

HOUSE FARM WORKERS!

Promoting safe, decent, and affordable housing
For farm workers and their families

Guide to Advocacy for Farm Worker Housing in 6th Cycle Housing Elements

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This guide describes advocacy activities of *House Farm Workers! (HFW!)* of Ventura County within the process of updating 6th Cycle (2021-2029) Housing Elements (HE) and offers strategies based on *HFW!'s* experience in eleven Ventura County jurisdictions from 2019 to 2022.



Fillmore City Hall after City Council meeting

(left to right) Gabrielle Vignone, Executive Director, *House Farm Workers!*; three youth from One Step a la Vez; Ana Rosa Rizo-Centino, former Executive Director of One Step, now working for Santa Paula Latino Town Hall

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Why Housing Elements are Important – and Difficult

The Housing Element is one of the seven required chapters of each City/County’s General Plan required by the State of California. Unlike other chapters of the general plan, State law requires the Housing Element to be updated every seven-eight years (in some cases, four years). Each City and County in California is assigned housing goals in four income categories for the HE period and must identify policies and programs designed to reach that goal. It’s understood that local governments can’t force the private market or non-profit developers to build or rehabilitate housing, but the HE includes analysis of constraints to housing development and programs to address any constraints. The needs of special groups of the population such as elderly, disabled, large families, and farmworkers must also be evaluated, and commitments made to address those needs.

Adopting a program in the HE is a binding commitment, and the State Department of Housing and Community Development (HCD) requires an annual report on each City’s or County’s progress in implementing the programs in the HE. HCD has staff dedicated to enforcement and accountability. Involvement in the HE update process is time-consuming, but can be valuable because it locks in City/County commitments to policies and programs (with timing and funding) that affect affordable housing for the next eight years.

HEs are lengthy and complex documents – rarely fewer than 80 pages. As the statewide housing crisis has deepened, the State legislature has stepped up the pace of frequently adopting new legislation related to affordable housing (more than 30 bills in each of the past two years). Given the challenges of limitations on staff and volunteer time and energy, *HFW!* evolved from an overall HE review to focusing on the description of farmworker housing needs and the HE’s program of actions. Activists can consider prioritizing focused review of certain topics rather than the entire HE document. HCD is particularly interested in local knowledge about proposed housing sites.

BUILDING RELATIONSHIPS

Preparing for involvement

Contact the Planning or Community Development staff of your city/county of interest and ask to be added to mail/email contact lists to receive notifications about the HE process and public meetings and hearings. *HFW!* staff began this in 2019.

Introduce yourselves to staff responsible for the HE. Ask if there are any advisory committees you could join or stakeholder meetings you could attend. Present yourself as a potential partner in developing an award-winning and effective HE.

Read the current HE ([Housing Element Download Tool | California Department of Housing and Community Development](#)) and most recent Annual Report to HCD on HE Progress [Annual Progress Reports \(ca.gov\)](#) (due April 1 for prior calendar year) – both can be viewed on the HCD website.

Review the Action Plan in the current HE and achievements so far and make preliminary list of data/information sources useful in HE update.

HFV! staff drafted a HE Advocacy Packet for volunteers on City Committees to prepare for the HE Process, as well as a city background document that included the staff contact info, notes on communications with staff (especially update schedule), and excerpts from the current (2014-2021) HE that dealt with farmworker housing.

Building relationships with decisionmakers and staff

Remember: it takes 3 out of 5 (or 4 of 7, 6 of 9) votes on the Planning Commission/City Council/Board of Supervisors to approve anything desirable or block anything terrible

Elected officials (and appointed officials such as Planning Commissioners): It is strategic to get to know your elected officials long before you need their vote on the Housing Element. Establish rapport by working jointly on something you agree on: volunteer work, holiday parade/event, asking questions at candidate forums that make them shine.

Besides introducing your group or committee, an agenda for an introductory meeting with new elected officials could include an offer to provide information or research on housing topics of interest to the official.

The orientation of newly elected officials varies from city to city. They may have attended a California League of Cities orientation for new officials, but the December 2020 curriculum included just one hour on California land use and housing regulations

in the day and a half meeting. The curriculum emphasized the rules for conducting meetings, Brown Act, ethics, and Public Records Act. Your official may have a specific interest or question – “can you tell me what other cities are charging for in-lieu housing fees?” – that you could help with.

Staff: *HFW!* can provide examples from numerous cities in the HE update process showing the value of establishing good rapport/cordial relationships with City staff. Sometimes staff shared draft documents and sought *HFW!* input in advance of public meetings. In several cases, staff were willing to meet with *HFW!* committee members to discuss topics in depth outside of the formal public meetings with three minute comment limits and little back-and-forth. An informal discussion of prominent *HFW!* Board members with Ventura County senior staff led to a key change in the HE program dealing with the constraint of competing development regulations from a variety of agencies who have overlapping jurisdiction. Initially, County staff acknowledged the problem but were unsure of how it might be resolved. After meeting with *HFW!*, they revised the HE program wording to recommend steps towards developing solutions.

Collaboration with Community and Allies

Community members: Begin to identify community members/leaders, especially those active in community organizations, and listen to their stories, paying special attention to those related to housing. Examples include churches, parent-teacher-student organizations or committees, local serving non-profits, construction unions, and for *HFW!*'s focus on farmworker housing: agencies such as Ventura County's Farmworker Resource Program, Migrant Education Programs within School Districts, and health clinics.

Allies: Analyze potential partner groups and leaders in the community who might sign on to a comment letter, speak at a public hearing or meeting, write a letter/comment for newspaper or social media. Contact organizations who could testify/make comments that complement yours and support them by adding you to their letters and comments. An example letter of April 1, 2021, signed by six representatives or organizations to comment on the City of Oxnard HE, is attached. *HFW!*'s ally groups in this HE Update cycle included the Homes For All Alliance, Vulnerable Populations Affordable Housing Network, Ventura Social Services Task Force, Santa Clara Valley Together, and YIMBY Ventura County. Check for a local representative of YIMBY's Campaign for Fair Housing Elements at <https://www.fairhousingelements.org>.

HFW! facilitated the creation of the Fillmore and Piru Affordable Housing Task Force, which held a “Town Hall” meeting in August 2022 to supplement the public workshops sponsored by the City of Fillmore.

MECHANICS OF INVOLVEMENT IN HOUSING ELEMENT UPDATE PROCESS

The cycle of community engagement, public hearings, and released documents

Look for each city’s schedule of the HE Update process and start a calendar of community workshops/engagement events, public hearings, release of draft documents, and deadlines for comments. Some cities (or their consultants) create a separate website/subpage for the Housing Element update process. Often the documents are accessed through the City Council/Planning Commission meeting agenda information posted online, i.e. attached to staff reports that are linked to the agenda action or public hearing.

Housing Element Process – Legally Required Public Hearings:

- Planning Commission (PC): Draft Housing Element, PC makes recommendation forwarded to City Council or County Board of Supervisors (BOS)
- City Council/County BOS: Draft Housing Element, approved for submission to State HCD
- Planning Commission: Final Housing Element i.e. revisions to the Draft to respond to the comments of the State HCD, PC makes recommendation forwarded to City Council/BOS
- City Council/County BOS: Final Housing Element, approve submission to State HCD for approval then certification

Public Hearing requirements:

- Legal Notice of hearing (published? Emailed? Posted? Bilingual?)
- Documents, such as Draft and Final Housing Element, must be publicly available in advance of the hearing (30 days; where - library, online, City Hall?); Staff report and resolution for PC/City Council/BOS action 3 days in advance of meeting per Brown Act requirements

- Letters received during the comment period or at the hearing become part of the hearing record
- 3 minutes for each speaker to comment at public hearing within City Council/County BOS meeting (sometimes shorter, e.g. 2 minutes or 90 seconds, if there are a lot of speakers)
- Translation available at public hearing according to the practices of the City or County for their City Council/BOS meetings

Required Public Review Period for Drafts

Note that AB 215, signed by the Governor on September 28, 2021, amended Section 65585 of the Government Code:

65585. (b) (1) At least 90 days prior to adoption of a revision of its housing element pursuant to subdivision (e) of Section 65588, or at least 60 days prior to the adoption of a subsequent amendment to this element, the planning agency shall submit a draft element revision or draft amendment to the department. The local government of the planning agency shall make the first draft revision of a housing element available for public comment for at least 30 days and, if any comments are received, the local government shall take at least 10 business days after the 30-day public comment period to consider and incorporate public comments into the draft revision prior to submitting it to the department. For any subsequent draft revision, the local government shall post the draft revision on its internet website and shall email a link to the draft revision to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting the draft revision to the department.

