

# Attachment 1

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

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October 18, 2011

Ms. Susan Healy Keene, Director  
Community Development Department  
City of Beverly Hills  
455 North Rexford Drive, 1st Floor  
Beverly Hills, CA 90210

Dear Ms. Keene:

**RE: Review of the City of Beverly Hills' Revised Draft Housing Element**

Thank you for submitting Beverly Hills' revised draft housing element received for review on October 6, 2011. The Department is required to review draft housing elements and report the findings to the locality pursuant to Government Code Section 65585(b). Various communications with Mr. Peter Noonan, Associate Planner, and Ms. Karen Warner, of Karen Warner and Associates, facilitated the review.

The revised draft element addresses the statutory requirements described in the Department's August 26, 2011 review. For example, the element now includes a complete analysis of potential governmental constraints to the development, maintenance or improvement of housing. The revised draft element will comply with State housing element law (Article 10.6 of the Government Code) when adopted and submitted to the Department, pursuant to Government Code Section 65585(g).

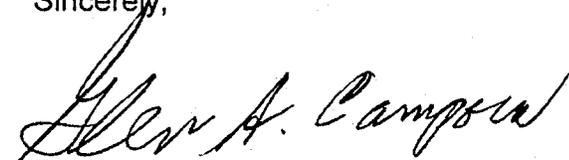
The element significantly relies on non-vacant and small sites to accommodate the regional housing need, particularly for lower-income households. Given this reliance, effective and timely implementation of Actions 10.1, 10.3, 10.5, 10.7, 12.2 and 12.3 to encourage redevelopment, lot consolidation and the development of housing affordable to lower-income households are necessary to demonstrate adequate sites and comply with housing element law. As a result, Beverly Hills must monitor and report on the status of these actions through the annual progress report, required pursuant to Government Code Section 65400. If these programs are not implemented by the dates specified or effective in encouraging redevelopment and lot consolidation of identified sites to accommodate the housing needs of lower-income households, the element must be amended immediately to identify alternative strategies and sites.

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The public participation process, including the consideration of public comments, is critical to identifying and addressing housing needs throughout the community. Beverly Hills should continue to engage all economic segments of the public including organizations representing lower-income individuals. Engaging the public should occur throughout the housing element update process, including adoption and implementation of programs such as action 12.1.

The Department appreciates the effort and cooperation provided by Mr. Noonan and Ms. Warner throughout the course of the review and looks forward to receiving Beverly Hills' adopted housing element. If you have any questions or need additional technical assistance, please contact Brett Arriaga, of our staff, at (916) 445-5888.

Sincerely,

A handwritten signature in cursive script that reads "Glen A. Campora". The signature is written in black ink and is positioned above the printed name and title.

Glen A. Campora  
Assistant Deputy Director

cc: Shelter Partnerships