CITY OF
OXNARD
CALIFORNIA

PLANNING COMMISSION
STAFF REPORT

TO: Planning Commission

FROM: Kathleen Mallory, AICP, Planning & Sustainability Manager
Heather Davis, Contract Planner

DATE: August 18, 2022

SUBJECT: Planning & Zoning (PZ) Permit No. 20-620-03, General Plan Amendment - Recommending City Council Approval of the Amended 2021-2029 Housing Element (6th Cycle)

1) **Recommendation:** That the Planning Commission:
   a) Receive a presentation on the Draft Amended City of Oxnard 6th Cycle 2021-2029 Housing Element (Attachment 1 - see link); and
   b) Open the public hearing and receive public input; and
   c) Adopt a Resolution 2022-XX recommending City Council approval of the Draft Amended City of Oxnard 6th Cycle 2021-2029 Housing Element as Chapter 8 within the 2030 General Plan, (Attachment 2); and

2) **Background:** On September 16, 2021, the Planning Commission recommended City Council approval of the Final Housing Element (October 2021) and associated approvals, including the Final Initial Study/Mitigated Negative Declaration, General Plan Land Use Element amendments and five ordinances. The recommendation included approval of amendments to the General Plan Land Use Element and Zoning text and map changes concurrently with the 6th Cycle Housing Element so that at the time of 6th Cycle Housing Element adoption, the appropriate zones would be in place to accommodate and implement the sites identified in Supplement 1 of the Housing Element, including the City's lower income RHNA allocation.

   On October 5, 2021 the City Council adopted Resolution No. 15,490 approving the 2021-2029 6th Cycle Housing Element. The Council also approved General Plan and Zoning Map Amendments to change land use designation on 13 parcels and the zoning designation on 106 parcels (https://arcg.is/HmSS1) to be consistent with Supplement 1 of the Final Housing Element (Resolution 15,491) and five (5) zoning ordinances to facilitate construction of housing units as stipulated in the Housing Element; these five (5) ordinances are summarized in Attachment 3.

   The City submitted the adopted Housing Element to the State of California Department of Housing and Community Development (HCD) for 90-day review on

October 8, 2021. The State law changed at the beginning of 2022 and shortened the review period for adopted Housing Elements to 60-days.

On January 10, 2022 the HCD completed their review and sent a findings letter to the City (Attachment 4). The State found that the City's adopted Housing Element addressed most of the statutory requirements but required additional revisions to fully comply with State Housing Element Law (Article 10.6 of Gov. Code). HCD identified specific requirements to comply to with State Law, including revisions or additional information needed regarding the following topics:

a) Affirmatively Furthering Fair Housing (AFFH) (**substantial edit**);
b) Rehabilitation/Renovation (**substantial edit**);
c) Status of pending projects;
d) Realistic capacity on commercially and industrially zoned parcels;
e) Accessory Dwelling unit (ADU) projection and affordability (**substantial edit**);
f) Availability of Infrastructure;
g) Emergency Shelters (**substantial edit**);
h) Parking Requirements;
i) Design Review and Site Plan Review;
j) Processing and Permit Procedures;
k) Persons with Disabilities (**substantial edit**);
l) Developed Densities and Permit Times;
m) Local Coastal Program;
n) Single Room Occupancy (SRO) (**substantial edit**); and
o) Public Participation.

Staff had review meetings with HCD staff on February 16, 2022, March 17, 2022 and April 4, 2022 to receive clarification on the topics in the January 10, 2022 letter. As a result of these meetings, staff prepared a Conceptual Amended Housing Element and a response letter outlining how the City would address the January 10, 2022 HCD comment letter (see Attachment 5). Pursuant to state law, the Conceptual Amended Housing Element was: 1) posted on the City's website for one week; 2) notification of the posting of this document was sent to interested parties; and 3) the Conceptual Amended Housing Element was submitted to HCD on May 12, 2022 (hard copy May 13th) for the state stipulated 60-day review.

As a result of the May 2022 submittal to HCD, staff had review meetings with HCD staff on June 22nd and 28th, 2022 and HCD staff asked for further revisions (see Attachment 6). HCD requested additional information and revision to address concerns regarding the following topics:

a) Age and Condition of housing stock information and addition to Code Compliance Program (**substantial edit**);
b) Guest parking requirements;

c) Findings for the City's recently adopted Site Plan Review process; and
d) Timing to update the City's Local Coastal Plan.

Pursuant to State law, the Proposed Revisions in response to HCD input on the Conceptual Amended Housing Element were: 1) posted on the City's website for one week; 2) notification of the posting of this document was sent to interested parties; and 3) the Proposed Revisions to the Conceptual Amended Housing Element was submitted to HCD on July 7, 2022. On July 11, 2022 HCD completed their review of the Conceptual Amended Housing Element submitted on May 12, 2022, as revised on July 7, 2022, and issued a Conditional Certification letter (Attachment 7) for the Amended 2021-2029 Housing Element. According to HCD's letter, the Housing Element will comply when it is adopted, submitted to and approved by HCD.

On July 27, 2022, the City posted the Amended 6th cycle 2021-2029 Housing Element (July 2022 - reflecting all of the edits staff recommended and HCD endorsed). To aid in review, two versions were posted: Draft Clean Version and Draft Track Change/Legislative Version. Housing advocates and interested parties were informed on July 27, 2022 of the posting of the revised document and notified of an upcoming August 1st virtual public review meeting, and the Planning Commission's August 18, 2022 public hearing.

3) Analysis: Though there are a number of required changes to the City Council adopted Final Housing Element, this staff report focuses on the HCD recommended "substantial changes" to the Final Housing Element. The substantial and non-substantial changes are described in detail in Attachment 8 (and highlighted above in the background section of the staff report), have been reviewed with housing advocates, and posted on the City's Housing Element update website at Housing Element Update — City Of Oxnard (on July 29, 2022) for transparency and clarity. Detailed discussions of the non-substantial and substantial changes are also provided in the letters to HCD on May 13, 2022 and June 28, 2022 (See Attachments 5 & 6).

Recommended Substantial Changes to Housing Element (Since October 2021):

- **Affirmatively Furthering Fair Housing (AFFH) – Goals, Priorities, Metrics and Milestones (Attachment 4 HCD Jan. 10, 2022 Letter on Appendix pages 1 and 2)** – HCD requested specific, quantifiable commitments to promoting AFFH in Programs 4, 10, 11, 12, 18, 19, 26, 29, 35 & 36. Goals and actions must significantly seek to overcome contributing factors to fair housing issues, and actions must have metrics and milestones to address choice & affordability in high opportunity areas, place-based strategies to preserve & revitalize, and address displacement risk. The listed programs have been updated with information on existing metrics, or were revised to include new metrics as discussed below to address HCD's comment:

  a) Program 4 - Urban Village Program. The 2030 General Plan requires Urban Villages to provide 15% affordable housing. Consistent with this requirement,

Program 4 has been updated with a metric of 372 lower income units within Urban Village Housing Element Sites (North Maulhardt, RiverPark Specific Plan Amendment, and Teal Club); these numbers are consistent with applicant proposals. Note that Housing Element Program 24 already established that if the Teal Club Annexation has not occurred by the end of Fiscal Year 2025-2026, the City will identify new sites. The only change to Program 4 is to align the metric for lower income units accommodated by this program with the proposed development project.

b) Program 6 - Zoning Code Amendment - Program 6 has been updated within the proposed Amended Housing Element to include zoning code amendments to allow Residential Care Facilities as a permitted use in zones where multifamily housing is permitted, and allow Single Room Occupancy units (SROs) in a zoning district by the end of Fiscal Year 2022-2023. Program 6 has also been updated to include revision to emergency shelter standards to only those that comply with state law, and to revise Reasonable Accommodation findings to only include objective considerations. The only changes are updates to the OCC to comply with existing State law, and to specify when the code will be updated.

c) Program 11 - Home Ownership Assistance Citywide. The metric for this program has been revised to assist 4 households annually, with at least half to households originating from low resource areas and/or areas designated as R/ECAPs. This is an ongoing program that is subject to available Home, CalHome, BEGIN and inclusionary in-lieu funds. A timeframe of June 2023 has been added within the proposed Amended Housing Element for developing and disseminating marketing material for the program in low resource or R/ECAPs areas to support the City's anti-displacement strategy by increasing home ownership. The only changes are to identify the number of households to be assisted, specifying that at least half of the households assisted would originate from low resources areas or R/ECAPS, and specifying the date by when to disseminate marketing materials.

d) Program 12 - Mortgage Credit Certificate. The metric for this program is to help 6 mortgage tax credit certificates per year, and an additional metric has been added for the Ventura County Consortium to outreach to at least twenty-four households, with at least half of applicants from low resource areas and/or areas designated as R/ECAPs. This ongoing program can be used with the City's Home Ownership Assistance program to qualify for private mortgages. A timeframe of June 2023 has been added for developing and disseminating focused marketing material for the program in low resource or R/ECAPs areas to support the City's anti-displacement strategy by increasing homeownership. The only changes are to identify the number of households for Ventura County Consortium outreach, specifying that at least half of the households assisted would originate from low resources areas or R/ECAPS, and specify the date by when to disseminate marketing materials.

e) Program 19 - AFFH. This program has been updated to include additional Anti-displacement Strategies, Place-based Revitalization Strategies, and Strategies to Address Barriers. Many of the existing actions have been updated to include metrics for assistance to a specified number of households and focus on low

resource areas, areas of linguistic isolation and R/ECAPs. The City has also added action items that utilize the City's Climate Action and Adaptation Plan (CAAP), Green Alley Plan, Parks and Recreation Master Plan, Bicycle and Pedestrian Facility Master Plan and Sustainable Transportation Plan to direct green infrastructure and capital improvements in low resource areas. The only change is to focus on households/low resource areas/linguistic isolation areas to be assisted and other programs and studies the City is currently working on.

f) Program 26 - Extremely low income households. The Program objective has been modified to accommodate a metric of at least 600 extremely low-income units in areas designated as moderate or higher resource areas. This number represents ⅔ of the City's extremely low income RHNA. The timeframe for Program 26 has been updated to begin meeting with developers annually in 2023 to facilitate opportunities to develop extremely low-income units. Program 26 is an ongoing program to encourage development of housing for extremely low income households. The program is subject to available Federal, State or local grant funds. Program 22 Special Needs Groups has also been updated to allow single room occupancy in at least one zoning district pursuant to AB 2634. The only changes are to identify the number of extremely low-income units to be located in moderate or higher resource areas, and specifying a date when this program will be implemented.

g) Program 29 - City owned sites and developer assistance. Program 29 has been updated with a metric to accommodate 193 units affordable to lower income households on city-owned properties as identified in Supplement 1 of the Housing Element. This number is consistent with the number of units projected on City-owned sites in Supplement 1 of the Housing Element. The only changes are to identify the number of lower income units on City-owned properties, and to specify the date to begin community outreach.

h) Program 34 (Renumbered from Program 36) - Pre-Approved Accessory Dwelling Units (ADU). The City commits to incorporating relevant and useful ADU/County REAP information on the City's Planning Department website by Fiscal Year 2023-2024, provided the County has completed the ADU design at that time. The program description has been updated to include an objective of reducing overall development costs through pre-approved plans and streamlined approvals. A metric has also been added to accommodate at least 320 ADUs to increase housing choice and mobility to higher resource areas. The only changes are to clarify the number of ADUs projected to be accommodated through the ADU programs and committing to utilize pre-approved ADU plans if acceptable by the Building Official.

- **Rehabilitation/Renovation Units (Attachment 4 HCD Jan. 10, 2022 Letter on Appendix page 2 and follow-up discussions with HCD staff on June 22, 2022 and June 28, 2022)** - HCD requested that the Housing Element clarify the number of estimated housing units in need of rehabilitation or replacement and include quantified objectives to be closer in line with the estimates. The proposed Amended Housing

Element Section B.6 Housing Stock Characteristics was updated to provide an estimate of the number of units in need of rehabilitation or replacement (page B-19).

Program 1 in Chapter G was also updated to include a targeted housing conditions survey as requested by HCD reviewer Melinda Coy in discussions with the City's Housing Element consultant, Placeworks, in a phone call on June 28, 2022. The Program 1 revision is a commitment for the City to complete a windshield housing condition survey in targeted older and lower income neighborhoods during Fiscal Year (FY) 2024-2025, which will help to inform the City on where rehabilitation efforts should be focused. The survey will be conducted by visually assessing exterior of homes such as roofing, windows, and siding conditions and categorizing units as sound, in need of minor repair, moderate repair, substantial rehabilitation or dilapidated. Based upon the survey findings, in FY 2025-2026 the City will identify specific needs and tailor housing rehabilitation measures to fit those needs, such as encourage housing preservation, conservation, acquisition rehabilitation, mitigation of potential costs, and minimizing displacement and relocation impacts on residents. This revision creates a City obligation that will require substantial staff time and resources to implement. An estimate of man hours needed for this type of survey are not known at this time, as they are dependent on the scale of the survey and the number of neighborhoods targeted. Many communities have funded such studies with Community Development Block Grant funds specifically awarded for this type of survey. The only change was to create a survey program.

- **Accessory Dwelling Unit (ADU) projections and affordability (Attachment 4 HCD Jan. 10, 2022 Letter on Appendix page 3 and discussion with HCD on March 8, 2022 and March 17, 2022)** - HCD questioned in their January 10, 2022 letter the City's Final Housing Element (October 2021) projection of 490 ADUs to be constructed from 2021 to 2029. The City had projected that number of ADUs based on the 54 ADU building permits issued in 2021 (54 x 8.8 year 6th cycle timeframe = 475) as a result of the City's recent ADU code update, streamlined building permit process, and creation of 4 new ADU Housing Element programs and the no net loss program (Program 3) in the Final Housing Element. On March 8, 2022, in a City correspondence the City asked HCD to reconsider their position and provided an analysis on the ADU projections and data justifying ADU affordability assumptions based on entitlement application rental surveys. During a virtual meeting between the City and HCD staff on March 17, 2022, HCD staff indicated that a revised ADU project of 320 units would be acceptable based on building permit history. Staff reviewed updated building permit data and site information and determined that the Projected ADUs reflected in the Housing Element could be reduced to the 320 units. HCD staff also indicated that based on the data provided on March 8, 2022, approximately 10% of the projected ADUs should be reflected as moderate. The number and affordability of projected ADUs in Section F.2 (Accessory Dwelling Unit Potential) and in Table F-3 (page F-13) have been updated to reflect 320 projected ADUs for 2021-2029 and the remaining number of ADUs (283) after subtracting building permits to date in the RHNA cycle. With this adjustment, the City will still

have sufficient units to meet RHNA in all income categories. The only change was to reduce the number of ADUs and level of affordability in meeting our RHNA.

- **Zoning for a Variety of Housing Types (Emergency Shelters) (Attachment 4 HCD Jan. 10, 2022 Letter on Appendix page 3 and discussion with HCD on February 15, 2022) -** During the February 15, 2022 virtual meeting, HCD staff identified that the City's standards for emergency shelters (Oxnard City Code (OCC) Section 16-504) are greater than those applicable to residential or commercial development within the same zone. Consistent with the State law, Program 6 (Zoning Code Amendments) has been revised to include an update to OCC Section 16-504 for emergency shelters. The only change is to allow development standards specific to the underlying zone and those standards listed in Government Code Section 65583(a)(4)(A).

- **Persons with Disabilities (Attachment 4 HCD Jan. 10, 2022 Letter on Appendix page 4)** - In response to HCD's comments, Program 27 (Parking Standards) has been updated to list a revision to OCC Section 16-622 (Off-street Parking) to move the requirements for parking for persons with disabilities (assisted living, nursing home) from the Health Services category to the Residential category, and expand the types of residential care facilities to recognize changes in the industry (currently only assisted living and nursing home are listed to encompass the various types of senior care facilities, including residential care facilities, independent living, memory care, etc. Programs 6 (Zoning Code Amendments) and 21 (Reasonable Accommodation) have also been updated to reflect a revision to OCC Section 16-501.5 (Reasonable Accommodation - Findings) by end of Fiscal Year 2022-2023 to only include objective considerations, consistent with State law. The only changes are revision to residential care facility requirements to comply with current state and federal law.

- **Housing Programs SRO's (Attachment 4 HCD Jan. 10, 2022 Letter on Appendix page 5)** - HCD requested a City commitment to amend the OCC to allow SROs in at least one zone, consistent with Assembly Bill (AB) 2634. Programs 6 (Zoning Code Amendments) and 22 (Special Needs Groups) within the Conceptual Amended Housing Element have been updated to provide language to allow SROs in at least one zone district, rather than 'study the allowance.' Note that the policy decision on which zone will accommodate SROs will be reviewed by the City Council and implemented within the prescribed time frame. The timeframe for updating the OCC per Housing Element Program 6 and 22 is Fiscal Year 2022-2023. The only change is a commitment to allow SROs, consistent with current state law.

<u>Revisions to Adopted Final Housing Element from New Information and City Actions:</u>

- **Public Participation** - After the Conceptual Amended Housing Element was posted for public review in May 2022, staff received an email from Barbara Macri-Ortiz on May 25, 2022 (Attachment 9). Staff met with Ms. Macri-Ortiz two times (May 31, 2022 and July 29, 2022) to answer questions and discuss requested revisions to the

Conceptual Amended Housing Element. Based on input, the following revisions are recommended and have been included in the proposed Amended Housing Element:

a) Figure B-12 Racially or Ethnically Concentrated Areas of Poverty (R/ECAPS) map has been added to Chapter B. The Housing Element currently includes maps in Chapter B that identify disadvantaged areas in the City such as TCAC Opportunity Areas, Linguistic Isolation, and CalEnviroScreen 4.0. Ms. Macri-Ortiz identified, and staff concurs, the need for identification of R/ECAPS, which would be helpful for affordable housing developers to identify areas with greater need and associated availability of public funding.
b) Discussion on the Just Cause Eviction ordinance (Ord. No. 3012) and a Rent Stabilization ordinance (Ord. No. 3013) that were recently adopted on May 3, 2022 has been added to Section B.8 Fair Housing in the Housing Element and Program 19 AFFH. The program recognizes implementation of the adopted ordinances.

- **Current Information** – The Draft Amended Housing Element has been updated to include current information, such as number of permits issued and approval status; and revision/removal of programs that had been implemented since the City Council's adoption of the 2021-2029 Final Housing Element in October 2021. The following updates are reflected in the proposed Draft Amended 2021-2029 Housing Element (Attachment 1).
  a) Section D.2 (Housing Production Progress) has been updated to reflect entitlements, building permits and certificates of occupancy between June 30, 2021 and February 28, 2022. Tables D-2, D-3 & F-3 (Residential Units Approved, Remaining RHNA, and Comparison of Site Capacity) have been updated to reflect approvals through February 28, 2022.
  b) Several sections and programs in the Housing Element were revised to reflect City Councils approval in October 2021 to rezone parcels and revise General Plan designations to accommodate RHNA. Tables E-1, E-2 and E-3 and associated text were updated to include development standards for the newly adopted -AHP/-AHD Additive Zones. Description and findings for the City's new Site Plan Review permit were added to Chapter E. Program 3 was revised and renamed from "Rezone to Meet RHNA" to "No Net Loss Monitoring," and Program 30 (Vacant Repeat Sites for Lower Income RHNA) and Program 31 (Non-Vacant Repeat Sites for Lower-Income RHNA) have been removed as fulfilled programs.
  c) Code compliance case data has been updated from recent quarterly reports through March 2022.
  d) Supplement 1 sites have been updated to reflect the City Council October 2021 rezone of parcels and the current project status has been updated. For example, on Site 1 the Lockwood Senior Apartments (173 lower-income units) and the Lockwood 2 Senior Apartments (168 lower-income units) were approved by the Planning Commission on December 16, 2021 and May 5, 2022, respectively.
  e) Figure S-1 was updated to reflect a reconfiguration of lots resulting from the Wagon Wheel (Village Specific Plan) Final Map.

4) **General Plan Conformity:** An analysis of General Plan conformity was conducted for City Council adoption of the 2021-2029 Final Housing Element on October 5, 2021 and is contained in approval documents. The proposed Amendment to the 2021-2029 Housing Element does not change this analysis. Additionally, the action of the City Council on October 5, 2021 to update the General Plan Land Use Element ensured that the Land Use and the Housing Element would be internally consistent and support actions and development densities allowed within the Housing Element.

5) **California Environmental Quality Act (CEQA) Review:** On October 5, 2021 the City Council approved an Initial Study - Mitigated Negative Declaration (IS/MND - No. 2021-01) for the 2021-2029 Final Housing Element and related actions in accordance with CEQA Guidelines, Section 15070; see https://www.oxnard.org/housing-element-update/.

   Consistent with CEQA Guidelines Sections 15162 and 15164, the proposed amendment to the 2021-2029 Final Housing Element updates existing information and does not trigger the need to prepare a subsequent or supplemental environmental document.

6) **Community Outreach:** A notice of public hearing was posted in the Ventura County Vida newspaper, and an email sent to the City's Housing Element interested parties list. The Draft Amended 2021-2029 Housing Element was posted on the City's website and notification was sent to the City's Housing Element interested parties list on July 26, 2022, along with notification of Community drop-in hours. On August 1, 2022 from 3pm to 5pm, staff hosted community drop-in hours for the public to discuss any questions they had on the proposed Draft Amended 2021-2029 Housing Element. Other than the summary of discussions with the affordable housing advocates summarized above under analysis, no additional discussion has been received from members of the public since the preparation of this staff report.

Attachments:

1. Draft Amended City of Oxnard 6th Cycle 2021-2029 Housing Element (see https://www.oxnard.org/housing-element-update/)
2. Resolution for General Plan Amendment
3. Summary of Ordinances approved in October 2021
4. January 10, 2022 Findings letter from HCD
5. May 13, 2022 Resubmittal Letter with Response to HCD Requirements
6. June 28, 2022 Addendum to May 2022 Conceptual Amended Housing Element
7. July 11, 2022 Conditional Certification Letter from HCD
8. Summary Matrix of Revisions to 2021-2029 Final Housing Element (October 2021)
9. Public Comment(s)
10. Staff Presentation

Attachment 1

See https://www.oxnard.org/housing-element-update/

Draft Amended City of Oxnard 6th Cycle 2021-2029 Housing Element (July 2022)

The City's Draft Amended Housing Element can be downloaded here. Two versions are available: Draft Clean Version and Draft Track Change/Legislative Version. This document will be reviewed by the Planning Commission on August 18, 2022 and considered by the City Council in early Fall 2022.

You can download the Clean Draft (July 2022) of the Housing Element here.

The Legislative Version reflects changes made to the October 2021 Adopted Housing Element in response to input received during the public comment period, follow up meetings with housing advocates, and input from meetings and written correspondence from HCD. Removed text is shown in strikethrough and new text has been underlined. The text that was revised following the May 2022 published Conceptual Draft Housing Element has additionally been denoted by highlighted text and is summarized in the following table.

You can download the Legislative Draft (July 2022) of the Housing Element here.

Attachment 2

Resolution of General Plan Amendment

RESOLUTION NO. 2022 – [PZ 20-620-03]

RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF OXNARD RECOMMENDING THAT THE CITY COUNCIL AMEND THE 2030 GENERAL PLAN GOALS AND POLICIES DOCUMENT BY ADOPTING THE AMENDED 2021-2029 HOUSING ELEMENT (6TH CYCLE) (PZ 20-620-03). FILED BY CITY OF OXNARD, COMMUNITY DEVELOPMENT DEPARTMENT, 214 SOUTH C STREET, OXNARD, CA, 93030.

WHEREAS, Government Code Section 65300 requires each legislative body and planning agency to prepare and adopt a comprehensive, long-term general plan for the physical development of the city and any land outside its boundaries which in the planning agency's judgment bears relation to its planning; and

WHEREAS, the California State Legislature identified the State's major housing goal as the attainment of a decent home and suitable living environment for every Californian and due to the critical role that local planning programs play in achieving this goal, the California State Legislature requires that all jurisdictions prepare and periodically review and update a Housing Element as the directed by the California State Legislature; and

WHEREAS, Government Code Section 65583 lists requirements of the Housing Element wherein each Housing Element must contain "an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled program actions for the preservation, improvement, and development of housing"; and

WHEREAS, the City of Oxnard (City) falls within the metropolitan planning region covered by the Southern California Association of Governments (SCAG) and for each Housing Element planning cycle, SCAG is required to determine the share of the regional housing needs to be allocated to each city and unincorporated county area within the SCAG region, and this process is called the Regional Housing Need Assessment (RHNA); and

WHEREAS, the Housing Element requires review and certification by the State of California, Department of Housing and Community Development (HCD); and

WHEREAS, the City of Oxnard 2030 General Plan was adopted on October 11, 2011; and the operative documents of the Oxnard 2030 General Plan consist of the (1) Background Report (2006), and the (2) Goals and Policies which includes the HCD-certified 2006-2014 Housing Element as Chapter 8; and

WHEREAS, the City Council adopted the 5th Cycle 2013-2021 Housing Element update on December 13, 2016, and the Mid-Cycle 2013-2021 Housing Element update on October 10, 2017. Both updates were certified by HCD; and

WHEREAS, the City Council adopted the 6th Cycle 2021-2029 Final Housing Element on October 5, 2021; and

WHEREAS, On October 8, 2021 the adopted 2021-2029 Final Housing Element was submitted to HCD for 90-day review; and

WHEREAS, On January 10, 2022 HCD completed their 90-day review and sent a findings letter to the City, incorporated by reference as Exhibit "A." The State found that the City's

adopted Housing Element addressed most of the statutory requirements but required additional revisions to fully comply with State Housing Element Law (Article 106 of Gov. Code), and included a request for specific revisions or additional information; and

WHEREAS, City Staff met with HCD on February 16, 2022, March 17, 2022 and April 4, 2022 to receive clarification on the topics in the January 10, 2022 letter. In response to the State's review, a Conceptual Amended Housing Element was prepared to address HCD's letter. The Conceptual Amended Housing Element was posted on the City's website and notification was sent to the City's Housing Element interested persons list on May 5, 2022, and the Conceptual Amended Housing Element was submitted to HCD on May 12, 2022 for a 60-day review period; and

WHEREAS, Based upon follow-up discussions with HCD staff on June 22nd and 28th, 2022, staff prepared an Addendum to the Conceptual Draft 6th Cycle 2021-2029 Amended Housing Element. The Addendum also addressed HCD's comments and minor revisions resulting from ongoing community input on the May 2022 Conceptual Draft Amended Housing Element. The Addendum was posted on the City's website and notification was sent to the City's Housing Element interested persons list on July 1, 2022, and the Addendum was sent to HCD on July 7, 2022; and

WHEREAS, On July 11, 2022 HCD completed their review of the Conceptual Amended Housing Element submitted on May 12, 2022, as revised on July 7, 2022, and issued a Conditional Certification letter, incorporated by reference as Exhibit "B." HCD's letter stated that the Housing Element will comply when it is adopted, submitted to and approved by HCD; and

WHEREAS, the documents and other material that constitute the record of proceedings upon which the 2030 General Plan is located in the Planning Division, and the custodian of the record is the Planning Manager; and

WHEREAS, the proposed Amended 2021-2029 Housing Element is consistent with the City of Oxnard 2030 General Plan and the certified Coastal Land Use Program; and.

WHEREAS, the proposed Amended 2021-2029 Housing Element Update meets the requirements of state law (Government Code Section 65880 *et seq.*) and associated regulations relating to Housing Elements; and.

