

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT

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December 13, 2012

James M. Moore
Director of Planning and Building Services
Town of Fairfax
142 Bolinas Road
Fairfax, CA 94930

Dear Mr. Moore:

RE: Review of the Town of Fairfax's Adopted Housing Element

Thank you for submitting Fairfax's adopted housing element received for review on September 14, 2012 and adopted on April 4, 2012. The adopted housing element was submitted for the 4th planning cycle and covers the 2009-2014 planning period. The Department is required to review adopted housing elements and report the findings to the locality pursuant to Government Code Section 65585(h). A meeting and subsequent conversations with you facilitated the review.

According to Department records, the Town did not submit a draft element for review as required by State housing element law. Government Code Section 65585(b) states "at least 60 days prior to the adoption of an amendment to this element the planning agency shall submit a draft of the element or amendment to the Department" (of Housing and Community Development). Furthermore, Section 65585(e) states, "prior to the adoption of its draft or draft amendment, the legislative body shall consider the findings made by the Department." Since the element was not submitted to this Department prior to adoption, the Town must consider these findings pursuant to Section 65585(e) and (f).

The adopted element addresses many statutory requirements; however, revisions will be necessary to comply with State housing element law (Article 10.6 of the Government Code). In particular, the element must demonstrate adequate sites to accommodate the City's regional housing need allocation (RHNA) for lower-income households. The enclosed Appendix describes these and other revisions needed to comply with State housing element law.

We are committed to assist Fairfax in addressing all statutory requirements of housing element law. If you have any questions or need additional technical assistance, please contact Melinda Coy, of our staff, at (916) 445-5307.

Sincerely,

Glen A. Campora
Assistant Deputy Director

Enclosure

APPENDIX TOWN OF FAIRFAX

The following changes would bring Fairfax'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 the Department's website at www.hcd.ca.gov/hpd. Refer to the Division of Housing Policy Development and the section pertaining to State Housing Planning. Among other resources, the Housing Element section contains the Department's latest technical assistance tool *Building Blocks for Effective Housing Elements (Building Blocks)* available at www.hcd.ca.gov/hpd/housing_element2/index.php, the Government Code addressing State housing element law and other resources.

A. Review and Revision

Review the previous element to evaluate the appropriateness, effectiveness, and progress in implementation, and reflect the results of this review in the revised element (Section 65588 (a) and (b)).

A thorough program-by-program review is necessary to evaluate Town's performance in addressing housing goals. As part of this analysis, the element should describe the actual results of the prior element's programs, compare those results to the objectives projected or planned, and based on an evaluation of any differences between what was planned versus achieved, provide a description of how the objectives and programs of the updated element incorporate changes resulting from the evaluation. This information and analysis provides the basis for developing a more effective housing program.

B. Housing Needs, Resources, and Constraints

1. *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 (Section 65583(a)(1)).*

While the element quantifies the number of existing ELI households (Page HB-6), it must also include an estimate of the projected number of extremely low-income households and analyze the existing housing needs. The element may either use available Census Data to calculate the number of extremely low-income households, or presume 50 percent of the very low-income households qualify as extremely low-income households. To assist the analysis, see the *Building Blocks'* website at: http://www.hcd.ca.gov/hpd/housing_element2/EHN_extremelylowincome.php.

2. *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 (Section 65583(a)(2)).*

While the element includes overpayment information for lower-income households, the element must also identify and analyze overpayment by tenure (renters and owners) for all households. Further, the element must include overcrowding information by tenure. A thorough analysis will assist the Town in

developing appropriate housing policies and prioritizing housing resources. For additional information, refer to the *Building Blocks*' technical assistance tool at http://www.hcd.ca.gov/hpd/housing_element2/EHN_Overpayment.php.

3. *Include an inventory of land suitable for residential development, including vacant sites and sites having the potential for redevelopment, and an analysis of the relationship of zoning and public facilities and services to these sites (Section 65583(a)(3)). The inventory of land suitable for residential development shall be used to identify sites that can be developed for housing within the planning period (Section 65583.2).*

Fairfax has a regional housing need allocation (RHNA) of 108 housing units, of which 35 are for lower-income households. To address this need, the element relies on second units, vacant and non-vacant sites, and non-residential sites. To demonstrate the adequacy of these sites and strategies to accommodate the Town's RHNA, the element must include complete analyses:

Addressing Unaccommodated Need from the Previous Planning Period (AB 1233): The element did not address this requirement. Pursuant to Chapter 614, Statutes of 2005 (AB 1233), if the Town of Fairfax failed to make adequate sites available to accommodate the regional housing need in the prior planning period, including failure to implement rezoning, the Town must zone or rezone sites to accommodate any unaccommodated need within the first year of the 2008-2014 planning period. As you know, the Town of Fairfax's housing element was found out of compliance in the previous planning period due to inadequate sites, and therefore the element must include an analysis or programs to demonstrate compliance with these statutory requirements. Further information can be found at http://www.hcd.ca.gov/hpd/hrc/plan/he/ab_1233_final_dt.pdf.