(2) The planning agency staff shall collect and compile the public comments regarding the housing element received by the city, county, or city and county, and provide these comments to each member of the legislative body before it adopts the housing element.

Other Public Engagement Activities: (no specific number or format required, but encouraged by HCD)

- Public meetings, workshops, pop-ups, open houses
- Survey: online or on paper
- Stakeholder interviews

- City Council/BOS meetings of committees, subcommittees, commissions dealing with Housing and Community Development

Schedule of Involvement and Time Commitment

Ideally, building successful relationships with elected/appointed officials should start years before the HE update process begins, and certainly before the HE is adopted and determines city/county policies and programs for the next eight years.

It's important to understand the timing of the cycle of each HE and begin work in advance of the process. (Northern and Southern California HEs are on different schedules.) To quote Ellen Brokaw, co-founder of *HFW!*: **START EARLY!**

Consultant selection and contracting: Watch the City website for release of Request for Proposals for Consultants to conduct the HE Update process, then track when a consultant proposal is attached to a contract for City council approval. When considering potential comments on the consultant contract at a City Council meeting, pay close attention to the scope of work for the community engagement process – how much is the City staff doing vs. the consultant, and plans for translation of written documents and interpretation at meetings, including indigenous languages if relevant in your community. The consultant contract will contain a schedule, usually month by month with approximate target dates for work products.

Time commitment: Be prepared for the HE Update process to take months after contracting with the consultant begins. A 'fast track' process would include:

- Community outreach (no required timing, many cities devote 60-90 days)
- Release of Draft HE – 30 day public comment period (required after January 1, 2022 by AB 215) – and advertisement of public hearings
- Public hearing of Planning Commission (PC) and then City Council (CC) (could be achieved within 40 days, allowing for 10 business days to respond to comments raised at the PC hearing and incorporated into draft presented to CC)
- Submission of draft HE to HCD for 90 day review period
- City receives HCD comment letter by the end of the 90 days, makes appropriate revisions e.g. within 30 days, and then releases draft of Final HE that incorporates the revisions
- Public hearing of PC and then CC (30 days depending on PC comments and how quickly they are addressed)
- Transmitted to HCD for final review (30 days)

- If HCD approves, CC action scheduled for certification (14 days)

Therefore, adding up the time periods, the process is a minimum of 284 days or 10 months. But the 2020-2022 processes have typically taken longer, in part because of the impact of COVID on office closures and HCD’s delays in releasing the guidance to address the Affirmatively Furthering Fair Housing requirements.

Strategy/Tips for Effective Input

Consider overall strategy for inclusion of essential programs (within the Action Plan, Policies, or Goals discussion of the HE): Focus on your top three priority items. Mention them early in the process, check if they are included in drafts and addressed in staff reports. [Note: you aren’t limited to recommending three programs; some coalitions have submitted letters with ten or more proposed programs which were all successfully addressed.]

Focus most on Policies and Action Programs that will facilitate more affordable housing and access to that housing. Examples are rental assistance, multi-lingual outreach, financing, surplus sites donated to land trust, removal of barriers for undocumented persons to access affordable housing, overlay zones, first time homebuyer programs, and fair housing services to combat discrimination. Note: this comment is not intended to minimize the importance of commenting on the list of housing sites when you have local knowledge about their suitability/feasibility – HCD staff are eager to hear from you about sites that local people know are probably not realistic.

Give written recommendations at ALL stages including Planning Commission and City Council meetings and to HCD. Try to understand the local deadlines for submitting written comments that will be distributed to the decision-makers and included in the public meeting record. Some jurisdictions stated in 2020 that “Comments on the HE can be submitted by email anytime/ongoing for months” but in that scenario, there seemed to be no clear identification of what the staff response is and whether the staff recommendation on that comment is or isn’t presented to the decision-makers.

Provide verbal testimony at meetings: Whenever possible, tell a factual story and/or bring a person who is unable to find affordable housing or experiencing other housing problems, to highlight the need and reasons for your recommendations. A note about coordination of comments: keeping in mind the time limits on speakers (usually three

minutes, but sometimes 90 seconds!), work with allies or team members to decide the most important/key concepts to say out loud on the record in the meeting (even if you have submitted beautiful written comments, what if no one read them beforehand?) and then: (1) either split them up (i.e. five people speaking for three minutes each could get through a list of fifteen comments in the total fifteen minutes) or (2) give a title to the list of proposed policies/programs such as the “Happy Homes for Everyone” strategy letter and then the speakers can express their support for that document without getting detailed on the specifics. DO NOT have a series of speakers who repeat the same comment unless it’s something very short and focused: “I want to also say that there are not enough affordable apartments for large families with disabled family members because my family of six people looked for nine months for a place to rent.”

Recommend specific language to be adopted. State the HE page number and HE section number, and use track changes to propose text revisions, for example, that Program X should “add such-and-such wording that would make the program more effective and strengthen accountability to achieve it.”

Formatting input: A letter for comments in narrative format is acceptable, but when there is a list of comments/specific wording changes, it can be more effective to format them as a table. Columns in the table could include: topic, page number of document, quote from document, proposed rewording, comment/explanation for requested revision.

After the Draft document is revised and issued as Final: Check to see if the Final document shows the changes requested in track changes. If not, compare the Draft and Final with the comments that were submitted to identify whether the comments were addressed and changes made. If they weren’t, submit a comment letter on the Final that describes the original request and the wording in the Final HE that did not respond to the request.

Community Engagement and Outreach: people who don’t speak English

Make sure that the staff and consultant outreach efforts are culturally and linguistically appropriate and designed to maximize participation by all segments of the community.

HCD Requirements in Multi-Lingual Multi-Cultural Communities: HCD does not explicitly require cities to translate public meeting/hearing notices and other public documents of the HE process into other languages. But in April 2021, HCD issued guidance on Affirmatively Furthering Fair Housing [Affirmatively Furthering Fair](#)

[Housing \(ca.gov\)](https://www.ca.gov) which specifies outreach requirements on pages 10-11 and 21-22: “*The preparation, adoption, and implementation of a housing element requires a diligent effort to include all economic segments of the community. AB 686 reinforces and builds on this requirement. The element must describe meaningful, frequent, and ongoing community participation, consultation, and coordination that is integrated with the broader stakeholder outreach and community participation process for the overall housing element.*”

Based on HCD’s requirement for public participation and outreach “to include all economic segments of the community,” you could consider notifying HCD when you believe that a segment of the community is overlooked when there are no meeting materials in appropriate languages.