WHEREAS, consistent with the requirements of state law, the proposed Amended 2021-2029 Housing Element identifies and analyzes the current and future housing needs within the City of Oxnard and identifies goals, policies and programs to provide certain services and ensure adequate opportunities for housing of all income levels for the planning period set by the State of California; and

WHEREAS, changes have been made to the Final 2021-2029 Housing Element to address the issues raised by HCD as referenced in its letter of January 10, 2022, and subsequent discussions with HCD; and these changes allow HCD to determine that the Amended 2021-2029 Housing Element meets the statutory requirements of state housing law; and

WHEREAS, the City has met all legal requirements for public outreach and obtaining public input relating to the proposed Amended 2021-2029 Housing Element .

WHEREAS, before making its recommendation regarding the Amended 2021-2029 Housing Element , the Planning Commission held a duly noticed public hearing on August 18, 2022 in which all those who wished to speak were given the opportunity to do so; and

WHEREAS, the proposed Planning and Zoning (PZ) Permit No. 20-620-03, General Plan Amendment, replaces in its entirety the current Chapter 8 (2021-2029 Final Housing Element) with the Amended 2021-2029 Amended Housing Element; and

WHEREAS, in addition, before making its recommendation regarding the Amended 2021-2029 Housing Element, the Planning Commission considered all evidence in the record, including written comments and public comments.

NOW, THEREFORE, the Planning Commission of the City of Oxnard hereby resolves as follows:

Section 1. The foregoing recitals are true and correct and are hereby incorporated into the operative provisions of this Resolution.

Section 2. The Planning Commission recommends that the City Council amend the 2030 General Plan to incorporate the Amended 2021-2029 Housing Element in its entirety as Chapter 8.

PASSED AND ADOPTED by the Planning Commission of the City of Oxnard on this 18th day of August, 2022, by the following vote:

AYES: Commissioners:

NOES: Commissioners:

ABSENT: Commissioners:

_____
Daniel Chavez Jr., Chair

ATTEST: _____
Joe Pearson, Secretary

EXHIBIT A

January 10, 2022 HCD Findings Letter

EXHIBIT B
July 11, 2022 HCD Conditional Certification Letter

Attachment 3

Ordinance No. 2999 repealing the All-affordable Housing Opportunity Program (AAHOP) and replace these regulations with newly created Affordable Housing, Permitted (-AHP) And Affordable Housing, Discretionary (-AHD) Additive Zone Definitions, Designations and Regulations in OCC Sections 16-420a through 16-420k; and

Ordinance No. 3000 amending the General Commercial zone permitted and related uses in OCC Section 16-135 & 16-136 to allow up to 30 dwelling units per acre on parcels identified as AHP or AHD; and

Ordinance No. 3001 amending the Business And Research Park (BRP) zone permitted uses in OCC Section 16-162 & 16-163 to allow up to 30 dwelling units per acre on parcels identified as AHP or AHD; and

Ordinance No. 3002 amending the Density Bonus ordinance in OCC Section 16-410 to allow Density Bonus permit approval by the approval authority authorized to approve the associated discretionary or ministerial permit approval for the underlying development permit; and

Ordinance No. 3003 creating a Ministerial Site Plan Review process OCC Sections 16-523 through 16-523.12.

Attachment 4

January 10, 2022 the State of California Department of
Housing and Community Development (HCD) Findings Letter

See Exhibit A of Attachment 2

Attachment 5

May 13, 2022 Resubmittal Letter with Response to
HCD Comment Letter Dated January 10, 2022
(Submittal of Conceptual Draft Amended Housing Element - Identifying in Text Format
how the City would Address HCD's January 10, 2022 Comment letter)

Alexander Nguyen
City Manager

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www.oxnard.org

May 13, 2022

Paul McDougall, Senior Program Manager
State of California,
Department of Housing and Community Development
Division of Housing Policy Development
2020 W. El Camino, Suite 500
Sacramento, CA 95833
(Via Electronic Submittal)

Subject: Submittal of Conceptual Draft Amended City of Oxnard, 6th Cycle 2021-2029 Housing Element

Dear Mr. McDougall:

Thank you for your letter dated January 10, 2022, where you state that the adopted City of Oxnard Housing Element addressed most of the statutory requirements described in the State of California, Housing and Community Development's (HCD's) July 13, 2021 letter. This correspondence noted that additional revisions were necessary to fully comply with State Housing Element Law (Article 106 of Government Code).

City of Oxnard staff met with HCD staff members to review the comment letter. The Element has been updated in response to your letter and the productive conversations with HCD staff on February 16th, March 17th, and April 4th. A list of responses to each of the requirements listed in the Appendix to your letter is provided in Attachment A to this letter. While the enclosed material addresses the listed requirements, we request that if additional edits are needed that we have the opportunity to work with HCD during the 60 day review period to secure issuance of a compliance letter. This letter also confirms that in accordance with Assembly Bill 215, the City posted the Conceptual Draft Amended Housing Element on the City's Housing Element website beginning on May 5, 2022 and distributed notice of the posting to all interested parties. This posting complies with the HCD's January 2022 posting requirement.

The City is committed to working with HCD to implement the City's Housing Element, to ensure the legal adequacy of the City's General Plan and to preserve local control of land use decisions. We appreciate HCD's assistance throughout this process. As offered by your staff, Melinda Coy, we request an expedited review of our Conceptual Draft Amended Housing Element. We'll be in touch very soon to schedule a virtual follow up meeting.

In conclusion, Kathleen Mallory, Planning & Sustainability Manager, can be reached at either (805) 385-8370 or Kathleen.Mallory@oxnard.org to schedule this expedited review and to follow up with any questions you or your staff may have.

We greatly appreciate your assistance and continued close collaboration with our staff in the City's efforts to obtain the expeditious certification of the City's Housing Element; we know this is a mutually important goal of HCD and the City of Oxnard.

Sincerely,

Alexander Nguyen
City Manager

Attachments:

A - City of Oxnard Response to January 10, 2022 HCD Comment Letter, Appendix A

B - Red-line Conceptual Draft Amended, 6th Cycle City of Oxnard - 2021-2029 Housing Element

C - Conceptual Draft Amended, 6th Cycle City of Oxnard - 2021-2029 Housing Element

Attachment A
Response to Requirements Listed in
Appendix to January 10, 2022 letter from HCD

In response to your letter in January 2022 on the City's Final Housing Element as well as verbal feedback from HCD staff via virtual meetings on February 16, 2022, March 17, 2022 and April 4, 2022, this correspondence identifies where changes have been made to the Conceptual Draft Amended Housing Element to address HCD's comment letter.

Item A.1 – Affirmatively Furthering Fair Housing (AFFH) - Goals and Actions to Overcome Patterns of Segregation (Appendix - Page 1 of HCD Jan. 10, 2022 Letter) - Within the October 5, 2021 Final Housing Element, HCD recognized that Section B.8 Fair Housing Assessment and Program 19 (AFFH) were revised in response to the July 2021 HCD correspondence on our Draft Housing Element ("July Draft") to address statutory requirements. HCD also requested that the Final Housing Element be amended to "include goals and actions sufficient to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity".

The Conceptual Draft Amended Housing Element includes in Section B.8 an analysis on the patterns of segregation and integration (page B-33) and lists goals to address issues of segregation and poverty on page B-37. The actions to address these goals are included in Programs 2, 4, 9, 10, 11, 12, 13, 19, 26, 29, 33 & 34 in Chapter G. To address HCD's concern and clarify these goals and action items, Goal H-5 in Chapter G has been augmented to include additional language under Policy H-5.9 (page G-6) to specify overcoming patterns of segregation, including Racially/Ethnically Concentrated Areas of Poverty (R/ECAP) and areas of linguistic isolation, and fostering inclusive communities free from barriers that restrict access to opportunity.

Item A.1 – AFFH - Disparities in Access to Opportunities (Appendix page 1 of HCD Letter) - HCD recommended that the Final Housing Element include additional factors/policies/programs related to access to transportation opportunities; specifically, land use controls for bike lanes, carsharing, walkability and pedestrian infrastructure to expand access to public transportation. In response to HCD's July 2021 correspondence, the City added as an action item to Program 19 (AFFH) implementation of outcomes which are anticipated from the City of Oxnard Sustainable Transportation Plan (STP), which will be completed in Fiscal Year 2022-2023. The STP will provide guidance on ways to address disparities in access to transportation opportunities by incorporating complete streets design, safe routes to school, vision zero, sidewalk and bike lane improvements and first/last mile planning in tandem with land use opportunities in lower resourced areas including R/ECAPs and areas of linguistic isolation. Following submission of the Final Housing Element to HCD in October 2021, the City received a $410,000 transportation grant from Caltrans toward completing the STP. In April 2021, the City Council awarded a professional services agreement with Fehr & Peers to develop the STP. Development of the STP will include idea generation and prioritization, establishment of the sustainable transportation framework, catalog of enhanced streetscape elements, conceptual design alternatives, identification of funding sources, implementation steps, and a

final STP for adoption by the City Council (anticipated in Fiscal Year 2022- 2023). To address HCD's comment, a discussion and current status on the STP has been added to Section B.8 Fair Housing Assessment under Mobility Options (page B-39). Program 19 of the Conceptual Draft Amended Housing Element has been updated with additional action items related to the implementation of the STP (See bullet 8 under Place Based Strategies; page G-25).

A discussion on the City's adopted Bicycle and Pedestrian Facilities Master Plan has also been added to Section B.8 Fair Housing Assessment under Mobility Options (page B-39). The Bicycle and Pedestrian Facilities Master Plan includes Class II bike routes (separate bike lanes) within the City's low resource areas in central Oxnard and areas designated as an R/ECAP to provide mobility options for residents. The Bicycle and Pedestrian Facilities Master Plan will be incorporated within the City's STP.

Item A.1 – AFFH – Goals, Priorities, Metrics and Milestones (Appendix pages 1 and 2 of HCD Letter) – HCD requested specific, quantifiable commitments to promoting AFFH in Programs 4, 10, 11, 12, 18, 19, 26, 29, 35 & 36. Goals and actions must significantly seek to overcome contributing factors to fair housing issues, and actions must have metrics and milestones to address choice & affordability in high opportunity areas, place-based strategies to preserve & revitalize, and address displacement risk. The listed programs have been updated within the Conceptual Draft Amended Housing Element as discussed below to address HCD's comment:

- Program 4 - Urban Village Program. The 2030 General Plan Community Development chapter discusses the intent of the integration of land uses with the Urban Village "to provide and promote a pedestrian orientation to reduce trips and vehicle miles traveled in order to reduce greenhouse gas emissions." Through the Urban Village project review process, transportation issues/connectivity/integration with transit providers occurs. Further, as part of environmental analysis, the vehicle miles traveled (VMT) is considered to connect housing with transportation and mitigation of environmental effects. Urban Villages are also required to provide 15% affordable housing. Program 4 has been updated with a metric of 372 lower income units within Urban Village Housing Element Sites (North Maulhardt, River Park Specific Plan Amendment, and Teal Club). Additionally, the Conceptual Draft Amended Housing Element Program 24 establishes that if the Teal Club Specific Plan / Urban Village Annexation has not occurred by the end of Fiscal Year 2025-2026 the City will identify new sites.
- Program 6 - Zoning Code Amendment - Program 6 has been updated within the Conceptual Draft Amended Housing Element to include zoning code amendments to allow Residential Care Facilities as a permitted use in zones where multifamily housing is permitted, and allow Single Room Occupancy units (SROs) in a zoning district by the end of Fiscal Year 2022-2023. Note that the policy decision on which zone will accommodate SROs will be reviewed by the City Council and implemented within the prescribed time frame. Program 6 has also been updated to include revision to emergency shelter standards to only those that comply with state law, and to revise Reasonable Accommodation findings to only include objective considerations.
- Program 10 - Inclusionary Housing. Although the City is not counting on production of affordable housing through the City's Inclusionary Housing ordinance as a means of meeting the City's Regional Housing Needs Assessment (RHNA) for the 6th cycle, the City

has committed to updating the Inclusionary Housing ordinance by early 2023; this decision was collaboratively made by the City in conjunction with affordable housing community advocates. The metric to produce 18 lower income units per year is included under the Objective field for Program 10. This program requires that developers integrate affordable units into market-rate development to create opportunities for households with diverse socioeconomic backgrounds to live in the same developments and have access to the same services and amenities. Additionally, the City's 10% inclusionary requirement (5% very low and 5% low for rental projects), which applies to all new residential development over 10 units, automatically benefits from reduced parking requirements per State Density Bonus law and entitles the project to a 20% state density bonus and one or more concessions. Inclusionary Housing is discussed in Section E.4 (page E-31) of the Housing Element, and further discussion has been provided under Program 10 to address AFFH goals of upward housing mobility, place-based revitalization and anti-displacement.

- Program 11 - Home Ownership Assistance Citywide. The metric for this program has been revised to assist 4 households annually, with at least half to households originating from low resource areas and/or areas designated as R/ECAPs. This is an ongoing program that is subject to available Home, CalHome, BEGIN and inclusionary in-lieu funds. A timeframe of June 2023 has been added within the Conceptual Draft Amended Housing Element for developing and disseminating marketing material for the program in low resource or R/ECAPs areas to support the City's anti-displacement strategy by increasing home ownership.
- Program 12 - Mortgage Credit Certificate. The metric for this program is to help 6 mortgage tax credit certificates per year, and an additional metric has been added for the Ventura County Consortium to outreach to at least twenty-four households, with at least half of applicants from low resource areas and/or areas designated as R/ECAPs. This program can be used with the City's Home Ownership Assistance program to qualify for private mortgages. This is an ongoing program. A timeframe of June 2023 has been added for developing and disseminating focused marketing material for the program in low resource or R/ECAPs areas to support the City's anti-displacement strategy by increasing homeownership.
- Program 18 - Section 8 Assistance. The program objective and description have been updated to include AFFH metrics, priorities and goals. The City is committed to seeking an increase in Section 8 HUD vouchers utilization by 95% by expanding the City's outreach and engagement effort to landlords. The goal is to improve landlord and tenant relations, which in turn will impact the participation rate of property owners in the Section 8 program. The City will continue to apply for new or targeted population vouchers as those opportunities arise. HUD requires that 75% of new leases through Section 8 be made to households earning below 35% AMI. In November 2020, the Oxnard Housing Authority submitted a request to HUD for technical assistance, which was approved. HUD technical assistance included an asset repositioning report with implementation strategies and an evaluation of staffing levels and capacity, but did not provide additional Section 8 vouchers.
- Program 19 - AFFH. This program has been updated to include additional Anti-displacement Strategies, Place-based Revitalization Strategies, and Strategies to Address Barriers. The quantified objectives for specified actions are included in the action description. Many of the existing actions have been updated to include metrics

for assistance to a specified number of households and focus on low resource areas, areas of linguistic isolation and R/ECAPs. The City has also added action items that utilize the City's Climate Action and Adaptation Plan (CAAP), Green Alley Plan, Parks and Recreation Master Plan, Bicycle and Pedestrian Facility Master Plan and Sustainable Transportation Plan to direct green infrastructure and capital improvements in low resource areas.

HCD suggested as an example AFFH action item, to waive parking standards for units that are deed restricted. The ADU ordinance already waives parking for most units, and State Density Bonus addresses parking for restricted units. The majority of multi-family development within Oxnard is automatically eligible for State Density Bonus parking requirements due to the City's Inclusionary Housing Ordinance requirement of 10% lower income units. Parking is not a constraint for development in the downtown, as the downtown code accommodates offsite parking in a shared City parking garage. With the existing City parking provisions in place, staff determined that an additional waiver to parking standards was not necessary at this time.

- Program 26 - Extremely low income households. The Program objective has been modified to accommodate a metric of at least 600 extremely low-income units in areas designated as moderate or higher resource areas. The timeframe for Program 26 has been updated to begin meeting with developers annually in 2023 to facilitate opportunities to develop extremely low-income units. Program 26 is an ongoing program to encourage development of housing for extremely low income households. The program is subject to available Federal, State and local or grant funds. Note, Program 22 Special Needs Groups has also been updated to allow single room occupancy in at least one zoning district pursuant to AB 2634.
- Program 29 - City owned sites and developer assistance. This is an ongoing program to disseminate information to local affordable housing developers and advocates about available developer assistance. The City is actively selling City properties in compliance with the Surplus Lands Act where the first opportunity is offered for affordable housing development to support upward housing mobility and housing choice in higher resource areas; this information has been added to Program 29. Additionally, the City has added an annual outreach meeting with the community, starting Fiscal Year 2022-2023, to discuss and provide feedback on opportunities for development of affordable housing on City-owned surplus land. Program 29 has also been updated with a metric to accommodate 193 units affordable to lower income households on city-owned properties as identified in Supplement 1 of the Housing Element.
- Program 33 (Renumbered from Program 35) - Allow Housing in Business Research Park (BRP) zone. This program will utilize the results of the High Quality Transit Corridor (HQTC study; Program 31) to identify opportunities for construction in the BRP. The timeframe listed for this program is consistent with the timeframe for the HQTC of Fiscal Year 2023-2024 for completion, and community outreach to property owners starting in 2023. Note that the City is not counting on production of affordable housing through the Program 33 as a means of meeting the City's RHNA for the 6th cycle, but rather as a means of providing more affordable housing construction opportunities. The BRP Overlay zone would affirmatively further fair housing by increasing housing mobility opportunities and/or housing in higher resource areas by reducing constraints on development of residential units and expanding where they can be built.

- Program 34 (Renumbered from Program 36) - Pre-Approved Accessory Dwelling Units (ADU). The City commits to incorporating relevant and useful ADU/County REAP information on the City's Planning Department website by Fiscal Year 2023-2024, provided the County has completed the ADU design at that time. The program description has been updated to include an objective of reducing overall development costs through pre-approved plans and streamlined approvals. A metric has also been added to accommodate at least 320 ADUs to increase housing choice and mobility to higher resource areas.

Item A 2 - Rehabilitation/Renovation Units (Appendix page 2 of HCD Letter) - Conceptual Draft Amended Housing Element Section B.6 Housing Stock Characteristics has been updated to provide an estimate of the number of units in need of rehabilitation or replacement (page B-19). As summarized in Table B-25, approximately 45 percent of the housing units in the City were constructed prior to 1970 and may be in need of rehabilitation or replacement. Although building age does not always correlate with substandard housing conditions, neighborhoods with a concentration of homes 50 years old (or more) are more likely than newer neighborhoods to experience housing problems stemming from deferred maintenance, inadequate landscaping, and outdated utilities.

Item A 3 - Pending Projects (Appendix page 2 of HCD Letter) - Following City Council approval of the Final Housing Element in October 2021, on December 16, 2021 the Planning Commission approved the Lockwood Senior Apartments located at 2001 Outlet Center Drive (APN 213-0-090-285). The project includes 173 senior apartments that are deed restricted as 100% affordable to lower income seniors (10% affordable to extremely low income, 10% affordable to very low income and 80% affordable to low income). The Lockwood 2 Senior Apartments located at 2001 Outlet Center Drive on the western portion of the same site (APN 213-0-090-285) was approved by the Planning Commission on May 5, 2022. This project includes 168 senior apartments deed restricted as 100% affordable to lower income seniors (22% affordable to very low income, 78% affordable to low income @ 60% AMI). The parcel at 2001 Outlet Center Drive (APN 213-0-090-285) has also been split to accommodate the two projects; the new APNs are 213009029 and 213009030. Site 1 in the Conceptual Draft Amended Housing Element Supplement 1 has been updated with the affordability and approval status of the two projects.

Items A 3 – Realistic Capacity for commercially and industrially zoned parcels (Appendix pages 2 and 3 of HCD Letter) - To justify the housing projections for residential development on nonresidential sites (BRP Business and Research Park, C-2 General Commercial, M-L Industrial Limited, and M-1 Light Manufacturing zoned parcels), in a virtual meeting on February 16, 2022 HCD staff asked that the City to assess the percentage of nonresidential sites listed in the 2013-2021 (prior) adopted Mid-Cycle Housing Element that were developed with commercial uses rather than lower income/residential land uses. HCD requested that the City use that percentage to inform the realistic development capacity assumption for sites in these zones that are listed in the Conceptual Draft Amended Housing Element to address the assigned number of lower income units. The City reviewed those sites identified in the City's Mid-Cycle Housing Element (2013-2021) that were designated All Affordable Housing Opportunity Program (AAHOP) with a commercial or industrial base zone compared to the current land use. Staff's analysis found that none of the commercial or industrial zoned AAHOP sites were

developed with new commercial or industrial uses. Therefore, realistic capacity should not be reduced from the HCD standard of 80% of the potential density. This analysis was provided to HCD Staff Shawn Danino in an email transmittal dated March 8, 2022, and is included in Section F.6 Relatistic Capacity (pages F-12 and F-13) of the Housing Element. Staff's methodology for the Realistic Capacity was provided in Attachment A of the March 8, 2022 letter (AAHOP commercial and industrial zoned sites in the 2013-2024 Mid-Cycle Housing Element). With the summary of realistic capacity, the City believes sufficient support has been provided for utilizing the 80% capacity in our Housing Element; this is in alignment with HCD's standard. In a virtual meeting between City and HCD on March 17, 2022, HCD reviewer Shawn Danino indicated that the information provided satisfied the request for verifying realistic capacity.

Here is a summary of the City's March 2022 findings:

- 20 of the AAHOP sites were zoned C-2, CM, M-1 or ML. The sites were made up of 80 parcels;
- None (0) of the AAHOP commercial or industrial zoned sites in the prior Housing Element have been developed with new commercial and industrial uses;
- Two (2) of the AAHOP sites have been developed with new 100% affordable residential uses; and
- 14 of the 20 AAHOP sites (or some parcels/sites) were continued in the 2021-2029 6th Cycle Housing Element as sites that may be developed by-right (meaning discretionary review if not required/finding approval).

Item A 3 - Accessory Dwelling Unit (ADU) projections and affordability (Appendix page 3 of HCD Letter) - HCD questioned the City's Final Housing Element's projection of 490 ADUs to be constructed from 2021 to 2029. The City had projected that number of ADUs based on the 54 ADU building permits issued in 2021 (54 x 8.8 year 6th cycle timeframe = 475) as a result of the City's recent ADU code update, streamlined building permit process, and creation of 4 new ADU Housing Element programs and the no net loss program (Program 3) in the Final Housing Element. On March 8, 2022, in a City correspondence the City asked HCD to reconsider their position. The March 8th letter provided an analysis on the ADU projections and data justifying ADU affordability assumptions based on entitlement application rental surveys. To support City staff's analysis and the reporting provided by homeowners, the March 8, 2022 City correspondence to HCD staff included the results of 2021 and 2022 ADU affordability surveys & 2021 Building permits issued. This information has been added to Conceptual Draft Amended Housing Element, Section F.2 - Accessory Dwelling Unit Potential (pages F-2 and F-3).

In 2021, 90 of 182 ADU entitlement applications provided rental amounts as requested by the City. Of the 90 applications, 94% reported rental rates that were affordable to lower income households. Rental percentages were as follows:

- 18% were affordable to persons of extremely low income;
- 22% were affordable to persons of very low income;
- 54.5% were affordable to persons of low income;
- 4.5% were affordable to persons of moderate income; and
- 1% (1 unit) was reported as "market rate" which may be interpreted as above moderate income.

In 2022, 34 of the 40 ADU entitlement applications received to date (as of Feb 2022) provided rental amounts that were 100% affordable to lower income households:

- 6% were affordable to persons of extremely low income;
- 24% were affordable to persons of very low income;
- 71% were affordable to persons of low income;
- 0% were moderate income; and
- 0% were above moderate income

During a virtual meeting between City and HCD staff on March 17, 2022, Melinda Coy at HCD indicated that a revised ADU project of 320 units would be acceptable based on building permit history. Staff reviewed updated building permit data and site information and determined that the Projected ADUs reflected in the Housing Element could be reduced to the 320 units. The number of projected ADUs in Table F-3 (page F-13) reflects the remaining number of ADUs (283) after subtracting building permits to date in the RHNA cycle. With this adjustment, the City will still have sufficient units to meet RHNA in all income categories. Based on the combination of the online survey analysis, the feedback from ADU owners in Oxnard, and the Chapple industry research, 90 percent the 320 ADUs projected to be built in Oxnard between 2021 and 2029 are anticipated to be affordable to lower-income households and 10 percent are anticipated to be affordable to moderate-income households. Ms. Coy indicated during the meeting on March 17th that based on the data approximately 10% of the projected ADUs should be reflected as moderate.

Item A.3 - Availability of Infrastructure (Appendix page 3 of HCD Letter) - HCD requested that the City clarify availability of sufficient water and wastewater capacity to support new housing units. Conceptual Draft Amended Housing Element Section F.10 Environmental Constraints and Adequate Infrastructure (pages F-15 and F-16) has been updated to include information on water and sewer availability. Based on the data provided in the 2020 Urban Water Management Plan, the City has adequate facilities, services and infrastructure to accommodate the planned residential growth within the city limits during the time frame of this Housing Element. The Oxnard Wastewater Treatment Plant (OWTP) has a current capacity of 31.7 million gallons per day (mgd) with average daily flows of approximately 19.0 mgd. Sufficient capacity exists to accommodate wastewater generated by the 2030 General Plan and the development of the Housing Element sites. All Affordable Housing additive zone sites would be considered infill development and are within the City's ability to serve.

Item A.3 - Zoning for a Variety of Housing Types (Emergency Shelters) (Appendix page 3 of HCD Letter) - During the February 15, 2022 virtual meeting with HCD staff, concern was expressed that the standards for emergency shelters (Oxnard City Code (OCC) Section 16-504) are greater than those applicable to residential or commercial development within the same zone. To address HCD's concern, and consistent with the State law, the City will amend Program 6 (Zoning Code Amendments) to include an update to OCC Section 16-504 for emergency shelters. The revision will allow development standards specific to the underlying zone and those standards listed in Government Code Section 65583(a)(4)(A). A discussion on this revision has been added to Section F.4 under Other Special Needs Housing (pages E-30 and E-31). The timeframe for code update is Fiscal Year 2022-2023.

Item A.4 - Parking requirements (Appendix pages 3 and 4 of HCD Letter) - HCD is concerned that the City's parking requirements for covered/enclosed residential parking create a constraint on affordability and they would like the Housing Element to provide additional discussion or programs. HCD provided as an example of concern a City code requirement for up to 6 parking spaces for a single family home with an ADU. Additional discussion on residential parking has been provided in Section E.1 starting on page E-18. In context, 6 parking spaces would be required for the rare circumstance of a detached 8-bedroom home with an ADU. Only 2 parking spaces are presently required for a detached residence with up to 5 bedrooms, which are the majority of single family homes in the City. Under the current ADU ordinance, parking for ADUs is not required for the majority of locations in the City. Two parking spaces for a 5-bedroom home with an ADU is a reasonable requirement that does not create a constraint on affordability. Additionally, the City will update the ADU portion of the OCC (Sections 16-468(D) and 16-622) to recognize current State law that no replacement parking spaces are required if using the garage for an ADU. Program 6 (Zoning Code Amendments) and Program 27 (Parking Standards) program descriptions text have been updated to recognize this revision.

