

April 1, 2021

Planning Commission  
 City of Oxnard  
 305 West Third Street  
 Oxnard, CA

cc:  
 Kathleen Mallory

**Re: Draft City of Oxnard 2021-2029 Housing Element**

Dear Oxnard Planning Commissioners:

In collaboration with affordable housing advocates and nonprofit developers, we are providing comments and recommendations herein, in response to the draft City of Oxnard 2021-2029 Housing Element. We are appreciative of staff's efforts for hosting public workshops to seek feedback and answer questions on the draft City of Oxnard 2021-2029 Housing Element. We share the City's goals of identifying programs and strategies to meet its Regional Housing Needs Allocation (RHNA) obligation, with special attention to very-low and low-income RHNA goals.

As stated in the draft Housing Element, Oxnard housing production was not "on pace" to meet its very low income (VLI), low income (LI), moderate income (Mod) or above moderate income (Above Mod) RHNA production targets totaling 7,301 units.

5 <sup>th</sup> Cycle Progress	Units Built and Approved 2014-21	Units Remaining	Total RHNA Allocation	6 <sup>th</sup> Cycle RHNA
VLI	239	1,449	1,688	1,840 (ELI+VLI)
LI	994	166	1,160	1,071
Mod	1,122	229	1,351	1,538
Above-Mod	3,298	0	3,102	4,100
Total			7,301	8,549

5 <sup>th</sup> Cycle Progress	VLI	LI	Mod	Above Mod
RHNA target	1688	1160	1,351	3,102
Units permitted	179	738	375	545
% complete	10.6%	63.62%	27.76%	17.57%

While more LI units were produced in Oxnard than in other municipalities within the County, it is also true that there were significantly less VLI units produced in Oxnard than in other municipalities, meeting only 10.6% of the City's VLI RHNA allocation.

Ventura County	Planning period	RHNA VLI	VLI % complete	RHNA LI	LI % complete
CAMARILLO	15-OCT-13 - 15-OCT-21	539	23.56%	366	29.23%
FILLMORE	15-OCT-13 - 15-OCT-21	160	0.00%	112	0.00%
MOORPARK	15-OCT-13 - 15-OCT-21	289	1.73%	197	12.18%
OJAI	15-OCT-13 - 15-OCT-21	87	0.00%	59	0.00%
<b>OXNARD</b>	<b>15-OCT-13 - 15-OCT-21</b>	<b>1,688</b>	<b>10.60%</b>	<b>1,160</b>	<b>63.62%</b>
PORT HUENEME	15-OCT-13 - 15-OCT-21	1	0.00%	1	0.00%
SAN BUENAVENTURA	15-OCT-13 - 15-OCT-21	861	15.91%	591	9.81%
SANTA PAULA	15-OCT-13 - 15-OCT-21	288	0.00%	201	4.98%
SIMI VALLEY	15-OCT-13 - 15-OCT-21	310	11.29%	208	1.44%
THOUSAND OAKS	15-OCT-13 - 15-OCT-21	47	42.55%	32	6.25%
VENTURA COUNTY	15-OCT-13 - 15-OCT-21	246	34.55%	168	85.71%
<b>VENTURA CO.</b>		<b>4,516</b>	<b>13.02%</b>	<b>3,095</b>	<b>35.09%</b>

The City's responsibility for proactively planning to address the housing crisis is significant. Currently, 69% of renter households are experiencing at least 1 of 4 housing problems: incomplete kitchen facilities; incomplete plumbing facilities; overcrowding; and high cost burdens with 30%-50% of household income required to go toward rent. Very low- and extremely low-income households make up **30%** of all households in Oxnard, and low-income households earning less than 80% area median income represent **53%** of all households in Oxnard. The City faces a critical and urgent need to prioritize the development of VLI units, in particular, as these households are at risk of homelessness, threatening to further deepen the schism of income and racial inequality in the community.

In order to meet the 2021-2029 RHNA allocation, we recommend consideration of the following:

**1. Provide local incentives to streamline 100% affordable housing.**

As a replacement for AAHOP, consider code revisions that would allow 20 u/a density by-right for 100% affordable housing developments, irrespective of the underlying zoning. All too often affordable housing developers cannot pursue potential housing sites because of the uncertainty and cost required by zone changes and general plan amendments for sites subject to exclusionary zoning designations such as R-1 and CR. While certain State laws have provided pathways for streamlined ministerial approval of affordable housing developments, these State tools are imperfect and are limited in their applicability. Many of the streamlining state laws have specific criteria, including consistency with base land use designations and impose new requirements that can increase project costs. We need a replacement for AAHOP that truly streamlines and facilitates increased affordable housing production; ministerial approval of 100% affordable housing projects with a base density of 20 u/a will materially incentivize housing production. Streamlined, by-right densities for 100% affordable housing can facilitate housing opportunity along transit corridors distributed equitably throughout the City, without concentrating low-income housing in any one zone. This is more efficient than rezoning specific sites or applying additive zoning designations which convolute design and planning efforts. In devising a replacement AAHOP program, the City should not incentivize higher densities without ensuring 100% affordability as this could drive up land values and attract interest from market-rate developers.