Meeting Announcements: Monitor the community engagement process to check that announcements of meetings/events and opportunities for comment are translated into appropriate languages. For example, the City of Camarillo does not currently translate any of its Public Hearing Notices. In the fall of 2021, the “Notice(s) of Public Hearing” was written in English, with one sentence at the bottom: “*Para asistencia en español, por favor de contactar el Departamento de Desarrollo Comunitario y comunicarse con Monique Martínez al 805.388.5360.*” In December 2021, *HFV!* submitted a written comment to the City suggesting translation of the Notice title – the subject of the public hearing – in Spanish, with the sentence about assistance immediately following, instead of at the bottom of the page, and noting that ideally this would be for all public hearing notices and not just for the Housing Element update process. But by April 2022, Camarillo public hearing notices were only in English - the one sentence in Spanish is no longer included.

Interpretation at Meetings: Some jurisdictions provide oral interpretation in Spanish – and in the case of the County of Ventura, Mixteco as well – if a non-English speaker wishes to make a comment in the public comment portion of a meeting/hearing. However, there is rarely interpretation of the public meeting in Spanish or an indigenous language so that the Spanish-speaker can understand what has been discussed.

A notable exception is Housing Element Community Workshop #1 (virtual) in Fillmore which began with an introduction to the HE in English, with simultaneous interpretation in Spanish, and then the Spanish-speaking workshop participants were offered an opportunity to go to a virtual break-out “room” for Spanish-language slides and a fully interpreted back and forth of staff narrative presentation and questions and answers. Both the Spanish and English language versions were recorded on Vimeo and can be viewed at [Fillmore Housing Element Update | Social Pinpoint \(engagekh.com\)](#)

Encouraging Public Comments – Legal Sensitivities: In addition to language, a potential barrier for individual farmworkers or others to speak or write a public comment may be legal status and fear of potential reprisal. In these situations, it is useful for a representative of the person to speak instead, and report that “a colleague, friend, or relative told me about....”

In past years, the managers of farmworker housing projects, such as those owned by the Cabrillo Economic Development Corporation, were able to assist *HFW!* with access to inform tenants about opportunities for public comments. Unfortunately this was not possible these past two years due to pandemic safety protocols.

Strategy to involve youth: In Fillmore, *HFW!* is working closely with the “One Step a la Vez” nonprofit youth program to help youth become more familiar with the experience of making comments at a public meeting. With the encouragement of a supportive Councilwoman, teens wrote out their comments and practiced reading them to check that they were under three minutes. Then they planned to attend the meeting in City Hall together, wearing matching t-shirts, so they would feel team support when making the comments.

Solution to lack of appropriate equipment for virtual meetings: During the 2020-2022 period of online meetings and public hearings, some farmworkers and community members with Limited English Proficiency (LEP) did not have access to quality broadband service, home computers with appropriate camera/sound equipment, and/or sophisticated cell phones. Central Coast Alliance United for a Sustainable Economy (CAUSE), a nonprofit organization based in Ventura, developed an effective work-around solution: at a community center or office of the organization, they set up a computer, registered everyone who wished to speak at the City Council meeting, and logged on to the meeting. When the City Clerk called their name, each person took a turn sitting at the computer with camera to make their comment within the three minutes (or six minutes if their Spanish-language comments were also interpreted in English). When they finished, the speaker moved back to their original seat (where they were masked and distanced), the next person was called, and that person went to the computer seat to speak. This can be viewed in the City Council meeting of August 2, 2021 [City Council Meeting - 8/2 - Aug 2nd, 2021 \(granicus.com\)](#) at minute 2:47 to 2:52.

The power of “lived experience” testimony: Statistics, data, and generalized statements can communicate about the extent of a problem but may lack heart and soul to convey the human suffering that the data represents. Examples from the August 2, 2021 Ventura City Council meeting (video at [City Council Meeting - 8/2 - Aug 2nd, 2021 \(granicus.com\)](#)):

- a woman formerly unhoused for 19 years, Irene Johnson, living in a riverbed, coaxed by a police officer to go to a homeless shelter, obtained a Section 8/Housing choice voucher, and then her case manager called landlords every day for seven months to find an apartment that would accept it; she has lived there happily for fourteen months, sober, stable, healthy, grateful [minute 2:38]
- a disabled tenant, Liz Campos, evicted after her apartment building sold, searching unsuccessfully for a new apartment with physical adaptations to accommodate her injured spine condition [minute 2:53]

Who cannot grasp the impact of the lack of accessible housing for the disabled, or problems of landlords not accepting Section 8, after hearing these stories?

AN EXAMPLE OF ADVOCACY WORK: *HFW!*

House Farm Workers!: Mission and Organization

The mission of HFW!, founded in 2004, is “To promote safe, decent, secure, and affordable housing for Ventura County farm workers and their families through education and advocacy.”

Organizational Structure for HE Advocacy: Education and advocacy work is carried forward by the ten person Board of Directors and committees of volunteers (City Groups) in six of Ventura County’s ten unincorporated cities: Camarillo, Fillmore, Oxnard, Moorpark, Santa Paula, and Ventura.

House Farm Workers! staff consists of the Executive Director and one part time Program Assistant. Over the years, the City Committee structure has enabled *HFW!* to leverage limited funds and staff resources.

The Chairs of the City Committees are often members of the Board of Directors. City Committees have considerable autonomy to tailor education and advocacy to the needs of their individual communities. In two cities, the *HFW!* City Committees have convened and chaired Affordable Housing Task Forces. In two other cities, *HFW!* partnered with another

HFW! volunteers represent a mix of backgrounds, experience, and professional expertise in affordable housing, in addition to interest in farmworkers. Committed volunteers have included a former mayor, retired County Planning Director, past Deputy County Agricultural Commissioner, Farm Bureau Executive Director, project managers for affordable housing developers, and farmers. Anyone is welcome to participate in the city committees, but people have tended to be knowledgeable about many of the issues and existing solutions. In one city, new volunteers felt overwhelmed by the technical expertise of the other committee members.

organization: an affordable housing group in one city, and in Fillmore, a youth organization that includes many children of farm workers – One Step a la Vez.

City Committee Chairs periodically hold special meetings together to share updates and generate ideas for city agendas and projects.

House Farm Workers! Commitment to Housing Element Advocacy Work

HFW! first engaged in Housing Element work in several cities in 2014 when the staff person submitted comment letters.

In 2020, the Board of Directors identified work on the 6th cycle 2021-29 Housing Elements as a major focus, with initial steps of creating a “Housing Element Advocacy Packet” for volunteers and hiring a consultant to support the HE effort.

When the then *HFW!* Executive Director Sonja Flores prepared comment letters on HEs, she became so interested in housing policy and programs that she enrolled in California Polytechnic University- San Luis Obispo for a degree in City Planning! Next she started working in development of affordable housing and today is a Project Manager in the Development Department of the Housing Authority of the City of San Buenaventura.

City Committee logistics: Each Committee has a Chair or Co-chairs, who participate in “All City Committee Chairs” (CCC) meetings, called as needed, to share updates and generate ideas. Agenda topics at the CCC meetings included updates on state regulations and exploration of topics such as requirements for multi-lingual outreach, and potential over-reliance on Accessory Dwelling Units (ADUs) to meet housing targets.

The City Committees usually met monthly, for less than two hours, with additional urgent meetings as needed to prepare for public hearings. The agenda for each meeting is usually formed by the chair in consultation with *HFW!* staff and/or consultants and when resources permit, summary notes of each meeting are made. City tracking sheets noted the dates of public meetings, emails/comments, document release, and committee meetings in one place.

In the HE update process, the committee chair would track the dates of community engagement events and activities (e.g. workshops and online surveys), the release of documents for comments, and public hearings. Emailing drafts of comments and coordination of presenters at meetings was essential between monthly meetings due to significant time constraints – often the draft documents were made available to the public just three days ahead of the Planning Commission/City Council Public Hearing in accordance with the state Brown Act. (This happened frequently in 2021, but

effective January 1, 2022, cities are required to provide 30 days for public review of the Draft HE.) Zoom meetings helped committee members to practice reading draft comments and checking the timing within the three minute limit (sometimes reduced to two minutes or 90 seconds if a meeting had a large number of people wishing to speak).



