



**City of Burlingame**  
**RHNA 6 2023-2031 Housing Element**  
**Draft #2 Revisions**

HCD Findings From Letter Dated May 18, 2023	Responses
<b>A. Review and Revision</b>	
<p><u>Finding</u>  <i>While the element addresses many of the requirements of this section, a complete analysis should also summarize the cumulative impact and effectiveness of the previous housing element’s programs to address the housing needs of all special-need populations.</i></p>	<p>Appendix A provides a summary of the effectiveness of the previous housing element’s programs to address the housing needs of all special-need populations. Previous Programs H(A-2), H(A-3), H(A-6), H(B-1), H(B-2), H(C-1), H(C-2), H(C-5), H(D-1), H(D-2), H(D-3), H(D-4), H(D-5), H(F-1), H(F-6), H(F-7), H(F-10), and H(F-11) in the RHNA 5 Housing Element addressed the housing needs of special-need populations. The analysis in Appendix A also indicates changes in the RHNA 6 Housing Element to in response to the effectiveness of the previous programs.</p>
<b>B. Housing Needs, Resources, and Constraints</b>	
<p><u>Finding B.1.a. Disproportionate Housing Needs</u>  <i>The element includes some general information on persons experiencing homelessness and housing conditions but should also evaluate those needs, impacts and patterns within the City, such as areas of higher need. For homelessness, the element should examine patterns of need or areas with higher concentrations of persons experiencing homelessness, including access to transportation and services. For housing conditions, the element should discuss any areas of potentially higher needs of rehabilitation and replacement. The element should utilize local data and knowledge such as service providers and code enforcement officials to assist this analysis.</i></p>	<p>Appendix C and Chapter 3 Profile of Community – Housing Needs Assessment address disproportionate housing needs. An expanded analysis of homelessness is included on pages 39-41.</p>

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<p><u>Finding B.1.b. Identified Sites and Affirmatively Furthering Fair Housing (AFFH)</u>  <i>The analysis of whether identified sites AFFH should account for where the sites are located. The analysis should address the number of units by all income groups, and location (e.g., neighborhood, planning area, census tract), discuss any isolation of the regional housing need allocation (RHNA) by income group and evaluate the magnitude of the impact on existing concentrations of socio-economic characteristics by area. The analysis should be supported by local data and knowledge and other relevant factors and address overlapping fair housing issues with other components of the assessment of fair housing (e.g., segregation and integration, concentrated areas of poverty, disparities in access to opportunity).</i></p>	<p>A section “AFFH and the Sites Inventory” has been added to Chapter 4 on page HE-62. Additional analysis is provided in the sections “Identification of Sites for Affordable Housing” on pages HE-132 through HE-137, and “Sites Inventory” on pages HE-144 through HE-145 in Chapter 6.</p>
<p><u>Finding B.1.c. Contributing Factors to Fair Housing Issues</u>  <i>Based on the outcomes of a complete analysis, the element should re-assess and prioritize contributing factors to fair housing issues.</i></p>	<p>Contributing Factors are identified and responded to in Chapter 4, Affirmatively Furthering Fair Housing in Table E-8.</p>
<p><u>Finding B.2.a. Extremely Low-Income (ELI) Households</u>  <i>While the element quantifies existing and projected ELI households, it must also analyze their housing needs. The analysis of ELI housing needs could consider tenure, overpayment, overcrowding, resources and the effectiveness of strategies and the magnitude of housing need.</i></p>	<p>The discussion of Extremely-Low Income Households in Chapter 3 starting on page HE-41 has been expanded with additional information on how policies and programs will address matters such as cost burden, overcrowding, and substandard conditions.</p>
<p><u>Finding B.3.a. Realistic Capacity</u>  <i>While the element provides assumptions of buildout for sites included in the inventory, it must also provide support for these assumptions. For example, the element should demonstrate what specific trends, factors, and other evidence led to the assumptions. The estimate 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</i></p>	<p>The “Zoned Versus Realistic Capacity” section on pages HE-121 through HE-123 provides a detailed analysis of realistic capacity for each of the housing sites planning area, based on the densities of projects approved and built over the past RHNA cycle. A new section “Realistic Capacity of Mixed Use Sites” on pages 129-132 has been added to determine the likelihood of residential development in zoning where 100 percent nonresidential uses are allowed.</p>

