

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

2020 W. El Camino Avenue, Suite 500  
Sacramento, CA 95833  
(916) 263-2911 / FAX (916) 263-7453  
[www.hcd.ca.gov](http://www.hcd.ca.gov)



February 2, 2024

Matt Flood, Assistant City Manager  
City of San Joaquin  
21900 Colorado Avenue  
San Joaquin, CA 93660

Dear Matt Flood:

**RE: City of San Joaquin's 6<sup>th</sup> Cycle (2023-2031) Revised Draft Housing Element**

Thank you for submitting the City of San Joaquin's (City) revised draft housing element received for review on December 4, 2023. Pursuant to Government Code section 65585, HCD is reporting the results of its review.

The revised draft element addresses many statutory requirements described in HCD's November 2, 2023 review; however, revisions will be necessary to substantially comply with State Housing Element Law (Gov. Code, § 65580 et seq), as follows:

1. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics...* (Gov. Code, § 65583, subd. (c)(5).)

Goals, Priorities, Actions, and Milestones: The element should expand place-based strategies toward community revitalization such as increasing community programs or rehabilitation efforts, including indoor air quality, energy efficiency or other environmental health initiatives. In addition, programs should be revised, as follows:

- *Program 6 (Affordable Housing Incentives):* The Program should include geographic targeting such as throughout the City and consider actions to improve housing choices such as increasing R-2 capacity or reducing minimum lot sizes.
- *Program 28 (Improve Access to Resources):* The element should commit to applying for funding at least every other year and implement the capital improvement plan on at least an annual basis.

2. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards... ..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. (Gov. Code, § 65583, subd. (c)(1).)*

Zoning for a Variety of Housing Types (Emergency Shelters): Program 13 (Zoning Code Amendments) should commit to update the definition of emergency shelters in compliance with new requirements and clarify emergency shelters will be permitted without discretionary actions. In addition, the element should further evaluate the redevelopment potential of R-3 properties for emergency shelters, including proximity to services for persons experiencing homelessness. For example, the element could discuss any opportunities for re-purposing existing structures.

The element will meet the statutory requirements of State Housing Element Law once it has been revised, adopted, submitted, and reviewed by HCD to comply with the above requirements pursuant to Government Code section 65585.

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City should continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate. As noted in HCD's prior review, the City should employ additional methods (beyond a workshop) for public outreach efforts in the future, particularly for lower-income and special needs households. Please be aware, any revisions to the element must be posted on the local government's website and to email a link to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD.

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

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant, the Affordable Housing and Sustainable Communities program, and HCD's Permanent Local Housing Allocation consider

housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: <https://www.opr.ca.gov/planning/general-plan/guidelines.html>.

HCD appreciates the hard work and diligence of the City in the housing element update and welcomes the opportunity to discuss this review and assist with the remaining statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Melissa Vasquez, of our staff, at [Melissa.Vasquez@hcd.ca.gov](mailto:Melissa.Vasquez@hcd.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul McDougall", with a stylized flourish at the end.

Paul McDougall  
Senior Program Manager