In Fillmore, HFW! facilitated the creation of the Fillmore/Piru Affordable Housing Task Force, which held a “Town Hall” meeting in August 2022 to supplement the public workshops sponsored by the City of Fillmore.

Speakers at Fillmore Town Hall on Housing



Element, left to right: Joe Ramirez, Interim Development Director at One Step a la Vez and HFW! Board member; Gabrielle Vignone, Executive Director of HFW!; Lynn Edmonds, City Council member, and Christina Villasenor, City Council member.

HFW Board of Directors: Throughout the HE Update process, the HFW! Board reviewed reports from the All City Committee Chairs meetings at monthly board meetings. Acknowledging the complexity of HEs and conscious of the limited time of volunteers to review lengthy bureaucratic documents with very detailed analyses, the Board endorsed a focus of advocacy activities to include two priority programs in HEs and to commit resources for coordination.

Overall Coordination: HFW! found it helpful to designate a coordinator to track overall Housing Element progress in each city, alert City group chairs of document release and public hearing dates, help them prepare written and oral comments, and provide in depth analysis of inclusionary housing and other programs and policies. An

example of a calendar of public meetings and milestones in the process is attached, titled “Overall Tracking Sheet: All HE’s in Ventura County.”

HE Comments and Requests for Programs

Highest Priority Programs: Initial advocacy work involved proposing two programs to the County of Ventura, who adopted both:

- ***Countywide Farmworker Housing Study:*** The City/County will (1) work with the County of Ventura, advocacy groups, and agricultural organizations to plan, seek funding through grants or other sources, for the implementation of a countywide survey of farmworkers, employers, and housing providers to further define housing conditions, needs and barriers to farmworker housing and (2) utilize the survey results to develop targeted programs and strategies to address the identified housing needs of farmworkers and to support agricultural businesses with a stable and healthy workforce.
- ***Funding for the Housing Trust Fund Ventura County and permanent source of funding for affordable housing:*** The City/County shall continue to support the efforts of the Housing Trust Fund Ventura County, a local nonprofit organization that provides short term, acquisition and pre-development funding to developers of affordable housing. In addition, the City/County will coordinate with local agencies and community stakeholders on the creation of a countywide dedicated source of funding for affordable housing.

HFW! City Committees subsequently requested inclusion of those two programs in each city’s HE Action Plan.

Additional programs and comments: In addition to the request for two key programs listed above, *HFW!* and allies developed additional program recommendations that, although not specifically targeting farmworkers, would increase the supply of housing available to them by focusing on resources for very low and extra low income families. These included:

- Inclusionary Housing;
- Affirmatively Furthering Fair Housing Programs;
- delaying payment of city impact fees for affordable housing projects;
- ensuring adequate city staff to implement housing programs and policies;
- tenant protections and rent stabilization;

- identification of Accessory Dwelling Units (ADUs) to fulfill the Regional Housing Needs Analysis (RHNA) goals;
- repurposing underutilized sites; and
- requiring an annual public workshop to review progress on HE goals, separate from the public hearing on the Annual Progress Report.

Depending on the volunteers involved, in some cities, *HFV!* commented on the list of suitable housing sites. Another source of concern that could become a comment was public outreach in the update process, especially making sure the City offered appropriate access for non-English speakers.

Slate of programs: In several cities, *HFV!* worked on the HE collaboratively in alliances with others, and supported a slate of requests for actions proposed by the group. Examples include *HFV!* signing the “Homes For All” letter with eleven requests for the City of Ventura HE (all eleven were accepted) and the April 1, 2021 letter to City of Oxnard Planning Commission (attached).

Affirmatively Furthering Fair Housing (AFFH) and Programs: In 2018, the State legislature approved AB 686 with new and expanded HE requirements for affirmatively furthering fair housing. This required more in depth analyses of patterns of segregation, disparate resources according to poverty and race/ethnicity, gentrification; and the promotion of programs to address those conditions. HCD detailed the requirements of this complex exploration in 91 pages of guidance issued April 2021, which usually resulted in new sections of the Draft HEs of more than 50 pages. On September 29, 2021, the legislature passed AB 1304, 45 pages, with the purpose of clarifying AB 686.

When time permitted, *HFV!* compared AFFH programs in the HE to the recommendations in the 2020 “Countywide Analysis of Impediments to Fair Housing Choice” (AI), a document required every five years by recipients of federal funds from the US Department of Housing and Urban Development (HUD). The County and many of the cities receive grant funds from HUD’s Community Development Block Grant (CDBG) and HOME programs, and spend a portion of those funds for fair housing services.

In some cities, the organization of the AFFH programs within the HE was somewhat awkward because the “meaningful actions” to address fair housing issue identified in the AFFH section did not necessarily carry over specifically into the Action Plan of programs with goals and policies in another chapter of the HE.

Measuring Success

The most significant accomplishment of *HFW!*'s advocacy efforts was the early 2021 adoption by Ventura County of a HE program to undertake a countywide farmworker housing study, and for the County to take on the role of coordinating the study. From then on, *HFW!* was able to quote to the cities in Ventura County, including the four that were not the focus of *HFW!* advocacy (Ojai, Port Hueneme, Simi Valley, Thousand Oaks), that the County was leading the study and the cities were requested to participate. Five cities included the farmworker housing study in their Draft HE Action Plan. The second priority request, action to support the Housing Trust Fund Ventura County and create a countywide dedicated source of affordable housing funding, was adopted in full or partially by Moorpark, Oxnard, Santa Paula, Ventura and County of Ventura. The attached table, “Sixth Cycle HEs in Ventura County: Status of *HFW!* Requested Wording,” provides specifics.

Communications Planning and Social Media

HFW!'s organizational communications tools include: a website ([Why Our Work Matters - House Farm Workers!](#)), e-newsletter sent to curated mailing list, and postings on Facebook, Instagram, and LinkedIn. [December 2021 newsletter [December 2021 Year End Newsletter - House Farm Workers!](#)] Posting on Facebook [[\(20+\) House Farm Workers | Facebook](#)] about City Committee/Task Force meetings helped attract new people. Otherwise, email lists were created and maintained for each City Committee to send the Committee meeting agendas, with links and related documents, to prepare for meetings and coordinate comments on the HE documents. Overview information about the City Committees and how to participate is posted on the *HFW!* website year-round [Get Involved - House Farm Workers!](#).

The changing landscape of local serving hard copy newspapers and online news make sustained media communication more difficult than in the past, when (1) letters to the editor and opinion pieces could supplement news articles to raise awareness about conditions and potential solutions, and (2) it was possible to cultivate relationships with reporters over time who became subject matter experts. In February 2020, *HFW!* coordinated a meeting of the Ventura County Task Force on Farmworker Housing; fifty people, including elected officials and their staff, attended a presentation on “How Great is the Need? Developing a Comprehensive Action Plan for Farm Worker Housing in Ventura County.” The reporter at the *Ventura County Star* daily newspaper who covered that meeting, [New study of farmworker housing in Ventura County proposed](#)

vcstar.com), and wrote many other articles related to farmworkers and County agriculture, transferred to another newspaper in Orange County six months later.

There were few television news stories covering the HE process in Ventura County (hard to compete with “if it bleeds, it leads”), although, in 2020 especially, there were news stories about the impact of the pandemic on farmworkers, the national food supply, and COVID-19 breakouts in seasonal housing provided by employers. This brought attention to the fact that farmworkers are essential workers, and that a safe and secure food supply requires a stable healthy trained workforce living in quality affordable housing.