HCD also requested analysis of the cumulative effects of residential and guest parking requirements. Additional discussion has been provided in Housing Element Section E.1 (page E-18 and E-19) regarding guest/visitor parking. Only one parking space is presently required for studio and one-bedroom units, and one visitor space is required for the first 30 units. However, most multifamily development receives further parking reduction (no visitor spaces required, parking waiver) due to the City's Inclusionary Housing ordinance requirement of 10% lower income units. Development that meets the City's inclusionary requirement is automatically eligible for reduced State Density Bonus parking requirements.

Discussion on the City's Downtown centralized parking provision and in-lieu fee for the district parking facility is provided in the Review of Parking Standards on page A-27 and in Section E.1 Land-Use Planning and Development Standards on page E-15. Pursuant to HCD's recommendation, the City has augmented the discussion on parking for multifamily in the downtown within Conceptual Draft Amended Housing Element Section B.8 Fair Housing Assessment discussion on transportation and access to opportunity on page B-40 and on page E-19 to clarify the City's existing parking provisions for centralized parking rather than parking onsite. Programs 19 (AFFH) and 27 (Parking Standards) include an action item on reducing total parking requirements in the Downtown, including a study on ways to increase transit-oriented development in the Downtown.

Item A. 4 - Design Review and Guidelines (Appendix page 4 of HCD Letter) - HCD recognized that the Housing Element provided information on the design review process and requirements for public noticing and workshops. They requested that the Housing Element additionally include an analysis on potential constraints on housing development caused by the design review process. For this analysis, HCD provided as an example that the element could describe required findings for approval and discuss whether objective standards and guidelines improve development certainty and mitigate cost impacts.

As part of the 2021-2029 Final Housing Element adopted by the City Council in October 2021, the Council approved a new ministerial Site Plan Review process (OCC Section 16-523) for reviewing by-right development and the addition of new Affordable Housing Additive Zone code

(OCC Section 16-420) for sites identified in Supplement 1 of Housing Element. The Additive Zone code includes objective standards for reviewing affordable development. Discussion regarding Site Plan Review for the Affordable Housing Additive Zone sites have been added to Housing Element Section E Constraints on pages E-3, E-41, E-43 and E-44 and Tables E-1 and E-3. Objective development standards for the additive zone are listed in the adopted City Code Section 16-420 at the following link: https://codelibrary.amlegal.com/codes/oxnard/latest/oxnard_ca/0-0-0-53148

Item A. 4 - Processing and Permit Procedure (Appendix page 4 of HCD Letter) - HCD requested that the Housing Element include the approvals that are necessary, approving body, required number of public hearings and process timing for a Special Use Permit (SUP). The approval body and typical processing times for types of approval, and specifically the processing timeline for an SUP are provided on Tables E-8 and E-9 of the Housing Element on Pages E-46 and E-47.

HCD's letter also indicated that a third party identified a subjective finding for SUP approval that was not included in the City's list of SUP approval findings in Section E.5 Processing and Permit Procedures on page E-40 of the Final Housing Element and that this may constrain housing production. The Final Housing Element included all of the required SUP findings from "Requirements for Granting" pursuant to OCC Section 16-531. The third party's referenced line is from the introductory section of the Division for SUP (i.e., OCC Section 16-530) that explains why SUPs are necessary in general and is not a required finding.

The Housing Accountability Act (HAA) does not prohibit cities from requiring discretionary approval for housing projects. The City of Oxnard is predominantly a built-out City where remaining infill developable vacant or underutilized sites may face development constraints. The City must retain an element of discretion on some sites to ensure safe locations for residential development. For this reason, the City created two zones to allow development at default densities of 30 dwelling units per acre for sites identified in the Final Housing Element.

These include the Affordable Housing Permitted (AHP) additive zone where sites from prior Housing Elements are permitted by-right with the provision of 20% affordable housing, and Affordable Housing Discretionary (AHD) additive zone for new sites that have not been included in prior housing elements. Many of the new sites are in underutilized Industrial and Business Research Park zoned areas and were added to the Final Housing Element with the understanding that they would be subject to discretionary review. Such review will help ensure that future multifamily or mixed-use developments are not subject to noise, odor, or other incompatible conditions while also allowing other non-residential uses to be allowed within areas which currently allow non-residential uses. Therefore, discretion must be retained on these sites. Additionally, both the AHP and AHD sites are subject to objective development and design standards as listed in OCC Sections 16-420H and 16-420I, and objective Finding for approval (OCC Section 16-420L) consistent with the HAA. Therefore, projects with an SUP will be reviewed with these objective standards, and can also have HAA findings.

HCD staff member, Shawn Danino indicated during a virtual meeting between City and HCD staff on March 17th that HCD is agreeable to the SUP findings on page E-40 provided that they don't include the preamble mentioned by the third party commenter. We have added text in Section E.5 on pages E-40 and E-41 to clarify that the preamble regarding 'integrity and character of the

zoning district' is not a required finding for approval. The City has also provided additional information on the SUP review process.

Item A.4 - Persons with Disabilities (Appendix page 4 of HCD Letter) - HCD is requesting that the City add a definition of family and address how projects with insufficient parking will be processed and/or be denied for residential care facilities under reasonable accommodation for. The definition for 'family' in OCC Section 16-10 is the same as the building code definition for household, which is a group of residents. This definition has been added to the Terms in Housing Element Section E.1 (page E-2) for clarity. Under OCC Section 16-446, Senior and/or Senior Assisted Living Residential Facilities have flexibility on parking requirements with a parking study that demonstrates sufficient parking. discussion on provision for residential care facility parking has also been added for clarity to Section E.1 the Housing Element on pages E-19 and E-28. Program 27 (Parking Standards) has been updated to list a revision to OCC Section 16-622 (Off-street Parking) to move the requirements for parking for the elderly from the Health Services category to the Residential category, and expand the types of residential care facilities to recognize changes in the industry (currently only assisted living and nursing home are listed to encompass the various types of facilities, including residential care facilities, independent living, memory care, etc. Programs 6 (Zoning Code Amendments) and 21 (Reasonable Accommodation) have also been updated to reflect a revision to OCC Section 16-501.5 (Reasonable Accommodation - Findings) by end of Fiscal Year 2022-2023 to only include objective considerations.

Item A.5 – Developed Densities and Permit Times (Appendix pages 4 and 5 of HCD Letter) - HCD is concerned that development projects will be proposed and approved with less than the maximum allowable density. Planning does not generally receive project applications which are 'substantially' below allowed density. The OCC does not mandate minimum densities, though this has not been found to be a constraint to development. Table F-2 was augmented following HCD's comments on the Draft Housing Element in July 2021 to include a list of current/recent projects showing that developers consistently propose to build at maximum density (or even above maximum density with Density Bonuses). In the event that the approval of a development project results in the remaining sites' capacity becoming inadequate to accommodate the City's RHNA by income category and there are no replacement sites remaining in the Site Inventory surplus (Table F-3; See Surplus RHNA), Program 3 provides a no-net-loss process for the City to rezone enough sites to meet the City's RHNA allocation.

HCD also asked in this comment about the "length of time between received application approval for a housing development and submittal of an application for building permits that potentially hinders the construction of a locality's share of the regional housing need." Information on turnaround times was included in Section E.5 of the prior submittal, which stated "Typical turnaround time after receiving planning entitlements until requesting a building permit is driven by market and funding availability. Development projects are conditioned to secure a building permit within 12-36 months from entitlement (depending on the permit type)" (page E-42). The City has added information on page E-42 to indicate the time between when an application receives their entitlement and when they apply for building permits, which is typically dictated by the developers funding and outside of the City's control. The last five residential projects that have been processed in the City took an average of 18 months between entitlement and the request for a building permit.

Item B.1 - Housing Programs - Programs 6, 9, and 14 pertaining to the Local Coastal Plan (LCP) (Appendix page 5 of HCD Letter) HCD is asking for the City to provide a specific commitment on when these programs will be accomplished in relation to the LCP. Within the Conceptual Draft Amended Housing Element, Program 6 (Zoning Code Amendments) and 14 (Shelter Development) have been updated to include commitment language to completing the Local Coastal Implementing Plan (LIP) once the City's Local Coastal Plan (LCP) is updated in Fiscal Year 2027/2028. However, none of the RHNA sites are located in the coastal zone, as the City would not have been able to rezone coastal sites to allow 30 du/ac, nor would we be able to secure Coastal Commission rezoning approval prior to the Housing Element approval deadline. Program 9 (Farmworker Housing) does not reference the LCP; therefore language regarding the LCP completion date was not listed in this program.

Item B.1 - Housing Programs SRO's (Appendix page 5 of HCD Letter) - HCD is requesting a City commitment to amend the OCC to allow SROs in at least one zone. HCD reviewer Sean Danino specified that this is a requirement of Assembly Bill (AB) 2634, which has been confirmed by the City Attorney. Programs 6 (Zoning Code Amendments) and 22 (Special Needs Groups) within the Conceptual Draft Amended Housing Element have been amended to provide language to allow SROs in at least one zone district, rather than 'study the allowance.' The timeframe for updating the OCC per Housing Element Program 6 and 22 is Fiscal Year 2022-2023.

Item B.2 – Complete Site Analysis (Appendix pages 5 and 6 of HCD Letter) - Related to Item A.3. **Comment Noted**

Item B.3 – Complete Governmental and Non-Governmental Constraints Analysis (Appendix page 6 of HCD Letter) - Related Items A.4&A.5. **Comment Noted**

Item B.4 – Complete analysis of AFFH (Appendix page 6 of HCD Letter) - Related Item A.1. **Comment Noted**

Item C. Public Participation (Appendix pages 6 and 7 of HCD Letter) - As a result of robust community outreach and public participation during preparation of the Final Housing Element, HCD requested additional information on the policy and program changes incorporated into the Housing Element. The City Council implemented many, if not all, of the public recommendations submitted to the City. A summary of the input as well as revisions to the document was forwarded to HCD on March 8, 2002 and has been added to Supplement 3 of the Conceptual Draft Amended Housing Element.

Attachments:

A1 – Realistic Capacity Documentation

A2 – 2021 ADU Affordability Survey

A3 – 2022 ADU Affordability Survey

A4 – 2021 ADU Building Permits Issued

2013-2021 Housing Element Commercial and Industrial Sites Development Status

AAHOP Number		Site Description		GP Des	Zoning	Total Acreage	Buildable Acreage	Allowable Density	ite Capacity All Affordable verlay Site Zone	Affordability Level	Developed with New Commercial?	Site Continued in 6th cycle Housing Element	Development Status (No Change = No improvements since 2013-2021 Mid-Cycle Housing Element)
Vacant													
A-05	225001418		Vacant	CG	C2-PD	13.9	11	24	211	VL/L	No	Yes	No change
Largely Vacant													
B-01	139026025	2121 N. Oxnard Blvd	Auto sales lot	CG	C2-PD	5.2	4.5	24	65	VL/L	No	No	No change
B-02	222015208	4684 & 4700 Saviers	Eagles Lodge	RMH	C-2-PD*	1.16	1.16	24	17	VL/L	No	Yes	No change
	222015202		Propane gas distributor	RMH	C-2-PD*	0.59	0.59	24	8	VL/L	No	Yes	No change
B-06	203012048	1331 - 1369 Saviers Rd	garage bldg	CG	C2	0.77	0.77	24	11	VL/L	No	Yes	No change
	203012050		Com. strip center	CG	C2	0.24	0.24	24	3	VL/L	No	Yes	No change
			2,500 sf total in								No	Yes	No change
	203012041		two garage	CG	C2	0.35	0.35	24	5	VL/L	No	Yes	No change
			buildings								No	Yes	No change
B-07	205044308	3461 Saviers Rd	partly vacant former market/swap meet	CG	C2	4.2	4.2	24	60	VL/L	No	Yes	No change
B-11	223004104	5690 Cypress Rd	vacant	ILM*	M1-PD*	0.37	0.29	24	6	VL/L	No	No	Developed with Residential, Garden City Labor Camp, 100% affordabe
B-12	222001126	5513 Saviers	residence,	CG	C-2 PD	0.92	0.92	24	13	VL/L	No	No	No change
			vehicle storage										
	222001111	5777 S. Saviers	vacant	CG	C-2 PD	0.45	0.45	24	6	VL/L	No	Yes	No change
	222001130	161 W. Hueneme	vacant	CG	C-2 PD	1.7	1.7	24	24	VL/L	No	Yes	No change
	222001129	5489 S Saviers	SF residence	CG	C-2 PD	0.92	0.92	24	13	VL/L	No	No	No change
	222001128	5527 S Saviers	vacant	CG	C-2 PD	0.90	0.90	24	22	VL/L	No	No	Developed with Ormond Beach Villas 39 veteran units, 100% affordable
	222001127	5527 S Saviers	vacant	CG	C-2 PD	0.91	0.91	24	22	VL/L	No	No	Developed with Ormond Beach Villas 39 veteran units, 100% affordable
	222001110	5577 S Saviers	auto repair	CG	C-2 PD	0.31	0.31	24	4	VL/L	No	No	no change

B-13	222010201	Saviers and Pleasant Valley	vacant	CG	C-2-PD	0.44	0.38	24	5	VL/L	No	Yes	No change
	222010218		parking lot	CG	C-2-PD	0.13	0.13	24	2	VL/L	No	No	no change
	222010219		restaurant	CG	C-2-PD	0.34	0.34	24	5	VL/L	No	No	no change
	222010225		vacant	CG	C-2-PD	0.01	0.01	24	0	VL/L	No	No	no change
	222010227		vacant	CG	C-2-PD	0.01	0.01	24	0	VL/L	No	No	no change
B-14	202005409	2nd St	Vacant. bldg	CG	C-2	0.16	0.16	24	2	VL/L	No	Yes	No change
	202005408		parking lot	CG	C-2	0.16	0.16	24	2	VL/L	No	Yes	No change
	202005407		Vacant building (city owned)	CG	C-2	0.32	0.32	24	5	VL/L	No	Yes	No change
	202005410		vacant	CG	C-2	0.16	0.16	24	2	VL/L	No	Yes	no change
	202005404		vacant	CG	C-2	0.16	0.16	24	2	VL/L	No	Yes	no change
	202005403		vacant	CG	C-2	0.16	0.16	24	2	VL/L	No	Yes	no change
	202005402		vacant	CG	C-2	0.16	0.16	24	2	VL/L	No	Yes	no change
B-19	203004114	800-900 blocks of	commercial	CG	C-2-PD	0.09	0.09	24	2	VL/L	No	No	no change
	203004115	W. Wooley Rd	commercial	CG	C-2-PD	0.18	0.18	24	5	VL/L	No	No	no change
	203004116		commercial	CG	C-2-PD	0.09	0.09	24	2	VL/L	No	No	no change
	203004117		commercial	CG	C-2-PD	0.09	0.09	24	2	VL/L	No	No	no change
	203004118		commercial	CG	C-2-PD	0.35	0.35	24	9	VL/L	No	No	no change
	203004119		commercial	CG	C-2-PD	0.18	0.18	24	4	VL/L	No	No	no change
	203004216		commercial	CG	C-2-PD	0.09	0.09	24	2	VL/L	No	No	no change
	203004217		commercial	CG	C-2-PD	0.18	0.18	24	4	VL/L	No	No	no change
	203004218		commercial	CG	C-2-PD	0.35	0.35	24	8	VL/L	No	No	no change
	203004219		commercial	CG	C-2-PD	0.18	0.18	24	4	VL/L	No	No	no change
	203004222		commercial	CG	C-2-PD	0.18	0.18	24	5	VL/L	No	No	no change
	203004226		commercial	CG	C-2-PD	0.01	0.01	24	0	VL/L	No	No	no change
Largely Vacant Structure													
C-01	142001034	Levits	parking lot	CG	C2-PD	5.3	5.3	24	76	VL/L	No	No	no change
	142002101		vacant Levitz	CG	C2-PD	3.6	3.6	24	52	VL/L	No	No	no change
C-03	222008229	207-631 W. Hueneme	older strip com.	CG	C-PD*	0.7	0.7	24	10	VL/L	No	yes	no change
	222001128		older strip com.	CG	C-PD*	1.37	1.37	24	20	VL/L	No	yes	no change
	222001127		vacant	CG	C-PD*	0.27	0.27	24	4	VL/L	No	yes	no change
	222001126		vacant	CG	C-PD*	1.09	1.09	24	16	VL/L	No	yes	no change
	222008265		older strip com.	CG	C-2	0.29	0.29	24	4	VL/L	No	yes	no change
	222008263		older strip com.	CG	C-2	1.48	1.48	24	21	VL/L	No	yes	no change

	222008257		older strip com.	CG	C-2	0.59	0.59	24	8	VL/L	No	yes	no change
	222008255		older strip com.	CG	C-2	0.59	0.59	24	8	VL/L	No	yes	no change
	222008256		parking lot	CG	C-2	0.29	0.29	24	4	VL/L	No	yes	no change
	222008258		older strip com.	CG	C-2	0.3	0.3	24	4	VL/L	No	yes	no change
Constrained													
D-03	203007028	1132 S. C St.	vacant	CG	C-PD*	0.29	0.29	24	6	VL/L	No	Yes	no change
D-05	205014132	Pleasant Valley Shopping Center	Unique Characteristics	CG	C2	7.8	3	24	43	VL/L	No	No	no change
D-06	200010002	1345 N. Oxnard	car dealership	CG	C2-PD	2.82	2.82	24	41	VL/L	No	Yes	Active application for residential, 195 units, 100% affordable
	200010003		car dealership	CG	C2-PD	1.13	1.13	24	16	VL/L	No	Yes	Active application for residential, 195 units, 100% affordable
	200010004		car dealership	CG	C2-PD	4.47	4.47	24	64	VL/L	No	No	no change
D-07	200008219	1205 N. Oxnard Bvd	dealership	CG	C2-PD	2.8	2.5	24	36	VL/L	No	Yes	no change
D-10	203007034	1111 S. Saviers Rd		CG	C2	1.4	1.3	24	19	VL/L	No	Yes	no change
D-11	204006003	1225 to 1263 S Oxnard	auto shop	CG	CM-PD	0.6	0.6	24	9	VL/L	No	Yes	no change
	204006004		small offices	CG	CM-PD	0.7	0.7	24	10	VL/L	No	Yes	no change
	204006012		vacant	CG	CM-PD	0.85	0.85	24	12	VL/L	No	Yes	no change
	204006013		9 apartments	CG	CM-PD	0.5	0.5	24	7	VL/L	No	Yes	no change
D-12	204007301	1325to 1401 S. Oxnard	bar & parking	CG	C-2	0.34	0.34	24	5	VL/L	No	No	no change
	204007302		auto sales	CG	C-2	0.34	0.34	24	5	VL/L	No	Yes	no change
	204007317		auto sales	CG	C-2	0.17	0.17	24	2	VL/L	No	Yes	no change
	204007318		auto sales	CG	C-2	0.17	0.17	24	2	VL/L	No	Yes	no change
D-14	183025021	SE corner Patterson Rd & W. Wooley Rd	industrial bdg	IL	ML	0.5	0.5	24	12	VL/L	No	No	no change
	183025013		industrial bdg	IL	M-PD	0.4	0.4	24	10	VL/L	No	No	no change
	183025015		industrial bdg	IL	M-PD	0.4	0.4	24	10	VL/L	No	No	no change
	183025023		industrial bdg	IL	ML	1.5	1.5	24	36	VL/L	No	No	no change
	183025024		self storage	IL	ML	2.4	2.4	24	57	VL/L	No	No	no change
	183025018		industrial bdg	IL	M-PD	0.2	0.2	24	5	VL/L	No	No	no change
	183025019		industrial bdg	IL	M-PD	0.3	0.3	24	5	VL/L	No	No	no change
	183025009		industrial bdg	IL	ML	0.6	0.6	24	14	VL/L	No	No	no change
	183025010		industrial bdg	IL	ML	0.4	0.4	24	10	VL/L	No	No	no change

	183025012		industrial bdg	IL	M-PD	0.3	0.3	24	8	VL/L	No	No	no change
	183025022		industrial bdg	IL	ML	1.2	1.2	24	29	VL/L	No	No	no change

Attachment A2 to A4 – Redacted

Attachment 6

June 28, 2022 Proposed Revisions to Conceptual Draft Amended Housing Element
(Revisions to Conceptual Amended Housing Element)

Vytautas Adomaitis, Community Development Director
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June 28, 2022

Shawn Danino
Housing Policy Development, Land Use & Planning
Housing & Community Development
2020 W. El Camino, Suite 500
Sacramento, CA 95833

(Via Email – Hard Copy to Follow)

Subject: Proposed Revisions to Conceptual Draft Amended Final Housing Element, City of Oxnard - 6th Housing Element

Dear Mr. Danino:

Thank you for meeting with the City of Oxnard on June 22, 2022, and on June 28, 2022 via conversation with Placeworks, to discuss your review of the Conceptual Draft Amended City of Oxnard, 6th Cycle 2021-2029 Housing Element that was submitted to HCD on May 13, 2022 ("Housing Element").

During our meeting, you identified four additional revisions that are necessary for the Housing Element to fully comply with State Housing Element Law. The City committed to providing the following revisions to assist HCD in evaluating the Housing Element. The items contained in this correspondence provide information we discussed and pertain to:

1. Age & Condition of Housing Stock;
2. Guest Parking;
3. Findings and Design Standards for Site Plan Review; and
4. Timing on Local Coastal Plan

Each of the four revisions are outlined in Attachment A to this letter. Attachment A also identifies additional proposed minor revisions due to community input. This letter confirms that in accordance with Assembly Bill (AB) 215, the City will post the Proposed Revisions to the Conceptual Draft Amended Final Housing Element (Attachment A to this correspondence) on the City's Housing Element website beginning on July 1, 2022 and distribute notice of the posting to all interested parties. This posting complies with AB 215 posting requirements.

Should you have any further questions, Kathleen Mallory, Planning & Sustainability Manager, can be reached at either (805) 385-8370 or Kathleen.Mallory@oxnard.org.

We greatly appreciate your assistance and continued close collaboration with our staff.

Sincerely,

Kathleen Mallory

for Vytautas "Vyto" Adomaitis
Community Development Director

Attachment:
A - Proposed Revisions to Conceptual Draft Amended Final Housing Element (May 2022)

Attachment A
Proposed Revisions to Conceptual Draft Amended Final Housing Element (May 2022)

In response to a June 22, 2022 phone call and follow-up discussions with HCD staff on the City's Conceptual Draft Amended Final Housing Element (May 2022) ("Housing Element"), this correspondence identifies conceptual modifications to this document to address HCD's comments. Changes are identified in legislative format below (new text is underlined and strike through is to be deleted):

1. **Rehabilitation/Renovation Units** - Housing Element Section B.6 Housing Stock Characteristics has been conceptually revised to provide updated estimates of the number of units in need of rehabilitation or replacement (Page B-19). Chapter G has also been revised with updates to Table G-1 to increase quantified objectives and Program 1 to include a targeted housing conditions survey as requested by HCD reviewer Melinda Coy in discussions with the City's Housing Element consultant, Placeworks, in a phone call on June 27, 2022.

The text in Section B.6 will be conceptually updated as follows.

> Most legally-permitted units in Oxnard have full plumbing and kitchen facilities, based on observations by the City's building inspectors and Code Compliance staff. There are a handful of older, small residences that were built before 1940 without what is now considered complete kitchen and bathroom facilities. There are also an unknown number of unpermitted garage and internal subdivided homes that do not have complete kitchen and/or bathroom facilities, and some lack safe heating. Residents of these units probably have access to kitchens and bathrooms in the "parent" housing unit or share with other boarders. Code Compliance responds to complaints of illegal units and initiates cases to bring the units into permit compliance if possible or requires the units to be removed. The City relies on anecdotal information from inspector, Police and Fire department field personnel, and Code Compliance cases to provide statistics on the condition of the housing stock. <u>From 2015 through 2022, Code Compliance has opened a total of 518 substandard housing cases, investigated a total of 2,168 substandard Housing cases and resolved/closed 529 substandard housing cases.</u> With the recent allowance of Accessory Dwelling Units (ADUs) and Junior ADUs, many of the unpermitted conditions that previously were not allowed will now be allowed with proper permits. This has resulted in an extended time to resolve cases as the corrections are not considered resolved until the entire permitting process for the units is completed. In addition, the COVID-19 pandemic has affected the number of substandard cases reported. They are significantly lower since the pandemic began. As summarized in Table B-25, approximately 45 percent of the housing units in the City were constructed prior to 1970 and may be in need of <u>some type of</u> rehabilitation or replacement. Although age does not always correlate with substandard housing conditions, neighborhoods with a concentration of homes 50 years old (or more) are more likely than newer neighborhoods to experience housing problems stemming from

deferred maintenance, inadequate landscaping, and outdated utilities, and therefore approximately 11,440 units could be in need of rehabilitation. However, this does not consider ongoing property owner reinvestment and most likely the rehabilitation need is much lower. To ensure the City has an accurate understanding of the neighborhoods in need of rehabilitation, the City has included in Program 1 a commitment to complete a windshield housing condition survey in targeted older and lower income neighborhoods which will help to inform the City on where rehabilitation efforts should be focused.

Table G-1 in Chapter G has been conceptually updated as follows: The increased objectives for rehabilitation and conservation for the moderate and above moderate categories align with the projected need discussed in Chapter B. Rehabilitation of moderate and above moderate units would be owner funded while some funds are available from the City for rehabilitation of lower income units.

Table G-1 Housing Unit Objectives by Income Category (Quantified Objectives): 2021–2029

Income Group	2021–2029 RHNA Table D-1	Rehabilitation Conservation Estimate [Program No.]	Preservation Estimate [Program No.]	Total Housing Units Constructed, Rehabilitated, or Preserved
Extremely Low/ Very Low	1,840	125 [1,2]	215 [16]	2,180
Low	1,071	125 [1,2]	216 [16]	1,412
Moderate	1,538	~~28~~150 [1, 2]	0	~~1,566~~ 1,688
Above Moderate	4,100	~~28~~300 [1, 2]	0	~~4,128~~ 4,400
TOTAL	**8,549**	**~~306~~ 700**	**431**	**~~9,286~~ 6,980**

Program 1 in Table G-2 in Chapter G has been updated as follows:

Table G-2. Housing Element Implementation Programs **Implementation by**

Program	Objective (quantified/ qualified)	Imple-ments Policy	In prog-ress	2021-2022	2023-2024	2025-2026	2027-2029	Annually or Ongoing

Program 1: **Code Compliance Program** **Responsibility: Community Development Department, with technical support by other City Departments as needed** **Funding: General Fund, CDBG, Measure 'O'** **Time Frame: Ongoing**	Ensure compliance with City codes, with a focus on substandard housing, which includes garage conversions and unpermitted additions. 300 cases per month.	1.1 1.2 1.3 1.4 1.5 1.7			■	■		■

The Code Compliance Division enforces building and property maintenance regulations with a goal of compliance and safety. Code Compliance officers work with neighborhood advisory groups and respond to complaints to identify violations, and then direct owners to appropriate City departments to achieve compliance. The City may have loan and grant programs and works with other agencies to avoid unnecessary displacement. The Housing Department serves as a liaison for Code Compliance in mobile home parks under HCD jurisdiction. The Code Compliance Division will continue to ensure that landlords of rental units are completing repairs for tenants in a timely manner to reduce displacement risk and without threat of retaliation.