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<p><i>approved residential developments at a similar affordability level in that jurisdiction. In addition, the element must analyze the likelihood of residential development in zoning where 100 percent nonresidential uses are allowed. The analysis should be based on factors such as development trends including nonresidential, performance standards requiring residential uses or other relevant factors such as enhanced policies and programs. Lastly, the element should consider public comments received on sites in the inventory and make revisions as appropriate.</i></p>	
<p><u>Finding B.3.b. Zoning for Lower-Income Households</u>  <i>Specific analysis and actions are necessary if the housing element relies upon nonvacant sites to accommodate more than 50 percent of the RHNA for lower-income households. The current analysis provided is insufficient. For your information, the housing element 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.</i></p>	<p>A new section “Realistic Capacity of Mixed Use Sites” on pages 129-132 has been added to determine the likelihood of residential development in zoning where 100 percent nonresidential uses are allowed.</p>
<p><u>Finding B.3.c. Nonvacant Sites</u>  <i>For your information, nonvacant sites that include residential units, either existing or demolished, that are/were occupied by, or subject to affordability agreements for lower-income households within five years preceding the beginning of the planning period are subject to a housing replacement program consistent with the requirements listed in Government Code 65915(c)(3) and Government Code 65583.2(g)(3). The element must clarify compliance with this requirement.</i></p>	<p>None of the nonvacant sites include existing or demolished residential units. This has been clarified in the Sites Inventory section on page 144.</p>

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<p><u>Finding B.3.d. Publicly-Owned Sites</u>  <i>The element identified City-Owned sites to accommodate a portion of the RHNA. As a result, the element should demonstrate the suitability and availability of these sites for development in the planning period, including status, schedule, existing uses and potential impediments, relocation of existing uses if applicable and any known barriers to development in the planning period.</i></p>	<p>A new section “Publicly-Owned Sites” has been added on pages 141-142.</p>
<p><u>Finding B.3.e. Sites Identified in Prior Planning Periods</u>  <i>The element must include a program for vacant sites identified in two of more consecutive planning periods’ housing elements or non-vacant sites identified in a prior housing element, that are currently identified to accommodate housing for lower-income households. The program must be implemented within the first three years of the planning period and commit to zoning that will meet the density requirements for housing for lower-income households and allow by-right approval for housing developments that include 20 percent or more of its units affordable to lower-income households (Gov. Code, § 65583.2, subd. (c)).</i></p>	<p>Program H(A-6) has been added to require zoning amendments for the MMU and R-4 zoning districts.</p>
<p><u>Finding B.3.f. Availability of Infrastructure</u>  <i>While the element states there is sufficient water and sewer capacity to accommodate the RHNA, the element must also clarify whether sites have sufficient existing or planned dry utility infrastructure available and accessible to support housing development or add a program to increase such capacity.</i></p>	<p>A section addressing dry utilities has been added to pages 81-82.</p>
<p><u>Finding B.3.g. Small Sites</u>  <i>The element must provide sufficient analysis to demonstrate small sites are adequate to accommodate housing for lower-income households (e.g., providing similarly sized sites that were or are being developed with an equivalent number of units in the same income category) or add a program to encourage lot</i></p>	<p>Sites smaller than 0.5 acres have been removed from the Sites Inventory. There are no longer any sites smaller than 0.5 acres in the Sites Inventory. However Program H(A-7) has been added to encourage lot consolidation, in recognition that there may be small sites suitable for housing but are not included in the Sites Inventory.</p>

