

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

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January 6, 2026

Erica Fraser, Director
Planning Department
City of Plymouth
9426 Main Street
Plymouth, CA 95669

Dear Erica Fraser:

RE: Plymouth's 6th Cycle (2021-2029) Modifications to the Adopted Housing Element

Thank you for submitting modifications to the City of Plymouth's (City) housing element that was adopted January 9, 2025. The modifications were received November 7, 2025 and authorized by Resolution Number 2025-03. Pursuant to Government Code section 65585, HCD is reporting the results of its review.

The adopted housing element generally meets the statutory requirements of State Housing Element Law (Gov. Code, § 65580 et. seq.), including as described in HCD's May 8, 2023 review. For example, based on meetings and additional documentation, the City has already completed rezones and met program requirements from the 5th cycle and rezoning is not necessary to accommodate the lower-income regional housing need allocation (RHNA) and unaccommodated need from the 5th cycle. However, the element does not reflect these conditions and circumstances and must still address HCD's March 14, 2025 review to substantially comply with State Housing Element Law. Specifically, the element should be reconciled and corrected to reflect the requirements described in HCD's March 14, 2025 review, as follows:

- Modify all references to a shortfall and need to rezone sites and update discussion and tables to reflect the completion of the rezoning including updating Table IV-P-1, accompanying narration and parcel inventory in the element, including adding APN 010-011-047.
- As part of the review and revise section of the housing element (p. 238 of the Background Report), describe how rezoning was completed to meet all Program H-9 requirements as committed in the 5th cycle element such as ministerial processing and affordability provisions or revise Program 3 (Adequate sites) to address any unmet statutory requirements.

- Revise the parcel inventory in the element and the electronic sites inventory to utilize at least a sufficient portion of the rezoned site (APN 010-011-047) toward the lower-income RHNA and re-submit the electronic sites inventory with future submittal of the housing element. For example, the element could assume 20/80 percent lower/moderate income split for the 100-unit site.

To assist in meeting these requirements, HCD will send a checklist and markup of the adopted housing element with comments denoting the location of the needed modifications.

The element will substantially comply with State Housing Element Law once it has been modified, as authorized by Resolution Number 2025-03, submitted to, and reviewed by HCD to comply with the above requirements pursuant to Government Code section 65585.

As a reminder, the City's 6th cycle housing element was due September 15, 2021. As of today, the City has not completed the housing element process for the 6th cycle. The City's 5th cycle housing element no longer satisfies statutory requirements. HCD encourages the City to revise the element as described, adopt, and submit to HCD to regain housing element compliance.

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. During the housing element revision 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.

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 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 Land Use and Climate Innovations at: <https://lci.ca.gov/planning/general-plan/>.

Erica Fraser, Director

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We are 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 Jamillah Williams, of our staff, at Jamillah.Williams@hcd.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "PMD".

Paul McDougall
Senior Program Manager