

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

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August 30, 2021

Joanne Coletta, Director  
Community Development Department  
City of Corona  
400 S. Vicentia Avenue  
Corona, CA 92880

Dear Joanne Coletta:

**RE: Review of Corona's 6<sup>th</sup> Cycle (2021-2029) Draft Housing Element**

Thank you for submitting the City of Corona's (City) draft housing element received for review on July 1, 2021 along with revisions on August 10, 2021. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. In addition, HCD considered comments from the Southwest Regional Council of Carpenters pursuant to Government Code section 65585, subdivision (c).

The draft element addresses many statutory requirements; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). The enclosed Appendix describes the revisions needed to comply with State Housing Element Law.

To remain on an eight-year planning cycle, the City must adopt its housing element within 120 calendar days from the statutory due date of October 15, 2021 for Southern California Association of Governments (SCAG) localities. If adopted after this date, Government Code section 65588, subdivision (e)(4), requires the housing element be revised every four years until adopting at least two consecutive revisions by the statutory deadline. For more information on housing element adoption requirements, please visit HCD's website at: [http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sb375\\_final100413.pdf](http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sb375_final100413.pdf).

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

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

HCD is committed to assisting Corona in addressing all statutory requirements of State Housing Element Law and appreciates the efforts of Jay Eastman, Planning Manager, Emily Green and consultants Brenna Weatherby and Veronica Tam in the preparation of your draft element. If you have any questions or need additional technical assistance, please contact Chelsea Lee at [Chelsea.Lee@hcd.ca.gov](mailto:Chelsea.Lee@hcd.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Shannan West". The signature is fluid and cursive, with the first name being more prominent.

Shannan West  
Land Use & Planning Unit Chief

Enclosure

## APPENDIX CITY OF CORONA

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

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

### **A. Housing Needs, Resources, and Constraints**

1. *An analysis of population and employment trends and documentation of projections and a quantification of the locality's existing and projected housing 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).)*

Overcrowding: Although the element indicates the total number of overcrowded households (page 14), it must quantify and analyze the number of overcrowded households by tenure (renter and owner).

Extremely Low-income Households (ELI): The element quantifies existing and projected ELI households but must also analyze their housing needs. This is particularly important given the unique and disproportionate needs of ELI households. For example, the element could 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>.

2. *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).)*

Public Outreach: The element provides a brief discussion of community outreach conducted on C-1 but generally does not address AFFH requirements. While AFFH outreach can be conducted with the other portions of the housing element, it must also be specific to AFFH. For example, the outreach could specifically target fair housing organizations (Table 20) or neighborhoods with relatively concentrated poverty for

input related to housing and community development needs and access to opportunities such as education and transportation.

Local Data and Knowledge and Other Relevant Factors: The element provides useful information and data on local and regional patterns and trends for all areas (Fair Housing Enforcement and Capacity, Segregation and Integration, Racially/Ethnicity Concentrated Areas of Poverty (R/ECAP), Access to Opportunity, and Disproportionate Housing Needs and Displacement Risk). However, the City's analysis for each of these areas must also be informed by local data and knowledge from stakeholders within the City. For example, the analysis could utilize outreach as described above through surveys, interviews, etc. from local non-profit organizations and advocacy groups engaged in housing issues. In addition, the element must include other relevant factors that contribute to fair housing issues in the jurisdiction. For instance, the element can analyze historical governmental and nongovernmental land use, zoning and investment practices (e.g., infrastructure) or other information and demographic trends.

Site Inventory: The element includes some general discussion and conclusions that identified sites for lower-income households are concentrated in central areas of the City or areas of lower opportunity and sites for above moderate-income households are mainly in the southern portion of the City where incomes are relatively higher. In addition, the element should include analysis to support these conclusions, including the number of units per site by income group for each of the AFFH categories relative to the existing patterns (e.g., number of households), impacts on patterns of disproportionate housing needs (e.g., overpayment, overcrowding, displacement) and expanding on the reasoning for apparently isolating the regional housing need allocation for lower income households. Further, if the inventory continues to isolate the Regional Housing Needs Allocation (RHNA) for lower-income households in central areas, the element must have commensurate programs with place-based strategies for community revitalization and new opportunities in higher opportunity areas (beyond RHNA) to result in an equitable quality of life and AFFH throughout the City.

Contributing Factors to Fair Housing Issues: The element identifies many contributing factors to fair housing issues. In addition, the element should consider prioritizing these factors, especially in relation to the major identified issues, to better formulate policies and programs and carry out meaningful actions to AFFH.