Please also note, Government Code Sections 65584.09 and 65583(c)(1) (AB 1233) requires the Town to zone sufficient sites to accommodate the unaccommodated need from the previous planning period within the first year of the 2009-2014 planning period. As this timeframe has lapsed, the Department cannot find the element in compliance until the required rezoning is complete and it is amended to reflect that rezoning.

Sites Inventory: While the element lists sites by parcel number, parcel size, existing use and zoning, it must also include the general plan designation and estimated capacity for each parcel.

Multiple Parcels: Sites 1, 3, 5, and 6 are comprised of multiple parcels. While the inventory may aggregate parcels, it should also list sites individually by size, General Plan designation, zoning, and capacity. *For parcels anticipated to be developed individually*, the element should include an analysis demonstrating the potential of these sites to accommodate new residential development, given necessary economies of scale particularly for new multifamily rental development affordable to lower-income households. While it may be possible to build housing on a very small parcel, the nature and conditions necessary to construct the units often render the

provision of affordable housing infeasible. For example, assisted housing developments utilizing State or federal financial resources typically include 50-80 units. *For parcels anticipated to be consolidated*, the element could describe the potential for lot consolidation, including conditions rendering parcels suitable and ready for redevelopment, trends or information on the number of owners and indicating where sites have been assembled.

Realistic Capacity: The element did not address this requirement. The element must describe the methodology for determining the residential capacity of sites. The estimate of potential unit capacity must consider land-use controls and site improvement requirements and could reflect recently built densities. For mixed-use or commercial sites allowing residential uses, the capacity analysis should also account for potential development of non-residential uses and could consider any performance standards mandating a specified portion of a mixed-use site as non-residential (e.g., first floor, front space as commercial). See the *Building Blocks'* website and sample analysis at http://www.hcd.ca.gov/hpd/housing_element2/SIA_zoning.php#capacity.

Suitability of Underutilized Sites: The element did not address this requirement. The element appears to rely on potential reuse or intensification of sites with existing residential development to accommodate a portion of the remaining regional housing need. While the element provides a very general description of the existing uses, it must also demonstrate the potential for redevelopment and evaluate the extent to which existing uses may impede additional residential development. For example, one site is listed including a mix of old homes, apartments and offices, while another lists the use as a variety of commercial businesses, but provides no information about the appropriateness of these sites or the potential for the uses to be discontinued. The evaluation should consider development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites. For sites with residential uses, the inventory could generally describe structural conditions or other circumstances and trends demonstrating the redevelopment potential to more intense residential uses. For non-residential sites, the inventory could generally describe whether the use is operating, marginal or discontinued, and the condition of the structure or could describe any expressed interest in redevelopment. Refer to the sample analysis on the *Building Blocks'* website at: http://www.hcd.ca.gov/hpd/housing_element2/SIA_zoning.php#nonvacant

Second-Units: As the Town plans to utilize second units to accommodate a portion of the regional housing need for lower-income households, the element must include an analysis supporting the realistic capacity of second units in the planning period based on the number of units approved in the previous planning period, whether or not the units are permitted by-right, the need for the units in the community, the resources or incentives available for their development, anticipated affordability, and any other relevant factors. In addition, the capacity analysis should also account for the timeframe for development and adoption of the new amnesty program. This

analysis is critical given only two units were approved under the previous amnesty program (page H-11). The analysis could consider trends and the length of time to bring illegal structures to current building code requirements for residential use.