Additionally, the City will complete a targeted windshield housing conditions survey during Fiscal Year (FY) 2024- 2025 in several City selected older neighborhoods and neighborhoods with lower median incomes, to evaluate rehabilitation needs. The survey will be conducted by visually assessing exterior of homes such as roofing, windows, and siding conditions and categorizing units as sound, in need of minor repair, moderate repair, substantial rehabilitation or dilapidated. Based upon the survey findings, in FY 2025-2026 the City will identify specific needs and tailor housing rehabilitation measures to fit those needs, such as encourage housing preservation, conservation, acquisition rehabilitation, mitigation of potential costs, and minimizing displacement and relocation impacts on residents. These measures may include, but are not limited to the following:

· Reaching out directly to homeowners of housing units in need of repair to promote the Homeowner Repair Program (Program 2).

· Streamlining permit review for repairs on housing units identified during the conditions survey.

· Seeking non-city funding to offer relocation assistance to low-income tenants or owners displaced during rehabilitation efforts.

· Seeking non-city funding to develop a housing rehabilitation program.

2. **Guest/Visitor Parking** - HCD requested that language be added to Housing Element Program 27 (Review of Parking Standards) to monitor how the City's guest parking requirement could be a governmental constraint to production of affordable housing. Oxnard City Code (OCC) Section 16-622 presently requires for multifamily development one uncovered visitor parking space per unit for the first 30 units; after the 31st unit, 0.5 uncovered visitor space per unit. As discussed with HCD, due to the City's existing Inclusionary Housing Ordinance that requires that all developers provide 10% lower income units in development with 10 or more units, most multifamily development in the City is eligible for waived guest parking under the State's Density Bonus parking requirements, including projects that do not apply for Density Bonus. However, the guest parking requirement is still in place for projects that are not eligible for State Density Bonus. Accordingly, the following bullet item will conceptually be added to Program 27:

   - Monitor existing visitor parking requirements for impacts to affordable housing development applications. As part of the City's Annual Housing Element reporting, the City will evaluate the multifamily visitor parking requirements to determine if it is a constraint to production of lower income units and conduct necessary Oxnard City Code modifications as needed. (Multifamily parking visitor parking is presently one uncovered visitor space per unit for the first 30 units; after the 31st unit, 0.5 uncovered visitor space per unit).

3. **Site Plan Review and Affordable Housing Overlay Design Standards**- HCD requested that the Housing Element include the Site Plan Review findings for the City's newly adopted Site Plan Review process for by-right development, and the objective design standards from the City's newly adopted code for development in the Affordable Housing Additive zones.

   As discussed in prior correspondence with HCD, in October 2021 the Council approved a new ministerial Site Plan Review process (OCC Section 16-523) for reviewing by-right development, and a new Affordable Housing Additive Zone (OCC Section 16-420) for development of sites identified in Supplement 1 of Housing Element that have been zoned Affordable Housing Permitted (AHP) or Affordable Housing Discretionary (AHD) and provide 20% of unis affordable to lower income households. The Additive Zone code includes objective development and design standards for reviewing affordable development projects.

   The following findings from OCC Section 16-523.4 for Site Plan Review are provided in Section E starting on page E-43:

   (A) The project is consistent with the applicable general plan policies and is in conformance with applicable zoning regulations contained in this chapter and other adopted standards.

(B) There are adequate infrastructure and public services available to serve the proposed development, including sewerage, water, fire and police protection, storm drainage facilities, and legal access to the lot.
(C) The proposed development is on a legally created lot.

Objective development standards for development in the AHP and AHD zones are provided in Table E-2 starting on Page E-10, and Table E-3 on Page E-14 of the Housing Element. The City recently adopted OCC Section 16-420, which also requires objective design standards for development in the AHP and AHD zones. The following text is provided in Section E on Page E-44 of the Housing Element regarding the objective design standards:

Housing development permitted under the Additive Zone code for development in the AHP and AHD zones are required to follow Objective Design Standards outlined under OCC 16-420I for neighborhood compatibility, building design, massing/articulation, site design and accessory elements such as refuse enclosures.

The OCC is available online at the following link: CHAPTER 16: ZONING CODE (amlegal.com). Rather than including the full list of objective design standards in its entirety within the Housing Element, for reference, the list of the objective design standards that are required for development in the AHP and AHD additive zones are provided below (OCC, Chapter 16, Article 5, Division 7C):

SEC. 16-420I. DESIGN STANDARDS.
Housing developments permitted under this Division 7C shall incorporate the following objective design standards and include on-site amenities appropriate for the resident population to be served:

(A) Neighborhood compatibility.

(1) Residential developments located abutting or across the street from a single-family neighborhood shall orient the buildings to the street with individual entries, patio areas and landscaping facing the single-family homes. Parking lot areas, garages and carports shall be located behind residential structures unless it is technically infeasible based on other city or state required standards.

(2) Duplexes, triplexes, and fourplexes abutting or across the street from a single-family neighborhood shall include individual front doors and interior stairs (when stairs are needed).

(3) When determined necessary by a noise assessment, sound walls shall include an earth berm and landscaping. Walls between buildings shall be extended to create pockets of protected common space avoiding long continuous walls for the entire length of a development site.

(B) Building design.

(1) Buildings shall orient towards the street or internal courtyard.

(2) Buildings shall carry the same theme on all elevations. For the purposes of this standard, a theme includes primary (non-accent) materials and colors.

(3) Architectural articulation shall be provided on all four sides of a building-Architectural articulation rhythms shall be followed based upon dimensions found in existing developments immediately adjacent to the site being developed.

(4) Exterior siding shall be made of nonreflective and nonmetallic materials. Acceptable siding material includes wood, stucco, ceramic tile, brick, stone, or other masonry materials, or any combination of these materials.

(5) Affordable units and market rate units in the same development shall be constructed of the same or similar exterior materials and details such that the units are not distinguishable.

(6) Blank walls (facades without doors, windows, landscaping treatments) shall be less than 30 feet in length along sidewalks, pedestrian walks, or publicly accessible outdoor space areas.

(7) Buildings over three stories must provide a ground floor elevation that is distinctive from the upper stories by providing a material change or color change between the first floor and upper floors when in alignment with a change in architectural fenestration or facade articulation. The change in material or color shall occur along at least 75% of the building facade with frontage upon a street, adjacent public park or public open space.

(8) The primary street and the side street frontages, up to 75 feet from the primary street front property line, of on-grade parking podiums and parking structures shall be lined with occupiable, usable space with a minimum depth of 18 feet. Non-lined portions of above-grade garages (rear of lots along side streets) must be set back at least five feet. The setback area should contain landscaping of the same quality as elsewhere on the property.

(9) Trim surrounds shall be provided at all exterior window and door openings. In lieu of exterior window trim, windows can be recessed from the wall plane by a minimum of three inches.

(10) At least two materials shall be used on any building frontage, in addition to glazing and railings. Any one material must comprise at least 20% of the building frontage.

(11) Building facades shall be multi-colored. Each facade must contain not less than two but not more than five distinct colors. Extremely bright colors are only allowed on doors, window trim, or other building components that represent a small portion of the overall building facade. Materials, finishes, fixtures, and colors visible from the street shall be designed in a manner that is consistent with the architectural style of the building

(C) Massing/articulation.

(1) A minimum of two features such as balconies, cantilevers, dormers, bay windows, patios, individualized entries, and accent materials shall be incorporated into each proposed building.

(2) A minimum one-foot offset is required for any wall plane that exceeds 30 feet in length.

(3) Buildings over three stories tall shall have major massing breaks at least every 100 feet along any street frontage, adjacent public park, publicly accessible outdoor space, or designated open space, through the use of varying setbacks and/or building

entries. Major breaks shall be a minimum of 30 inches deep and four feet wide and extend the full height of the building.

(4) Buildings shall have minor massing breaks at least every 50 feet along the street frontage, through the use of varying setbacks, building entries and recesses, or structural bays. Minor breaks shall be a minimum of 12 inches deep and four feet wide and extend the full height of the building.

(5) Rooflines shall be vertically articulated at least every 50 feet along the street frontage, through the use of architectural elements such as parapets, varying cornices, reveals, clerestory windows, and varying roof height and/or form.

(6) Within 20 feet of an R-1 District boundary, the maximum building height is 35 feet. From this point, the building height may be increased to a ground level of up to 16 feet to allow for podium parking and four additional stories of ten feet each with a combined maximum height of 56 feet.

(D) Site design.

(1) When dwelling units are abutting common open space areas and parks, a minimum of one window from each dwelling shall be located to overlook common area and parks.

(2) Garages and carports shall be designed to include a minimum of two of the following from the main building(s): materials, detailing, roof materials, and colors.

(3) Controlled entrances to parking facilities (gates, doors, etc.) shall be located a minimum of 18 feet from the back of sidewalk, in order to accommodate one vehicle entering the facility.

(4) Where bicycle parking is not visible from the street, directional signage to bicycle parking shall be included at the main building entrance. The signage shall be in the form of either a directory not exceeding six square feet and or up to ten individual directional signs not exceeding one square foot each.

(5) Within commercial zones parking shall not be allowed within the front setback areas and direct pedestrian access to the building(s) must be provided from the public right-of-way. Direct pedestrian access between the public right-of-way and the building shall not require crossing parking, drive aisles, or other spaces used for vehicular circulation.

(6) Within commercial zones all housing developments must have direct interaction with the public right-of-way. When ground floor residential units are proposed, the residential units which front the public right-of-way shall locate kitchens and other living spaces (but not bedrooms) to front on the public right-of-way. These residential units may have covered patios and decks which can be constructed within the front yard setback within five feet of the property line provided the patios or decks have steps and or gates which lead directly to the public right-of-way. Second and third floor residential units are encouraged to place kitchens and other living spaces (but not bedrooms) to overlook the public right-of-way. These residential units may have decks and or balconies which encroach up to ten feet into the front yard back.

(7) Surface parking spaces may be open or covered. All surface parking shall be screened from street views by buildings, walls (36 to 48 inches tall), landscaping, a planted earth berm, planted fencing, topography, or some combination of the above.

Landscaping used for screening purposes must be no less than five feet wide (from the back of sidewalk or street curb to the parking lot paving, whichever is greater).

(8) Frontage improvements consistent with public works plates. The frontage improvements shall be designed to connect with and transition into adjacent existing frontage improvements.

(9) Common use site areas shall include refuse collection, mail distribution, laundry, recreation, and congregation. All such areas shall be connected with an accessible route.

(10) All secured mail and parcel distribution areas shall be well lit, secure, and shall remain open to the tenants at all times.

(E) Accessory elements.

(1) Perimeter fencing utilized along a public street shall be constructed of decorative iron, pre-painted welded steel, CMU block, or wood picket material.

(2) The height of solid fencing between private yards and common open spaces shall be limited to four and one-half feet in height. If a six-foot fence is desired, the top 18 inches shall allow for vision in and out of the yard.

(3) All roof top, wall mounted or ground mounted equipment must be screened. Rooftop screening must use the materials and colors from the building and be architecturally integrated.

(4) All exterior storage facilities shall be screened from the public right-of-way, within an enclosure with walls at least six feet in height.

(5) All wood service poles, electric and gas meters, fire sprinkler valves and backflow preventers and transformers shall be located in the least prominent locations onsite as allowed by the utilities, and all equipment shall be camouflaged using building materials and colors and or landscaping included within the project design.

(6) Refuse enclosures.

(a) All refuse enclosures shall be designed to comply with the city material management And enclosure design guidelines.

(b) Shield all dumpsters within an enclosure a minimum of six feet tall with a solid roof. Allow adequate size to accommodate the needed dumpsters and recycling containers. All enclosures and gates shall be detailed to withstand heavy use. Provide wheel stops or curbs to prevent dumpsters from banging into walls of enclosure.

(c) Provide an opening so that pedestrians can access the dumpsters without opening the large gates.

(d) Provide lighting at trash enclosures for night time security and use.

(e) Locate dumpster enclosures so that no dwelling is closer than 20 feet (including those on abutting properties), or more than 150 feet from a residential unit. No minimum distance from dwellings is required if dumpsters are located within a fully enclosed room.

4. **Local Coastal Plan Timing (LCP)** HCD requested that the City provide additional discussion on the timeline for completing the City's Local Coastal Plan (LCP) in Fiscal Year 2027/2028. Additional discussion on the LCP timeline has been provided in Section E under the Local Coastal Program, starting on Page E-54. The following conceptual text will be added:

The City will be updating the City's General Plan and Local Coastal Plan (LCP) simultaneously beginning in early 2023. This multi-year work effort is envisioned to take 3 - 4 years. Following City Council approval of the two documents, in accordance with State law the LCP will be submitted to the State of California Coastal Commission for review and approval. The review and approval process is estimated to take 1 1/2 years to complete. Therefore, Fiscal Year 2027-2028 has been specified in the Housing Element for revisions to the City's Local Coastal Implementing Plan (LIP), Chapter 17 which implements the LCP.

As discussed in prior correspondence with HCD, none of the Regional Housing Needs Assessment (RHNA) sites that the City has identified in the Housing Element are located in the coastal zone, as the City would not have been able to rezone coastal sites to allow 30 du/ac, nor would we be able to secure Coastal Commission rezoning approval prior to the 6th cycle Housing Element approval deadline.

5. **Additional Revisions from Public Participation** - As a result of ongoing community outreach, and due to public review of the May 2022 Housing Element, staff has received additional public input that will result in minor revisions to the Housing Element. These conceptual revisions will be implemented in the below discussed locations to provide consistency and clarity within the Housing Element.
   - Racially or Ethnically Concentrated Areas of Poverty (R/ECAPS) map in Chapter B - The Housing Element currently includes maps in Chapter B that identify disadvantaged areas in the City such as TCAC Opportunity Areas, Linguistic Isolation, and CalEnviroScreen 4.0. Public input identified the need for identification of R/ECAPS, which would be helpful for affordable housing developers to identify areas with greater need and associated availability of public funding. Accordingly, a R/ECAPS map will be added as Figure B-12.
   - Rent Caps Ordinance and Just Cause Eviction Ordinance - The City adopted a 4% annual rent cap ordinance and a Just Cause Eviction Ordinance on May 3, 2022. These two ordinances became effective June 4, 2022. Discussions on these two ordinances will be added to Section B.8 Fair Housing and in Program 19 of the Housing Element.
   - Single Room Occupancy (SRO) - Although Program 6 was revised in the last draft of the Housing Element to allow SRO in at least one zone (rather than study), the revision was missed in Program 22 that also discussed SRO. Program 22 will be revised to be consistent with Program 6.

Attachment 7

July 11, 2022 HCD Conditional Certification Letter

See Exhibit B of Attachment 2

Attachment 8

Summary Matrix of Revisions to Final Housing Element (October 2021)

Attachment No. 8

This attachment provides a matrix of revisions to the October 2021 Adopted Housing Element. Edits to the Housing Element are noted below in legislative format; text to be removed is shown in ~~strikethrough~~ and new text is underlined. The matrix includes changes reflected in 1) the City of Oxnard Conceptual Draft Amended 2021-2029 Housing Element that was release to the public of the on May 5, 2022 and submitted to HCD on May 12, 2022 (May 13, 2022 Letter to HCD); and 2) Revisions that were published on June 28, 2022 and sent to HCD on July 7, 2022 (June 28, 2022 letter to HCD), which were based on follow up input from HCD discussions with staff on June 22nd and 30th, 2022 and ongoing community input on the May 2022 Draft.

On July 11, 2022 HCD sent a conditional certification letter based on the May 2022 Draft and the proposed July 7, 2022 revisions.

The following revisions summarize changes to the City Council adopted Housing Element (October 2021). Changes can be categorized as substantial and non-substantial changes. Changes have been reviewed with housing advocates and interested parties. Most of the changes can be considered non-substantial.

Page Number	**Substantial Change/Non-Substantial Change**	**Updated Information or Input Received**	**Description of Change**	**Staff Comment**
Page B-19	Non-substantial change	Date January 10, 2022 Findings Letter from HCD (Attachment 4); and June 22, 2022 and June 28, 2022 meetings with HCD (Attachment 6 June 28, 2022 Letter to HCD) - clarify the number of estimated housing units in need of rehabilitation. Current Information: Update Code Compliance data through 2022 and	"The City relies on anecdotal information from inspector, Police and Fire department field personnel, and Code Compliance cases to provide statistics on the condition of the housing stock. <u>From 2015 through 2022, Code Compliance has opened a total of 518 substandard housing cases, investigated a total of 2,168 substandard Housing cases and resolved/closed 529 substandard housing cases.</u>" <u>"As summarized in Table B-25, approximately 45 percent of the housing units in the City were constructed prior to 1970 and may be in need of some type of rehabilitation or replacement. Although age does not always correlate with substandard housing conditions, neighborhoods with a concentration of homes 50 years old (or more) are more likely than newer neighborhoods to experience housing problems stemming from deferred maintenance, inadequate landscaping, and outdated utilities, and therefore approximately 11,440 units could be in need of rehabilitation. However, this does not consider ongoing property</u>	The code compliance information is being updated to include current data through March 2022. HCD requested that the Housing Element further clarify the number of estimated housing units in need of rehabilitation or replacement. The discussion on Program 1 (Code Compliance Program) has also been updated to include a targeted housing conditions survey as requested by HCD reviewer Melinda Coy in

Page Number	Substantial Change/Non-Substantial Change	Updated Information or Input Received	Description of Change	Staff Comment
			owner reinvestment and most likely the rehabilitation need is much lower. To ensure the City has an accurate understanding of the neighborhoods in need of rehabilitation, the City has included in Program 1 a commitment to complete a windshield housing condition survey in targeted older and lower income neighborhoods which will help to inform the City on where rehabilitation efforts should be focused. "	discussions with the City's Housing Element consultant, Placeworks, in a phone call on June 28, 2022.
B-33	Non-substantial change	Date May 31, 2022 meeting with Barbara Macri Ortiz (see Attachment 9 May 25, 2022 email) - Add to Section B.8 Fair Housing a discussion on the City's recently adopted Just Cause and Rent Stabilization ordinances.	The City adopted a Just Cause Eviction ordinance (Ord. No. 3012) and a Rent Stabilization ordinance (Ord. No. 3013) on May 3, 2022 that are more protective than California Civil Code Section 1946.2. These two ordinances became effective June 3, 2022 and were codified into the OCC under Chapter 27 Articles I and II. The Just Cause ordinance requires landlords to give tenants a reason for their eviction (Consistent with California AB 1482) and includes a requirement that the owner provide tenant relocation assistance for no-fault evictions equal to 2 months of the tenant's rent or $5,000, whichever is greater. The Rent Stabilization Ordinance restricts annual rent adjustments to not more than 4%. Both ordinances make it illegal for owners or their representatives to retaliate against tenants for lawfully and peaceably exercising their legal rights under the ordinances. The landlords are required to post notice of the existence of Chapter 27 in the following languages: English, Purepecha, Mixteco, Otomi, Tagalog, Zapoteco, Nahuatl, and Spanish.	This information is being added due to development and adoption of this program after Council approval of the October 2021 Housing Element. Note: the effective date of the ordinances is incorrect in the legislative draft. This will be updated for the version that is submitted to HCD.
Pages B-35 & B-36	Non-substantial change	As a result of ongoing public outreach, staff identified a need for a clear	"The different categories of areas in terms of resources as defined by TCAC are shown below. Not all of the types of areas currently exist in Oxnard. The current map and types of areas	The definitions for Opportunity Areas (aka resource categories) from

Page Number	Substantial Change/Non-Substantial Change	Updated Information or Input Received	Description of Change	Staff Comment
		description of the different resource categories as defined by TCAC in Housing Element Section B.8 Fair Housing Assessment.	identified represent a static moment in time and will change over time. **High Segregation & Poverty.** Areas in which at least 30 percent of the population earns an income below the federal poverty line and there is an overrepresentation of people of color relative to the county. **High Resource.** Top 40 percent highest-scoring census tracts in the region. Indicates residents in these census tracts have access to highly positive outcomes in terms of health, economic attainment, and education attainment. **Highest Resource.** Top 20 percent highest-scoring census tracts in the region. Indicates residents in these census tracts have access to the best outcomes in terms of health, economic attainment, and education attainment. **Low Resource.** Bottom 30 percent of remaining census tracts in the region. Indicates residents in these census tracts could be experiencing a lack of access to positive environmental, economic, and education factors results in negative outcomes or perpetuated outcomes (such as perpetuated poverty). **Moderate Resource.** Top 30 percent of remaining census tracts in the region. Indicates residents in these census tracts have access to either somewhat positive outcomes in terms of health, economic attainment, and education; or positive outcomes in a certain area (e.g., score high for health, education) but not all areas (e.g., may score poorly for economic attainment). **Moderate Resource (Rapidly Changing).** A filter applied to moderate resource tracts based on index scores	the California Tax Credit Allocation Committee (TCAC) have been added to the Housing Element for clarity. Note that Oxnard does not have any areas that qualify as high or highest resource areas (See Housing Element Figure B-2 TCAC/HCD Opportunity Areas).

Page Number	Substantial Change/Non-Substantial Change	Updated Information or Input Received	Description of Change	Staff Comment
			just below the high resource threshold and experiencing rapid increases in key dimensions of opportunity (housing price, median income, job proximity, etc.). "	
Page B-36	Non-substantial change	Add reference to new Figure B-12, R/ECAP map	"Oxnard has three census tracts that are considered a Racially/Ethnically Concentrated Area of Poverty (R/ECAP), or areas in which more than 50 percent of the population identifies as non-white and there is a poverty rate of 40 percent or more or a poverty rate of more than three times the average poverty rate for the county (see Figure B-12)."	See discussion for Page B-58.
Page B-39	Non-substantial change	Date January 10, 2022 Findings Letter from HCD (Attachment 4); update to address AFFH.	"To address issues of segregation and poverty the City has included Programs 2, 4, 9, 10, 11, 12, 13, 19, and 26, 29, 33 & 34 in Chapter G to:" ● "Increasing housing mobility opportunities and/or housing in high resource areas."	This revision adds programs where AFFH goals are addressed. An AFFH goal to increase mobility to high resource areas has been added to the list of how the Housing Element addresses patterns of segregation.
Page B-40 to B-42	Non-substantial change	Date January 10, 2022 Findings Letter from HCD (Attachment 4). HCD recommended that the Housing Element include additional factors/policies/ programs related to access to transportation opportunities;	"In February 2011, the City adopted a Bicycle and Pedestrian Facilities Master Plan, which identified the existing bike and pedestrian infrastructure and the demand for routes, improvements, and/or safety features. As identified in the Plan, the City has existing Class II bike routes (separate bike lane) citywide, including within the City's low resource areas in central Oxnard and areas designated as an R/ECAP. Within the R/ECAPs, Class II bike routes are provided along Gonzales Road, Camino Del Sol, and Rose Avenue providing either direct or proximate access to seven schools and several parks. The Bicycle and Pedestrian Facilities Master	The discussion on Mobility Options in Chapter B is being updated to include a discussion on the City's adopted Bicycle and Pedestrian Facilities Master Plan, which will be incorporated with the City's Sustainable Transportation Plan (STP). The Plan includes

Page Number	Substantial Change/Non-Substantial Change	Updated Information or Input Received	Description of Change	Staff Comment
		specifically, land use controls for bike lanes, carsharing, walkability and pedestrian infrastructure to expand access to public transportation..	Plan includes proposed bike plan improvements and expansions, most significantly a multi-use path (not in the roadway) for bikes and pedestrians that runs north and south in central Oxnard along Oxnard Boulevard and connecting path (east/west) within the R/ECAP along Fifth Street. This will provide convenient and safe access to a major commercial corridor and is accessible to residents of low resource and R/ECAP areas. The Bicycle and Pedestrian Facilities Master Plan will be reviewed and incorporated as a part of the City's Sustainable Transportation Plan (STP) effort, which was initiated in 2022. Access, multi-modal transportation, and environmental amenities are significant goals of the Sustainable Transportation Plan. The City has added an action item to Program 19 in Chapter G regarding the completion of the City of Oxnard STP in Fiscal Year 2022-2023. The STP will address disparities in access to transportation opportunities by incorporating complete streets design, safe routes to school, vision zero, sidewalk and bike lane improvements and first/last mile planning in tandem with land use opportunities in lower resourced areas including R/ECAPs and areas of linguistic isolation. Following submission of the housing element to HCD in October 2021, the City received a $410,000 transportation grant from Caltrans toward completing the STP. In April 2022 the City Council awarded a professional services agreement with Fehr & Peers to develop the STP. Development of the STP will include idea generation and prioritization, establishment of the sustainable transportation framework, catalog of enhanced streetscape elements, conceptual design alternatives, identification of funding sources,	Class II bike routes (separate bike lanes) within the City's low resource areas in central Oxnard and areas designated as R/ECAP to provide mobility options for residents.

Page Number	Substantial Change/Non-Substantial Change	Updated Information or Input Received	Description of Change	Staff Comment
			implementation steps, and a final STP for adoption by the City Council. A key initiative of the City's Bicycle and Pedestrian Facilities Master Plan was to complete a citywide sidewalk survey to identify areas of increased pedestrian demand (based on proximity to schools, commercial areas/employment centers, and public transit, among other factors) and barriers to safely utilize pedestrian infrastructure in areas of high demand. The City completed the report of High Demand Pedestrian Areas in 2015, identifying 14 high demand pedestrian areas that each encompass about one to two blocks. Of the 14 pedestrian areas, 11 are located along Oxnard Boulevard/South Oxnard Boulevard/ Saviers Road corridor, and seven (or half) are concentrated along South Oxnard Boulevard between West Ninth Street to the south and Palm Drive to the north (referred to as Downtown Oxnard in the report). These areas fall within census tracts designated as low resource (west of South Oxnard Boulevard) and an area of High Segregation and Poverty (east of South Oxnard Boulevard) and would reasonably be utilized by residents in both census tracts. The High Demand Pedestrian Areas report identified that within a half mile radius of these areas there were approximately 20 instances of missing curb ramps and 40 instances of pedestrian collisions. Compared to the City's other high demand pedestrian areas, Downtown Oxnard has lower instances of missing curbs and ramps, which is more significant since it is the largest area surveyed. With the exception of Palm Drive, the high demand pedestrian areas in Downtown Oxnard also received relatively low scores comparatively for ADA Severity, an indicator for the number of barriers within each area for a person with	

Page Number	Substantial Change/Non-Substantial Change	Updated Information or Input Received	Description of Change	Staff Comment
			disabilities to safely navigate as a pedestrian. However, the number of pedestrian collisions in Downtown Oxnard is higher than other areas of high pedestrian demand. The report includes the following suggested programs for the City to consider that would address pedestrian safety. ● Consider adopting a Vision Zero policy sets the goal of reducing traffic-related fatalities to zero by a certain year. The City would work to improve safety conditions for all road users, particularly vulnerable users like pedestrians and cyclists. ● Consider adopting a Complete Streets policy to institutionalize practices associated with complete streets. ● Install pedestrian-friendly traffic signals, such as leading pedestrian intervals that gives pedestrians an advance walk signal before motorists get a green signal, and pedestrian-oriented speed limits. These efforts have been included in Program 19. In addition to providing infrastructure for alternative transportation, the City further supports alternative forms of transportation in the Downtown by allowing centralized parking in an offsite lot for residential developments rather than requiring parking minimums onsite. This allows more efficient land use development by dedicating more space onsite to the land use, and in the case of multifamily housing, allows more units onsite. The City is committed to reviewing development standards and regulations on an annual basis to facilitate transit-oriented development Downtown (Program 19) and reviewing parking requirements citywide (Program 27).	