Goals, Priorities, Metrics, and Milestones: The element must be revised to add or modify goals and actions based on the outcomes of a complete analysis. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have metrics and milestones as appropriate and must address housing mobility enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for community preservation and revitalization and displacement protection.

- 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).)*

Regional Housing Need Allocation (RHNA) Progress: The City's RHNA may be reduced by the number of new units approved, permitted and built since July 1, 2021 by demonstrating affordability based on rents, sale prices or other mechanisms ensuring affordability (e.g., deed restrictions). The element credits planned and approved projects toward the RHNA for moderate and above moderate-income household; however, it does not provide sufficient information for moderate-income units. Specifically, the element assumes apartments and condominiums are affordable to moderate-income households based on market rents and sale prices, but this assumption does not appear consistent with sales prices, rents, and affordability levels (pages 32 to 33). To utilize these units toward moderate-income housing needs, the element should demonstrate their affordability based on the actual or anticipated rents and sales prices of the listed projects.

Realistic Capacity: The element assumes 75 percent of maximum allowable density for most parcels and notes the assumption is based on historical development patterns, but this information appears inconsistent with planned and approved projects (Table 38). For example, R-3 zoned projects for moderate-income households appear to achieve densities near 50 percent of maximum densities. The estimated of the number of units for each site must be adjusted as necessary, based on the land-use controls and site improvements, typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction, and on the current or planned availability and accessibility of sufficient water, sewer, and dry utilities. The element should be revised to address this requirement.

In addition, the element appears to assume residential development on sites with zoning that allow 100-percent nonresidential uses. For these sites, the element should account for the likelihood of nonresidential uses. The element should include analysis based on factors such as development trends, performance standards or other relevant factors. For example, the element could analyze all development activity in these nonresidential zones, how often residential development occurs and adjust residential capacity calculations, policies, and programs accordingly.

Suitability of Nonvacant Sites: The element describes nonvacant sites were identified based on improvement-to-land value ratio of less than 1.0 (i.e. improvements on site are worth less than the value of the land), the parcel's existing use vs. zoned use, age of structure, floor area ratio, and ownership patterns (i.e. if contiguous parcels have one owner, they are more likely to be consolidated and redeveloped). The element also concludes characteristics around recent trends are similar to identified sites. However, to demonstrate the likelihood that uses will discontinue in the planning period, the inventory should contain information on the various factors used for identification and characteristics related to recent trends.

For your information, if the housing element relies upon nonvacant sites to accommodate more than 50 percent of the RHNA for lower income households, it must demonstrate existing uses are not an impediment to additional residential

development and will likely discontinue in the planning period (Gov. Code, § 65583.2, subd. (g)(2)). Absent findings (e.g., adoption resolution) based on substantial evidence, the existing uses will be presumed to impede additional residential development and will not be utilized toward demonstrating adequate sites to accommodate the RHNA.

Replacement Requirements: If the sites inventory identifies sites with existing residential uses, it must identify whether the current residential uses are affordable to lower-income households or describe whether the additional residential development on the site requires the demolition of the existing residential use. For nonvacant sites with existing, vacated, or demolished residential uses and occupied by, or subject to an affordability requirement for, lower-income households within the last five years there must be a replacement housing program for units affordable to lower-income households (Gov. Code, § 65583.2, subd. (g)(3)). Absent a replacement housing program, these sites are not adequate sites to accommodate lower-income households. The replacement housing program has the same requirements as set forth in Government Code section 65915, subdivision (c)(3). The housing element must be revised as appropriate consistent with this statutory requirement including a program, if necessary.

In addition, the inventory identifies mobilehome parks with potential for redevelopment in the planning period and should include specific discussion and programs given the importance of this housing types in addressing a variety of housing needs. For example, the element should discuss if the mobilehome parks are likely to be redeveloped or units are being added to the existing sites and should include specific programs for replacement. Further, the element should consider impacts on residents, consistency with City program goals (Program 4), municipal code (Chapter 17.30), Government Code section 66427.5, and provisions related to AB 2782 (Chapter 35, Statutes of 2020). AB 2782 requires, among other things, noticing to homeowners prior to local approval of change in use and a replacement and relocation plan and steps to mitigate impacts on displaced residents.