Sites with Zoning for a Variety of Housing Types: The element did not address this requirement. The housing element must demonstrate the availability of sites, with appropriate zoning, that will facilitate a variety of housing types including multifamily rental housing, factory built housing, mobilehomes, housing for agricultural employees, emergency shelters and transitional housing. An adequate analysis should, at a minimum, identify whether and how zoning districts explicitly allow the uses, analyze whether zoning, development standards and permit procedures encourage and facilitate these housing types. If the analysis does not demonstrate adequate zoning for these housing types, the element must include implementation actions to provide appropriate zoning. Additional information on this requirement, including a sample analysis, is available in the Building Blocks' website http://www.hcd.ca.gov/hpd/housing_element2/SIA_variety.php

Emergency Shelters: Program H-2.1.5.1, (page H-38) proposes to amend the zoning code to allow emergency shelters without as a "permanent, non-conditional use" in the CC zone and public and Quasi- Public districts. Pursuant to Chapter 633, Statutes of 2007 (SB 2), the element must include an analysis of the suitability and appropriateness of this zone and demonstrate sufficient capacity to accommodate at least one year-round emergency shelter. In addition, the rezone must occur within one year of adoption of the element. Refer to the sample analysis on the *Building Blocks'* website at http://www.hcd.ca.gov/hpd/housing_element2/SHN_shelters.php#Requisite_Analysis.

4. *Analyze 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. The analysis shall also demonstrate local efforts to remove governmental constraints that hinder the locality from meeting its share of the regional housing need in accordance with Section 65584 and from meeting the need for housing for persons with disabilities, supportive housing, transitional housing, and emergency shelters identified pursuant to paragraph (7) (Section 65583(a)(5)).*

Land-Use Controls: While the element generally concludes that the Town's land use standards do not constrain the development of housing, it should describe these standards and analyze their potential impacts on the cost and supply of housing or add implementation actions to address and remove or modify the standards as constraints on development. . For more information, see the *Building Blocks'* website at http://www.hcd.ca.gov/hpd/housing_element2/CON_landuse.php

Fees and Exaction: The element must include a complete listing of processing and impact fees for single and multifamily development and analyze their impact on the cost and supply of housing. For example, the element should describe total planning and impact fees for typical multi and single-family developments and analyze the total

effect or proportion of these fees and exactions on development costs. For further information, refer to the *Building Blocks'* website at http://www.hcd.ca.gov/hpd/housing_element2/CON_fees.php.

Local Processing and Permit Procedures: While the element includes some information regarding the typical timeframes for approval of a single and multifamily development, it must specifically describe and analyze the Town's permit processing and approval procedures by zone and housing type. To address this requirement, the element should discuss all processing and approval procedures, including type of permit, level of review, and any discretionary approval procedures or design review requirements.

In addition, the element states multifamily developments over 10 units must be approved through a CUP (page H-17). This process must be further analyzed as a constraint and should identify findings of approval for the CUP and their potential impact on approval certainty, timing, and cost. The Town may need to include a program to address this permitting requirement. Additional review and complex discretionary findings can add significant time and uncertainty to the approval process and consequently can impact the cost and supply of housing, particularly housing affordable to low- and moderate-income households. Consequently, the element must demonstrate this process is not a constraint or include a program to remove or mitigate this permitting requirement

Design Review: The element indicates design review is required as part of the approval procedure for residential development (page H-13). The element should include a description and analysis of the design criteria review guidelines and process, including identifying requirements and approval procedures and analyzing the impact of the guidelines and process on housing costs and approval certainty.

On/Off-Site Improvements: While the element notes sidewalks, curbs and other improvements are required, the element should identify the actual standard (i.e., 40 foot minimum street width) and analyze potential impacts on the cost and supply of housing.

Constraints on Persons with Disabilities: While the element includes Program H-2.1.3.1 to adopt a reasonable accommodation procedure, it must include a complete analysis of potential constraints on the development, maintenance, and improvement of housing for persons with disabilities. The analysis should address zoning, development standards, any definition of family, building codes, and approval procedures for the development of housing for persons with disabilities. Additional information, including sample and model ordinances, is available in the *Building Blocks'* website at http://www.hcd.ca.gov/hpd/housing_element2/CON_disabilities.php.

5. *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 (Section 65583(a)(7)).*

While the element describes the number of persons or households in each of the special housing needs groups, the element must be expanded to include an analysis of the housing needs and resources for each group. For example, the element should include tenure information for elderly households, identify and analyze housing need of any farmworkers, and include a current estimate of the number and needs of the homeless specifically with the Town of Fairfax. This analysis will assist the Town in identifying any unmet housing need and whether new or expanded program responses are required.

In addition, Chapter 507, Statutes of 2010 (SB 812), amended State housing element law to require an analysis of the special housing needs of persons with developmental disabilities. The term developmental disability refers to a severe and chronic disability attributable to a mental or physical impairment, such as cerebral palsy, epilepsy, or autism, which begins before individuals reach adulthood (Welfare and Institutions Code, Section 4512). 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.

