Writing a Housing Element: Components on the Way to Compliance

Linnea S. Jones
University of California, Berkeley

Abstract

The Housing Element is a document produced by urban planners to set goals for growth and development in a city. One specific component is the Programs Section, which details the actions for the goals of the Housing Element. But there is no standardized way to write the Programs section of the Housing Element, making it difficult to write and comply with state standards. This study will examine the core components in the Programs section of Housing Elements in the Bay Area so writer practitioners can better produce them and comply with state standards. By analyzing the state guidelines for components that should appear and samples of Housing Elements from cities, one component that became clear was effective descriptions. Effective descriptions are made up of action steps, measurable outcomes, and funding sources. Action steps were seen throughout the samples in a variety of ways, however the specific action that the city would take was typically included. Measurable outcomes were not always clear in the samples, with cities like San Francisco loosely addressing them. Funding Sources were also seen throughout the samples being addressed clearly and often following the same format of being its own section. Despite this variance, the component of an effective description were generally met. This understanding of the Programs Section allows writers to know where to take care when writing so that they can meet state requirements.

Keywords: housing element, programs section, action steps, measurable outcomes, funding sources

1. Introduction

The Housing Element is a document that sets up the goals of the city based on current needs as they relate to housing, helping urban planners set policies, gain funding, and implement programs to create a better city (Los Angeles City Planning, 2021; State of California, 2001). Composed of multiple elements, it highlights housing needs, resources, programs and how they align with state goals (State of California, 2003, p. 64; State of California, 2017, p. 101). One of the most critical sections is the Programs Section, which is where the city provides their specific actions and steps to achieve their specific goal by going through the different state requirements (State of California, 2017, p. 101). Written by the city and available for anyone to read, from citizens to developers, the Housing element and Programs section is approved by the state.

However, because there is no standardized way to write the Programs section of the Housing Element, those writing the document struggle to comply with state standards. Paul G. Lewis observed that "about one-third of all cities" in California were non-compliant with state standards (2003, p. 3). This study will examine the core components in the Programs section of

Housing Elements in the Bay Area so writer practitioners can better produce them and comply with state standards.

2. Method

In order to understand the core components of the Programs section, this study will draw from guidelines and samples explained below.

2.1. State Guidelines

The State of California puts out guidelines on how to write the Housing Element and Programs Section. Included in these guidelines are the codes written into law that the cities and localities must address as well as recommendations from the state on how to address them. This study used the 2003 guidelines as the most recent samples would have used these guidelines for reference.

2.2. Bay Area Housing Elements

Samples of the Programs Section of the Housing Element from Bay Area cities in the start period of 2014 to 2015 were used. The samples chosen were from cities that had populations of more than 200,000 people because if these samples didn't comply with state standards then they would affect the most people.

2.3. Analysis

The State guidelines and sample sections were analyzed in conjunction with each other. The guidelines were used to identify components of the Programs Section that should be included in the samples. The samples were then read and analyzed for the components that had been extracted from the state guidelines. Notes on structure as well as content were taken to help in the analysis of the samples.

3. Housing Element Components

The State of California Guidelines calls for "effective descriptions," written for cities to show their commitment to implementing their programs and achieving their goals that they have defined (State of California, 2003, p. 70). Because they are important for the city's goals these descriptions are made public, so it is important that non-planners can read and extract information from the descriptions. An "effective description" is made up of "immediate, short-term, and long-term action steps," "proposed measurable outcomes," and "specific funding sources" (State of California, 2003, p. 70). Below is a description with exemplification of each part.

3.1. Immediate, Short-term, and Long-term Action Steps

The first part of an "effective description" is the "immediate, short-term, and long-term action steps," which are what the city will do to achieve their goals. "Action steps" are defined as being concrete details of what an organization will do (State of California, 2003, p. 70; Community

Tool Box, 2021). These action steps can be in the form of policies, programs or a combination of both depending on how the city is choosing to address their goals.

