks at https://www.hcd.ca.gov/community-development/building-blocks/housing-needs/people-experiencing-homelessness.shtml .	46	The element adds a statement regarding a proportional estimate of unsheltered individuals in the City.	Y		This item is understood to be satisfied. No additional response required.
B7.	<i>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).)</i>	The element states there are no assisted housing developments at-risk of conversion to market rate uses until 2032. However, HCD records show Imperial Villas may opt out of affordability terms in 2029. Therefore, the City should reconcile this information, and if necessary, provide analysis of at-risk units and add or modify programs as appropriate. For more information, please see HCD Building Blocks for housing elements at https://www.hcd.ca.gov/community-development/building-blocks/housing-needs/assisted-housing-developments.shtml .	34-38	The element clarified the assessment of risk and concluded that the Imperial Villas development will be at risk during the next 10 years. Subsequent analysis was added	Y	The element clarified the assessment of risk and added preservation costs, and other requisite analysis points.	This item is understood to be satisfied. No additional response required.
C6.	<i>The housing program shall preserve for low-income household the assisted housing developments identified pursuant to paragraph (9) of subdivision (a). The program for preservation of the assisted housing developments shall utilize, to the extent necessary, all available federal, state, and local financing and subsidy programs identified in paragraph (9) of subdivision (a), except where a community has other urgent needs for which alternative funding sources are not available. The program may include strategies that involve local regulation and technical assistance. (Gov. Code, § 65583, subd. (c)(6).)</i>	As noted in Finding B7, the element may require analysis of units at-risk of converting to market rate uses. If applicable, the element may need to add or modify programs.	129-130	The element substitutes language	Y		This item is understood to be satisfied. No additional response required.

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D.	<i>Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element, and the element shall describe this effort. (Gov. Code, § 65583, subd.(c)(8).)</i>	HCD understands the City held public workshops to solicit input for the housing element; however, the element must describe how input was incorporated into the draft housing element. Further, the element should describe additional methods for public outreach efforts in the future, particularly for include lower-income and special needs households and neighborhoods with higher concentrations of lower-income households. For example, the City could conduct targeted stakeholder interviews or establish a committee representative of lower-income households in future public outreach efforts.			Y	This has been satisfied through the proactive outreach conducted for the housing element.	This item is understood to be satisfied. No additional response required.
D. cont.		In addition, the element does not clearly describe when the element was made available for public comment. For your information, by not providing an opportunity for the public to review and comment on a draft of the element sufficiently in advance of submission, the City will not have yet made a diligent effort to encourage the public participation in the development of the element and the lack of availability reduces HCD's consideration of public comments in its review. The availability of the document to the public and opportunity for public comment prior to submittal to HCD is essential to the public process and HCD's review. The City must proactively make future revisions available to the public, including any commenters, prior to submitting any revisions to HCD and diligently consider and address comments, including revisions to the document where appropriate. HCD's future review will consider the extent to which the revised element documents how the City solicited, considered, and addressed public comments in the element. The City's consideration of public comments must not be limited by HCD's findings in this review letter.	12	The element was made available two separate times prior to HCD submittal	Y	The element was made available. The lack of public comment did not result from inadequate noticing of the housing element updates.	This item is understood to be satisfied. No additional response required.