

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

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March 18, 2024

Masa Alkire, City Planner  
Community Development Department  
City of Beverly Hills  
455 North Rexford Drive  
Beverly Hills, CA 90201

Dear Masa Alkire:

**RE: City of Beverly Hills' 6<sup>th</sup> Cycle (2021-2029) Revised Draft Housing Element**

Thank you for submitting the City of Beverly Hills' (City) revised draft housing element update received for review on February 14, 2024. The California Department of Housing and Community Development (HCD) is reporting the results of its review pursuant to Government Code section 65585.

HCD is pleased to find the revised draft housing element meets the statutory requirements described in its December 15, 2023 review. The housing element will substantially comply with State Housing Element Law (Gov. Code, § 65580 et seq.) when it is adopted, submitted to, and approved by HCD, in accordance with Government Code section 65585. This finding of compliance is based, in part, on a complete sites inventory analysis of nonvacant sites, including factors and considerations that are applied to the sites inventory that support the conclusion that existing uses on nonvacant sites are not an impediment to additional development. These factors and considerations include data and analysis that support the housing element's methodology in determining the adequacy of the site inventory to accommodate the regional housing needs allocation (RHNA). This finding does not absolve the City from complying with applicable court rulings.

For your information, since the housing element relies upon nonvacant sites to accommodate more than 50 percent of the RHNA for lower-income households, it must demonstrate that the existing use is not an impediment to additional residential development 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.

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. Please be aware, any revisions to the element must be posted on the local government's website and to email a link to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD.

As a reminder, pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD. Please see HCD's housing element webpage at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements> for a copy of the form and instructions. The City can reach out to HCD at [sitesinventory@hcd.ca.gov](mailto:sitesinventory@hcd.ca.gov) for technical assistance.

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 programs; 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 housing element team provided throughout the housing element review and update process. If you have any questions or need additional technical assistance, please contact me at [paul.mcdougall@hcd.ca.gov](mailto:paul.mcdougall@hcd.ca.gov).

Sincerely,



Paul McDougall  
Senior Program Manager