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<p><i>consolidation of small sites (i.e., 1818 El Camino Real, 1825 California Drive, 1811 El Camino Real, and 1819 El Camino Real).</i></p>	
<p><u>Finding B.3.h. Environmental Constraints</u>  <i>The element describes known environmental constraint to the development of housing within the jurisdiction such as steep slopes, sensitive habitats, and endangered species, and noise, but should also explain which areas of the City are impacted by these potential constraints and discuss any other known conditions that preclude development in the planning period (e.g., parcel shape, contamination, easements, property conditions).</i></p>	<p>The Environmental Requirements section on pages 82-86 has been expanded to address environmental constraints.</p>
<p><u>Finding B.3.i. Zoning for a Variety of Housing Types</u></p> <ul style="list-style-type: none"> <li>• <i>Emergency Shelters: The element identifies the zoning districts for emergency shelters as well as their suitability and proximity to transportation; however, it must also identify and analyze any development standards (e.g., spacing, parking, concentration requirements) and other requirements imposed on emergency shelters. The element should also clarify whether emergency shelters are permitted without discretionary action, analyze whether sites in the RRMU and I-I districts are fit for human habitation and free of hazards, and discuss the total capacity of the applicable zoning districts. Lastly, the element must describe compliance with Government Code section 65583, subdivision a)(4)(A) or include a program to comply with this requirement. For your information, pursuant to Government Code section 65583, subdivision a)(4)(A), parking requirements should be limited to allowing sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone.</i></li> <li>• <i>Employee Housing: The element must demonstrate zoning is consistent with the</i></li> </ul>	<p>Emergency Shelters:</p> <ul style="list-style-type: none"> <li>▪ Added performance standards for emergency shelters from C.S. 25.48.100</li> <li>▪ Added to Program H(D-5) to change minimum allowed separation requirement from one-half mile to 300 feet</li> <li>▪ Discussion of sites being fit for human habitation and are free of hazards added to pages 72-74.</li> </ul> <p>Employee Housing:</p> <ul style="list-style-type: none"> <li>▪ Added new Housing for Employees section on pages 70-71 discussing how zoning is consistent with the Employee Housing Act and provides reason why Burlingame does not need to provide special housing for agricultural workers.</li> <li>▪ Added discussion regarding “urban agriculture” use in Burlingame on page 71.</li> </ul> <p>Supportive Housing</p> <ul style="list-style-type: none"> <li>▪ Added to Program D-2: City to review and revise zoning code for consistency with AB 2162.</li> </ul> <p>Manufactured Housing</p> <ul style="list-style-type: none"> <li>▪ Added language on page 70 confirming that manufactured housing is included in the definition of single-unit dwelling.</li> </ul>

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<p><i>Employee Housing Act (Health and Safety Code, § 17000 et seq.), specifically, sections 17021.5 and 17021.6. Section 17021.5 requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. Section 17021.6 requires employee housing consisting of no more than 12 units or 36 beds to be permitted in the same manner as other agricultural uses in the same zone. For additional information and sample analysis, see the Building Blocks at <a href="https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/farmworkers">https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/farmworkers</a>.</i></p> <ul style="list-style-type: none"> <li>• <i>Supportive Housing: The element should specifically clarify whether the City permits permanent supportive housing by-right as a residential use and only subject to those restrictions that apply to other residential dwellings of the same type in the same zone pursuant to Government Code section 65583 (a)(5) and describe applicable policies and procedures.</i></li> <li>• <i>Manufactured Housing: Manufactured housing that is built on a permanent foundation, generally, should be allowed in the same manner and in the same zones as conventional or stick-built structures pursuant to Government Code section 65852.3. The element must demonstrate consistency with this requirement or add or modify programs as appropriate.</i></li> </ul>	
<p><u>Finding B.4.a. Land Use Controls</u>  <i>The element must identify and analyze all relevant land use controls impact as potential constraints on a variety of housing types. For example, the analysis should address any impacts on cost, supply, housing choice, affordability, timing, approval certainty and ability to achieve maximum densities and include programs to address identified constraints. Specifically, the element should analyze parking (clarifying any garage requirements) lot coverages, setbacks,</i></p>	<p>Land Use Regulations are evaluated in Chapter 5.</p>