<table>
<tr><th>Page Number</th><th>Substantial Change/Non-Substantial Change</th><th>Updated Information or Input Received</th><th>Description of Change</th><th>Staff Comment</th></tr>
<tr><td>Pag B-58</td><td>Non-substantial change</td><td>Date May 31, 2022 meeting with Barbara Macri Ortiz (see Attachment 9, May 25, 2022 email) - Add R/ECAPS map as Figure B-12</td><td>Figure B-12 Racially or Ethnically Concentrated Areas of Poverty (R/ECAPS)</td><td>Map is being added to assist affordable housing developers in locating R/ECAPS areas.</td></tr>
<tr><td>Pages D-2 & D-3</td><td>Non-substantial change</td><td>Current Information: Update data through February 28, 2022.</td><td>“Housing Completed Through ~~July 2021~~ February 28, 2022

Housing Element law and HCD Guidelines allow cities to count housing units receiving entitlements, building permits, or certificate of occupation towards meeting the RHNA allocation if the entitlements, building permits, or certificate of occupation are issued after June 30, 2021. Table D-2 lists housing projects as of ~~July 2021~~ February 2022 that have received building permits after June 30, 2021 and are expected to be fully developed by October 15, 2029.”

Table D-2. Residential Units Approved, through ~~July 2021~~ February 28, 2022
<table>
<tr><th>Project Name</th><th>Extremely Low/Very Low (EL/V</th><th>Low (Low)</th><th>Moder (Mod)</th><th>Above Moderate</th><th>Total</th></tr>
</table></td><td>This revision updates Tables D-2 & D-3 with building permits issued through February 28, 2022.</td></tr>
</table>

Page Number	Substantial Change/Non-Substantial Change	Updated Information or Input Received	Description of Change					Staff Comment
			L)					
			~~Duplex~~ Single Family, Detached, July – December 2021	0	0	0	2	2
			Duplexes July – Decembe 2021	0	0	0	4	4
			F Street Condom ms, July - Decembe 2021	0	0	0	12	12
			Wagon Wheel, Oxford F Single Family Attached July – Decembe 2021	0	0	0	24	24
			Anacapa Townhor Single Family Attached July – Decembe 2021	0	0	0	16	16
			Accessor dwelling units, Jul Decembe 2021	4 ~~1~~	6 ~~0~~	15 ~~0~~	0	25 ~~1~~
			Accessor dwelling units, January - February 2022	3 ~~1~~	7 ~~0~~	2 ~~0~~	0	12 ~~1~~
			~~Accessor dwelling~~	~~0~~	~~1~~	~~0~~	~~0~~	~~1~~

Page Number	Substantial Change/Non-Substantial Change	Updated Information or Input Received	Description of Change	Staff Comment

~~unit~~					
~~Accessor dwelling unit~~ Wag Wheel, Oxford F Single Family Attached January - February 2022	0	0 ~~1~~	0	12 ~~0~~	12 ~~1~~
~~Accessor dwelling unit~~	~~0~~	~~1~~	~~0~~	0	~~1~~
TOTAL ~~(J 2021)~~	**7 ~~2~~**	**13 ~~3~~**	**17 ~~0~~**	**70 ~~2~~**	**107 ~~7~~**

Source: City of Oxnard ~~July 2021~~ February 2022 project list

Note 1: The accessory dwelling units are counted as affordable to very low and low income households based on the survey of ADUs for rent conducted by the City in 2020-2022.

Table D-3 presents the City's total and remaining RHNA for the 2021–2029 RHNA cycle after subtracting units that have been approved (Table D-2). As of ~~July 2021~~ February 2022, the City's total remaining RHNA need is 8,442 units in the four income categories.

Table D-3. Remaining RHNA ~~through~~ as of ~~July 2021~~ February 28, 2022

Status Toward Goal	Extremely Low/Very Low	Low	Mod	Above Moderate	Total
RHNA Allocati n (2014	1,840	1,071	1,538	4,100	8,549

Page Number	Substantial Change/Non-Substantial Change	Updated Information or Input Received	Description of Change	Staff Comment
			–2021) Under Construction or Approved: 7 ~~2~~ 13 ~~3~~ 17~~0~~ 70~~2~~ 107~~8~~ Remaining: 1,833~~8~~ 1,05~~6~~~~8~~ 1,521~~3~~ 4,030~~9~~ 8,45~~42~~ *Source: SCAG 2021; City of Oxnard 2022~~1~~*	
Page E-2 & E-3	Non-substantial change	Date January 10, 2022 Findings Letter from HCD (Attachment 4). HCD requested that the City add a definition of family.	**"Family**. A group of residents whose members jointly occupy a dwelling unit as a single housekeeping unit; have joint use of and responsibility for common areas; share household activities such as meals, chores, maintenance and expenses; but not including residents of commercial group living such as hotels, dormitories and fraternities." **"Gross acreage**. The total area of a development site expressed in acres, usually including the area to be devoted to streets. **High Segregation & Poverty.** Areas in which at least 30 percent of the population earns an income below the federal poverty line and there is an overrepresentation of people of color relative to the county. **High Resource.** Top 40 percent highest-scoring census tracts in the region. Indicates residents in these census tracts have access to highly positive outcomes in terms of health, economic attainment, and education attainment. **Highest Resource.** Top 20 percent highest-scoring census tracts in the region. Indicates residents in these census tracts have access to the best	The definition for 'family' in OCC Section 16-10 is the same as the building code definition for a household, which is a group of residents. This definition has been added to the Terms in Housing Element. For clarity and a consistent understanding of terms, TCAC definitions for resource areas have been added to the definitions.

Page Number	Substantial Change/Non-Substantial Change	Updated Information or Input Received	Description of Change	Staff Comment
			outcomes in terms of health, economic attainment, and education attainment. **Lot coverage**. The amount of a lot that is allowed to be covered by the footprint of structures on that lot. **Low Resource.** Bottom 30 percent of remaining census tracts in the region. Indicates residents in these census tracts could be experiencing a lack of access to positive environmental, economic, and education factors results in negative outcomes or perpetuated outcomes (such as perpetuated poverty). **Moderate Resource.** Top 30 percent of remaining census tracts in the region. Indicates residents in these census tracts have access to either somewhat positive outcomes in terms of health, economic attainment, and education; or positive outcomes in a certain area (e.g., score high for health, education) but not all areas (e.g., may score poorly for economic attainment). **Moderate Resource (Rapidly Changing).** A filter applied to moderate resource tracts based on index scores just below the high resource threshold and experiencing rapid increases in key dimensions of opportunity (housing price, median income, job proximity, etc.)."	
Page E-3	Non-substantial change	Current Information: -AHP and -AHD zones adopted by Council in October 2021	"In October 2021 the City adopted Affordable Housing Additive Zones (-AHP and -AHD). The Additive Zones are a residential overlay zones that allow multifamily development on nonresidential zoned sites identified in Supplement 1 of the Housing Element at densities of up to 30 du/ac with the provision of 20% of units affordable to lower income households. The Additive Zones have a specific set of objective standards to streamline the approval	A discussion on the Additive Zones that were adopted in October 2021 has been added to Housing Element Section E.1 Land-use Planning and Development Standards.

<table>
<tr><th>Page Number</th><th>Substantial Change/Non-Substantial Change</th><th>Updated Information or Input Received</th><th>Description of Change</th><th>Staff Comment</th></tr>
<tr><td></td><td></td><td></td><td>process for affordable projects and accommodate greater density, such as a higher height limit than the underlying zone. “</td><td>Note: the text in the legislative draft includes a typo (‘adopting’). This will be updated for the version that is submitted to HCD.</td></tr>
<tr><td>Page E-4, E- & E-14</td><td>Non-substantial change</td><td>Current Information: Newly adopted -AHP and -AHD zones added to Tables E-1 & E-2</td><td>Table E-1 Residential Zoning and 2030 General Plan Compatibility
<table>
<tr><th>Zoning District</th><th>Minimu Lot Area per housing unit (Square Feet)</th><th>Densit Range Units p Net Ac (Zoning</th><th>2030 Genera Plan La Use Designa on</th><th>Dwellir Units p Gross Acre (2030 Genera Plan)</th></tr>
<tr><td>-AHP/ -AHD</td><td>Afforda e Housin Additiv Zone</td><td>na</td><td>Up to 30</td><td>Afforda e Housi Additiv Zone</td><td>Up to 30</td></tr>
</table>
Table E-2 Residential Development Standards by Zoning District
<table>
<tr><th>Zoni Distr</th><th>Type Hous Allov</th><th>Dens Units Acre</th><th>Front</th><th>Side</th><th>Rear</th><th>Heigl</th><th>Min. Lot Size (Cove /FAR</th></tr>
<tr><td>-AHP -AHD</td><td>Mult ly resid al wi min of un affor e to lowe incor ADU Uses allow in</td><td>30 units per acre</td><td>20 f C 30 f BF</td><td>5 ft 1-2 s 7.5 f 3 st 10 f 4+ s in 30 str side BF</td><td>5 ft 1-2 s 7.5 f 3 st 10 f 4+ s in N/A BF</td><td>56</td><td>Und erlyin Zone</td><td>n/a</td></tr>
</table></td><td>Additive Zones that were adopted in October 2021 have been added to Tables E-1, E-2 and E-3 to show development standards specific to the new additive zones.</td></tr>
</table>

Page Number	Substantial Change/Non-Substantial Change	Updated Information or Input Received	Description of Change	Staff Comment
			unde g zon **Table E-3 Allowance for Housing in Oxnard's Nonresidential Zoning Districts** **Zoni Distr / Type Hous Allov / Dens Units Acre / Front / Side / Rear / Heig / Min. Lot Size / Cove /FAR** -AHP -AHD / Mult ly resid al wi min of un affor e to lowe incor ADUs Uses allow in unde g zon / 30 units per acre / 20 f C 30 f BF / 5 ft 1-2 s 7.5 f 3 st 10 f 4+ s in / 30 str side BF / 5 ft 1-2 s 7.5 f 3 st 10 f 4+ s in / N/ BF / 56 / Und erlyin Zone / n/a	
Page E-13	Non-substantial change	Current Information: Newly adopted -AHP and -AHD zones added to discussion on Nonresidential Zoning Options.	The majority of housing opportunities in Oxnard are governed by its residential zoning districts. There is considerable opportunity for residential growth in ~~both~~ the commercial and industrial zoning districts and in the Downtown Zones: Downtown Core (DT-C), Downtown General (DT-G), and Downtown Edge (DT-E). Table E-3 summarizes these opportunities by nonresidential zoning district. Oxnard will need to take into consideration the requirements of California's Housing Accountability Act (California Government Code Section 65589.5) when considering applications for the districts listed in Table E-3. Lot coverage is indicated for each district in Table E-3.	Additive Zones that were adopted in October 2021 have been added discussion on Nonresidential Zoning Options.

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			Many districts don't have a maximum lot coverage or FAR. Those that do have maximum lot coverage or FAR have large enough lot coverages to allow for maximum residential densities in that zone. In addition, in October 2021 multiple properties in zones in Table E-3 had an Affordable Housing overlay zone applied that allows 30 du/ac and objective development standards for affordable housing ~~are proposed to receive an overlay that allows high density housing and will be accompanied by any needed changes to development standards to facilitate those densities (See Programs 3, 30, 31, and 35 in Chapter G)~~.	
E-16	Non-substantial change	Date January 10, 2022 Findings Letter from HCD (Attachment 4). Provide additional discussion on if parking requirements for covered/ enclosed residential parking may create a constraint on affordability.	"Multifamily projects receive further parking reductions (no visitor spaces required) with a state density bonus, which is applicable to most multifamily development as they are subject to the City's inclusionary housing requirement of providing 10 percent lower income units. "	This revision adds a discussion on Multifamily parking requirements. Most multifamily project in the City have been subject to reduced state density bonus parking requirements due to the City's 10% lower income inclusionary housing ordinance that makes most multifamily development eligible for state density bonus.

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E-17	Non-substantial change	Date January 10, 2022 Findings Letter from HCD (Attachment 4). Provide additional discussion on if parking requirements for covered/ enclosed residential parking may create a constraint on affordability.	**Table E-4. Residential Off-Street Parking** Requirements Detached single-family dwelling with Accessory Dwelling Unit "Per OCC 16-468, ADU parking is not required for the majority of locations in the City. The City will update ADU code (16-468(D) and 16-622) to recognize current State law that no replacement parking spaces are required if using the garage for an ADU."	Minimum off-street parking requirement for Detached Single-family dwelling with Accessory Dwelling Unit In Table E-4 has been updated to include OCC 16-468. The OCC will need to be updated regarding ADU replacement parking to be consistent with State law. The code update will be processed at the same time as OCC updates listed in Program 6.
Page E-18 & E-19	Non-substantial change	Date January 10, 2022 Findings Letter from HCD (Attachment 4). Provide additional discussion on if parking requirements for covered/ enclosed residential parking may create a constraint on affordability.	"Only two (garage) spaces are presently required for single-family units up to five bedrooms, which are the majority of single-family units. Detached housing in Oxnard requires a minimum of two garage parking spaces for dwelling units up to six bedrooms,One additional garage space is required at seven bedrooms, and another space for eight or more bedrooms. In the case of apartments, only a single space is required, unless there are two or more bedrooms in the unit, in which case two are required. Only one visitor space is required for the first 30 units in a multifamily project. When the inclusionary regulations apply, as is the case on nearly all multifamily projects, visitor parking is waived altogether upon request of the developer. Adequate and appropriate on-site garage parking is a necessity that	Clarification on existing code requirements has been added to the Housing Element discussion on Parking Requirements. Note: a clarifier "upon request of the developer" has been added to the revision that discusses visitor parking. This will be updated for the version that is submitted to HCD.

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			prevents impacts on public streets and neighborhoods and provides secure parking for vehicles." "The City has an administrative relief procedure that is often approved to request reduced parking under certain circumstances (such as retirement housing, senior housing, and affordable housing) and the City's density bonus ordinance is in compliance with state law to allow a lower parking requirement for projects that qualify for the density bonus. Most m~~M~~ultifamily projects in the City ~~are generally~~ are automatically eligible for parking reductions (no visitor parking) under State Density Bonus law as they are subject to the City's inclusionary housing requirement of providing 10 percent lower income units ~~reducing guest parking, utilizing tandem parking, and using more surface parking as the projects qualify for density bonus parking standards. The City~~OCC Section 16-466 also allows reduced parking requirements for senior and ~~affordable housing projects~~ senior assisted living residential facilities with approval of a parking study that demonstrates sufficient parking as well as shared parking when uses with different peaking characteristics (such as offices and apartments) are combined in a single structure. Program 27 also proposes to update the parking requirements in OCC Section 16-622 to move parking requirements for the elderly – residential care facilities, independent living, memory care – under residential uses (OCC 16-622 currently lists parking for assisted living and nursing homes under health services). Currently, assisted living requires one space for every two units plus one shuttle van parking space. Nursing Homes require one space per three beds for nursing and convalescent	

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			homes which do not contain separate living quarters containing individual kitchens, plus one space for every two employees required on largest shift. Over the past five years, the City monitored the impacts of these parking studies for any constraints on the development of housing affordable to lower-income households. In addition, the new Downtown Code, approved in 2019, has reduced parking requirements for residential uses in the downtown and reductions for studio and one-bedroom apartments, as a result of a review of city parking requirements. The reduced requirements for the Downtown include The Downtown Parking In-Lieu fee program which facilitates designation of parking spaces to serve residential projects in Downtown in city parking garages rather than requiring parking onsite for each project."	
Page E-24	Non-substantial change	Date January 10, 2022 Findings Letter from HCD (Attachment 4). update to address HCD's comments on Reasonable Accommodation.	**Zoning and Land-Use Policies** The Oxnard Zoning Code is conscious of fair housing law and the housing needs of the disabled. It contains provisions designed to accommodate the development of housing for residents with physical and/or mental challenges. Program 6 in Chapter G proposes to remove a finding that is part of the City's Reasonable Accommodation approval process for consistency with state law.	The Reasonable Accommodation findings in OCC Section 16-501.5 will be revised to remove a subjective consideration, in compliance with the Fair Housing Act. This OCC update will be processed at the same time as other code updates listed in Program 6.
Page E-26	Non-substantial change	Date January 10, 2022 Findings Letter from HCD (Attachment 4). Update discussion on	**Permit Procedure** In compliance with the California Health and Safety Code, the City of Oxnard permits residential care facilities for the elderly by right. No Special Use Permit is required for these types of licensed	A discussion has been added on revision to the requirements for residential care to comply with

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		residential care facilities in relation to reason accommodation .	facilities in residential zones and the C-R zone as long as they are designed to serve no more than six persons, and residential care facilities with no more than 15 persons are permitted in the C-2 zone ~~by right~~. Similarly, congregate living health facilities are ~~allowed~~ permitted in residential zones, the C-R zone and the C-2 zone ~~by right~~, which ensures that the City provides the ability to consider these smaller types of dwellings for the elderly and disabled in its Municipal Code. To affirmatively promote more inclusive communities, the City will also review and revise the City's requirements for Residential Care Facilities with seven or more persons by the end of Fiscal Year 2022-2023 and permit them as a residential use in zones where multifamily housing are permitted, subject only to those restrictions that apply to other residential dwellings of the same type in the same zone.	Reasonable Accommodation and AFFH. Program 6 includes a new action item to review and revise the City's requirements for Residential Care Facilities to be permitted where multifamily housing are permitted and subject only to those restrictions that apply to other residential dwellings of the same type in the same zone.
Pages E-27 & E-28	Non-substantial change	Date January 10, 2022 Findings Letter from HCD (Attachment 4). Update to address HCD's comments on Reasonable Accommodation .	"Program 6 in Chapter G proposes to remove the following finding that is part of the City's Reasonable Accommodation approval process for consistency with state law: § Whether the accommodation would result in a substantial increase in traffic or insufficient parking. Program 27 also proposes to move the requirements for parking for the elderly from the Health Services category to the Residential category, and expand the types of residential care facilities to recognize changes in the industry (currently only assisted living and nursing home are listed to encompass the various types of facilities, including residential care facilities, independent living, memory care, etc."	The Reasonable Accommodation approval process in OCC Section 16-501 will be revised in compliance with the Fair Housing Act. Program 27 has been updated to list a revision to OCC Section 16-622 (Off-street Parking) to move the requirements for parking for the elderly from the Health Services category to the Residential category. This OCC update will

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				be processed at the same time as other code updates listed in Program 6.
Pages E-30 & E-31	Non-substantial change	Date January 10, 2022 Findings Letter from HCD (Attachment 4). Add to the the standards for emergency shelters and zoning code update in Program 6 to bring standards into compliance with state law.	The parking requirements stated above are in compliance with current state law. <u>The standards for emergency shelters listed below are out of compliance with state law. Under Program 6 in Chapter G the City will delete or revise these requirements to comply with state law:</u> ● <u>The emergency shelter operator shall conduct a background check on all prospective patrons using Megan's Law database and restrict patron intake in accordance with State and local registered sex offender residency restrictions.</u> ● <u>Patrons shall not possess or consume alcoholic beverages or illegal drugs while in the shelter, nor shall they possess weapons of any kind while in the shelter.</u> ● <u>Space shall be allocated for each patron consisting of a bed and storage area.</u> ● <u>At least two toilets, one shower and one sink shall be provided for every twenty patrons.</u> ● <u>All items stored outdoors shall be screened from the view of all public rights-of-way.</u> ● <u>Should an emergency shelter be proposed within 300 feet of a school, the development services director or designee may request that the developer/sponsor coordinate with the school district to address potential concerns.</u>	Existing OCC findings for emergency shelter have been provided per HCD's request. The standards are required to be updated to comply with state law. The revision will allow development standards specific to the underlying zone and those standards listed in Government Code Section 65583(a)(4)(A). This revision is discussed in Housing element Section F.4 under Other Special Needs Housing.
Page E-37	Non-substantial change	Current Information: Newly adopted -AHP and -AHD	**Table E-7 Housing Types Permitted by Zoning District** (See Table)	Additive Zones that were adopted in October 2021 have been added to Table E-7 to

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		zones added to Table E-7	*Notes: 12. Permissible if allowed in underlying zone and subject to permitting required in underlying zone (see OCC 16-420c)*	clarify required permits (SPR or SUP) for multifamily in each overlay zone. Most residential uses listed as permissible if allowed in underlying zone.
Pages E-40 and E-41	Non-substantial change	Date January 10, 2022 Findings Letter from HCD (Attachment 4). List all findings for SUPs and add clarification regarding OCC 16-530 Purpose.	Once City staff have reviewed the application for the Special Use Permit as described above, it is forwarded to the Planning Commission for a public hearing. Developers are required to notify and then present their projects to the Planning Commission and public at that hearing so that interested citizens may provide input. This process is intended to confirm the public's issues and any concerns early in the development review process. The required findings for Special Use Permits are: ● The proposed use is in conformance with the General Plan and other adopted standards. ● The nature, condition and development of adjacent uses, buildings and structures shall be considered, and no proposed special use permit shall be granted if the approval body finds such use will adversely affect or be materially detrimental to such adjacent uses, buildings or structures or to the public health, safety or general welfare. ● The site that is subject to the special use permit shall be adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and items which may be required by section 16-532. ● The site that is subject to the special use permit shall be served by highways adequate in width and	The SUP findings were included in the October 2021 Housing Element. HCD's January 10th letter indicated that a third party identified a subjective finding for SUP approval that was not included in the City's list of SUP approval findings in Section E.5 Processing and Permit Procedures. The third party's referenced line was from the introductory section of the Division for SUP (OCC Section 16-530) that explains why SUPs are necessary in general and is not a required finding. This clarification has been added. Note: the text in the legislative

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			improved as necessary to carry the kind and quantity of traffic such use would generate. ● The site that is subject to the special use permit shall be provided with adequate sewerage, water, fire protection and storm drainage facilities. It should be noted that the above findings are the only criteria used to make a determination about approval of a project. The purpose section for Special Use Permits (OCC Section 16-530) includes the following language: "..necessary to preserve the integrity and character of the zoning district, the utility and value of adjacent property and the general welfare of the neighborhood and the public." This language is not a constraint to approval of Special Use Permits as it is not a required finding for approval. The Planning Commission must render a decision by written resolution, reciting any findings on which the decision is based and any conditions imposed on the approved permit, within 30 days of the public hearing. The conditions imposed upon a Special Use Permit may involve any of the factors affecting the establishment, operation, or maintenance of the requested use, including but not limited to: special yards, open spaces and buffer areas; fences and walls; traffic circulation and parking facilities; street and alley dedications and improvements; water supply, fire protection, sewerage service and storm drainage facilities; landscaping and maintenance of grounds; regulation of nuisance factors such as noise, vibrations, smoke, dust, dirt, odors, gasses, noxious matter, heat, glare, electromagnetic disturbances and radiation; regulation of operating hours for activities affecting normal neighborhood	draft includes a misspelling. This will be updated for the version that is submitted to HCD.

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			schedules and functions; regulation of signs and outdoor advertising; a specified period limiting the time in which development may begin; provision for a bond or other surety that the proposed special use will be removed on or before a special date; height limitations to protect the character and integrity of abutting parcels or the general welfare; residential density, by specifying the number of dwelling units per acre; and such other conditions as will make possible the development of the proposed special use in an orderly and efficient manner and in general accordance with the intent of the Zoning Code. The applicant may file an appeal of the Planning Commission's ruling to the City Council within 18 days after the date of the decision.	
Page E-41	Non-substantial change	Date January 10, 2022 Findings Letter from HCD (Attachment 4). HCD requested discussion on potential constraints on housing development caused by the design review process related to by-right development.	**Development Review Process** Larger and more complex projects, such as subdivisions, condominiums, apartments, or projects that require other planning permits (e.g., Special Use Permits) usually require design review. However, in October 2021 the City Council approved a new ministerial Site Plan Review process for by-right approval of development on sites identified in Supplement 1 that were in prior Housing Elements. These sites are no longer subject to design review. Further discussion on Site Plan Review is provided in the next section.	Clarification was added that by-right development on sites identified in Supplement 1 are no longer subject to design review and references the new Site Plan Review process adopted by Council in October 2021.
Page E-42	Non-substantial change	Date January 10, 2022 Findings Letter from HCD (Attachment 4). HCD requested information on typical time	Typical turn around time after receiving planning entitlements until requesting a building permit is driven by market and funding availability. Development projects are conditioned to secure a building permit within 12-36 months from entitlement (depending on the permit type). The last five residential	Information has been added on page E-42 to indicate the time between when an application receives their entitlement and

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		between entitlement and building permit issuance.	projects that have been processed in the City took an average of 18 months between entitlement and the request for a building permit.	when they apply for building permits, which is typically dictated by the developers funding and outside of the City's control.
E-43 & E-44	Non-substantial change	Date June 22, 2022 meeting with HCD (Attachment 6 June 28, 2022 Letter to HCD); add discussion on the newly adopted Site Plan Review permit process and findings.	With regard to parcels with the ~~proposed~~AHP additive zone, ~~the~~ a development that provides 20% lower income units would be reviewed under Site Plan Review rather than Design Review. The Site Plan Review process is discussed further below. ~~review process is staff approved and does not require review by the Planning Commission or City Council.~~ These concepts reviewed identify only technical issues such as architectural and landscape design issues and do not constrain development of housing affordable to lower-income households. Rather, they ensure functionality, public safety, and neighborhood compatibility. **Site Plan Review Process** In October 2021 the City Council approved a new ministerial Site Plan Review process (OCC 16-523) for reviewing by-right development, the addition of a new Affordable Housing Additive Zone code (16-420), and update to the Zoning map and General Plan Land Use Plan to include the new Affordable Housing Additive Zone. The Additive Zone code includes objective standards for reviewing affordable developments. Sites that are zoned AHP are reviewed under a Site Plan Review. Site Plan Review is reviewed by the Community Development Director unless the development is processed concurrently with a required discretionary permit. Procedures for Site Plan Review are outlined under	This revision provides a description of the City's new ministerial Site Plan Review process (OCC Section 16-523) that the City Council adopted as part of the 2021-2029 Final Housing Element in October 2021 for reviewing by-right development. Reference to the Development standards for the Affordable Housing Additive Zone sites (OCC Section 16-420; also adopted in October 2021) have also been added to the discussion.

