

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

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May 21, 2018

**Attachment - 1
Planning Case P18-0074**

Rafael Guzman
Community and Economic Development Director
City of Riverside
3900 Main Street
Riverside, CA 92522

Dear Rafael Guzman:

RE: Review of the City of Riverside's 5th Cycle (2013-2021) Draft Four-Year Housing Element Update

Thank you for submitting the City of Riverside's revised draft housing element update received for review on April 4, 2018, along with revisions received on April 25 and May 8, 2018. Pursuant to Government Code (GC) Section 65585(b), the Department is reporting the results of its review. Our review was facilitated by conversations with Doug Darnell and Jay Eastman, of your staff.

The revised draft element, submitted to meet the four year update requirements pursuant to GC Section 65588(e)(4), meets the statutory requirements of state housing element law. This finding was based on, among other reasons, the completed rezones pursuant to Program H-21, amendments to the constraints analysis to incorporate new provisions of state law, and the inclusion of Policy H-3.8, which prevents the displacement of affordable housing units on non-vacant sites within the sites inventory. The revised element will comply with state housing element law (Article 10.6 of the Government Code) when it is adopted and submitted to the Department, in accordance with GC Section 65585(g).

However, as noted in the prior review, Riverside was required to submit a four year update by October 15, 2017 pursuant to GC Section 65588(e)(4). As this deadline was missed, the city must continue to revise its element every four years until adopting at least two consecutive revisions. Provided the city adopts its 6th cycle housing element on or before the statutory due date for that housing element, it will meet the first four-year update requirement. For more information on housing element adoption requirements, please visit our website at:
http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sb375_final100413.pdf

For your information, some general plan element updates are triggered based upon housing element adoption. For example, a jurisdiction must address environmental justice in their general plans, by the adoption of a separate environmental justice element or to integrate environmental justice goals, policies, and objectives into their general plans. This requirement is applicable upon the adoption or next revision of two or more elements concurrently on or after January 1, 2018 (GC 65302(h)). In addition, the safety and conservation elements of the general plan must include analysis and policies regarding fire and flood hazard management (GC Section 65302(g)). The

Department urges the City of Riverside 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:

http://opr.ca.gov/docs/SB244_Technical_Advisory.pdf and
http://opr.ca.gov/docs/Final_6.26.15.pdf.

The Department appreciates the hard work and dedication of Doug Darnell and Jay Eastman provided in preparation of the housing element and looks forward to receiving Riverside's adopted housing element. 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 must continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available while considering and incorporating comments where appropriate. If you have any questions or need additional technical assistance, please contact Melinda Coy, of our staff, at (916) 263-7425.

Sincerely,

A handwritten signature in blue ink, appearing to read "Zachary Olmstead", with a stylized flourish at the end.

Zachary Olmstead
Deputy Director