HFW! has used Facebook Live events and posting video clips as tools to inform the public about advocacy opportunities and to attract more volunteers. The Ventura County Farmworker Resource Program (FRP) posts on their Facebook page short videos with health and services information in several languages.

Special Challenges in 2020-2022

The COVID-19 pandemic forced changes in how California cities conduct public meetings – the Governor issued an emergency order to suspend portions of the Brown Act requiring in-person attendance to comment at public hearings or meetings. Each City adopted their own procedures for submitting written comments by email and participating in meetings by Zoom online or by telephone. Over time, starting in spring 2022, some cities returned to in-person comments only in City Council chambers, and in some cases, a hybrid of in-person and remote via telephone or Zoom.

Reflections and Thoughts for the Future

Express Gratitude: It was more important than usual to be kind. *HFW!* continued to thank staff, consultants, and officials for their work and the chance to participate in the HE update process, whenever there was an opportunity. This built on the foundation of good relationships that *HFW!* established previously and has maintained over many years.

Working in Covid-19 Conditions: The pandemic offered opportunities – and obstacles. The closure of City Halls and move of public meetings to Zoom/online meant that those with the right equipment and internet signal strength could participate from wherever they were, with no worries about driving to a night meeting, arranging

for child care, local transit schedules that don't run late enough at night, or accommodating physical disabilities. But the virtual meetings also reduced community engagement events where less formal interactions, such as dot voting exercises, can facilitate deeper discussions than may occur in structured public meetings where oral comments are limited to 3 minutes. It is hard to anticipate the potential impacts of returning to open/must-attend-in-person meetings on *HFW!*'s approach.

Would facilitating more participation from people with “lived experience” have changed outcomes in the HE Update process? Perhaps the programs and policies would be the same, but hearing the stories of people with the lived experience might make more of an impression on elected officials about why the programs are important? Pandemic safety protocols made it more difficult to gather people, educate, discuss, and organize their participation in meetings where technology was required. Would Ventura area radio stations such as Radio Indigena be a useful tool for publicizing gatherings and meetings?

State Legislature: There were so many new State regulations to contend with! Changes in real time during the SCAG 6th cycle timeline – e.g. the AFFH guidance (91 pages) not released by HCD until April 27, 2021 followed up by 45 pages of “clarifications” in AB 686 of September 2021. Thirty new bills were approved in the fall of 2020 AND another 30 in 2021 -- a lot for volunteers to keep up with.

When HFW! comments on HEs are ignored: HCD reviews appeared inconsistent concerning checking that HEs describe all of the public comments received and how the City addressed those comments. It is rarely mentioned – especially in the four cities (Ojai, Port Hueneme, Simi Valley, Thousand Oaks) where *HFW!* had sent a letter rather than make verbal comments at a meeting. *HFW!* could consider being more active about reporting this to HCD and resubmitting those comments that a city overlooked to HCD directly. When asked about this at a meeting in November 2022, HCD staff stated that not every comment letter received needs to be attached in full to the HE, but a summary of public comments with the City's response is required.

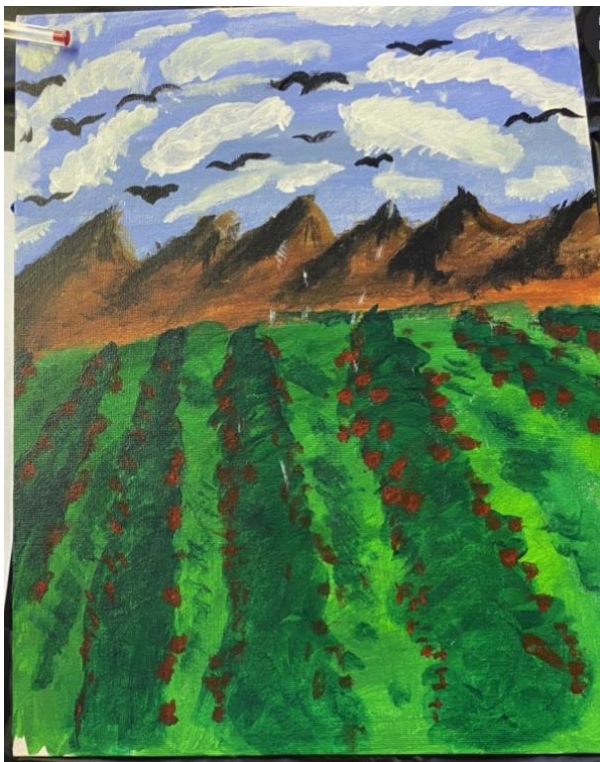
Participation by more people with “lived experience”: In a few cases in 2020, *HFW!* speakers were almost the only speakers at public meetings, which may have given us extra focused attention paid to our comments, but, disturbing to have so little voice of community members. Should there be goals of recruiting a minimum of two farmworkers to speak at every public meeting? Work with allies such as the Mexico Indigenous Community Organizing Project (MICOP) to assist and explain when and how to participate? Seek written comments in Spanish or other languages and submit those into the hearing record? Record brief videos (without showing faces of

undocumented) with farm workers speaking about their housing or search for housing, via StoryCorps, Arts Council youth/diversity project, community cable access, or filmmaking students?

Continue involving youth in civic processes: *HFW's* program of activities to engage with youth at One Step a la Vez in Fillmore appears promising. One Step was founded in 2008 with the mission to serve the communities of the Santa Clara River Valley by providing a safe environment for 13-19 year old's and preparing informed, empowered youth who are equipped with the tools to lead; cultivate cultural awareness; bridge the gaps of inequality; and advocate for fair, just and healthy individuals and community. To help teens become accustomed to speaking at public meetings and/or feeling comfortable to participate in other government processes will be a skill that will



last them a lifetime.



Although HEs are complex, and potentially overwhelming in length, *HFW!* kept youth engaged through a series of monthly meetings with experiences related to “bite-size” pieces of data and regulations. One night included working with an artist to paint, together with four open-ended questions: “1. What do you think about Fillmore not having an October 15, 2021-October 15, 2029 Housing Element yet? 2. What type of housing do you see in Fillmore now? 3. What type of housing do you think Fillmore needs? 5.What does your painting show?”

Perhaps *HFW!* could expand its leadership in incorporating the arts for youth in this way. Possibly grants could fund more arts-based civic education activities, potentially in partnership with architecture students,

designing a model town for example, or creating zines to explain to their parents what goes on in City Hall. Admittedly housing policy and state regulations are fairly abstract, but the environmental education movement of the 1970s sought to incorporate design-based learning for K-12. Doreen Nelson, Frank Gehry’s younger sister, pioneered programs in Los Angeles (documentary about Kid City project in [100 Day Studio: Doreen Gehry Nelson & Neil Pinder - YouTube](#)). Not to stray too far from the *HFV!* mission, possibly consider potential collaboration with high school civics/government teachers in the form of *HFV!* representatives (including empowered teens) speaking to classes once a year. And of course, share, share, share on social media.

Expanding input/monitoring of federally funded housing grants: Monitoring of housing programs and funding could also include closer attention to federally funded programs, especially the US Department of Housing and Urban Development (HUD). Every five years, grantees must prepare a Consolidated Plan (Con Plan) and an Analysis of Impediments to Fair Housing Choice. Every year, the grantee must prepare an annual plan, derived from the five year Con Plan, and report on accomplishments from the previous grant year. The City Council/Board of Supervisors approves these documents after conducting public hearings. *HFV!* may want to consider additional focus on housing project and program expenditures and accomplishments, especially fair housing services. The next five year Con Plan and AI will be developed in 2024.