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			OCC 16-523.2, and are intentionally streamlined to reduce costs and process time for affordable housing development. The process includes the following: ● The application is reviewed by the Development Advisory Committee (DAC) for consistency with applicable regulations and standards. The intent of this review is to provide interdepartmental perspective and coordination prior to project approval with the goal of streamlining the building permit process. This review is non-discretionary, though the Committee may provide conditions of approval to ensure compliance with applicable regulations and standards. ● The applicant is informed in writing within 30 calendar days of application submittal if the application is complete or the application is incomplete and additional information, specified in writing, is required before it can be accepted for processing. ● A Site Plan Review is issued after the Director makes the following required findings: (A) The project is consistent with the applicable general plan policies and is in conformance with applicable zoning regulations contained in OCC Chapter 16 and the adopted standards. (B) There are adequate infrastructure and public services available to serve the proposed development, including sewerage, water, fire and police protection, storm drainage facilities, and legal access to the lot. (C) The proposed development is on a legally created lot. Housing developments permitted under the Additive Zone code are required to follow Objective Design Standards	

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			outlined under OCC 16-420I for neighborhood compatibility, building design, massing/articulation, site design and accessory elements such as refuse enclosures.	
Page E-46	Non-substantial change	Date January 10, 2022 Findings Letter from HCD (Attachment 4). HCD requested information on design review findings.	The City makes the same findings for the Development Design Review process as those required for a Special Use Permit. Those findings are listed earlier in this chapter in Section E.5. These ~~standards~~ findings are to ensure conformance with surrounding neighborhoods and increase transparency in the permit review process, thereby minimizing additional costs related to additional work and extended project timelines. Therefore, these standards do not constrain development of housing affordable to lower-income households.	Information added on City's existing requirements.
Pages E-54 & E-55	Non-substantial change	Date January 10, 2022 Findings Letter from HCD (Attachment 4); and June 22, 2022 meeting with HCD (Attachment 6 June 28, 2022 Letter to HCD) - Provide discussion on the LCP timeline	**Local Coastal Program** The City will be updating the City's General Plan and Local Coastal Plan (LCP) simultaneously beginning in early 2023. This multi-year work effort is envisioned to take 3 - 4 years. Following City Council approval of the two documents, in accordance with State law the LCP will be submitted to the State of California Coastal Commission for review and approval. The review and approval process is estimated to take 1 1/2 years to complete. Therefore, Fiscal Year 2027-2028 has been specified in the Housing Element for revisions to the City's Local Coastal Implementing Plan (LIP), Chapter 17 which implements the LCP.	This information is being added to clarify the realistic timeline for updating the City's LCP and LIP, Chapter 17 that implements the LCP.
Pages F-2 & F-3	Non-substantial change	Update number of ADU that received building permits through 2021.	**F.2 Accessory Dwelling Unit Potential** In 2018~~, 2019, and 2020,~~to 2021 City planning permit records indicate that an average of 24~~16~~ ADUs received building permits per year. ● 2018 - 4~~3~~ ADUs received building permits	Data was added to the discussion on ADU potential to justify the 490 ADUs that had been projected in the October 2021

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		Date January 10, 2022 Findings Letter from HCD (Attachment 4); provide discussion of analysis of ADU affordability.	● 2019 - 14~~3~~ ADUs received building permits ● 2020 - 25~~8~~ ADUs received building permits ● 2021 – 54 ADUs received building permits ● The increase in ADUs permitted in 2020 and 2021 was due to updates in the City's ADU program that became effective in January 2020. The 2020 ADU program simplified the ADU permitting process, revised development standards and waived parking requirements consistent with State law based on ADU location. Because of efforts the City is already making to promote and facilitate ADUs, and additional efforts committed to in the programs in Chapter G, it is assumed that an additional 320~~490~~ ADUs have already been or will be permitted between ~~now~~ June 30, 2021, and October 2029. Over the course of a couple weeks in May 2020, the City conducted a survey of ADUs for rent in Oxnard. Six listings for ADUs for rent were found during that point-in-time survey. Address information was only available for three of the listings. Two of those listings were in the northern section of the city in moderate resource areas and one was in the central part of the city in a low resource area. All of the ADUs available for rent were affordable to very low- or low-income one- or two-person households. The average market rate for an ADU surveyed ranged from about $975 per month to up to $1,575 per month. Not all listings included information about size of the units but those that did ranged from 300 to 940 square feet. All listings were either studios or one-bedroom units. In addition, over the past few years, the City has been collecting rental figures	Final Housing Element. The analysis was based on the results of 2021 and 2022 ADU affordability surveys & 2021 Building permits issued. The 490 ADU projection was reduced following conversation with HCD on a number they would find acceptable based on building permit history prior to the City's ADU code update. With this adjustment, the City will still have sufficient units to meet RHNA in all income categories. Projected Affordability is based on the combination of the online survey analysis, the feedback from ADU owners in Oxnard, and the Chapple industry research, and has been evaluated by HCD as acceptable.

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			on ADU application materials to document rental affordability. Providing this type of information is voluntary for ADU applicants. To justify the affordability assumptions for ADUs in this Housing Element, a summary of the ADU affordability data collected by the City is provided below. In 2021, 90 of the 182 ADU entitlement applications reported rental amounts. Of the 90 applications, 94 percent reported rental rates that were affordable to lower income households. The distribution of responses was as follows: ● 18% were affordable to persons of extremely low income; ● 22% were affordable to persons of very low income; ● 54.5% were affordable to persons of low income; ● 4.5% were affordable to persons of moderate income; and ● 1% (1 unit) was reported at "market rate" which may be interpreted as above moderate income In 2022, 34 of the 40 entitlement applications received through February of 2022 reported rental rates that were 100 percent affordable to lower income households. ● 6% were affordable to persons of extremely low income; ● 23.5% were affordable to persons of very low income; ● 70.5% were affordable to persons of low income; ● 0% were moderate income; and ● 0% were above moderate income In addition, ADU research conducted by the University of California, Berkeley's (UC Berkeley's) Center for Community Innovation (Chapple et al. 2017) indicates that 40 percent of ADUs are typically rented to family members or friends at either no cost or	

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			below-market rental rates. Based on the combination of the online survey analysis, the feedback from ADU owners in Oxnard, and the Chapple industry research, 90 percent the 320 ~~490~~ ADUs projected to be built in Oxnard between 2021 and 2029 are anticipated to be affordable to lower-income households and 10 percent are anticipated to be affordable to moderate-income households. The Oxnard ADU regulations encourage this housing type and allow flexibility in their development. The City has most recently updated their ADU regulations in ~~2020~~ 2019 and will continue to do so to comply with state law (see Program 6 in Chapter G). The City also has a dedicated website providing information and resources related to ADUs. Programs 6, 34~~6~~, 35~~7~~, 36~~8~~, and 424 commit the City to other ongoing and new efforts to promote and facilitate ADUs to support the development of an increased number of ADUs during the 2021-2029 Housing Element update.	
Pages F-3 & F-4	Non-substantial change	Current information	**F.3 Vacant Sites** ~~Table F-1 shows that~~ Oxnard has a limited number of vacant never-developed parcels with zoning that currently allows residential development, or with changes to the zoning and/or General Plan land use that would allow residential development at suitable densities. A detailed table of vacant parcels by Assessor's Parcel Number (APN) is shown in Supplement 1. The sites that are addressing the lower-income RHNA allocation are described in more detail in Supplement 1. Table F-1 provides a summary of land available on vacant and non-vacant sites in the City. ~~Sites that were used to address lower-income RHNA allocations in the two prior~~	Discussion on vacant sites has been updated to reflect adjustments to development status of sites within Supplement 1. For example, the buildings on Site 13 (Gold Coast) were demolished, which revised the site classification from 'non-vacant' to 'vacant.' Discussion of the newly adopted Additive Zone also added.

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<tr><td></td><td></td><td></td><td>~~Housing Elements are subject to Program 30 in Chapter G.~~

Certain vacant sites ~~will need a~~ have recently received a change to their zoning and/or their General Plan land use designation to address the lower-income allocation via overlays that allow greater density with the provision of 20% lower income units~~(see Program 3 in Chapter G)~~. Several sites are part of existing Specific Plans that have not been completely built out. The City will also rely on non-vacant sites and a discussion of the non-vacant, underutilized sites that are available for meeting the City's lower-income RHNA allocation follows this section. The sites that are in the vacant land inventory can accommodate 1,233~~010~~ lower-income units, 142~~1~~ moderate-income units, and 610 above-moderate income units.</td><td></td></tr>
<tr><td>Page F-4</td><td>Non-substantial change</td><td>Current Information</td><td>Table F-1. Summary of Vacant and Non-Vacant Sites (Including Specific Plans and Pending Annexations)
<table>
<tr><th>Current Zoning Designation (overlays not denoted)</th><th>Total Acreage Per Zone</th><th>~~Current or Proposed~~ Maximum Density (du/ac)</th><th>Realistic/ Net Unit Capacity</th></tr>
<tr><td>Business Research Park</td><td>27.03</td><td>30</td><td>681~~14~~</td></tr>
<tr><td>Multiple Family Residential</td><td>134.28</td><td>30</td><td>1,239~~7~~</td></tr>
</table></td><td>Table F-1 has been updated to reflect minor revisions to total acreage and Realistic net unit capacity based on current data and changes to development status.</td></tr>
</table>

Page Number	Substantial Change/Non-Substantial Change	Updated Information or Input Received	Description of Change	Staff Comment
			(R-2) Downtown General 57.45 Unlimited 2,968~~2~~ Downtown Core 28.47~~3~~ ~~1~~ Unlimited 884~~78~~ **TOTAL 504.34 ~~18~~ — 9,514 ~~8,512~~**	
Page F-4	Non-substantial change	Current Information	**F.4 Non-Vacant Sites** To provide adequate sites for the lower-income RHNA categories, additional non-vacant sites have been identified as the most likely locations where additional housing could be built by the private sector. As with the vacant sites, the City has ~~some will need a~~ recently changed ~~to~~ their zoning and/or General Plan land use designations ~~(see Program 3 in Chapter G)~~ to address the lower income allocation. A summary of the sites is shown in Table F-1. The sites that are addressing the lower-income RHNA allocation are described in detail in Supplement 1. ~~Sites that were used to address lower-income RHNA allocation in the prior Housing Element are subject to Program 31 in Chapter G.~~	Discussion updated to reflect City's rezone of parcels to meet RHNA in October 2021.
Pages F.12 and F.13	Non-substantial change	Date January 10, 2022 Findings Letter from HCD (Attachment 4) and discussion with HCD on February 16, 2022. To justify the housing projections for residential development on nonresidential sites (BRP Business and	"Realistic capacity for vacant sites was determined by first multiplying the number of acres by the maximum density for the site or 30 dwelling units per acre for the sites to address the lower-income RHNA. Thirty dwelling units per acre has been used for the sites as the default density to address the lower-income RHNA allocation because those sites were~~ill~~ either rezoned and/or redesignated to that maximum density prior to the 2021–2029 RHNA planning period in October 2021. City Council resolution 15,491 making the updates is included in Supplement 3. The realistic capacity	Section F.6 Realistic Capacity was revised in response to HCD input to include an analysis on realistic capacity and a discussion on parking in the downtown. The analysis found that none of the commercial or industrial zoned

Page Number	Substantial Change/Non-Substantial Change	Updated Information or Input Received	Description of Change	Staff Comment
		Research Park, C-2 General Commercial, M-L Industrial Limited, and M-1 Light Manufacturing zoned parcels), HCD asked the City to assess the percentage of nonresidential sites listed in the 2013-2021 (prior) adopted Mid-Cycle Housing Element that were developed with commercial uses rather than lower income/residential land uses. HCD requested that the City use that percentage to inform the realistic development capacity assumption for sites in these zones.	calculation was then reduced by 20 percent as a buffer to account for setbacks, open space, access and/or other requirements for sites." "To further support the unit assumptions in the sites inventory for these sites that allow non-residential development, the City has analyzed the past development trends on sites listed in the City's current housing element that allow non-residential development. The City reviewed all of the sites with an All Affordable Housing Opportunity Program (AAHOP) additive designation with a base designation of commercial or industrial in the City's currently adopted Mid-Cycle Housing Element (2013-2021) and compared that with current uses on the site. The details about the sites analyzed are below: ● 20 of the AAHOP sites were zoned C-2, CM, M-1 or ML (commercial and industrial zones). The sites were made up of 80 parcels ● None of the AAHOP commercial or industrial zoned sites have been developed with new commercial or industrial uses ● Two of the AAHOP sites have been developed with new 100 percent affordable residential uses ● 14 of the 20 AAHOP sites (or some parcels from the sites) were continued in the 2021-2029 Housing Element sites inventory as sites that may be developed by right. The City found that none of the commercial or industrial zoned AAHOP sites were developed with new commercial or industrial uses. This analysis did not result in identification of a need to adjust realistic capacity assumptions on this type of site." In the Downtown there is no maximum density and all projects with residential	sites in the prior housing element were developed with new commercial or industrial uses. Therefore, the realistic capacity utilized (which reflected HCD's standard of 80% of the potential density) was retained.

Page Number	Substantial Change/Non-Substantial Change	Updated Information or Input Received	Description of Change	Staff Comment
			units proposed or approved since the Downtown Code was adopted in 2019 have had densities of over 100 dwelling units per acre; therefore, the maximum number of units at 100 dwelling units per acre were calculated for the realistic/net unit numbers on sites in the Downtown. This assumption also relies on the understanding that parking is not a constraint to development in Downtown, supported by the densities that projects are achieving and the Downtown Parking In-Lieu Fee program that is in place. The Downtown Parking In-Lieu fee programs facilitates designation of parking spaces to serve residential projects in Downtown in city parking garages rather than requiring parking onsite for each project. Multiple projects are listed in Table F-2 that are pending or have been approved/built in the DT-G zone and their characteristics support the realistic capacity assumptions for sites in the Downtown. Because there is no maximum density in the Downtown, the state default density threshold was used to calculate the percent of allowed density achieved on projects in Downtown shown in Table F-2.	
Page F-13	Non-substantial change	Date January 10, 2022 Findings Letter from HCD (Attachment 4); Update projected ADUs. Update remaining RHNA based on construction data through February 2022. Update vacant and nonvacant site capacity based on	**Table F-3. Comparison of Site Capacity to 2021-2029 Regional Housing Needs Assessment** Incom Group / Rem RHN Table D-3 / Proje Acce Dwel Units / Vaca Sites Capa [Sup / Non- nt Si Capa [Sup / Spec Plans [Sup / Subt Rem RHN / Pend Anne ns (R Urba and T Club / Total Units / Surp RHN Addr Extrem Low: 1,835 ~~5~~ / ~~2544900~~ / 1,233010 / 1,303456 / 224 / 0 / 165 / 3,19935 ~~0~~ / +28843 ~~9~~ Very Low Low: 1,05	Table F-3 has been updated to reflect 320 projected ADUs for 2021-2029 and the remaining number of ADUs (283) after subtracting building permits to date in the RHNA cycle. Table F-3 has also been updated to reflect current remaining RHNA

<table>
<tr><th>Page Number</th><th>Substantial Change/Non-Substantial Change</th><th>Updated Information or Input Received</th><th>Description of Change</th><th>Staff Comment</th></tr>
<tr><td></td><td></td><td>updates to site status in Supplement 1.</td><td>
<table>
<tr><td></td><td>8
~~7~~
~~4~~</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td>Mode</td><td>1,
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~~8~~</td></tr>
<tr><td>Above Mode</td><td>4,
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~~8~~</td><td>0</td><td>6
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<tr><td>TOTAL</td><td>8,
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~~4~~
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~~7~~</td><td></td></tr>
</table>
As shown in Table F-3, after reviewing available sites for residential development, the City has an additional 662~~777~~ moderate- and above-moderate income units to accommodate.
</td><td>as adjusted in Table D-3 after subtracting building permits through February 2022.</td></tr>
<tr><td>Pages F-15 and F-16</td><td>Non-substantial change</td><td>Date January 10, 2022 Findings Letter from HCD (Attachment 4); HCD requested that the City clarify availability of sufficient water and wastewater capacity to support new housing units.</td><td>● Adequate Water Supply, Water Delivery, and Water Treatment Facilities. As described in greater detail in the 2030 General Plan, the City has a comprehensive multifaceted Water Management Program that outlines how the City plans to provide an adequate water supply to meet forecast water demands well into the future. The City completed and adopted its 2015 Water Master Plan and Urban Water Management Plan in 2016. The land use assumptions are within the range of the 2030 General Plan and with consideration of water conservation, use demand factors, and agriculture water annexation factors, the City has determined it has sufficient water supplies. The City completed and adopted its 2020 Urban Water Management Plan (UWMP) in 2021.</td><td>Section F.10 Environmental Constraints and Adequate Infrastructure has been updated to include information on water and sewer availability.
Based on the data provided in the 2020 Urban Water Management Plan, the City has adequate facilities, services and infrastructure to accommodate the planned residential</td></tr>
</table>

Page Number	Substantial Change/Non-Substantial Change	Updated Information or Input Received	Description of Change	Staff Comment
			The UWMP identified additional water sources to plan for future growth, such as utilizing recycled water for indirect potable reuse. ~~The City is currently in the process of updating the 2015 UWMP. To plan for future growth the City is pursuing water sources and implementing water conservation measures.~~ Oxnard voters approved Measure E in 2020 to fund City improvements including infrastructure improvements that would further assist in conservation efforts. In addition to its internal water management program, the City is working cooperatively with local groundwater managers, such as the Fox Canyon Groundwater Management Agency (FCGMA), United Water Conservation District (UWCD), and Calleguas Municipal Water District (CMWD) ~~(Las Posas)~~ on local groundwater management programs, as well as with the CMWD and the Metropolitan Water District (MWD) on regional imported water supply issues. Together, these programs are intended to provide a high degree of flexibility to provide a reliable long-term water supply under a broad range of known (i.e., projected growth and planned water supply projects) and unknown scenarios (i.e., global climate change). The availability of local groundwater i~~a~~s augmented by existing groundwater management programs (including groundwater recharge through the Freeman Diversion project, the Las Posas Aquifer Storage Project, and the Aquifer Storage and Recovery program), imported state water, and the City's planned water recycling effort through its Groundwater Recovery Enhancement and Treatment (GREAT) and Augmented Municipal and Industrial (M&I) Supplemental Water Programs	growth within the city limits during the time frame of this Housing Element.

Page Number	Substantial Change/Non-Substantial Change	Updated Information or Input Received	Description of Change	Staff Comment
			will help to ensure that the City will be able to meet long-term water demands. Relative to water delivery, all Affordable Housing additive zone sites would be considered infill or redevelopment and are within the City's ability to serve. The 2030 General Plan includes policies and implementation measures that address a range of water supply and groundwater resource issues. With implementation of the applicable policies and implementation programs, the 2030 General Plan Project Environmental Impact Report (PEIR) found impacts on water resources and services to be a less-than-significant impact. Based on the data provided in the 2020 Urban Water Management Plan, the City has adequate facilities, services and infrastructure to accommodate the planned residential growth within the city limit during the time frame of this Housing Element. The City has the water capacity to accommodate the projected residential demand. ● **Adequate Wastewater Collection and Treatment**. The Oxnard Wastewater Treatment Plant (OWTP) has a current capacity of 31.7 million gallons per day (mgd) with average daily flows of approximately 19.0 mgd. Sufficient capacity exists to accommodate wastewater generated by the 2030 General Plan and the full development of the Housing Element sites. Major interceptor and trunk lines also have sufficient capacity to accommodate known future wastewater flows. Localized wastewater conveyance (including sewer lines and lift stations) may require additional wastewater flow capacity ~~need to be increased~~ to accommodate future ~~wastewater~~	

Page Number	Substantial Change/Non-Substantial Change	Updated Information or Input Received	Description of Change	Staff Comment
			~~flows associated with~~ Affordable Housing additive zone sites. Capacity of local sewers and lift stations will be evaluated on ~~development to be determined on~~a case-by-case basis during technical development review. Deficient sewer infrastructure will be addressed as part of the development project.	
Page G-6	Non-substantial change	Date January 10, 2022 Findings Letter from HCD (Attachment 4); HCD also requested the Housing Element to include goals to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity.	**H-5.9 Affirmatively Furthering Fair Housing** Take proactive steps to overcome ~~address~~ longstanding patterns of segregation (including racially or ethnically concentrated areas of poverty and areas of linguistic isolation), discrimination, and disinvestment with a focus on use of Federal funds. Foster inclusive communities free from barriers that restrict access to opportunity.	Goal H-5 in Chapter G has been augmented to include additional language under Policy H-5.9 (page G-6) to specify overcoming patterns of segregation, including Racially/Ethnically Concentrated Areas of Poverty (R/ECAP) and areas of linguistic isolation, and fostering inclusive communities free from barriers that restrict access to opportunity.
Page G-7	Non-substantial change	Date June 22, 2022 meeting with HCD (Attachment 6 June 28, 2022 Letter to HCD) - in Table G-1, update number of estimated moderate and upper income rehabilitation conservation units to align	**Table G-1 Housing Unit Objectives by Income Category (Quantified Objectives): 2021–2029** **Income Group** | **2021–2029 RH** | **Rehabilitation Conservation Estimate [Program No.]** | **Preservation Estimate [Program No.]** | **Total Housing Units Constructed, Rehabilitated, or**	This revision increases the estimate to be closer to the number of units anticipated to be rehabilitated by moderate and above moderate income homeowners. The revision does not create a new objective for the

<table>
<tr><th>Page Number</th><th>Substantial Change/Non-Substantial Change</th><th>Updated Information or Input Received</th><th>Description of Change</th><th>Staff Comment</th></tr>
<tr><td></td><td></td><td>with projected needs discussed in Chapter B.</td><td>
<table>
<tr><th></th><th>NA
Table D-1</th><th></th><th></th><th>Preserved</th></tr>
<tr><td>Moderate</td><td>1,538</td><td>~~28~~150 [1, 2]</td><td>0</td><td>~~1,566~~ 1,688</td></tr>
<tr><td>Above Moderate</td><td>4,100</td><td>~~28~~300 [1, 2]</td><td>0</td><td>~~4,128~~ 4,400</td></tr>
<tr><td>TOTAL</td><td>8,549</td><td>~~306~~ 700</td><td>431</td><td>~~9,286~~ 9,680</td></tr>
</table>
</td><td>City, as rehabilitation of moderate and above moderate units would be owner funded, while some funds are available from the City for rehabilitation of lower income units.

Note: The Table on Page G-7 shows the incorrect total in the last column. This will be updated for the version that is submitted to HCD.</td></tr>
<tr><td>Page G-8</td><td>Substantial Change</td><td>Date June 28, 2022 HCD reviewer discussions with the City's Housing Element consultant, Placeworks, requested the City include a targeted windshield housing condition survey to help inform the City on where rehabilitation</td><td>Program 1: Code Compliance Program

"Additionally, the City will complete a targeted windshield housing conditions survey during Fiscal Year (FY) 2024- 2025 in several City selected older neighborhoods and neighborhoods with lower median incomes, to evaluate rehabilitation needs. The survey will be conducted by visually assessing exterior of homes such as roofing, windows, and siding conditions and categorizing units as sound, in need of minor repair, moderate repair, substantial rehabilitation or dilapidated. Based upon the survey findings, in FY 2025-2026 the City will identify specific needs and tailor housing rehabilitation measures to fit those needs, such as</td><td>This revision adds an action item to Program 1 that will require substantial staff time to conduct a targeted windshield housing conditions survey, compile results and take measures listed based on survey findings.</td></tr>
</table>

Page Number	Substantial Change/Non-Substantial Change	Updated Information or Input Received	Description of Change	Staff Comment
		efforts should be focused. Program 1 (Code Compliance Program) has been updated to include a targeted housing conditions survey.	encourage housing preservation, conservation, acquisition rehabilitation, mitigation of potential costs, and minimizing displacement and relocation impacts on residents. These measures may include, but are not limited to the following: · Reaching out directly to homeowners of housing units in need of repair to promote the Homeowner Repair Program (Program 2). · Streamlining permit review for repairs on housing units identified during the conditions survey. · Seeking non-city funding to offer relocation assistance to low-income tenants or owners displaced during rehabilitation efforts. · Seeking non-city funding to develop a housing rehabilitation program."	
Page G-9	Non-substantial change	Date January 10, 2022 Findings Letter from HCD (Attachment 4); address HCD's comment on AFFH.	**Program 2: Citywide Homeowner Repair Program** The Homeowner Repair Program supports an anti-displacement strategy.	Added sentence clarifies that the existing Homeowner Repair Program supports an AFFH strategy.
Page G-9 and G-10	Non-substantial change	Update program following City rezoning to meet RHNA in October 2021. Rename program, update timeframe and Program Objective, remove reference to rezoning that has took place	**Program 3: ~~Rezone to Meet RHNA~~ No Net Loss Monitoring** **Time Frame: Assess whether sufficient sites remain annually and continue to maintain sufficient sites at all income categories throughout the planning period.~~Time Frame: Rezoning will be completed prior to or concurrent with Housing Element adoption by October 15, 2021.~~** Maintain sufficient sites to meet the RHNA throughout the planning period ~~Rezone sites to allow 30 dwelling units per acre (du/ac) and continue to~~	This update removes a portion of Program 3 that was completed in October 2021 with the City rezone of parcels in Supplement 1 to accommodate the default density of 30 dwelling units/acre.

Page Number	Substantial Change/Non-Substantial Change	Updated Information or Input Received	Description of Change	Staff Comment
		in October 2021.	~~maintain a running sites inventory that meets or exceeds the remaining RHNA lower income allocation need.~~ ~~To address the 2021–2029 RHNA, the City shall amend the General Plan and the Zoning Code, as needed, and as detailed in Chapter F, Achieving the RHNA Allocation, to provide adequate site(s) for at least 2,911 lower-income units and allow 30 dwelling units per acre or greater on certain sites or in certain zones. The City intends to amend the General Plan Land Use map and text, as well as Chapter 16 of the Oxnard City Code (OCC) and zoning map as part of this program, for the Assessor's Parcel Numbers (APNs) listed in Supplement 1 of this Housing Element. This will include changing General Plan and Zoning density and text as needed to allow for the density of 30 dwelling units per acre. Rezoning will be completed prior to the start of the Housing Element planning period, which is October 15, 2021. (This program replaces Programs 3 and 26 in the 2013-2021 Housing Element.)~~ Consistent with "no-net-loss" zoning requirements in Government code section 65863, the City will maintain an inventory of potential sites to accommodate housing at all income categories. In the event that the approval of a development project results in the remaining sites' capacity becoming inadequate to accommodate the City's RHNA by income category and there are no replacement sites remaining in the Sites Inventory surplus (Table F-3), the City will initiate the legislative process to rezone enough sites to meet No Net Loss requirements. The determination as to ~~on~~ if a replacement site is needed and required will be based on results of the City's Annual Report which will be	

Page Number	Substantial Change/Non-Substantial Change	Updated Information or Input Received	Description of Change	Staff Comment
			submitted to the California Department of Housing and Community Development (HCD) on a yearly basis. The legislative process will be implemented when the City does not have sufficient surplus land capacity to meet the RHNA.	
Page G-10	Non-substantial change	Date January 10, 2022 Findings Letter from HCD (Attachment 4); Update Objective to include a metric and add text to address HCD's comment on AFFH.	**Program 4: Urban Village Program** "Accommodate at least 372 lower income units in Urban Village areas identified in Supplement 1 to increase access to higher opportunity areas, prioritizing construction of affordable units." "Development of the Urban Villages affirmatively furthers fair housing by increasing access to housing in moderate and higher resource areas by reducing constraints on development of affordable residential units and expanding where they can be built. Supplement 1 identifies 372 lower income units in three Urban Village designated Specific Plan projects (Teal Club 148 units, Riverpark Specific Plan Amendment 118 units, and Northeast Community/East Village Specific Plan Amendment 106 units). Urban Villages~~should~~ occur in the designated areas but may be proposed in others through a General Plan Amendment, and other associated entitlement permits. The integration of land uses is intended to provide and promote a pedestrian orientation to reduce trips and vehicle miles traveled in order to reduce greenhouse gas emissions. Urban Villages are implemented through City Council approval of a specific plan and entitlement permits. Within these areas, as stipulated in the 2030 General Plan Land Use Element a minimum of 15 percent of the UVP housing would be affordable."	This revision provides a metric that aligns with the lower income units accommodated within the proposed development project within Urban Village Housing Element Sites (North Maulhardt, River Park Specific Plan Amendment, and Teal Club)

Page Number	Substantial Change/Non-Substantial Change	Updated Information or Input Received	Description of Change	Staff Comment
Page G-12	**Substantial change**	Date January 10, 2022 Letter from HCD (see Attachment 4); and June 22, 2022 and June 28, 2022 meetings with HCD (Attachment 6 June 28, 2022 Letter to HCD) - In Program 6, update bullets to bring OCC into compliance with state and federal law, including ADU parking, Employee Housing Act, emergency shelters, residential care facilities, and reasonable accommodations. Remove SPR action item that was adopted in October 2021.	**Program 6: Zoning Code Amendments** ● " In order to comply with recently adopted state law and address identified constraints to residential development, the City will address the following issues and make needed OCC amendments. Amendments to Chapter 17 (Coastal Zoning) of the code will occur once the City updates its Local Coastal Plan (LCP) which is estimated to occur by the end of Fiscal Year 2027-2028. ● The City adopted updates to the Accessory Dwelling Unit (ADU) ordinance in 2020 to comply with state law and implement this program. With the City's ADU program, the City has successfully permitted ADU's throughout the City. The City will amend the ordinance further to make one change to address current state law. By the end of Fiscal Year 2022-2023, the City will update OCC Sections 16-468(D) and 16-622 to recognize current State law that no replacement parking spaces are required if using the garage for an ADU. If additional changes to state law occur during the planning period, the ADU ordinance will be updated to comply with those changes. ● Pursuant to the state Employee Housing Act (Health and Safety Code Sections 17021.5, 17021.6, and 17021.8) and Senate Bill 2 (2007), in 2022, the City anticipates beginning to update the Coastal Zoning Chapter 17 of the OCC to address updates called for in this Housing Element in Programs 9 and 14 once the City updates the Local Coastal Plan. Completion of updates to the Local Coastal Plan are expected by the end of Fiscal Year 2027-2028. The City will adhere to the Employee Housing Act in areas outside of the Coastal zone by the end of Fiscal Year 2022-2023 as	The recommended additional action items are necessary to bring the OCC into compliance with existing law on ADU parking, Employee Housing Act, emergency shelters, residential care facilities, and reasonable accommodation. Site Plan Review was adopted as OCC Section 16-523 et seq. in October 2021.