Small and Large Sites: Sites larger than ten acres in size or smaller than a half-acre in size are deemed inadequate to accommodate housing for lower-income households unless it is demonstrated, with sufficient evidence, that sites are suitable to accommodate housing for lower-income households. While the element included a few examples about developments with lot consolidation, it must also provide specific examples with the densities, affordability and, if applicable, circumstances leading to consolidation. The element should relate these examples to the sites identified to accommodate the RHNA for lower-income households to demonstrate that these sites can adequately accommodate the City's lower-income housing need. In addition, the element must demonstrate the suitability of the 11.31-acre site proposed rezoning and for your information, sites rezoned to accommodate a shortfall of capacity to accommodate the regional housing need for lower-income households must permit at least 16 units per site. Based on a complete analysis, the City should consider adding or revising programs to include incentives for facilitating development on small sites.

Accessory Dwelling Units (ADUs): The element states the City received 3 applications for ADUs in 2019 and permitted 28 units in 2020 and, based on recent increases, assumes 160 ADUs over the planning period or approximately 20 ADUs per year. According to HCD records, 3 units were permitted in 2018, none were permitted in 2019, and 14 were permitted in 2020. The trends noted in the element appear inconsistent with HCD records and, further, do not support an assumption of 20 ADUs per year. To support assumptions for ADUs in the planning period, the element should reconsider assumptions, reconcile trends with HCD records, include additional information such as more recent permitted units and inquiries, resources and incentives, other relevant factors and modify policies and programs as appropriate.

Water and Sewer Priority: As noted on page 80, 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.) While the element indicates the City will deliver the housing element to the City's Department of Water and Power, it should also clarify whether written procedures are available to grant water and sewer priority and if not, add or modify programs to establish a procedure early in the planning period. For additional information and sample cover memo, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/other-requirements/priority-for-water-sewer.shtml>.

Electronic Sites Inventory: For your information, pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD. Please see HCD's housing element webpage at <https://www.hcd.ca.gov/community-development/housing-element/index.shtml#element> for a copy of the form and instructions. The City can reach out to HCD at [sitesinventory@hcd.ca.gov](mailto:sitesinventory@hcd.ca.gov) for technical assistance.

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).)*

On-/Off-Site Improvements: The element provides a general description of on- and off-site improvements on page 70, but it must identify and analyze actual improvement standards (e.g., minimum street width) for impacts on housing supply and cost. For additional information and a sample analysis, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/constraints/codes-and-enforcement-on-offsite-improvement-standards.shtml>.

Processing and Permit Procedures: The element describes the Precise Plan review process for most development including approval findings related to compatibility with the character of the neighborhood, enhancing character and providing harmonious, orderly, and attractive development. However, the element should analyze these findings for impacts on timing, cost, supply, and approval certainty and include programs to address identified constraints.

Fees: The element must describe all required fees for single family and multifamily housing development, including impact fees, and analyze their impact as potential constraints on housing supply and affordability. The element provides a description of fees on pages 69-73, but should address all types of fees, including school fees and the Transportation Uniform Mitigation Fee (TUMF). Depending on this analysis, a program should be added as necessary.

SB 35 Streamlined Ministerial Approval Process: The element must clarify whether there are written procedures for the SB 35 Streamlined Ministerial Approval Process and add a program to address these requirements if necessary.

Zoning, Development Standards and Fees: The element must clarify compliance with new transparency requirements for posting all zoning, development standards and fees on the City's website and add a program to address these requirements, if necessary.

Housing for Persons with Disabilities: The element subjects group homes for seven or more to a conditional use permit (CUP), unlike other similar uses. The element should specifically analyze these constraints for impacts on housing supply and choices and approval certainty and objectivity for housing for persons with disabilities and include programs as appropriate.

5. *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).)*

The element must address the length of time between receiving approval for housing development and submittal of application for building permits. The analysis must address any hinderances on housing development and programs should be added as appropriate.

6. *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).)*

Farmworkers: The element indicates (page 25) there are 152 farmworkers employed in the agricultural industry within the City. However, the analysis does not specify whether regional contexts were taken into consideration. Farmworkers from the broader area and those employed seasonally may have housing needs that are not currently reflected in the analysis. As a result, the element should at least



acknowledge the housing needs of permanent and seasonal farmworkers at a county-level (e.g., USDA county-level farmworker data) and include programs as appropriate.

Persons with Developmental Disabilities: The element must also quantify the number of persons with developmental disabilities and analyze the special housing needs of persons with developmental disabilities. The analysis could include the following:

- a quantification of the total number of persons with developmental disabilities;
- a description of the types of developmental disabilities;
- a description of the housing need, including a description of the potential housing problems; and
- a discussion of resources, policies and programs including existing housing and services, for persons with developmental disabilities.