Affirmatively Furthering Fair Housing (AFFH): Farm workers often belong to several of the “protected classes” or groups of people that have been historically subjected to discrimination for whom equal opportunity/fair housing laws are designed to protect, e.g. race, color, national origin, religion, sex, familial status, and source of income. The guidance for AFFH to implement AB 686 (90 pages issued by HCD on April 21, 2021) and AB 1304 (45 pages of text of bill signed by Governor on September 29, 2021) is complex. Over time, perhaps *HFV!* and allies may become more familiar with the AFFH requirements in order to better understand and comment on the implementation of AFFH in their local area.

Comments to HCD about HCD and HEs: Besides City-specific comments, *HFV!* could consider sending general comments to HCD, with a copy to the County’s State Senator(s) and Assembly Member(s), on topics such as the following:

- *Multi-lingual outreach:* Although the HE does require reporting of how HE meetings were publicized and that “Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element, and the element shall describe this

effort. (Gov. Code, § 65583, subd. (c)(8),” effective multi-lingual outreach may be lacking. One strategy is to check if persons of Limited English Proficiency (LEPs) have been documented in the jurisdiction. Federal funds typically require the City to adopt a Language Access Plan for LEPs when there are specific thresholds of LEPs in the community. If so, HCD could check whether the outreach to publicize HE participation opportunities synchronizes with the Language Access Plan. The City of Camarillo provided no information in Spanish; the comment letter from HCD on their Draft HE states: “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.” But did HCD check how that was addressed in the Final HE?

- *Continuous comment period and official review of public comments:* Some cities announced in meetings and on their HE website that comments can be submitted “anytime” during the months of the HE update process. But how can the public be sure that the comment has been provided to City officials for consideration and whether staff have supported or recommended against the comment if it isn’t brought forward in a public meeting? Furthermore, HCD appears inconsistent in review and compliance of the AB 602 requirements. Some HCD comment letters on Draft HEs stated: “While the element includes a general summary of the public participation process (page 1 and Appendix C), it must also demonstrate diligent efforts were made to involve all economic segments of the community in the development of the housing element, particularly lower-income households. In addition, the element **must also describe how public comments were considered and incorporated into the element.**” But the Final HEs didn’t indicate that there was follow-up on this comment (for example, the four cities that ignored *HFV*’s request for the program of the farmworker housing study.)
- *Whether HCD responds to questions submitted by email:* Although the HCD HE website provided an email for questions (HousingElements@hcd.ca.gov), HCD sent no response to clarification questions raised in emails sent on May 9 and June 2, 2021, which was disappointing.

AFTER THE FINAL HOUSING ELEMENT IS CERTIFIED

Tracking progress and Follow-up: Annual Progress Reports

The Annual Progress Report (APR) to HCD on Housing Element/General Plan progress is due in Sacramento on April 1 and reports on HE Action Plan progress during the previous calendar year. For example, the 2022 APR prepared in March 2023 will have to describe 2022 progress on the programs that *HFW!* helped to insert in the 2021-2029 HE.

State regulations require City Council approval of the APR, so it is often an item on the agenda of the last City Council meeting in March. It's important to review and comment on the APR, especially if there is a lack of progress in an HE program.

The HCD website's subpage on APRs [Annual Progress Reports \(ca.gov\)](#) contains links to the APRs posted in the APR Dashboard at [Housing Element Implementation and APR Dashboard | California Department of Housing and Community Development](#).

Monitoring Updates

There is no charge to subscribe to the HCD email lists to be notified about memos, announcements, and website updates to stay current with changes in State laws, regulations, and financing related to state housing planning, policy and programs. Sign up at [Email Signup | California Department of Housing and Community Development](#).

RESOURCES FOR INFORMATION AND SUPPORT

Resources and Support from HCD

In addition to the State Code regarding Housing Elements ([Housing Elements \(ca.gov\)](#)), the State Department of Housing and Community Development (HCD) publishes a series of Memos, posted on their website at [HCD Memos \(ca.gov\)](#). The HCD website also contains the equivalent of an HE handbook or manual with template documents of best practices in their “Building Blocks” at [HCD Building Blocks \(ca.gov\)](#). The section on Farmworker Housing can be viewed at: [Building Blocks: Housing Needs - Farmworkers \(ca.gov\)](#). It does not appear to have been updated since 2014.

HCD’s Comment letters on every city/county’s draft and final HE can be downloaded at [heweb_list.xlsx \(live.com\)](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.hcd.ca.gov%2Fsites%2Fdefault%2Ffiles%2Fdocs%2Fplanning-and-community%2Fheweb_list.xlsx&wdOrigin=BROWSELINK) i.e. https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.hcd.ca.gov%2Fsites%2Fdefault%2Ffiles%2Fdocs%2Fplanning-and-community%2Fheweb_list.xlsx&wdOrigin=BROWSELINK

The HE Review Report identifies the date that HCD received the HE from the City/County, therefore the start of the 30 or 60 day review period, and the analyst assigned: [Housing Element Review and Compliance Report | California Department of Housing and Community Development](#).

Within the request form for HCD emails, there is an option to sign up to receive Housing Element Review Notification, which includes Housing Elements received for review and Housing Element letters issued.

Public comments on HEs may be submitted directly to HCD, but in December 2021, the HCD added this message to its website (bold italic emphasis added) about the timing of those comments:

Public Comments: As part of its review of the housing element, HCD must consider any written comments received from any public agency, group, or person. If an organization or individual plans to provide comments to HCD on a jurisdiction’s housing element, *early contact with the assigned review staff member is encouraged* to ensure that HCD is aware of this intent. To ensure that HCD has sufficient time to consider comments in the review of the housing element, *written comments should be provided within the first 30 days of the review*. Written comments can be provided directly to the assigned HCD Analyst or emailed to HousingElements@hcd.ca.gov.

Resources and Support from Others

YIMBY Campaign for Fair Housing Elements: The Yes In My Backyard (YIMBY) Law organization made HEs a priority and co-established the Campaign for Fair Housing Elements statewide. Their website [Campaign for Fair Housing Elements](#) includes a Resources Section, with several “explainer” videos, but much of their emphasis so far is on understanding and lobbying about the Regional Housing Needs Allocation (RHNA) numbers. *HFW!* is less concerned with RHNA targets than with promoting the most effective means to achieve them, such as inclusionary housing programs, expanded funding sources to develop affordable housing, and housing overlay zones.

The Resource Library subpage [Resource Library — Campaign for Fair Housing Elements](#) offers links to resources on topics such as City data, webinars of HCD and YIMBY, fair housing letter templates, recommended book list, maps, and the Kennedy Commission (Orange County) Guide to HEs. YIMBY also developed a “HE Audit Tool” [Housing Element Audit Tool — Campaign for Fair Housing Elements](#) with checklists to review HEs according to Site Capacity, Accessory Dwelling Units, Affirmatively Furthering Fair Housing, Rezoning, Constraints Analysis and Programs, and Policy and Programs (detailed instructions in the YIMBY Heat Sheet: Explainer for the HE Audit Tool at [YIMBY HEAT Sheet - Google Docs](#)).

Southern California Association of Governments (SCAG): SCAG’s website offers Housing Element Support [Housing Elements - Southern California Association of Governments](#) with data and parcel inventory tool, in the SCAG region plus technical assistance such as educational webinars presented by HCD staff on HE topics that are of broader interest.

Others - Educational Materials: *HFW!* studied websites and spoke with other affordable housing advocacy organizations seeking their “Housing 101” presentations in English and Spanish, e.g. Nonprofit Housing Association of Northern California (NPH), Southern California Association of Nonprofit Housing (SCANPH), San Francisco Housing Action Coalition, Monterey Bay Economic Partnership, and California Coalition for Rural Housing. Many appeared specifically tailored to their geographic region and its issues, including unhoused people.