Page Number	Substantial Change/Non-Substantial Change	Updated Information or Input Received	Description of Change	Staff Comment
			those requirements are already in effect." ● "By the end of Fiscal Year 2022-2023, update Chapter 16 of the OCC to streamline the ordinance provisions, clarifying permitting requirements, simplifying the code requirements, and creating a web-based OCC . ● By the end of Fiscal Year 2022~~By~~ 2023, amend the Zoning Code to allow supportive housing in compliance with AB 2162. This law requires that supportive housing be allowed without discretionary review in areas zoned for residential use in zones where multifamily and mixed uses are permitted, including in non-residential zones permitting multifamily uses. ● By the end of Fiscal Year 2024-2025, amend the OCC Chapter 16, Article 5, Division 18 to limit the standards applying to emergency shelters to only those that comply with state law. ● By the~~By~~ end of Fiscal Year 2022-2023, amend the OCC to allow low-barrier navigation centers without discretionary review in compliance with Assembly Bill (AB) 101 in areas zoned for mixed-use and nonresidential zones permitting multifamily uses. ● By end of Fiscal Year 2022-2023, pursuant to Assembly Bill 2634, amend the OCC to allow ~~study the allowance of~~ single-room occupancy units in at least one zoning district to facilitate housing options for extremely low income households ~~pursuant to Assembly Bill 2634~~ Solutions suitable to address the needs of extremely low income households include single-room occupancy and/or shared housing, establishing deeper income targeting for subsidies on housing projects,	

Page Number	Substantial Change/Non-Substantial Change	Updated Information or Input Received	Description of Change	Staff Comment
			providing housing with supportive services or rent subsidies through vouchers. ● To affirmatively promote more inclusive communities, pursuant to AB 686, the City will also review and revise the City's requirements for Residential Care Facilities with seven or more persons by the end of Fiscal Year 2022-2023 and permit them as a residential use in zones where multifamily housing are permitted, subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. ● By the end of Fiscal Year 2022-2023, and as required under the Fair Housing Amendment Act (FHAA), amend OCC Section 16-501.5 (Reasonable Accommodation – Findings) to only include objective considerations in compliance with the Fair Housing Act." ● "~~By December 2022, amend the OCC to include a Site Plan Review (SPR) process for ministerial review of By Right projects. The Planning Manager or designee will be the reviewing authority for SPRs. The process will include objective review by the Development Advisory Committee (made up of City Staff) for consistency with local, state and federal codes, which will ultimately reduce permit processing time during building permit plan check. The ministerial SPR process will not be subject to discretionary review, hearings, public workshops or public notification requirements.~~"	
Page G-15		Date January 10, 2022 Letter from HCD (see Attachment 4); update to address HCD's	**Program 10: Inclusionary Housing Program** In 1999, the Inclusionary Housing Program was established to generate affordable housing in proportion with the overall increase in market-rate	The program description has been updated to include AFFH priorities and goals.

Page Number	Substantial Change/Non-Substantial Change	Updated Information or Input Received	Description of Change	Staff Comment
		comments on AFFH	residential units. City Council Ordinances 2594, 2980, 2721, 2615, and 2688 require developers with ten~~10~~ or more units to provide ten~~10~~ percent affordable units. Developers of rental projects with 10 or more units are required to provide five~~5~~ percent for very low-income households and 5 percent for low-income households. Pursuant to current ordinance provisions, Developers may request City Council approval at the preliminary stage ~~in advance for payment~~ of entitlement processing (i.e., at the beginning) to secure Council approval to pay the City's Inclusionary Housing in-lieu fees (Resolution 15,330), which are periodically adjusted based upon inflation provisions contained in the ordinance ~~The City conducted a study and subsequently updated the inclusionary housing fee in May 2020~~. The City will use the in-lieu fees to produce affordable housing opportunities within areas of the City of Oxnard that are proximate to moderate or higher resources (such as place based conditions proximate to the Oxnard Transit Center, employment hubs, education facilities and medical providers) to support upward housing mobility. The City will also seek to improve the existing living and affordability conditions of racially or ethnically concentrated areas of poverty with high rates of households over burdened by housing cost and with linguistic isolation (such as South Oxnard, Downtown, Five Points Northeast and Colonia). The City will also implement anti displacement strategies to prevent displacement of households in areas improved by new affordable housing. By early 2023, the City will update the City's Inclusionary Housing Ordinance	

Page Number	Substantial Change/Non-Substantial Change	Updated Information or Input Received	Description of Change	Staff Comment
			~~the inclusionary housing~~ requirements, which will be codified in Chapter 16 of the OCC to take into consideration many components and factors, including construction trends, opportunities, and effectiveness in securing affordable housing, to name a few. In addition, to ensure the Inclusionary Housing Program does not pose a constraint to the development of all housing affordability levels, the City will annually monitor the implementation of this program through the City's Annual Housing Element Workshop (Program 41), evaluate the impacts on the costs and supply of housing, and make necessary revisions to the program(s).	
Page G-16	**Substantial change**	Date January 10, 2022 Letter from HCD (see Attachment 4); update to address HCD's comments on AFFH. Add metric.	**Program 11: Homeownership Assistance Program** **Time Frame: Develop and disseminate marketing materials for by June 2023, update on an annual basis; Ongoing** Assist a total of four~~3~~ households annually. At least half of the households originating from low resource areas and/or areas designated as racially or ethnically concentrated areas of poverty in Oxnard. Continued assistance is provided for moderate and lower-income households to buy single-family units, condominiums, and mobile homes. Two loan opportunities are offered with an aggregate ~~The~~ maximum down payment assistance of ~~is~~ up to $57,000, based on income level and need. A forgivable loan will be up to $30,000, with a ten ~~10~~ -year term, non -~~zero~~interest bearing, deferred ~~, no monthly payments, forgiven at the end of the term, or due~~ and forgivable note. ~~payable if property is sold, transferred, or defaults before the end of the term.~~ A deferred loan of	The program timeline, objective and description have been updated to include AFFH metrics, priorities and goals. The metric for this program has been revised to assist 4 households annually. To address AFFH, a metric has also been included to require at least half of the households assisted originate from low resource areas and/or areas designated as R/ECAPs. This is an ongoing program that is subject to

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			up to $27,000 with a thirty year term, three percent interest bearing, and deferred note. To support upward housing mobility the City will develop focused discussion questions which will be shared during the City's Annual workshop and will address the needs of low resource areas and areas designated as racially or ethnically concentrated areas of poverty (such as South Oxnard, Downtown, Five Points Northeast and Colonia) to offer them homeownership opportunities. To combat barriers to participation due to linguistic isolation, all programmatic materials will be offered in Spanish. The City will also partner with local community-based organizations that serve residents in these neighborhoods ~~the term or earlier if the property is sold, transferred, or defaults before the end of the term.~~	available Home, CalHome, BEGIN and inclusionary in-lieu funds.
Page G-17		Date January 10, 2022 Letter from HCD (see Attachment 4); update to address HCD's comments on AFFH. Add metric.	**Program 12: Mortgage Credit Certificate (MCC)** **Responsibility: Housing Department and Ventura County** **Time Frame: Develop and disseminate marketing materials by June 2023, update on an annual basis; Ongoing and as first-time homebuyers' applications are pursued** Continue working with the Ventura County Consortium to distribute funding and work toward Oxnard residents using at least six Mortgage Credit Certificates per year. Work with the Ventura County Consortium to request that they outreach to at least twenty-four households in the areas designated as low resource and/or RE/CAPs through marketing efforts, so at least half of	The program timeline, objective and description have been updated to include AFFH metrics, priorities and goals. A metric has been added for the Ventura County Consortium to outreach to at least twenty-four households, with at least half of applicants from low resource areas and/or areas designated as R/ECAPs.

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			applicants are from low resource areas and/or areas designated as racially or ethnically concentrated areas of poverty in Oxnard. Oxnard participates with a consortium of cities in the Mortgage Credit Certificate ~~(MCC)~~ program administered by Ventura County. Mortgage Credit Certificates ~~MCCs~~ are available for income-qualified, first-time homebuyers and provide a federal income tax credit up to twenty percent of the annual mortgage interest paid. Since the mortgage payments repay the bonds, no City guarantee is required. Mortgage Credit Certificates ~~MCCs~~ can be used with City homebuyer programs to assist persons to qualify for private mortgage financing. To support upward housing mobility **t**he City will outreach to the Ventura County Consortium to develop a focused marketing campaign to households in low resource areas and areas designated as racially or ethnically concentrated areas of poverty to offer them homeownership opportunities. To combat barriers to participation due to linguistic isolation, the City will ask the Ventura County Consortium to ensure that all programmatic materials be offered in Spanish, and the City will ask the Ventura County Consortium to partner with local community-based organizations that serve residents in these neighborhoods.	
Page G-18	Non-substantial change	Date June 22, 2022 and June 28, 2022 meetings with HCD (see Attachment 6 June 28, 2022 Letter to HCD) - In Program 14,	**Program 14: Shelter Development Program** "The City will comply with SB 2 requirements for transitional and supportive housing outside of the Coastal zone by the end of Fiscal Year 2023-24."	This revision is for adherence to an existing law.

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		update timeline to comply with SB2 requirements for transitional and supportive housing.		
Page G-21	Non-substantial change	Date January 10, 2022 Letter from HCD (see Attachment 4); update timeframe, objective and description to address HCD's comments on AFFH. Add metric.	**Program 18: Section 8 Assistance Program** **Responsibility: Oxnard Housing Authority** **Time Frame: Ongoing. Increase voucher utilization; ~~Seek new vouchers and/or to~~ raise ~~the~~ payment standards; expand landlord outreach. Provide annual training to landlords starting in June 2023.~~standard as needed annually~~** Continue to participate in the Section 8 Assistance program. Increase voucher utilization by 95%~~, encourage property owners to register units, and~~ seek to raise the payment standard as needed to align with private rental markets. Expand landlord outreach The Section 8 Rental Assistance program provides rental assistance to very low-income families to afford housing in the private rental market. Participants' gross household income may not exceed 50% of the median income for the county or metropolitan area in which they choose to live. The income levels and maximum payment standards are established by the HUD. The program has an income targeting requirement which establishes that at least 75% of new admissions to the program must comprise of applicants whose income does not exceed 30% of the area median income level. The Housing Authority must also monitor the rental market and adjust the local payment standard so that the voucher remains	The program timeline, objective and description have been updated to include AFFH metrics, priorities and goals.

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			competitive. The Housing Authority will build on the recommendations as funding allows, focusing on the efforts of increasing voucher utilization and landlord participation in the program. The Oxnard Housing Authority will seek to increase voucher utilization by expanding our landlord outreach and engagement effort, including a demonstration that Section 8 participants are valued tenants and landlords are not permitted to discriminate on the basis of a Section 8 voucher participant. The goal is to improve landlord and tenant relations and customer service, which in turn will impact the participation rate of property owners in the Section 8 program. The City will apply for new or targeted population vouchers as those opportunities arise. ~~The Section 8 program subsidizes very low-income households who expend over half their income on rent. Prospective renters secure housing from HUD-registered apartments, and HUD pays the difference between what the tenant can afford and the negotiated payment standard. HUD regulations require that 75 percent of new leases be made to households earning below 35 percent of median family income, provided less than 40 percent of their income is spent on housing. In an inflating rental market, this standard is often exceeded, resulting in denial of a certificate. To protect housing opportunities for very low-income households, the rental payment standard must keep pace with the market. The City regularly seeks to increase Section 8 vouchers from HUD. In 2020, the Housing Authority began an effort known as "Rethink and Renew" to restructure operations. The goal is to~~	

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			~~improve landlord and tenant relations and customer service, which in turn will impact the participation rate of property owners in the Section 8 program . As a result of the COVID-19 pandemic, all efforts had to be postponed until the City of Oxnard authorizes for the department to proceed with community outreach events. In November of 2020, the Housing Authority submitted a grant request to HUD for technical assistance pertaining to the Rethink and Renew efforts. The application revolves around assistance with asset portfolio repositioning, organizational and staff assessment, and analysis of workforce productivity. All of these tasks are aligned with the goals and objectives of the Rethink and Renew effort. The City continue this type of work through the planning period if funding allows. The City will also provide biannual training to landlords regarding fair housing requirements, including the requirement that they accept vouchers, and encourage them to market available units at their rental properties in high resource areas to voucher holders to increase mobility from low to high resource areas.~~	
Pages G-22 to G-27	**Substantial Change**	Date January 10, 2022 Letter from HCD (see Attachment 4); update to address HCD's comments on AFFH. Add metrics to each action item. Date May 31, 2022 meeting with Barbara Macri Ortiz (see Attachment 9 May 25, 2022	**Program 19: Affirmatively Furthering Fair Housing** **Time Frame: Fair housing services are ongoing; Create plan by Fiscal Year 2022-2023 and implement on an ongoing basis. <u>Timeframes for individual actions are included in the action description.</u>** <u>Quantified objectives for specific actions are included in the action description.</u> ~~Average 320 contacts per year. Reach at least 50 households in areas of linguistic isolation to participate in the planning process or~~	The program update includes additional Anti-displacement strategies, place-based revitalization strategies, and strategies to address barriers. Many of the actions have also been updated to include metrics for assistance to a specified number of households

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		email) - In Program 19 under Anti-displacement Strategies, add implementation of the City's recently adopted Just Cause and Rent Stabilization ordinances. In Program 19, add clarification on the projected date when the Sustainable Transportation Plan (STP) will be completed.	~~serve the City during the planning period.~~ "The City will continue to provide fair housing services and will connect with an average 320 contacts per year to access fair housing services." Specific actions include: ● Implement this program to address AFFH affirmatively further fair housing, including targeting community revitalization through place-based programs, enhancing mobility between neighborhoods, and developing strategies to reduce displacement risk in areas of higher concentration of lower-income households and overpayment (e.g. Programs 10, 11, 12, and 29) and facilitating affordable housing in moderate or higher resource ~~high opportunity~~ areas (e.g. Programs 26 and 34~~36~~). Anti-displacement Strategies: ● Annually seek funding to provide targeted rehabilitation efforts in low resource areas and areas designated as Racially or Ethnically Concentrated Areas of Poverty to prioritize anti-displacement efforts in neighborhoods within these areas. The City will provide loans under the Citywide Homeowner Repair Program (Housing Element Program 2) to rehabilitate 6 lower income homes annually, with at least half of loans provided to households in low resource areas and areas designated as Racially or Ethnically Concentrated Areas of Poverty. ● Work with Ventura County Department of Health and Housing Rights Center to track fair housing issues and identify patterns in the City, including meeting annually to	and focus on low resource areas, areas of linguistic isolation and R/ECAPs. Action items have also been added that utilize the City's Climate Action and Adaptation Plan (CAAP), Green Alley Plan, Parks and Recreation Master Plan, Bicycle and Pedestrian Facility Master Plan and Sustainable Transportation Plan to direct green infra-structure and capital improve-ments in low resource areas. Implementation of two ordinances that Council adopted in May 2022 have also been added. This revision also clarifies the fiscal year timeframe for this action item in Program 19.

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			check on the status of active cases. The City will support Ventura County and Housing Rights center to increase public education and outreach on neighborhoods identified as being areas of linguistic isolation, as well as continuing to assist in the investigation and resolution of complaints of housing discrimination, including, where merited, targeted testing. This increased outreach shall include, beginning in 2024, at least one educational outreach campaign annually in an area of linguistic isolation, targeting a minimum of at least 25 households in such areas with multi-lingual fair housing education resources. The City will use its partnerships with community-based organizations that work with the Oxnard Mixteco community to provide access to information and resources, and will invite those organizations to participate in the City's Annual Housing Element workshop (Program 41). ● Continue working with Ventura County groups who promote expanded housing opportunities through various financial assistance initiatives and affordable housing/neighborhood revitalization programs and educates the community about fair-housing and equal housing opportunity, providing housing counseling services and family resource information and referral. Through this partnership, the City will connect with an average of 320 contacts per year. The City will collaborate with these organizations and the Housing Rights Center (which provides materials in seven languages) to disseminate fair housing information in all appropriate languages, and to encourage community participation in	

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			workshops, and public hearings, which shall include at least one fair housing outreach and education workshop annually, beginning in 2024, in the areas of linguistic isolation and in Spanish language. ● As part of the City's Housing Element Annual Report, continue to annually monitor zoning regulations to ensure compliance with fair housing laws. ● Each time a housing project is proposed that may influence a particular group or neighborhood, in particular in areas of linguistic isolation, the City will make efforts to distribute information on the project in Spanish, including partnering with community-based organizations to promote community engagement opportunities, to ensure that the group or neighborhood is made aware of the project and the process and has the opportunity to respond. When housing projects are proposed, including projects which may impact a particular group or neighborhood in a particular area of linguistic isolation, the City shall continue to provide interpretation services at said meetings. Further, the City will continue to ensure that public notice includes text communicating that interpretive services are available should they be needed. ● Implement the City of Oxnard's recently adopted and codified Rent Stabilization Ordinance No. 3012 and the Just Cause Eviction Ordinance No. 3013 to increase the certainty and fairness within the residential rental market in the City. Both ordinances are more protective than California Civil Code Section 1946.2. Place-based Revitalization Strategies: ● Continue to promote methods which provide opportunities for residents	

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			from neighborhoods of concentrated poverty and areas of linguistic isolation to serve or participate on boards, committees, and other local government bodies. The City's effforts to promote job opportunity and ESL jobs at the City's newly constructed Amazon Distribution Fullfillment Center is an example of a relevant program. The City, on an on-going basis, will track participation by residents of areas of linguistic isolation in public workshops, fair housing education and outreach seminars, and public hearings, and will also collect annual data from the Housing Rights Center on all cases opened from these areas which raise potential fair housing issues. ● Utilize the City's Climate Action and Adaptation Plan (CAAP) to disseminate community programs to improve climate and resilience citywide with particular attention to disadvantaged community areas as identified in the City's CAAP. ● Utilize the results of the tree inventory published as part of the City's Green Alleys Plan (2016), with focus on funding tree canopy installation/improvements in Racially/Ethnically Concentrated Areas of Poverty R/ECAP areas during the City's Capital Improvement Program (CIP) and in public areas only. Focus will be on areas of linguistic isolation, and neighborhoods identified as disadvantaged communities by December 2025. If tree canopy is less than in other areas of the City, prioritize actions through the City's CIP. ● As part of the City's CIP process, prioritize green infrastructure investment (permeable pavements, infiltration planters, trees, etc.) in areas of concentrated poverty,	

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			specifically neighborhoods identified as disadvantaged communities. ● The City will review the sufficiency of open space requirements (during Fiscal Year 2025-2026) for new developments, with consideration to state mandates and conservation, and City polices and revise as necessary by June 2026 to ensure all residents have access to healthy outdoor spaces. The analysis will consider if more or less open space is necessary to support housing, density, and options for passive or active open space is consideration to water and conservation. ● The City's Parks and Recreational Master Plan will assist the City in developing CIP activities to improve. access to parks and recreational areas, including seeking funding sources to develop and/or improve parks or recreational areas and programs and/or partnerships to access nearby recreational spaces located on sites that are not City-controlled. ● Implement the City's Bicycle and Pedestrian Facility Master Plan (2011), with consideration to bicycle and pedestrian facilities in R/ECAP areas. ● The City of Oxnard Sustainable Transportation Plan (scheduled to be complete in Fiscal Year 2022-2023) will focus on inclusive community engagement to ensure that the needs of each community, age group, and socioeconomic status are represented. The document will incorporate complete streets design, safe routes to school, vision zero, sidewalk or bike lane improvements and first/last mile planning in tandem with land use opportunities in lower resourced areas including R/ECAPs and areas of linguistic isolation. The Sustainable Transportation Plan shall	

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			incorporate the findings and key strategies identified in the City of Oxnard Bicycle and Pedestrian Facility Master Plan in 2011 and the Sidewalk Survey prepared in 2015, including the following strategies that improve pedestrian safety: o Consider adopting a Vision Zero policy set of goals for reducing traffic-related fatalities to zero by a certain year. The City would work to improve safety conditions for all road users, particularly vulnerable users like pedestrians and cyclists. o Consider adopting a Complete Streets policy to institutionalize practices associated with complete streets. o Secure grant, or other funding opportunities and seek to install pedestrian-friendly traffic signals consistent with Section 5.2.2 of the Oxnard Bicycle and Pedestrian Master Plan, such audible crossing signals, countdown timer signals, pedestrian refuge islands, and pedestrian-oriented speed limits. Strategies to Address Barriers to Housing Choice in Higher Opportunity Areas and Housing Mobility: ● Promote transit-oriented development in Downtown Oxnard through implementation of the Downtown Development Plan and as feasible the City's Sustainability Transportation Plan, and review development standards as part of the City's Annual Housing Element outreach (Program 41) to ensure that	

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			City regulations promote, rather than constrain, transit-oriented development. ● Use land use, zoning, and development standards to address barriers to housing choices in moderate or higher opportunity areas, such as allowing ADUs and decreasing minimum lot sizes. Starting in January 2023, and as part of the City's Annual Housing Element workshop, review land use, zoning, and development standards to identify regulations that constrain affordable housing development in higher resource areas. The City will initiate this process by amending the OCC to allow single-room occupancy units in at least one zoning district to facilitate housing options for extremely low income households pursuant to Assembly Bill 2634 (Program 6). ● As part of the City's Annual Housing Element Workshop, the City will meet with developers to discuss possibilities of multifamily housing development on sites identified in Supplement 1 of the Housing Element. ~~located in~~ ● Continue to promote affordable housing programs and opportunities in collaboration with the Housing Department and economic development organizations, as well as affordable housing advocates and any ~~interested party — see~~ ~~intereste partysee~~ https://www.oxnard.org/city-department/community-development/oxnard_affordable_housing/. These organizations and interested parties will also be consulted during the City's Annual Housing Element Workshop (Program 41). The City will use its partnerships to ensure that representatives from the Oxnard Mixtec community participate in the	

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			Annual Housing Element Workshop. ~~43).~~ ● Continue to provide Ventura County brochures and Ventura County Department of Health and Human Services information regarding fair housing, tenant rights, rehabilitation grants, rehabilitation loans, first-time homebuyer programs, and Section 8 programs in English and Spanish at the Oxnard customer service counter, Housing Department and City libraries. Continue to provide a link to the City's professional fair housing services provider organization, the Housing Rights Center's website on the City's website. The Housing Right Center provides numerous fair housing resources and brochures on their website, in multiple languages. The City will collaborate with the Housing Rights Center (which provides materials in seven languages) to distribute promotional materials (digital and physical) by December 2024 to ensure residents in areas of linguistic isolation (as identified inFigure B-7) can access fair housing education and City and County program resources. The City will use its partnerships with community-based organizations to ensure the Oxnard Mixteco community has access to information and resources. ● Actively recruit residents from neighborhoods of concentrated poverty and areas of linguistic isolation to serve or participate on boards, committees, and other local government bodies. ~~Ensure environmental hazards are not disproportionately concentrated in low-income communities of color.~~ ~~● Encourage additional multifamily housing in high-performing school areas.~~	

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			● ~~Meet with local school districts by February 2022 to identify mechanisms of attracting and retaining high-quality teachers to schools in Oxnard.~~ ● ~~Use land use, zoning, and development standards to address barriers to housing choices in high-opportunity areas, such as allowing ADUs and decreasing minimum lot sizes.~~ ● ~~Prioritize green infrastructure investment in areas of concentrated poverty.~~ ● Ensure non-English-speaking residents ~~applicants~~ have access to programs like rehabilitation grants, rehabilitation loans, first-time homebuyer programs, and Section 8 programs through advertising and outreach, including accommodation for translation services during the application review ● ~~Each time a housing project is proposed that may influence a particular group or neighborhood, in particular in areas of linguistic isolation, the City will make efforts to distribute information on the project to ensure that the group or neighborhood is made aware of the project and the process and has the opportunity to respond.~~ ● ~~Expand access to utilities in Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs).~~ ● ~~Conduct an assessment of tree canopy in R/ECAP areas and areas of linguistic isolation. If tree canopy is less than in other areas of the City, include actions in the Climate Action Plan the City is currently preparing to increase tree coverage in the identified areas.~~	
Page G-28	**Substantial Change**	Date January 10, 2022 Letter from HCD (see	**Program 21:Reasonable Accommodation**	The Reasonable Accommodation findings in OCC

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		Attachment 4); update to address HCD's comments on Reasonable Accommodation .	The City of Oxnard will continue to process requests for reasonable accommodation which are reviewed on a staff level (Chapter 16). OCC Section 16-501.5 (Reasonable Accommodation – Findings) will be updated by the end of Fiscal Year 2022-2023 to remove subjective considerations in compliance with the Fair Housing Act.	Section 16-501.5 will be revised to only include objective consideration, in compliance with the Fair Housing Act. This OCC update will be processed at the same time as other code updates listed in Program 6.
Page G-28	Non-substantial Change	Date January 10, 2022 Letter from HCD (see Attachment 4); update to address HCD's comments on SROs. Date May 31, 2022 meeting with Barbara Macri Ortiz (see Attachment 9 May 25, 2022 email) - In Program 22, revise text for SRO to be consistent with Program 6.	**Program 22: Special Needs Groups** "~~The City will also explore the feasibility of using its CDBG to provide seed money to assist nonprofit agencies in these efforts.~~ " "By end of Fiscal Year 2022-2023, pursuant to Assembly Bill 2634, amend the OCC to ~~study the~~ allow~~ance of~~ single-room occupancy units in at least one zoning district to facilitate housing options for extremely low income households."	Revision is necessary for the City to comply with AB 2634 to allow SROs in at least one zoning district.
Pages G-29 & G-30		Update program to recognize LAFCO approval of Rio Urban annexation.	**Program 24: Annexation Areas** **Time Frame: Annexation of Rio Urbana in Fiscal Year 2021-2022. City Council action in Fiscal Year 2023-2024, with~~; Consider alternative approaches if annexation does not occur by the end of Fiscal Year 2021-2022.~~ Annexation of Teal Club feasible ~~expected~~ by 2024-25; Consider alternative approaches if**	Program has been updated with current information on status of the Rio Urbana site that was recently received LAFCO approval for annexation. This program still includes the Teal

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			annexation does not occur by end of Fiscal Year ~~2024~~2025-2026. The Housing Element is relying on the Rio Urbana Annexation to satisfy a portion of its RHNA allocation, including 17 lower income units, 3 moderate~~The annexation is currently undergoing the annexation process~~ and 147 above moderate.~~may or may not be approved~~The project proposed at this site has already been approved by the City of Oxnard. Because the project site is within the City's sphere of influence it is required to be built in the City not within the County of Ventura pursuant to the Ventura County Guidelines for Orderly Development. Annexation was approved by the County of Ventura, Local Agency Formation Commission (LAFCO)~~This program is intended to create 167 residential units~~ in December ~~8 three-story buildings, including 17 low-income units and 3 moderate-income units. The annexation and rezone is expected to be completed in early Fall~~ 2021. The City is also continuing to process a ~~evaluate the potential~~ development and annexation project, known as the Teal Club Specific Plan site, which encompasses approximately ~~of about~~ 174 acres. If approval of the development project and support for annexation is approved by the City Council, annexation of the Teal Club Specific Plan area will accommodate ~~allow the~~ development of up to 990 housing units in a range of densities and affordability. City action on the Specific Plan project will be made in Fiscal Year 2023-2024. Due to Ventura County LAFCO ~~Local Agency Formation Commission~~ annexation processes, the annexation and service district detachment process takes approximately ~~approximatrely~~ one year.	Club annexation site, along with a requirement to find sites to accommodate 990 RHNA allocations if Teal Club is not annexed during FY 2025-2026.

