

City of Dixon – HCD Comments, December 6, 2022

Comment #	Location in HE	Comment	Page #
1	Housing Stock	Pg.1 “former redevelopment area” in need of rehab (repairs and maintenance) what kind of study led to this conclusion?	Page 1
2	RHNA Allocation	Small Typo on PG. 4 of the element regarding the allocation of lower income units through the RHNA process.	Page 4
3	Public Participation	Noted concerns regarding the public outreach process on PG. 8 What were these concerns regarding, why were translational services only provided upon request? Noting the City’s demographics, did this limit participation?	Page 2, 8, and 2-4
4	Table 2, Pg. 9	RHNA vs Building permits, revise this table and fix percentages while also verifying the data provided.	Page 9
5	Quantified Objectives Pg. 41	While the element includes quantified objectives for new construction, rehabilitation, and conservation by income group, it could consider quantified objectives for conservation (beyond at-risk preservation). For your information, the quantified objectives do not represent a ceiling, but rather set a target goal for the city to achieve, based on needs, resources, and constraints. I.e. code enforcement, rental assistance or housing choice vouchers, weatherization, tenant protections, mobile home park preservation ordinances	Page 42
6	Realistic Capacity Assumptions	Go over the example realistic capacity projects on Table 6 specifically the column outlining realistic capacity for the two initial phases of the senior affordable developments listed, 102%? In addition to the one example on pg. 47 for 2007, include relevant development trends from similar sized jurisdictions nearby, I.e., density, type, projects by income.	Page 45 and 49
7	Program 3.3.4 Pg. 28	Program Revisions: When financially feasible the City will offset.	Page 28
8	Remaining Sites Pg. 46 Realistic Capacity	Discuss likelihood of residential development on sites that allow 100% non-residential.	Page 49
9	Small Sites Analysis- Pg. 47	Expand Analysis.	Page 49
10	Water/Sewer	Sites have existing or planned, water, sewer, and dry utilities infrastructure available and accessible sufficient to support housing development (GC 65583.2(b)(5)(B)) _____	Page 47 and 63
11	Pipeline Projects Pg. 47	Demonstrate pipeline will be built in the planning periods including discussion of anticipated steps, any known barriers, presence or absence of phasing, typical completion rates, drop out rates, etc	Page 49

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12	Figure 2 Pg. 51	Lower income sites? Approved boundary selection on figure 2?	Page 53
13	Pg. 68/69 Development Standards	Assess how min site area requirements for the RM-3 RM-4, the 40 percent lot requirement in zones designed for MF housing, the height requirement (whether 3 stories can be achieved) with the noted heights facilitate housing. In addition, analyze setback requirements	Page 69 and 70
14	Parking Standards Pg. 71 m	Table 15: In addition to table 14 analyze setback requirements, and parking requirements especially for 1 bedroom MF units. ADU parking is off, requirements as follows (1)The accessory dwelling unit is located within one-half mile walking distance of public transit. (2)The accessory dwelling unit is located within an architecturally and historically significant historic district. (3)The accessory dwelling unit is part of the proposed or existing primary residence or an accessory structure. (4)When on-street parking permits are required but not offered to the occupant of the accessory dwelling unit	Page 31 and 72
15	Pg. 73 SB330	Dixon cannot impose a growth management ordinance under SB 330, the City is on the affected cities list.	
16	Pg. 72 Planned Development	Planned development, is it optional or is required? Evaluate the process for certainty and by typology.	Page 73
17	Zoning Table Pg. 74	Explain footnote 3 Res Care Facilities. Add 17021.8 Farmworkers	Page 31 and 77
18	Farmworkers Pg. 75	In addition to the data presented in the element, the analysis should identify challenges, strategies, resources, and an assessment of gaps in resources for farmworkers and should meet the analysis with revised policies and programs. Add analysis farmworker housing need characteristics (income, housing types, disproportionate needs)	Page 33 and 2-76
19	Emergency Shelters 76	Described development standards are off, expand amenities and proximity analysis.	Page 31, 79-80
20	Site improvements 80	Subdivision level improvements? I.e Street widths.	Page 82
21	DRC pg. 84	List typical number of hearings	Page 87
22	Building Codes 85	Add the Nov 2022 date in a program/since the building code is outdated.	Page 89
23	Land use Controls missing.	Comprehensive analysis	Page 72

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24	Missing	Complied with new transparency laws requiring all fees and inclusionary requirements to be provided on a jurisdiction’s website? (GC 65940.1(a)(1)(A))? Complied with new transparency laws requiring all zoning and development standards for each parcel to be provided on a jurisdiction website? (GC 65940.1 (a)(1)(B))?	Page 67
25	Missing	Identifies and analyzes requests to develop at densities below the density identified in the site inventory/Typical timeframes, break them out SF and MF	Page 72
26	Employment Tends 2-35	Data more than likely severely undercounts farmworkers, address this in the elements farmworkers analysis.	
27	Housing Conditions 2-46	Data on housing conditions in Dixon are currently missing? Use the recent windshield survey to supplement this information.	Page 2-47
28	ELI analysis-Missing	Expand discussion including disproportionate impacts (overcrowding, overpayment, tenure), comparisons to other income groups, effectiveness of past strategies and magnitude of needs (including projected) broaden the analysis	Page 2-76-2-78
29	Seniors-Missing	How many seniors? Not by household or overpayment.	Page 2-55
30	Homelessness	Missing.	Page 2-78
31	AFFH, Income	Expand on the element’s income analysis on a local level, including incorporating (local data and knowledge) and other relevant factors and coincidence with AFFH factors Acknowledge the census tract bounded by I-80 to the west, State Route (SR-) 113 to the east, and West H Street to the south as a potential RECAP (existing affordable housing) further analyze the conditions and circumstances of this area to the rest of the City, including incorporating local data and knowledge and other relevant factors.	Added p 3-36/37
32	Female headed households	Expand on the high levels of female headed households in Dixon evaluate their needs.	Page 29, 3-44/45 and program language added to Program 4.1.1
33	Disabilities	Include local data and knowledge in the analysis. For instance, consultation with local stakeholders on issues pertaining to those with disabilities in context to AFFH.	Page 3-50

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34	Environmental Conditions	Expand on the environmental hardships noted in the element (the eastern part of the City), relate these conditions to factors such as income (protected classes), employment etc.	Page 3-74
35	Substandard Housing	Further analyze and evaluate substandard housing for patterns that go beyond broader areas, look at neighborhood demographics, tie in trends patterns.	Page 3-89
36	Homelessness	The analysis should analyze local spatial trends of homelessness in the city, as well as patterns and trends in coincidence of homelessness with protected class groups in the City. In addition, the analysis can evaluate homeless patterns (areas of higher need) including access to transportation and services for homeless	Page 3-90 – 3-95
37	Programs	<p>4.1.1 Timing 5.3.1-AFFH Metric 5.4.1-AFFH Metric, displacement prevention 5.4.2-Quantified Objective/Metic 5.6.1-Mobility or displacement Metric? New opp? 6.6.1-Metrics (mobility to..) 6.2.1 Metrics (30 Affordable units in..) Don't see program 3.2.3? 7.2.1- Commitments listed in the AFFH analysis (environmental) are not in this program? Pg. 3-69 Add another program that address female headed household, farmworkers. In addition include a program for place based strategies, look at the CIP, notes on this in the AFFH section</p>	Pages 23, 29, 34, 35, 36, 37, 39