An example of a city giving "immediate, short-term and long-term action steps" as a part of their "effective description" is from San Francisco's Housing element. The San Francisco Planning Department has a policy to "encourage the remodeling of existing housing, for families with children" in which they state that "a minimum 40% of units constructed have two-bedrooms or more" (2020, p. 18). The City of Oakland Planning & Building Department also provides examples of action steps in order to build "effective descriptions" of "Housing Rehabilitation Programs." An immediate action step is "[providing] loans to owner-occupied low- and moderate-income households" for weatherization, while in the long term Oakland plans to create a "Residential Receivership Program" to "rehabilitate blighted properties" (City of Oakland, 2014, p. 251).

In San Jose's housing element, the San Jose Department of Planning, Building & Code Enforcement provides more general descriptions of their action steps stating that they will "invest in activities to end homelessness" as well as "increase, preserve, and improve the supply of safe, livable, and affordable housing" (2015). San Jose also acknowledges that they will address the specifics of their action steps in other sections of the Housing element and their appendix (San Jose Department of Planning, 2015). Finally, the City of Fremont Community Development Department addresses their action steps by giving the data from the land inventory, then the specific action step that is associated with that data. For example when addressing low-income units, they give the current data of how many units the city needs before stating their strategies of "supporting non-profit housing developers" and "participating in the EveryOne Home countywide consortium" in order to meet those goals (City of Fremont, 2014, p. 131).

"Immediate, short-term and long-term action steps" are the core part of an "effective description." While the samples show each city's take on this part of an "effective description," the specific action that the city will take is clear. The associated data that goes with the action that the city provides strengthens their argument for a program that will be successful. In the case of the cities without specific data they still give more information rather than a simple acknowledgement of what they want to do. Additionally, their explanations of action steps still allow for cities to show that they will implement their programs, therefore contributing to the first part of an "effective description."

3.2. Proposed Measurable Outcomes
A "proposed measurable outcome" is the concrete outcome of a goal that can be measured, the second part of "effective descriptions". A common example is the number of units created by a program (California Department of Housing and Community Development, 2021). This part of the description has two functions. First it allows the state to see if cities are actually complying

with the requirements they give that are code and, second, it acts as a benchmark for future housing elements as they do their analysis.

An example of a "proposed measurable outcome" comes from San Jose's Programs section. The San Jose Department of Planning states that "1,830 [low-income] homes would need to be permitted annually for eight years" in order to meet state standards (2015). San Jose also includes a table (Appendix A) in order to give proposed measurable outcomes with hard numbers. The City of Fremont also gives examples of "proposed measurable outcomes," including stating that they would provide "a total of 2,342 dwelling units" and "approximately 96 of these units" being affordable units (City of Fremont, 2014, p. 130). Similarly to San Jose, Fremont also presents their outcomes in table format (Appendix B).

While San Jose and Fremont both provide examples of "proposed measurable outcomes" San Francisco and Oakland lack examples. In the City of Oakland's Program Section the only time "measurable outcomes" are mentioned is in the "Emergency Shelters and Services for the Homeless Population" and there is a significant lack of data within this section too (2014, p. 253). Additionally, San Francisco doesn't provide any data for the goals they are trying to achieve other than the previously mentioned "minimum 40% of units constructed [having] two-bedrooms or more" (San Francisco Planning Department, 2020, p. 18).

The inconsistency of "proposed measurable outcomes" in the samples chosen is an interesting note. The concrete benchmarks that cities include become ways for urban planners to push for policies and the programs they write about. In the cities that do include the "proposed measurable outcomes" it also gives writer-practitioners a benchmark for their future Programs sections, as information in the current sample can become a source for a new housing element. The inconsistencies seen in the "proposed measurable outcomes" part means that an "effective description" is not always being met by writers.