Information for this analysis may be obtained from the area's local regional center for developmental services at <http://www.dds.ca.gov/RC/RCList.cfm>. For further assistance in meeting this requirement see the Departments SB 812 technical assistance memo at <http://www.hcd.ca.gov/hpd/NoticeCoverLtrSB812.pdf>.

6. *Analyze the opportunities for energy conservation with respect to residential development (Section 65583(a)(8)).*

The element did not address this requirement. The element must include an analysis of energy conservation opportunities in residential development. Given the importance of promoting strategies to address climate change and energy conservation, the analysis should facilitate the adoption of policies and programs that could be implemented in the housing element. For example, the element could include incentives to promote higher density housing along transit, encourage green building techniques and materials in new and resale homes, promote energy audits and participation in utility programs, and facilitate energy conserving retrofits upon resale of homes. Additional information on potential programs to address energy conservation objectives and a sample analysis is available in the *Building Blocks'* technical assistance tool at http://www.hcd.ca.gov/hpd/housing_element2/SIA_conservation.php.

7. *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 (Sections 65583(a)(8) through 65583(a)(9)(D)).*

Based upon information from the California Housing Partnership Corporation, Bennet House may be at-risk, and if so, the element should include relevant information about Parkview Manor and its potential to be at-risk, including:

- listing the development by project name and address;
- type of assistance received;
- earliest date of change from low-income use; and
- total number of elderly and non-elderly units.

In addition, the element must:

- Estimate total cost for producing, replacing and preserving the units at-risk;
- Identify public and private non-profit entities known to the Town to have the legal and managerial capacity to acquire and manage at-risk units. According to information provided to the Department, entities which may be interested within Marin County are indicated on a roster which is available in *Building Blocks'* technical assistance tool available at <http://www.hcd.ca.gov/hpd/hrc/tech/presrv/hpd00-01.xls>. The element should reference this or other appropriate resource for this information.
- Identify and consider use of federal, State and local financing and subsidy programs.

Additional information and sample analyses are available in the *Building Blocks'* section on Identification and Analysis of Developments At-risk at http://www.hcd.ca.gov/hpd/housing_element2/EHN_atrisk.php. You may wish to contact the California Housing Partnership Corporation for assistance at <http://www.chpc.net>.

C. 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 (Section 65583(c)).*

Programs should be revised for compliance with Government Code Section 65583 in order to ensure the beneficial impacts of the programs within the planning period. To address the program requirements of Government Code Section 65583(c)(1-6), and to facilitate implementation, programs should include: (1) a description of the Town's specific role in implementation; (2) definitive implementation timelines; (3) objectives, quantified where appropriate; and (4) identification of responsible agencies and officials. Programs to be revised include, but are not limited to the following:

Programs H-1.1.3.4, H-2.1.3.1, H-2.1.5.3, H-3.1.2.1, H-4.1.1.4, H-4.1.1.5, H-4.1.1.6, H-5.1.1.1, H-5.1.2.1, and H- 6.1.2.6: Describe timeframes the City will take to implement these programs.

Programs H-1.1.1.1, H-2.1.5.4, H-2.1.5.3, and H-2.1.5.7: Describe specific actions that will be taken to implement these programs. Where applicable, estimate the number of units or households that will be assisted within the planning period.

Program H-6.1.2.4: Describe when the Town will create guidelines for new second units and the types of incentives to be provided.

2. *Identify adequate sites which will be made available through appropriate zoning and development standards and with public services and facilities needed to facilitate and encourage the development of a variety of types of housing for all income levels, including rental housing, factory-built housing, mobilehomes, and emergency shelters and transitional housing. Where the inventory of sites, pursuant to paragraph (3) of subdivision (a), does not identify adequate sites to accommodate the need for groups of all household income levels pursuant to Section 65584, the program shall provide for sufficient sites with zoning that permits owner-occupied and rental multifamily residential use by right, including density and development standards that could accommodate and facilitate the feasibility of housing for very low- and low-income households (Section 65583(c)(1)).*

As noted in Finding B3, the element does not include a complete site analysis and therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the Town 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:

Since sites with appropriate zoning and development standards were not available prior to the beginning of the planning period, due to the housing element and inventory of sites not adopted by the statutory due date (i.e., June 30, 2009) the Town was required to include a program to address the shortfall of appropriately zoned sites to accommodate the Town's regional need for lower-income households.