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			Therefore, annexation would occur during Fiscal Year 2024-2025. If the ~~Rio Urbana and~~ Teal Club annexation is ~~annexations are~~ not approved, this program will also be used to find alternative housing opportunities ~~land~~ to accommodate 990 ~~rezone or up-zone for the creation of the 1,157~~ units (148 lower income, 282 moderate, 560 above moderate) during Fiscal Year 2025-2026.	
Pages G-30 & G-31	**Substantial Change**	Date January 10, 2022 Letter from HCD (see Attachment 4); Update to address AFFH	**Program 26: Extremely Low-Income Households** **Time Frame: Beginning in Fiscal Year 2022-2023, as part of the City's Annual Housing Element workshop, meet with developers to Look for opportunities to develop or facilitate extremely low-income units. Provide assistance to support development on a project-by-project basis throughout the planning period and on an annual basis. ~~at least annually~~** Comply with AB 2634. to accommodate at least 600 extremely low-income units (which represents 2/3rd of the City's Extremely Low Income RHNA) in areas designated as moderate or higher resource.~~Comply with AB 2634.~~ To address the housing needs of extremely low-income households, the City will continue to encourage the development of housing suitable for extremely low-income households ~~(i.e., single-room occupancy units, transitional housing, multifamily, etc.)~~, with a special emphasis on construction of these units in moderate or higher ~~high~~ resource areas to support the City's housing element goals . , the City will regularly meet with developers and on an annual basis as part of the City's Annual Housing Element workshop (Program 41) to discuss the possibilities	The program timeline, objective and description have been updated to include AFFH metrics, priorities and goals. A metric has been added for at least 600 extremely low-income units in areas designated as moderate or higher resource areas. This number represents ⅔ of the City's extremely low income RHNA.

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			of developing housing suitable for extremely low income households on sites located in neighborhoods in the City's moderate or higher resource areas. The City commits to supporting developers by~~. Activities include~~ assisting with site identification, available ~~and acquisition~~ local funding, ~~financial resources,~~ assisting to provide streamlined ~~and streamlining~~ entitlements, and implementing ~~providing~~ concessions and incentives. Program 22 also calls for allowing single-room occupancy units in at least one zoning district in the City.~~The City will meet with local nonprofit developers throughout the planning period.~~	
Page G-32	Non-Substantial Change	Date January 10, 2022 Letter from HCD. Update to address HCD comment on parking for the disabled, such as residential care. Date June 22, 2022 meeting with HCD (Attachment 6 June 28, 2022 Letter to HCD) - In Program 27, add a bullet to monitor if the City's guest parking requirement is a governmental constraint to the production	**Program 27: Review Parking Standards** ● "By end of Fiscal Year 2023-2024, pursuant to the Fair Housing Act, update OCC Section 16-622 to classify parking requirements for the facilities for the elderly – residential care facilities, independent living, memory care, etc. as residential uses rather than health facilities and to update the standards themselves. ● By the end of Fiscal Year 2022-2023, the City will update OCC Sections 16-468(D) and 16-622 to recognize current State law that no replacement parking spaces are required if using the garage for an Accessory Dwelling Unit." ● "Study ways to increase transit-oriented development in Downtown. ● Monitor existing visitor parking requirements for impacts to affordable housing development applications. As part of the City's	Program 27 has been updated to list a revision to OCC Section 16-622 (Off-street Parking) to move the requirements for parking for the elderly from the Health Services category to the Residential category, and expand the types of residential care facilities to recognize changes in the industry (currently only assisted living and nursing home are listed to encompass the various types of facilities, including

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		of affordable housing.	Annual Housing Element reporting, the City will evaluate the multifamily visitor parking requirements to determine if it is a constraint to production of lower income units and conduct necessary Oxnard City Code modifications as needed. (Multifamily visitor parking is presently one uncovered visitor space per unit for the first 30 units; after the 31st unit, 0.5 uncovered visitor space per unit)." "Per Government Code Section 65583(a), b~~B~~y the end of Fiscal Year 2023-2024,..."	residential care facilities, independent living, memory care, etc. This OCC update will be processed at the same time as other code updates listed in Program 6.
Page G-33	Non-Substantial Change	Date January 10, 2022 Letter from HCD. Update to address HCD comment on the sale of City-owned sites and address AFFH.	**Program 29: City Owned Sites and Developer Assistance** **Time Frame: Beginning in FY 2022/-2023, as part of the City's Annual Housing Element workshop, outreach to the community on uses for surplus land,~~Time Frame:~~ Promote awareness of availability of City-owned sites and assist applicants on an ongoing basis; disseminate information on technical assistance annually.** Accommodate 193 units affordable to lower income households on city-owned properties in low resource areas. The City owns some sites that could be suitable for affordable housing development. The City is actively selling City properties in compliance with the Surplus Land Act where the first opportunity is offered for affordable housing development to support upward housing mobility and housing choice in higher resource areas. Through website promotion of the City's Affordable Housing Ordinances and ~~/~~Programs and collaboration amongst City departments, the City will continue to ensure information and	A metric has been added to accommodate 193 units affordable to lower income households on city-owned properties, which is consistent with the number of units projected on City-owned sites in Supplement 1 of the Housing Element.

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			assistance is provided about opportunities to develop affordable housing on City-owned sites in compliance with the Surplus Land Act. Specifically, the City will continue to include information about opportunities for affordable housing on City-owned sites, assist developing projects that include affordable units on City-owned land, and/or for projects with State Density Bonuses, in one place on its website. Contact information for the Housing Department and Planning Division is provided on the website for interested parties to contact for further assistance. The City also disseminates information about this available assistance annually to local affordable housing developers and advocates. Starting in January 2023, as part of the City's Annual Housing Element Workshop (Program 41), the City will outreach to the community to discuss and provide feedback on opportunities for development of affordable housing on City-owned sites.	
Page G-34	Non-substantial Change	Remove Programs that were completed with the City's rezone of parcels in October 2021.	**~~Program 30: Vacant Repeat Sites for Lower-Income RHNA~~** (Remove Program) **~~Program 31: Non-Vacant Repeat Sites for Lower-Income RHNA~~** (Remove Program)	This update removes Program 30 & 31 that were completed in October 2021 with the City rezone of vacant and non-vacant parcels in Supplement 1 to accommodate the default density of 30 dwelling units/acre.
Pages G-36 & G-37	Non-substantial Change	Date January 10, 2022 Letter from HCD. Update to address HCD comment on AFFH.	**Program 33 ~~35~~: Allow Housing in the Business Research Park (BRP) Zone** Conduct outreach to property owners and community starting in 2023. The BRP Overlay zone affirmatively furthers fair housing by increasing	The program objective and description have been updated to include AFFH metrics, priorities and goals.

Page Number	Substantial Change/Non-Substantial Change	Updated Information or Input Received	Description of Change	Staff Comment
			housing mobility opportunities and/or housing in higher resource areas by reducing constraints on development of residential units and expanding where they can be built.	
Page G-37	Non-substantial Change	Date January 10, 2022 Letter from HCD; Update to address HCD comment on AFFH and add metric	**Program 34 ~~36~~: Pre-Approved Accessory Dwelling Units (ADUs)** Support approval and development of ADUs. Utilizing pre-approved ADU plans will reduce overall development costs and streamline approvals. Accommodate at least 320 ADUs to increase housing choices and mobility to higher resource areas. In addition to the 2019 update to the ADU ordinance ~~ordinace~~ that simplified the ADU permitting process, revised development standards and waived parking requirements (discussed in Section F.2), to further support ADU development and support affirmatively furthering fair housing through housing mobility and increasing housing choice in higher resource areas, the City will consider participating in the regional effort to evaluate and adopt pre-approved accessory dwelling unit (ADU) plans to streamline the approval process and lower development costs for applicants and develop a pre-fabricated ADU that can be used in the City. As part of the regional program, the City Building Official will evaluate the accessory dwelling unit (ADU) provisions developed by the Ventura County Association of Governments (VCOG~~VOG~~) to determine how and if they can be utilized in the permitting of affordable housing in the City. Provided the VCOG plans are available to the City, the Building Official will review the VCOG pre-approved ADU plans and options for a streamlined building permit review	This revision adds a metric of 320 ADUs, consistent with HCD's projected ADU recommendation. The VCOG plans, when available, would be reviewed by the Building Official to determine if the VCOG plans are viable for the City to use as pre-approved plans.

Page Number	Substantial Change/Non-Substantial Change	Updated Information or Input Received	Description of Change	Staff Comment
			process by the Quarter 2 of Fiscal Year 2024- 2025. If the City determines this will be a beneficial program for the City, information regarding the REAP ADU program will be posted on the City's Planning Department website and utilized where appropriate ~~for the City~~.	
Page G-38	Non-substantial Change	As a result of ongoing public outreach, clarification was necessary that the City does not presently have any areas that qualify 'high resource areas' under HCD/TCAC definition.	**Program 36~~38~~: ADU Promotion Program** "moderate and higher ~~high"~~	The program language presently emphasizes promoting construction of ADUS in high resource areas to improve mobility from low resource areas. Program language regarding resource areas was revised from 'high' to 'moderate and higher' to reflect that the City does not presently have any high resource areas. However, in the event that an area is reclassified as a high resource area in the future, the selected term does not preclude those areas.
Page G-40	Non-substantial Change	Update to timeframe.	**Program 38~~40~~: Institutional Land Use Housing Opportunity Program** **Time Frame: Amend zoning by Fiscal Year ~~2023-~~2024/2025** Program elements would be explored over the next three years, Fiscal Year 2024-2025.	Timeframe revised to reflect realistic parameters based on staffing and budget. The Housing Element does not depend on this program for units to meet RHNA.

Page Number	Substantial Change/Non-Substantial Change	Updated Information or Input Received	Description of Change	Staff Comment
Page G-41	Non-substantial Change	Date January 10, 2022 Letter from HCD (Attachment 4). Update to address AFFH.	**Program 41~~43~~: Annual Housing Element Workshop** Each year, hold an Annual Workshop ~~a public workshop~~ to update the community on progress towards implementing the Housing Element ahead of submission of the Annual Housing Element Progress Report to HCD. Outreach will include community based organizations with intention to outreach to all segments of the population. Yearly evaluate sufficiency of program and participation and inclusion.	The program description has been updated to include AFFH priorities and goals.
Page G-41	Non-substantial Change	Update to clarify time frame.	**Program 42~~44~~: ADU Construction Cost Assistance and Accelerator Program** **Time Frame: Establish program by the end of Fiscal Year 2022-2023**	Minor clarification added to the timeframe.
Supple-ment 1	Non-substantial Change	Current Information.	Supplement 1: Housing Element Sites Inventory - update Zoning and General Plan designation resulting from Rezone of parcels in October 2021; update project development status for sites; update lot splits.	This revision updates the approval status of a development project on the site.
Table A	Non-substantial Change	Date July 5, 2022 HCD Site Inventory review Ava Hoffman requested Update to the Housing Element Inventory table to replace 9-digit Assessor Parcel Number (APN) with 10-digit APNs (9-digits + suffix),	Table A: Housing Element Sites Inventory, update Assessor Parcel Number column to 10-digits.	Although the City and County database use the 9-digit APN to locate parcels, this revision is necessary for the Housing Element to sync with HCD's database.

Page Number	Substantial Change/Non-Substantial Change	Updated Information or Input Received	Description of Change	Staff Comment
		consistent with HCD's database		
Various Sections Through-out docu-ment	Non-substantial changes	Clean up typos and minor grammatical changes	Various	Minor clean up will occur

Attachment 9

Public Comments

Barbara Marci-Ortiz, dated May 25, 2022

BMO COMMENTS ON HOUSING ELEMENT IN RELATION TO 1/10/2022 HCD LETTER

1. RE: HCD Letter comment A.2., page 2 - estimate of total # of units in need of rehab or replacement.

Reference H/E Edit in red page B- 19 does not answer the question. Need to estimate a number.

Using Table B-25, I would estimate 11,924 units in need of rehab or replacement, which is 21.2% of our total housing stock, using the following percentages by age of housing to arrive at the estimate:

Before 1939	60% of units =	840
1940-1949	50% of units	1,333
1950 - 1959	40% of units	3,289
1960 - 1969	30% of units	3,941
1970 - 1979	20% of units	2,213
1980 - 1989	5% of units	308

* Total number of units needing rehab/replacement 11,924

2. See bullet on page F-16 re deficient sewer infrastructure. If City puts that burden on affordable housing on AH sites, that burden may make those projects infeasible. Need to include money in City's CIP in order for City to be able to address deficient sewer infrastructure for affordable housing projects.

3. See bullet on page G-28: Delete the word "study" re: single room occupancy units. Should read that the City will amend the OCC to allow single-room occupancy units in at least one zoning district**. I would urge you to allow in both the R-3 and R-4 districts, as well as the commercial and BRP and industrial sites that allow residential development.**

******* NEW COMMENTS that reference Attachment A - Response*****

Item A-1

1. Where are the moderate and high resource areas in Oxnard?

2. Need a chart that shows the low, moderate and high resource areas in Oxnard by neighborhood.. Should also identify low resource areas, areas of linguistic isolation and R/ECAPS, so that can be correlated with the programs being put in place (that are listed at top of page 4. Should also identify the location of the five census tracts listed on page G-14, in the discussion of the new SGC AHSC Grant (Cap & Trade) EDC set-aside for five highly qualified Oxnard census tracts.

3. Program 10, Inclusionary Housing [pg. 2] . Re: density bonus parking. Should redraft - with inclusionary requirements - not "automatically benefits" Should be: "allows reduced parking standards per SDB law..."

4. Program 18 - Section 8 - What was the OHA HUD technical assistance grant for? Says it "included an asset repositioning report with implementation strategies and an evaluation of staffing levels and capacity, did not provide additional Section 8 vouchers." I am confused, it sounds like this was for OHA properties, not section 8?

4. Program 19 AFFH -

* should include discussion of the City's new ordinance re: rent caps and just cause eviction as an anti-displacement strategy.

* Should also have an honest discussion about parking. HCD wants waiver of parking standards for deed restricted units. Can point out that developments are eligible for reduction of parking standards pursuant to DB law. But complete waiver is not practical in neighborhoods that are not well served by public transportation and where residents need cars to get to work and to the stores, etc. When there are no alternatives to cars, we do need to have some parking opportunities for families. Identify areas of city where parking problems are problematic.

5. Program 26 - Extremely low income households. Why are you raising AB 2634? That law was passed in 2006. Just note that City plans to update zoning code to make it clear that SROs are allowed in at least one zone. Note that SROs are needed for more than just "Special Needs Groups". In AB 2634 it appears to lump in SROs as supportive housing (no comma between supportive housing and SROs)

Govt Code § 65583 (c)

(1) Identify actions that will be taken to make sites available during the planning period of the general plan with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, **supportive housing single-room occupancy units,** emergency shelters, and transitional housing.

Item A 2. Rehabilitations/Renovations Units

Need to provide an estimate of the number of units. See prior comments, point 1. I came up with estimate of 11, 924 as the total number of units needing rehab/replacement

Item A.4 Processing of Permits (pg. 9)

While it is true that the HAA does not prohibit cities from requiring discretionary approval for housing projects, the scope of that discretion is limited. I would add the following sentence after that statement in the third paragraph regarding discretionary approval:

"However, the City may not deny a project protected by the HAA (i.e. where developer proposes that at least 20% of the units be for low income), based on the Planning Commission's inability to make any of the findings required for a special use permit. The reasons for denial are limited to the five reasons set forth in Govt. Code § 65589.5 (d).

Item B. 1 - Housing Programs SRO's

It is stated that the Conceptual DAH/E has been amended to provide language to allow SROs in at least one zone district, rather than **study the allowance.** However, that was not done. Program 22 still has the language "study the allowance." The language in Program 6 was changed.

Attachment 10

August 18, 2022 Presentation

General Plan Amendment
Amended 2021-2029 Housing Element

By: Kathleen Mallory, Planning & Sustainability Manager
Heather Davis, Contract Planner
Amy Sinsheimer, PlaceWorks Housing Consultant

Planning Commission
August 18, 2022

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Housing Element Update

Why is the Amended Housing Element being considered by the Planning Commission again?

- **September 16, 2021** - Planning Commission recommended City Council approval of the Final Housing Element & associated approvals
- **October 5, 2021** - City Council approved the 2021-2029 6th Cycle Housing Element, Rezoning & Amend General Plan land use designations, and 5 Ordinances, in the Oxnard City Code (OCC)
- **October 8, 2021** - City submitted the adopted Housing Element to State Housing and Community Development (HCD)
- **January 10, 2022** - HCD Findings Letter, with edits to Element
- **May 12, 2022** - City submitted the Conceptual Amended Housing Element to HCD
- **July 7, 2022** - City Submitted Addendum to Conceptual Amended Housing Element
- **July 11, 2022** - HCD Issued a Conditional Certification Letter

Background

- **To receive HCD certification of the Housing Element, City must adopt Amended City of Oxnard 6th Cycle 2021-2029 Housing Element:**
  - HCD Conditional Certification Letter (July 11, 2021) - must adopt "revised draft Housing Element received (by HCD) for review on May 12, 2022, along with revisions received on July 7, 2022"
  - Draft Amended City of Oxnard 6th Cycle 2021-2029 Housing Element posted July 27, 2022 incorporates these revisions
  - Most of the substantial revisions are updates to OCC to bring into compliance with existing State & Federal laws
- **Without Certification**
  - Withholding of housing related grant monies, including homeless program assistance money
  - Discussion of withholding gas tax money
  - Potential HCD originated litigation against jurisdictions

Overview of Changes

Housing Element changes are characterized as:

- Non-substantial - Changes which occurred to correct grammatical errors/text edits; and/or addition of language to reflect programs and approvals already implemented by the City Council. Not focus of staff report, but see Attachment 8
- Substantial - Changes which occurred to address edits requested by HCD staff to clarify program timing and/or compliance with State law; and addition of a new program action. Large reduction in number of Accessory Dwelling Units (ADU's) utilized to meet City's affordable housing requirements; summarized in Attachment 8
- Update to Address Current Information - Building permits, code compliance reports, project entitlement status, etc.; see Attachment 8
- Updates to Address Public Participation - Racially or Ethnically Concentrated Areas of Poverty (R/ECAPS) map, and definitions; Attachment 8

Analysis - Recommended Substantial Changes

- **Affirmatively Furthering Fair Housing (AFFH)**
  - Program 4 - Urban Village Program - Metric for 372 lower income units
  - Program 6 - Zoning Code Amendment - Residential Care in Multifamily zones, Reasonable Accommodation findings, Employee Housing Act
  - Program 11 - Home Ownership Assistance Citywide - Metric of half of households originating from low resource areas
  - Program 12 - Mortgage Credit Certificate - Metric of half of households originating from low resource areas
  - Program 19 - AFFH - Additional Anti-displacement Strategies, Place-based Revitalization Strategies, and Strategies to Address Barriers
  - Program 26 - Extremely low income households - Metric for 600 extremely low income units in moderate or higher resource areas
  - Program 29 - City owned sites and developer assistance - Metric for 193 lower income units
  - Program 34 (Renumbered from Program 36) - Pre-Approved ADU - Metric to reduce overall development costs and streamline approval for 320 ADUs

Analysis- Recommended Substantial Changes

- **Rehabilitation/Renovation Units (NEW)**
  - Program 1 - Targeted Windshield Housing Condition Survey
- **ADU projections and affordability**
  - Reduce Projected ADUs from 490 units to 320 units
- **Zoning for a Variety of Housing Types (Emergency Shelters - Comply with State Law)**
  - Program 6 - Update OCC on Emergency Shelters
- **Persons with Disabilities (Comply with State & Federal Law)**
  - Program 6 - Update OCC to Expand Types of Residential Care Facilities
  - Program 21 - Update OCC Reasonable Accommodation Findings
  - Program 27 - Update OCC Parking for Senior Housing
- **Housing Programs Single Room Occupancy (SRO) (Comply with State Law)**
  - Programs 6 & 22 - Update OCC to allow SROs in at least one zoning district

Analysis - Current Information

Draft Amended City of Oxnard 6th Cycle 2021-2029 Housing Element also includes updates to current information:

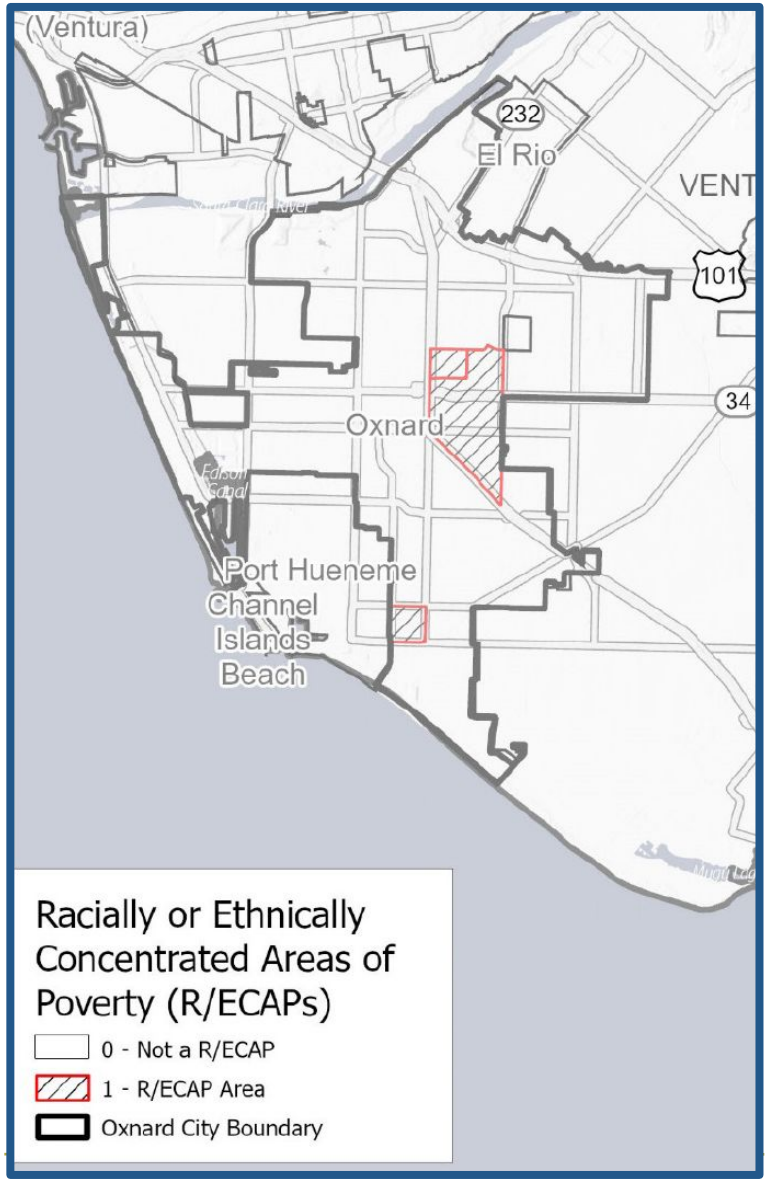
- Rezone and General Plan land use designation to accommodate Regional Housing Needs Assessment (RHNA), City Council Approval in October 2021
- Site Plan Review and Additive Zone Objective Standards, City Council Approval in October 2021
- Building Permits and certificate of occupancy between June 30, 2021 and February 28, 2022
- Code Compliance data through March 2022
- Supplement 1 Sites - Updates project descriptions, entitlement status, site status (vacant), lot reconfigurations, etc.

Analysis - Public Participation

Public Participation resulted in additional updates:

- Figure B-12 - Racially or Ethnically Concentrated Areas of Poverty (R/ECAPS)
- Just Cause Eviction Ordinance (Ord. No. 3012) &

  Rent Stabilization Ordinance (Ord. No. 3013), Adopted May 3, 2022
- Definitions for Resource Areas



California Environmental Quality Act (CEQA)

- October 5, 2021 - City Council approved an Initial Study - Mitigated Negative Declaration for the 2021-2029 Final Housing Element
- Amended Draft 2021-2029 Housing Element updates existing information and does not trigger the need to prepare a subsequent or supplemental environmental document
- Consistent with CEQA Guidelines Sections 15162 and 15164, the proposed amendment to the 2021-2029 Final Housing Element updates existing information and does not trigger the need to prepare a subsequent or supplemental environmental document

Community Outreach

Public Notification for Planning Commission Hearing on Draft Amended City of Oxnard 6th Cycle 2021-2029 Housing Element:

- Virtual meetings with housing advocates throughout 2022 to review changes presented to HCD
- Email Notice to City's Housing Element interested parties list
- Draft Amended 2021-2029 Housing Element posted on the City's website and notification sent to the City's Housing Element interested parties list on July 26, 2022
- August 1, 2022 from 3pm to 5pm, staff hosted community drop-in hours for the public; one housing advocate participated
- Notice of public hearing posted in the Ventura County Vida newspaper
- No additional discussion has been received from members of the public since the preparation of this presentation

Recommendation

That the Planning Commission:

a) Receive a presentation on the Draft Amended City of Oxnard 6th Cycle 2021-2029 Housing Element

b) Open the public hearing and receive public input

c) Adopt a Resolution recommending City Council approval of the Draft Amended City of Oxnard 6th Cycle 2021-2029 Housing Element as Chapter 8 within the 2030 General Plan

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QUESTIONS?