**2. Make Oxnard a more inclusive community by increasing Inclusionary Housing Ordinance requirements.**

We urge the Oxnard Planning Commission to increase the inclusionary housing requirement up to 20% across all residential development, rental and for-sale. We recommend referencing the City of Goleta's inclusionary housing ordinance linked here <https://www.cityofgoleta.org/home/showpublisheddocument?id=22902>. The Goleta inclusionary ordinance provides a 20% inclusionary requirement, but states that a reduction to 15% will be considered for projects with exceptional community services. This provision could give staff the tools to secure a maximum potential number of affordable units, while providing flexibility to decrease the requirement to 15% for sites/projects with exceptional services and amenities. The inclusionary requirement should only target production of ELI, VLI, and LI units. This is a critical policy step the City can take to reverse the inequitable impacts of exclusionary zoning that has contributed to residential segregation and inequitable opportunities for black indigenous and people of color.

**3. Streamline alternative housing models including efficiency housing projects.**

Consider an efficiency units ordinance, similar to the City of Santa Maria's efficiency unit ordinance which allows efficiency units, irrespective of income level or population served, in specific zones. This could facilitate more streamlined production of permanent supportive housing for vulnerable populations including seniors, adults with a disability, and individuals experiencing homelessness. We recommend allowing up to 10% of units that are 2 bd within efficiency housing projects, to allow a second bedroom for caretakers and or medical equipment.

**4. Streamline affordable housing for farmworker housing developments.**

Consider allowing multifamily affordable housing for farmworkers by-right. Currently, there is a State law designed to streamline affordable housing for farmworkers but it is extremely limited in its applicability because it is meant for H2A farmworkers and it only applies to agriculturally zoned land. The latter is counterproductive, particularly given our community's commitment to preserve open space and agricultural land, which also commonly lacks needed infrastructure. The City of Oxnard has the largest population of farmworkers, and as is widely documented, the majority of farmworkers in the community are permanent residents (here to stay). The City of Oxnard could be a leader on the issue of farmworker housing by taking a bold position that would allow farmworker housing in all residential and commercial zones.

**5. Ensure the ongoing affordability of ADUs.**

The draft 6<sup>th</sup> Cycle Housing Element relies very heavily on the production of ADUs. ADUs are singular housing units, without access to onsite amenities, services or property management as would be available in a multifamily setting. ADUs are exclusionary to households with more than one or two-persons. The draft Housing Element states that 1,000 ADUs are anticipated to be affordable to lower-income households. To ensure this goal is met, the ADU regulations should limit use of ADUs as short-term vacation rentals and the 1,000 ADUs should be affordable to very-low and low-income households. Without protections to ensure continued affordability of ADUs, these could end up displacing the population they are intended to serve.

**6. Reduce, defer or waive development fees including impact fees for 100% affordable housing projects that include units designated for ELI and VLI households.** This measure could help to reduce and or defer project costs, thereby incentivizing the development of a variety of types of housing for vulnerable populations. Impact fee loans that could be repaid from residual receipts would also be helpful. The production of affordable housing for extremely-low, very-low and low-income housing reduces public expenditures in other areas including public health and public safety. This is a financial tool the City can offer to incentivize affordability without obligating general fund or entitlement program dollars.

**7. HCD Pro-housing designation.**

HCD will shortly release a new program called the pro-housing designation which is aimed at housing production and aligns with state goals including fair housing. HCD will help municipalities by providing a menu of options designed to facilitate housing production. HCD will be doing outreach and will provide technical assistance. Affordable housing projects located in pro-housing jurisdictions will likely score more competitively for HCD affordable housing funding programs. This is another tool the City can pursue that could leverage State investments in affordable housing, without obligating general fund or entitlement program dollars.

**8. Contribute to a Countywide permanent source for affordable housing.**

Continue to support the efforts of the Housing Trust Fund Ventura County by making an annual contribution to support its provision of short term, pre-development, acquisition, and construction funding to developers of affordable housing. Support the creation of a county-wide dedicated source of funding for affordable housing. Without a county-wide dedicated source of funding, the City will be hamstrung in its efforts to meet RHNA allocations and be entirely dependent on limited and extremely competitive state and federal sources for affordable housing.

**9. Farmworker Housing Study.**

Work with the County of Ventura, advocacy groups, and agricultural organizations to plan, fund, and implement a countywide survey of farmworkers, employers, and housing providers to further define housing conditions, needs and barriers for farmworker households. Utilize the survey results to develop

targeted programs and strategies to address the verified needs of farmworkers and to support agricultural businesses with a stable and healthy workforce. *Note: On February 9, 2021, the Ventura County Board of Supervisors approved inclusion of the Farmworker Housing Study in the programs of their Draft 2021-2029 Housing Element.*

We believe these programs, incentives and policies will best position the City to meet its RHNA obligation. Thank you for the opportunity to provide feedback on the 6<sup>th</sup> cycle draft Housing Element. We are eager to support the City's efforts to respond to the community's housing needs.

Signed,

*These Concerned Community Members, Affordable Housing Advocates, and Affordable Housing Developers:*

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