

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

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March 26, 2024

Jessica Binnquist, City Manager
City of Alhambra
111 South First Street
Alhambra, CA 91801

Dear Jessica Binnquist:

RE: City of Alhambra's 6th Cycle (2021-2029) Adopted Housing Element

Thank you for submitting the City of Alhambra's (City) housing element that was adopted on October 9, 2023, and received for review on January 26, 2024. In addition, the California Department of Housing and Community Development (HCD) received Resolution Number R2M23-54 and Ordinance Number O2M23-4823 for review. Pursuant to Government Code section 65585, subdivision (c), HCD considered comments from Henry Fung. Pursuant to Government Code section 65585, HCD is reporting the results of its review.

The adopted element meets the statutory requirements of State Housing Element Law (Gov. Code, § 65580 et seq). The adopted element was found to be substantially the same as the revised draft element that HCD's May 25, 2023 review determined met statutory requirements. However, as noted in the prior review, the housing element cannot be found in substantial compliance until the City has completed necessary rezones that meet statutory requirements as described below.

Specifically, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), a jurisdiction that failed to adopt a compliant housing element within one year from the statutory deadline cannot be found in compliance until rezones to make prior identified sites available or accommodate a shortfall of sites to accommodate the regional housing needs allocation (RHNA) are completed pursuant to Government Code sections 65583, subdivision (c)(1)(A) and 65583.2, subdivisions (c), (h) and (i). HCD has reviewed Resolution Number R2M23-54 and Ordinance Number O2M23-4823 that were completed to address these statutory requirements. However, the Resolution and Ordinance do not appear to meet statutory requirements. Specifically, the zoning does not appear to meet minimum density and residential only requirements pursuant to Government Code section 65583.2, subdivision (h).

To address these requirements, the City should either submit zoning that meets all requirements pursuant to Government Code section 65583.2, subdivisions (c), (h) and (i) or provide additional documentation to demonstrate recent rezoning complies with these statutory requirements. HCD will review the documentation and issue correspondence identifying the updated status of the City's housing element compliance.

Additionally, the City must continue timely and effective implementation of all programs including but not limited to the following:

- Program 7 (Low Barrier Navigation Centers)
- Program 8 (Supportive Housing Zoning Amendment)
- Program 9 (Meeting Special Housing Needs)
- Program 12 (Expanded Density Bonus in the Downtown)
- Program 14 (Affordable Housing Funding)
- Program 15 (Density Bonus Ordinance)
- Program 16 (Flexible Development Standards)
- Program 18 (Rezone Sites Used in Previous Housing Element)
- Program 19 (Rezone and Upzone Strategies to Meet RHNA)
- Program 21 (Comprehensive Zoning Code Update)
- Program 22 (Affordable Housing on City-owned Land)
- Program 23 (Adaptive Reuse)
- Program 24 (Zoning for Missing Middle Housing)
- Program 25 (Lot Consolidation and Assemblage)
- Program 26 (Accessory Dwelling Units)
- Program 27 (Development Constraints)
- Program 29 (Development Streamlining)
- Program 30 (Affirmatively Furthering Fair Housing (AFFH))
- Program 33 (Housing Production in R1 Zones)
- Program 34 (AFFH Monitoring and Review)
- Programs 35 to 39 (Place-based Strategies)

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 program, 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.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City 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: <https://www.opr.ca.gov/planning/general-plan/guidelines.html>.

HCD appreciates the hard work and dedication the City's housing element team provided throughout the housing element update and review. HCD is committed to assisting the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Laurissa Wells, of our staff, at Laurissa.Wells@hcd.ca.gov.

Sincerely,

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

Paul McDougall
Senior Program Manager