According to conversations with you, the sites identified in the housing element were rezoned as part of the adoption of the General Plan on April 4, 2012. Because some of these sites were rezoned to address the lower-income need, the element must still demonstrate compliance with the requirements of Section 65583.2(h) and (i) or

include a program to do so, as appropriate. For example, on those sites rezoned to accommodate the lower-income housing need the element must demonstrate these sites permit owner-occupied and rental multifamily uses by-right during the planning period, and are zoned with minimum density and development standards that permit at least 16 units per site at a density of at least 20 units per acre. Also, at least 50 percent of the remaining need must be planned on sites that exclusively allow residential uses.

Mixed-Use/Underutilized Sites: Should the Town rely on underutilized sites and the potential for mixed-use development to accommodate the Town's RHNA for lower-income households, the element must include specific program actions to promote redevelopment of underutilized sites and lot consolidation including financial assistance, regulatory concessions or incentives to encourage and facilitate additional or more intense residential development on non-vacant and underutilized sites. Examples of incentives include: 1) organizing special marketing events geared towards the development community; 2) posting the sites inventory on the local government's webpage; 3) identifying and targeting specific financial resources; and 4) reducing appropriate development standards.

Small Sites/Lot Consolidation: Should the element rely on the potential of small sites to be consolidated to accommodate the Town's share of the RHNA, particularly for lower-income households. The element must include specific programs to facilitate lot consolidation and development of housing on small sites.

Transitional and Supportive Housing: While Program H-2.1.5.2 states the zoning code will be amended to allow transitional and supportive housing as a residential use, pursuant to Government code 65583 (a)(5) it must also clarify those uses will be subject to those restrictions that apply to other residential uses of the same type in the same zone. In addition, the program must have a definitive time frame for implementation.

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 (Section 65583(c)(2)).*

While the element includes some actions proposed to assist in the development of housing for very-low and low-income households, it must include programs that specifically assist in the development of a variety of housing types to address the needs of extremely low-income (ELI) households. To address this requirement, the element could revise programs to prioritize some funding for the development of housing affordable to ELI households, and/or offer financial incentives or regulatory concessions to encourage the development of housing types, such as multifamily, single-room occupancy units, and supportive housing, which address some of the needs of this income group.

The Town should also review its density bonus ordinance for compliance with recent statutory amendments (Chapter 1928, Statutes of 2004) to State density bonus law (Government Code Section 65915). A copy of the current law is available on the Department’s website at <http://www.leginfo.ca.gov/cgi-bin/displaycode?section=gov&group=65001-66000&file=65915-65918>

- 4. *The housing element shall contain programs which address, and where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing (Section 65583(c)(3)).*

As noted in Finding B4, the element requires a complete analysis of potential governmental constraints. Depending upon the results of that analysis, the Town may need to revise or add programs and address and remove or mitigate any identified constraints.

- 5. *The housing program shall preserve for low-income household the assisted housing developments identified pursuant to paragraph (8) 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 (8) 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 (Section 65583(c)(6)).*

The element must include specific and proactive actions to preserve housing units at-risk of converting to market-rate. For example, the program should ensure compliance with noticing requirements and include a tenant education component and consider pursuing funding on at least an annual basis. The program should also commit the Town to contacting non-profits immediately to develop a preservation strategy by a date certain to be ready to quickly act when notice of conversion is received.

D. Quantified Objectives

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

Include quantified objectives estimating the number of housing units by income category that can be constructed, rehabilitated, and conserved over a five-year time period. 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			

E. Public Participation

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 (Section 65583(c)(7)).

While the element includes a general summary of the public participation process (page H-3), it does not demonstrate how the Town did or will make a diligent effort to achieve the involvement all economic segments of the community through the adoption process. The element should be revised to specifically describe the Town's efforts to circulate the housing element among low- and moderate-income households and organizations that represent them and to involve such groups and persons in the development of the element. For example, the element could describe the success of outreach efforts, summarize public comments and describe how the element incorporated public input.

F. Consistency with General Plan

The housing element shall describe the means by which consistency will be achieved with other general plan elements and community goals (Section 65583(c)(7)).

The element must include a complete discussion of how consistency will be achieved and maintained during the planning period. The element could include a program to conduct an internal consistency review as part of its annual general plan implementation report required under Government Code Section 65400. This annual report can also assist future updates of the housing element.

The Town should also note recent statutory changes to Government Code Section 65302 (Chapter 369, Statutes 2007 [AB 162]) which requires amendment of the safety and conservation elements of the general plan to include analysis and policies regarding flood hazard and management information upon the next revision of the housing element on, or after, January 1, 2009. Please refer to Department's website at http://www.hcd.ca.gov/hpd/hrc/plan/he/ab_162_stat07.pdf for additional information.