In 2022, *HFW!* participated in regional monthly meetings of Local Early Action Planning Grants Program (LEAP) grantees involved in HE advocacy organized by SCAG to share experiences and ideas. Among the grantees was Long Beach Forward, whose Leadership Development Program includes the “People’s Planning School,” a free program with a range of topics “designed for residents to learn critical city planning tools and skills to improve the physical environment of their neighborhood and organize their neighbors for change.”

Mid-Pen Housing, affordable housing developer based in Bay Area/central coast California, prepared “Housing Element Best Practices: Lessons from Previous Cycles” [Housing Element Best Practices – MidPen Housing \(midpen-housing.org\)](#) in January 2022. Demonstrating sites and tools to advance affordable housing development is a key piece of an effective Housing Element. They noted that affordable housing developers and housing developers more broadly are frequently asked by localities to provide input on sites and policies regarding feasibility and impact, so they developed the Best Practices document with the message “We are here for this conversation. This opportunity to

dialogue with our trusted local partners inspired us to assemble a set of case studies which profile effective examples from previous Housing Element cycles.”

The City of Santa Cruz 2017 “Housing Conversation Kit” was innovative to use at ‘house parties’ of two to ten people on housing issues, [636407471639300000 \(cityofsantacruz.com\)](https://636407471639300000.cityofsantacruz.com). A stack of six cards presents facts about conditions and options for solutions to focus discussion and tally community opinions in a numeric uniform way. Generally this tool cannot be used when gatherings not permitted, such as during 2020-2021, but perhaps could be tried in a virtual meeting.

The easiest way to find presentations about HEs in Spanish is to search on YouTube under “Housing Elements in Spanish,” then numerous videos of presentations in cities all over California pop up.

Acknowledgements

In alphabetical order, *House Farm Workers!* thanks the following people for their help in the 6th cycle 2021-2029 Housing Element Update process: Linda Braunschweiger, Ellen Brokaw, Priscilla Cisneros, Karen Flock, Sonja Flores, Veronica Z. Garcia, Susan Johnson, Mary Ann Krause, Barbara Macri-Ortiz, Carl Morehouse, Paola Munoz-Ortiz, Bernardo Perez, Joe Ramirez, Alondra Serna, Chris Stevens, Gabrielle Vignone, and Gail Weller Brown. You were all great role models of how democracy can work with civil discourse, the polite interaction of intelligent people who care about their community.

The partners at Ventura County in this HE process launched a countywide farmworker housing study - thank you Jennifer Butler, Ruchita Kadakia, John Novi, and Dave Ward. We believe this will ultimately result in desperately needed housing units for farmworkers and their families.

This Guide and the activities described herein were funded in part by 2021-2022 LEAP grant funds of the State of California, administered by the Southern California Association of Governments and the California Community Foundation.

In September 2022, a draft of this Guide was posted online and circulated for review and comment among *HFW!*’s board of directors and City Committees, as well as allies such as the California Coalition for Rural Housing and members of the Ventura County Housing Coalition.

Background of Jennifer Coile

Jennifer N. M. Coile is experienced in planning, housing, project management, and public engagement. She has worked primarily in and around local government, large and small, “on both sides of the counter,” either as consultant or staff member. Ms. Coile has particular expertise in coordination of multi-agency projects and affordable housing administration and policy coordination, including entitlement processes and Housing Elements..

With thirty-plus years of experience in California, she knows the fundamentals of the state’s unique regulations involving General Plans, subdivisions, environmental review, Housing Elements, tax credit finance, and municipal codes. Working in federally funded community development programs, she is knowledgeable about the US Department of Housing and Urban Development’s programs to fund fair housing and safety net services, public facilities, and affordable housing.

In 2015-2018, she served as project manager of the “Farmworker Housing Study and Action Plan for Salinas Valley and Pajaro Valley.” Funded by a consortium of cities, counties, affordable housing developers, and nonprofit organizations, the project included a survey of 420 farmworkers and 60 agriculture employers, preparation of case study best practices, identification of potential housing sites, and review of the findings and draft action plan at a regional symposium of 220 people.

She began advising *HFV!* regarding farmworker surveys and Housing Element policies in January 2019, with more intensive coordination beginning in September 2020.

Coile has a Master of City and Regional Planning degree from Harvard University and Bachelor of Arts in History and Spanish Honors from the University of Maryland-College Park. She was a member of the American Institute of Certified Planners from 1982 to 2012.

Attachments: Example documents

- Example: Coalition letter of comments on Draft HE, City of Oxnard, April 1, 2021
- Overall HE Tracking Sheet: Ventura County Area HE Process – Completed and Scheduled
- Table: Sixth Cycle HEs in Ventura County: Status of *HFV!* Requested Wording

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 th Cycle Progress	Units Built and Approved 2014-21	Units Remaining	Total RHNA Allocation	6 th 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 th 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%
OXNARD	15-OCT-13 - 15-OCT-21	1,688	10.60%	1,160	63.62%
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%
VENTURA CO.		4,516	13.02%	3,095	35.09%

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 6th 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 6th 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:

Kenneth Trigueiro,
CEO & President
People's Self-Help Housing

Rebecca Albarran
Ventura County YIMBY

Clyde Reynolds,
Vulnerable Populations Housing
Advocacy Network

Judy Alexandre PhD, LCSW (ret.)

Veronica Garcia,
People's Self-Help Housing
City of Oxnard resident

Ellen Brokaw, *House Farm Workers!*

HOUSE FARM WORKERS! HOUSING ELEMENT TRACKING SHEET

Updated: March 23, 2022

VENTURA COUNTY AREA HOUSING ELEMENT PROCESS - COMPLETED AND SCHEDULED

Scheduled/Future Event: ***bold italics***

Jurisdiction	Workshop(s)/ GPAC Mtgs/ Open House	Jt. PC/CC Work-session s	Public Hearing Planning Commission Draft HE	Public Hearing City Council Draft HE	Draft HE received by HCD	30 days and 60 days of HCD Review Period	HCD Response Letter due	Resubmission to HCD re Draft HE	Public Hearing Planning Commission Final HE	Public Hearing City Council Final HE	Submit Final HE to HCD	HCD letter-certified compliant?
Camarillo	8/27/20, 2/11/21	10/14/20, 4/14/21	5/4/21	5/26/21	5/28/21	7/27/21	7/27/21		8/31/21	9/29/21	10/11/21	1/7/22 NO
Fillmore	5/21/21											
Moorpark	GPAC: 5/27/21, 6/19/21, 7/10/21 9/2/21 HE		1/13/22	1/2/22	1/8/22	4/8/22	4/8/22					
Oxnard	8/12/20, 9/8/20, 10/22/20, 3/24/21	10/7/20 3/9/21	4/1/21	4/29/21 ¹	5/15/21	7/13/21	7/13/21		9/2/21 and 9/16/21	10/5/21	10/12/21	1/11/22 NO
Santa Paula	7/15/21 8/6/21	7/7/21	8/24/21	9/15/21	9/16/20 ² 1	11/16/21	11/15/21	<i>April 2022?</i>				
Ventura-City	GPAC: ² 6/15,6/20, 7/10	8/2/21			8/12/21	10/11/21	10/11/21		1/12/22	1/31/22	2/22/22	
Ventura County	8/26/20, 1/27/21	8/4/21-AFFH webinar		2/9/21	1:3/16/21 2:6/24/21	1:5/14/21 2:7/27/21	1:5/23/21	6/24/21	9/2/21	10/12/21	10/14/21	YES

¹ Also, on 4/13/21 Oxnard Community Services, Public Safety, Housing and Development Committee.

² Ventura GPAC Meetings started in January 2021; dates are those meetings with agenda directly related to Housing Element; recordings on YouTube. City notes that Housing Element will be completed in 2021, then updated again in 2023 in accordance with the General Plan adopted at that time.