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<p><i>minimum unit size requirements, and open space requirements as potential constraints. In addition, while the element sufficiently describes floor area ratios and height limitations, the analysis should also analyze land use controls cumulatively with other land use controls. Lastly, the element should clarify whether projects at current zoning are feasible; This could be shown in the form of projects developed in the North Rollins Road Specific Plan area, Downtown Specific Plan area, as well as other projects in the City. The element must add or modify programs to address identified constraints.</i></p>	
<p><u>Finding B.4.b. Fees and Exaction</u>  <i>The element indicates that fees for multifamily projects are significantly greater than those for single-family projects, an uncommon observation not found in other comparable jurisdictions. Excessive fees for multifamily projects have significant impacts on housing affordability and production. The element should include an evaluation of these fees, including parking in lieu fees downtown, development impact fees for public facilities, and the recycling fee requirement for construction and demolition. The element must add programs to address identified constraints.</i></p>	<ul style="list-style-type: none"> <li>▪ Edited Table HE-11 to include a lower environmental review fee (Class 32 Infill Exemptions) rather than an EIR, based on typical experience of housing projects. This has significantly the cost of entitlements.</li> <li>▪ Added parking in-lieu fee section on page 90 to discuss the fee, noting that with AB 2097 and Density Bonus Law, project are not likely to require payment of this fee.</li> <li>▪ Added language to Public Facilities Impact fees on page 91 noting that developers can request a fee waiver.</li> <li>▪ Added language regarding recycling deposit fees on page 95.</li> </ul>
<p><u>Finding B.4.c. Local Processing and Permit Procedures</u>  <i>While the element includes information about processing times for different types of development, additional analysis will be required to satisfy this requirement and must address potential impacts on housing cost, supply, timing, and approval certainty. The element should start by clarifying the type of approval process for the development types identified (e.g., principally, conditionally permitted, etc.) by zone. The element must analyze the processes and standards including discretionary and nondiscretionary review findings and procedures, including public noticing requirements. In addition, the element must clarify and analyze the</i></p>	<ul style="list-style-type: none"> <li>▪ Added required findings for discretionary applications on pages 100-102.</li> <li>▪ Added Environmental Review section on pages 107-108, including Permit Streamlining.</li> </ul>

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<p><i>approval body required for certain types of entitlements and permits for potential constraints, including planning commission application requirements and potential appeals to City Council.</i></p> <p><i>Further, the element should address public comments on this revised draft submittal and discuss compliance with the Permit Streamlining Act and intersections with CEQA and timing requirements, including streamlining determinations and add or modify programs as appropriate.</i></p>	
<p><u>Finding B.4.d. Design Review</u>  <i>The element must describe and analyze the design review guidelines and process, including approval procedures and decision-making criteria, for their impact as potential constraints on housing supply and affordability. For example, the analysis could describe required findings and discuss whether objective standards and guidelines improve development certainty and mitigate cost impacts. The element must demonstrate this process is not a constraint or it must include a program to address this permitting requirement, as appropriate. Programs must also be added or modified to address all other identified constraints.</i></p>	<p>Additional information has been added to the Process and Permitting Procedures section, starting on page 100.</p>
<p><u>Finding B.4.e. Building Codes and Enforcement</u>  <i>While the element clarifies the current building code utilized, it must also analyze local amendments to building codes as potential constraints, including the requirement to install automated water sprinkler systems as well as seismic standards and engineering requirements.</i></p>	<ul style="list-style-type: none"> <li>▪ Changed title to “Building Codes and Enforcement” on page 77.</li> <li>▪ Added clarifying language on page 77, including City offering pre-application meetings to help reduce initial costs.</li> </ul>
<p><u>Finding B.4.f. Constraints on Housing for Persons with Disabilities</u>  <i>While the element mentions that accessible accommodation procedures are in place (p. HE-34), it should also describe the applicable approval findings and processes for providing reasonable accommodations exceptions in zoning</i></p>	<ul style="list-style-type: none"> <li>▪ Added description of typical improvements allowed under Reasonable Accommodation Application on pages 34-37.</li> <li>▪ Described application process, approval timing, and required findings for Reasonable Accommodations on pages 34-37.</li> </ul>



