

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

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December 21, 2022

Raffi Boloyan, Director  
Community Development Department  
City of Dixon  
600 East A Street  
Dixon, CA 95620

Dear Raffi Boloyan:

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

Thank you for submitting the City of Dixon's (City) draft housing element received for review on September 27, 2022, along with revisions received on December 21, 2022. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. Our review was facilitated by a conversation on December 6, 2022, with City staff, Raffi Boloyan and consultant Cynthia Walsh.

The draft element addresses many statutory requirements; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code), as follows:

1. *Include an analysis of population and employment trends and documentation of projections and a quantification of the locality's existing and projected needs for all income levels, including extremely low-income households. (Gov. Code, § 65583, subd. (a)(1).)*

Extremely Low-Income (ELI) Households: The element reports some data on the number of existing and projected ELI households, but it must also include an analysis of their housing needs. The analysis should evaluate tenure, overpayment, resources, and strategies available and the gap and magnitude of housing needs to better formulate policies and programs. Depending upon the results of this analysis, the City may need to add or revise existing programs.

2. *Analyze any special housing needs such as elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. (Gov. Code, § 65583, subd. (a)(7).)*

Farmworkers: While the element includes USDA and ACS data on farmworkers within the County, the element should be revised to include an analysis of farmworkers beyond identifying housing typologies to accommodate the need. While the element mentions only around three percent of residents work in Agriculture and Natural Resources, (p. 2-76) farmworkers from the broader areas (county wide) and those employed seasonally may have housing needs, including within the City's boundaries. Furthermore, a revised analysis can identify challenges, present strategies and resources to meet the need, and provide an assessment of gaps in resources for farmworkers within the City. The element should enhance existing policies and programs based on a revised analysis. For additional information, please see the Association of Bay Area Governments, (ABAG) farmworker tool kit: <https://abag.ca.gov/technical-assistance/farmworker-housing-toolkit>.

Programs: As noted above, the element is required to analyze special housing needs throughout the City. Depending upon the results of that analysis, the City may need to add or revise existing programs.

3. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures... (Gov. Code, § 65583, subd. (a)(5).)*

Growth Control: Currently, Measure B, a voter approved growth management initiative, limits annual residential growth in the City to a number of dwelling units that is no more than three percent of the total number of housing units as of December 31<sup>st</sup> of the prior calendar year. The Housing Crisis Act of 2019 (SB 330, 2019) was signed by Governor Newsom on October 9, 2019 and became effective on January 1, 2020. The Housing Crisis Act (Gov. Code, § 66300) generally prohibits a locality from enacting a development policy, standard or condition that reduces intensity, imposes moratoriums, enforces subjective design standards or implements any provision that limits approvals or caps population. These provisions remain in effect until January 1, 2030. Specifically, Government Code section 66300, subdivision (b)(1)(D), with limited exception, does not allow affected jurisdictions to adopt new or enforce existing limits on the number of land-use approvals or permits. The City should evaluate consistency with these requirements and if necessary, immediately void or suspend the annual growth cap. In addition, the element should also suspend the implementation of Program 3.1.1 until after January 1, 2030.

The element will meet the statutory requirements of State Housing Element Law once it has been revised and adopted to comply with the above requirements.

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. During the housing element revision process, the City must continue to engage the community, including organizations that represent lower-income and special needs households, including local neighborhood groups, by making information regularly available while considering and incorporating comments where appropriate. Please be aware, any revisions to the element must be posted on the local government's website and to email a link to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; 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 responsiveness and dedication of the City's housing element team during the review. We are committed to assisting the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Irvin Saldana, of our staff, at [Irvin.Saldana@hcd.ca.gov](mailto:Irvin.Saldana@hcd.ca.gov).

Sincerely,



Paul McDougall  
Senior Program Manager