For additional information and a sample analysis, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/people-with-disabilities.shtml>, and for additional information, see the area's local regional center for developmental services at <http://www.dds.ca.gov/RC/RCList.cfm>.

## **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 through the administration of land use and development controls, the provision of regulatory concessions and incentives, and the utilization of appropriate federal and state financing and subsidy programs when available. The program shall include an identification of the agencies and officials responsible for the implementation of the various actions. (Gov. Code, § 65583, subd. (c).)*

To have a beneficial impact in the planning period and address the goals of the housing element, programs must be revised with discrete timelines, including for Programs 2 (Housing Choice Vouchers), 5 (Neighborhood Improvements), 9 (Residential Sites Monitoring), 10 (Lot Consolidation), 11 (Multifamily Acquisition and Rehabilitation), 14 (Zoning Ordinance Monitoring), 22 (Housing for Persons Experiencing Homelessness), 23 (Housing for Special Needs Populations) and 25 (Alternative Housing Program).

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 the Finding A3, the element does not include a complete sites inventory or analysis; as a result, the adequacy of sites and zoning has not been established. Based on the results of a complete sites inventory and analysis, programs may need to be added, or revised, to address a shortfall of sites and zoning for a variety of housing types. In addition:

Shortfall of Sites: The element describes a shortfall of sites, indicates rezoning will occur to accommodate the RHNA and includes Program 7 (Site Availability). However, Program 7 must be revised pursuant to Government Code sections 65583.2, subdivisions (h) and (i), as follows:

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

Program 16 (ADU Monitoring Program): As noted in Finding A3, the element assumes a production of 160 ADUs for the 6<sup>th</sup> cycle. Program 16 should be revised based on the outcomes of a complete analysis. In addition, Program 16 should be revised to strengthen monitoring from a midterm review of ADU trends in 2025 to every two years and actions to address a potential shortage in ADU production or affordability should be done within a specified time period (e.g., 6 months).

Replacement Housing Requirements: As noted under Finding A3, the housing element must include a program to provide replacement housing pursuant to Government Code section 65583.2, subdivision (g), paragraph (3). The replacement housing program must adhere to the same requirements as set forth in Government Code section 65915, subdivision (c), paragraph (3).

Program 14 and 22 (Emergency Shelters): For emergency shelters, the element notes parking is required for staff members plus one space per 12 beds and shelters are *at least* 300 feet from any other shelter. These provisions are inconsistent with state law. Parking requirements are allowed for staff provided the requirements do not exceed parking requirements for other uses and proximity requirements provide those shelters

should not be more than 300 feet apart. As a result, either Program 14 or 22 should be modified to address these constraints.

3. *The housing element shall contain programs which assist in the development of adequate housing to meet the needs of extremely low-, very low-, low- and moderate-income households. (Gov. Code, § 65583, subd. (c)(2).)*

The element must include a program(s) with specific actions and timelines to assist in the development of housing for extremely low-income households. The program(s) could commit the City to adopting priority processing, granting fee waivers or deferrals, modifying development standards, granting concessions and incentives for housing developments that include units affordable to extremely low-income households; assisting, supporting or pursuing funding applications; and outreach and coordination with affordable housing developers.

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

As noted in Findings A4 and A5, 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 to address and remove or mitigate any identified constraints.

5. *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 A2 the element must include a complete assessment of fair housing. Based on the outcomes of that analysis, the element must add or modify programs. For additional guidance on program requirements to affirmatively further fair housing, please see HCD's guidance at <https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml>.

6. *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).)*

The element includes Program 3 (Conservation of Existing and Future Affordable Units) and specifies actions to monitor at-risk units, including contacting property owners and non-profit developers to identify potential acquisition opportunities. However, the program should be modified to include noticing to these entities within 3 years and 6 months and establish specific time parameters around such actions.

7. *Develop a plan that incentivizes and promotes the creation of ADUs that can be offered at affordable rent, as defined in Section 50053 of the Health and Safety Code, for very low, low-, or moderate-income households. (Gov. Code, § 65583, subd. (c)(7).)*

Programs must be added or modified to include incentives to promote the creation and affordability of ADUs. Examples include exploring and pursuing funding; modifying development standards; and reducing fees beyond state law; increasing awareness; pre-approved plans and homeowner/applicant assistance tools.

### **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 provides a summary of quantified objectives on page 142 for the 6<sup>th</sup> cycle planning period. For your information, conservation objectives could be increased by incorporating anticipated outcomes from the following programs: 2 (Housing Choice Voucher Program), 3 (Conservation of Existing and Future Affordable Units), 26 (Preservation of At-Risk Housing).