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<p><i>and land use, including what fees are charges, who is the approval body, and what time parameters are in place. In addition, the element should provide the City’s definition of family and analyze it to determine whether it presents a potential constraint on housing for persons with disabilities and add or modify programs as appropriate.</i></p>	<ul style="list-style-type: none"> <li>▪ Added clarification of the definition of “household” on page 37.</li> </ul>
<p><u>Finding B.4.g. Group Homes</u>  <i>The element must clarify how the City allows for group homes of seven or more persons in the jurisdiction, including what zones allow the use and what is the procedure for these types of development. For your information, zoning should simply implement a barrier-free definition of family instead of subjecting, potentially persons with disabilities, to special regulations such as the number of persons, population types and licenses. These housing types should not be excluded from residential zones, most notably low-density zones, which can constrain the availability of housing choices for persons with disabilities. Requiring these housing types to obtain a special use or Conditional Use Permit could potentially subject housing for persons with disabilities to higher discretionary standards where an applicant must demonstrate compatibility with the neighborhood, unlike other residential uses.</i></p>	<p>Added to Program H(D-2) to include specific definitions for group homes and amend land use provisions to allow group homes by right in residential districts</p>
<p><u>Finding B.4.h. Zoning, Development Standards and Fees</u>  <i>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.</i></p>	<p>Added language confirming that Burlingame is in compliance with transparency requirements under Zoning Ordinance and Fees and Exactions section on page 87.</p>
<p><u>Finding B.5.a. Availability of Financing</u>  <i>While the element provides data on average costs, more information should be provided regarding the availability of financing for the maintenance, improvement, and development of housing for all income levels.</i></p>	<p>Additional information has been added to the “Financing and Affordability” section on page 116.</p>
<p><u>Finding B.5.b. Approval Times</u></p>	<p>“Approval Timelines” section added on pages 105-106.</p>

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<p><i>The element must identify and analyze the actual length of time between receiving approval for housing development and submittal of application for building permits and discuss any hindrances on construction.</i></p>	
<p><b>Finding B.5.c. Developed Densities</b>  <i>The element must analyze requests to develop housing at densities below those anticipated in the sites inventory, including hinderance on the construction of a locality’s share of the regional housing need.</i></p>	<p>Tables 19B, 20B, and 21B added to provide analysis of requested density vs. approved/actual density of approved projects. The table indicate conclusively that requests to develop at densities below those anticipated in the Sites Inventory will not be a hinderance on the construction of Burlingame’s share of the regional housing need due projects developing at densities exceeding those anticipated in the sites inventory.</p>
<p><b>Finding B.5.d. Special Housing Needs</b>  <i>The element reports data on households and persons with special housing needs. However, it must also describe the resources available and effectiveness of strategies to these special housing needs groups, then determine the magnitude of housing needs to better formulate policies and programs.</i></p>	<p>Additional analysis has been added to the Special Needs Populations section on pages 31-38 in Chapter 3. Additional analysis has been provided for Senior Households, Large Households, Persons with Disabilities, Developmentally Disabled Persons, Accessible Accommodations, and Persons Experiencing Homelessness.</p>
<p><b>C. Housing Programs</b></p>	
<p><b>Finding C.1.</b>  <i>To have a beneficial impact in the planning period and achieve the goals and objectives of the housing element, programs should have specific commitment and discrete timing (e.g., at least annually, by 2025), as follows:</i></p> <ul style="list-style-type: none"> <li>• <i>Program H(A-2) (City-Owned Sites): The Program should commit to comply with the Surplus Land Act and a schedule of actions to facilitate development (e.g., coordination with potential developers, relocation of existing uses, assistance with funding and site preparation, final entitlements, building permits and alternative measure such as rezoning if development does not progress as anticipated).</i></li> <li>• <i>Program H(A-3) (First-Time Homebuyer Funding): The Program should go beyond considering linkage fees and should commit</i></li> </ul>	<ul style="list-style-type: none"> <li>▪ Program H(A-2) was revised as described and added mention of an upcoming RFP for a Ralston Avenue site being offered for affordable housing in 2023.</li> <li>▪ Program H(A-3) addresses first-time buyer funding.</li> <li>▪ Program H(B-1) was edited as described and reiterates the City’s commitment to annual outreach to disability organizations, publishing these materials in the City’s weekly eNewsletter and the City website, and providing targeted mailings based on AFFH mapping in areas with concentrated groups of persons with disabilities.</li> <li>▪ Program H(B-4) was edited as described.</li> </ul>