3.3. Specific Funding Sources

The third part of an "effective description" are "specific funding sources," where the money to fund the proposed programs will come from. This can include the names of funds or agencies where the money will come from and the amount that the city will be working with. Additionally, the funding sources can range from community level funds to federal level funds. While there is no specific format for a Housing element and its sections, some cities have adopted the similar strategy of separating their funding information (State of California, 2003, p. 61).

In the Housing Element from Oakland, San Jose, and Fremont a specific section is dedicated to explaining where the funding sources for programs are coming from. The City of Oakland Planning & Building Department calls this section "Former Redevelopment Agency Funding and

'Boomerang Funds'" (2014, p. 249) while the San Jose Department of Planning, Building & Code Enforcement calls this section "Financing and Subsidy Resources" (2015). Additionally, the City of Fremont Community Development Department, Planning Division calls the section on funding sources "Resources for Housing Production" (2014, p. 143). Despite the different names of the sections, they all cover information on "specific funding sources," listing agencies, and different funds from local to federal level that they will use to fund their projects.

The San Francisco Planning Department also includes information on funding, however it is broken up between the different policies and programs that the city is implementing. For instance in "Policy 7.1: Expand the financial resources available for permanently affordable housing, especially permanent sources" state and federal funds are mentioned as well as "local programs such as HOPE-SF" (2020, p. 27). Later in "Policy 9.1: Protect the affordability of units at risk of losing subsidies or being converted to market rate housing" they explain that funding will be coming from "Community Development Block Grant funds" (2020, p. 31).

In terms of "specific funding sources," these samples dedicate space to addressing them. It was more common for the funding sources to be separated out from the rest of the text with its own heading and section. However, even when the "specific funding sources" were housed within other sections the same information was contained. By "specific funding sources" consistently being addressed in the samples, one part of an "effective description" was being met.

4. Discussion

"Effective descriptions" in the Programs section vary by format and sometimes by content despite having three main parts. The variability in format is understandable as the guidelines give the discretion of the format to the localities. This variability accounts for the difference in formatting in the "specific funding sources" part. However, the variability of parts and content especially in the "proposed measurable outcomes" is less clear. Despite the variability, the combinations of these parts work together to create "effective descriptions" that do in fact show a city's commitment to their programs even if some parts may not be as strong. Additionally, the "immediate, short-term and long-term action steps" part does vary by specificity throughout the samples, however the main content remains the same.

Looking at the "effective descriptions" as a whole, there is no clear way to organize them as each city has shown their own style through the smaller parts. This variability throughout the parts as well as a whole further shows that each city will have parts of their description that they will want to emphasize in order to address their concerns. Finally, the fact that the smaller parts inform this larger component means that there are multiple things that come into play in determining a successful "effective description."

5. Conclusion

In understanding what an "effective description" is, there is a level of discretion that should be recognized as a result of less standardization. This level of discretion is higher, especially in the format and the consistency of parts that show up in an "effective description." This discretion is important to both readers and writers of the Programs section. For readers, it means that they have to be careful in their understanding of the document as components can appear throughout the document and won't always be in the same space. For writers, it means it is important that they take note of state standards to meet, as noncompliance can lead to funding being revoked. Additionally, it means that they have to take care in understanding how the Programs section fits within their larger housing element, so that state standards can be met. Writers are able to know where to spend more time editing prior to sending their document to the state for review. In the end, the considerations writers take and compliance they meet will impact the larger community furthering the importance of their writing.

6. Reference List

California Department of Housing and Community Development. (2021). *Program overview and quantified objectives.* Retrieved December 5, from: https://www.hcd.ca.gov/community -development/building-blocks/program-requirements/program-overview.shtml

City of Fremont Community Development Department, Planning Division. (2014, December 2). *General plan housing element 2015-2023* (180 pages). Retrieved from https://www. fremont.gov/DocumentCenter/View/4668/05-Housing_Element_2015_2023?bidId=

City of Oakland Planning & Building Department. (2014, December 9). *City of Oakland housing element 2015-2023* (612 pages). Retrieved from https://cao-94612.s3.amazonaws.com/ documents/oak050615.pdf

Community Tool Box. (2021). *Section 7: Identifying action steps in bringing about community and system change.* Retrieved December 3, from https://ctb.ku.edu/en/table-of-contents/ structure/strategic-planning/identify-action-steps/main.