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<p><i>to subsequent steps and how often (e.g., at least annually) those steps will be taken</i></p> <ul style="list-style-type: none"> <li>• <i>Program H(B-1) (Persons with Disability Outreach): Program outreach should include proactive methods and timing for how often outreach will occur as well as additional steps to facilitate development in the planning period. In addition, the Program must include quantifiable metrics or objectives and geographic targeting.</i></li> <li>• <i>Program H(B-4) (Residential Development Streamline): The Program should go beyond reviewing zoning and development standards and commit to revise zoning and development standards.</i></li> </ul>	
<p><u>Finding C.2.</u> <i>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.</i></p>	<p>With additional analysis performed for this 2<sup>nd</sup> draft of the RHNA 6 Element, Sites Analysis is provided in Chapter 6 and Appendix D. Appendix D provides a detailed analysis of each site in the Sites Inventory, as well as a review of 11 housing developments (consisting of a total of 2,308 units) approved and/or built on non-vacant sites that are considered representative of sites in the Sites Inventory.</p>
<p><u>Finding C.3.</u> <i>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 may need to revise or add programs and address and remove or mitigate any identified constraints.</i></p>	<p>Governmental and Nongovernmental constraints are evaluated in Chapter 5. Additional analysis has been provided in several portions of the chapter in response to other comments in the letter.</p>
<p><u>Finding C.4.</u> <i>As noted in Finding B1, the element requires a complete AFFH analysis. Depending upon the results of that analysis, the City may need to revise or add programs. 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 specific commitment, milestones, geographic targeting</i></p>	<p>Chapter 4, Affirmatively Furthering Fair Housing was amended to include some sections from Appendix B, AFFH to address some portions of this comment in the main body of the Housing Element, along with guidance provided in an AFFH toolkit prepared by HCD. Programs H(D-1) and H(B-5) were added to the Contributing Factors tables as examples of programs that the City will use to address mobility and displacement concerns. Sections discussing AFFH and the Sites</p>

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<p><i>and metrics or numerical targets and, as appropriate, address housing mobility enhancement, new housing choices and affordability in higher opportunity or higher income areas, place-based strategies for community revitalization and displacement protection. Particularly, the element must include significant and meaningful action to enhance housing mobility. HCD will send examples under separate cover.</i></p>	<p>Inventory has been added to Chapter 4 on page 62 and Chapter 6 on pages 134-136.</p>
<p><b>D. Quantified Objectives</b></p>	
<p><u>Finding</u>  <i>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.</i></p>	<p>"Quantified Summary of Objectives" section and Table HE-36 added on page 173, following the format provided in the letter.</p>
<p><b>E. Public Participation</b></p>	
<p><u>Finding</u>  <i>While the element provides some discussion on how public comments were considered, a complete analysis of public participation should include a summary of how public input was or will be considered and incorporated in the element. For example, the element should describe policies and programs in element that resulted from public participation.</i></p>	<p>A summary has been added to Appendix B – Community Outreach Summary discussing how comments received shaped programs included in the Housing Element.</p>