Lewis, P. G. (2003). *California's housing element law: The issue of local noncompliance.* [Research Report]. Retrieved from Public Policy Institute of California website: https: //www.ppic.org/publication/californias-housing-element-law-the-issue-of-local-noncompl iance/

Los Angeles City Planning. (2021). *What is the housing element of the general plan?.* Retrieved November 9, 2021, from https://planning.lacity.org/blog/what-housing-element-general -plan

San Francisco Planning Department. (2020, August). *2014 Housing element: An element of the general plan of the city and county of San Francisco* (52 pages). Retrieved from https:// generalplan.sfplanning.org/2014HousingElement-AllParts_ADOPTED_web.pdf

San Jose Department of Planning, Building & Code Enforcement. (2015, January 27). *San José housing element 2014‑2023* (422 pages). Retrieved from https://www.sanjoseca.gov /home/showpublisheddocument/16025/636681585185400000

State of California, Governor's Office of Planning and Research. (2001, January). *A citizen's guide to planning* (16 pages). Retrieved from https://www.acgov.org/sustain/documents/ CitizensGuidetoLandUsePlanninginCalifornia.pdf

State of California, Governor's Office of Planning and Research. (2003, October). *General plan guidelines* (290 pages). Retrieved from http://www.calaverascap.com/03OPRGPGuide/ General_ Plan_Guidelines_2003.pdf

State of California, Governor's Office of Planning and Research. (2017). *General plan guidelines* (404 pages). Retrieved from https://opr.ca.gov/docs/OPR_COMPLETE_ 7.31.17.pdf

7. Appendices

EIGHT-YEAR QUANTIFIED OBJECTIVES, JULY 1, 2014 TO JUNE 30, 2022

Targeting	New Construction	Acquisition / Rehabilitation	Preservation	Eight-Year Total
ELI	788	20	40	848
VLI	290	50	34	374
LI	2,048	29	106	2,183
Moderate	-	-	-	-
Market	14,231	-	-	14,231
Totals	**17,357**	**99**	**180**	**17,636**

San Jose Programs Section Measurable Proposed Outcomes Table for affordable housing at different income levels. From San Jose Department of Planning, Building & Code Enforcement, (2015, January 27), *San José housing element 2014‑2023* (422 pages). Retrieved from https://www.sanjoseca.gov/home/showpublisheddocument/16025/636681585185400000

"Appendix B"

Table 5-6 Capacity to Meet RHNA

	Extremely Low/Very Low	Low	Moderate	Above Moderate	Total
Table 5-1- Committed Residential Development	64	48	16	2,246	2,342
Table 5-2 – Underutilized, Residentially Zoned, (min. 30 du/acre or more)	0	1,414	0	0	1,414
Table 5-3 –Underutilized and Vacant, Commercial/Mixed-Use Zoning (min. 30 du/acre or more)	0	4,179	0	0	4,179
Table 5-4 – Vacant, Residentially Zoned Land (less than 30 du/acre)	0	0	0	440	440
Table 5-5 – Underutilized Residentially Zoned Land (less than 30 du/acre)	0	0	0	888	888
TOTAL	**64**	**5,641**	**16**	**3,574**	**9,263**
RHNA (2015-2023)	1,714	926	978	1,837	5,455

Fremont Programs Section Measurable Proposed Outcomes Table for Regional Housing Needs Assessment. From City of Fremont Community Development Department, Planning Division (2014, December 2) *General plan housing element 2015-2023* (180 pages). Retrieved from https://www.fremont.gov/DocumentCenter/View/4668/05-Housing_Element_2015_2023?bidId=