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HOUSING ELEMENT UPDATE WEBSITES AND CONSULTANTS

JURISDICTION	WEBSITE	HOUSING ELEMENT CONSULTANTS*
Camarillo	Camarillohousingelement.com	Rincon, Veronica Tam and Associates
Fillmore	https://engagekh.com/fillmorehousing	Kimley Horn
Moorpark	Moorparkgeneralplan.com	J.H. Douglas and Associates
Oxnard	www.xonard.org/housing-element-update	PlaceWorks
Santa Paula	Mysantapaula.com	JHD Consulting LLC
Ventura-City	www.planventura.com/gpac	Raimi + Associates, Circlepoint Veronica Tam & Assoc
Ventura County	https://vcrma.org/housing-element-update	Staff

*may be additional consultants for CEQA documents.

SIXTH CYCLE HOUSING ELEMENTS IN VENTURA COUNTY

HOUSE FARM WORKERS! REQUESTS – STATUS

January 19, 2022

City/County	Farmworker Housing Study	Support for Housing Trust Fund Ventura County and creation of a countywide dedicated source of funding for affordable housing	HE Document Status and Date
Camarillo	Program 5. Nonprofit Housing Organizations: “The City will work with the advocacy groups, agricultural organizations, and the County of Ventura to plan and implement a countywide survey of farmworkers, agricultural employers, and housing providers to further define housing conditions, needs, and barriers and how they can be addressed.”	No specific support	<ul style="list-style-type: none"> • Draft Final HE of August 26, 2021 • Planning Commission public hearing August 31, 2021 • City Council public hearing September 29, 2021 • Submitted to HCD October 11, 2021
Fillmore			No drafts released
Moorpark	<p>Program 20 – Farmworker Housing: “Work with the County-led coalition to plan, fund, and implement a countywide survey of farmworkers, employers, and housing providers to define housing conditions, needs, and barriers.</p> <ul style="list-style-type: none"> • Use 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.” 	In Program 20 - Farmworker Housing: “Support and participate in the Housing Trust Fund and the creation of a dedicated source of funding for affordable housing that will meet the needs of farmworkers.”	<ul style="list-style-type: none"> • GPAC Meeting #9- Housing, September 2, 2021 • GPAC Meeting #10- Housing Policy, December 9, 2021 • Draft HE released December 27, 2021 • Planning Commission public hearing January 12, 2022 • City Council Public hearing January 19, 2022

Ojai	Not included HFW! comments not acknowledged in HE*	Not included HFW! comments not acknowledged in HE*	<ul style="list-style-type: none"> • City Council approved Final Draft HE October 12, 2021 • Submitted to HCD October 13, 2021
Oxnard	Program 41. Special Needs Housing-Farmworker Housing Study: "The City will (1) work with the County of Ventura, advocacy groups, and agricultural organizations to plan, seeking funding through grants or other sources for the implementation of a countywide survey of farmworkers, employers, and housing providers to further define housing conditions, needs and barriers to farmworker housing and (2) utilize the survey results to develop targeted programs and strategies to address the identified housing needs of farmworkers and to support agricultural businesses with a stable and healthy workforce."	Program 42. Collaboration with Housing Trust Fund: "The City support the efforts of the HTFVC, will continue its partnership with the TF to support the provision of short term, predevelopment, acquisition, and construction funding to developers of affordable housing."	<ul style="list-style-type: none"> • Draft Final HE released August 13, 2021 • Planning Commission Public Hearing September 2, & 16, 2021 • City Council Public Hearing October 5, 2021 • Submitted to HCD October 12, 2021
Port Hueneme	Not included HFW! comments not acknowledged in HE*	Not included HFW! comments not acknowledged in HE*	<ul style="list-style-type: none"> • City Council Public Hearing-approval of 2045 General Plan Update, which includes Final HE, October 4, 2021 • Submitted to HCD October 15, 2021
Santa Paula	Program 16. Zoning for Transitional and Supportive Housing, Emergency Shelters and Farmworker Housing: "...In addition	Program 11. Affordable Housing Funding Sources: "To effectively implement Housing Element programs that create affordable housing depends on a variety of county,	<ul style="list-style-type: none"> • Draft HE released August 16, 2021 • Planning Commission

	<p>to these regulations, the city will (1) work cooperatively 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: (2) participate in the development of targeted programs and strategies to address farmworker housing needs.”</p>	<p>state, federal, and local funding sources. The various funding programs available to Santa Paula are outlined in Chapter IV, Resources and Opportunities. The City will assist affordable housing developers in seeking grant funds by providing background data necessary to complete applications, review and comment on draft applications, providing letters of support, City Council resolutions or other actions in support of applications, and assistance in monitoring compliance with grant requirements to the extent feasible. Other affordable housing funding options the City will explore include:</p> <ul style="list-style-type: none"> • Affordable housing trust funds and community land trusts in collaboration with other Ventura County jurisdictions and housing organizations • A local rental assistance program funded through inclusionary in-lieu fees or housing trust funds • Affordable housing linkage fees on large-scale commercial or industrial developments that significantly increase the need for affordable housing <p>2021-2029 Objectives: Actively pursue state, federal and private funding sources as a means of leveraging local funds and maximizing assistance. The City will support housing grant applications both through regulatory relief offered through the Density Bonus Ordinance and through City Council endorsement/support of funding applications. Explore the feasibility of creating an affordable housing trust fund or</p>	<p>Public hearing August 24, 2021</p> <ul style="list-style-type: none"> • City Council Public Hearing September 15, 2021 • Draft HE Submitted to HCD September 16 , 2021 • HCD Comment letter 11/15/2021
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		community land trust to facilitate production of affordable housing.”	
Simi Valley	Not included HFW! comments not acknowledged in HE*	Not included HFW! comments not acknowledged in HE*	<ul style="list-style-type: none"> • Planning Commission Public Hearing Final HE September 27, 2021 • Submitted to HCD October 28, 2021
Thousand Oaks	Not included HFW! comments not acknowledged in HE*	Not included HFW! comments not acknowledged in HE*	<ul style="list-style-type: none"> • Planning Commission Public Hearing Draft HE September 29, 2021 • Submitted to HCD October 6, 2021 • Planning Commission Public Hearing on draft Final HE, January 10, 2022
Ventura City (San Buenaventura)	Program 19. Support Ventura County’s efforts to update their Farmworker Housing Study including considering providing funding	Trust is mentioned but not with HFW! recommended wording: Program 13. Other Housing Funding options: “With the elimination of redevelopment, the City recognizes the importance of pursuing various sources of funding for housing, as well as participation in the Ventura County Housing Trust Fund (VCHTF). VCHTF is designed to assist in the development of affordable housing by leveraging public and private funding. VCHTF aims to become a critical, sustainable and ongoing source of local funding to support the production of new housing for working low and moderate income families and individuals across Ventura County, with a proposed focus on multi-family and special needs housing for households earning 80 percent or below	<ul style="list-style-type: none"> • Preliminary Draft HE July 26, 2021 • City Council meeting August 2, 2021 • Submitted to HCD August 23, 2021 • HCD Comment letter 10/11/2021 • Planning Commission Public Hearing, Final Draft HE, January 12, 2022

		<p>the Area Median Income in Ventura County. The funds are proposed to be utilized to:</p> <ul style="list-style-type: none"> • Create new affordable rental housing • Create home ownership assistance programs • Create permanent housing for homeless • Predevelopment assistance for developers. In addition, the State Department of Housing and Community Development (HCD) administers a range of housing funds for affordable housing. The City may also explore other funding mechanisms for affordable housing, such as a business tax for housing and a parcel tax. Eight-Year Objectives: <ul style="list-style-type: none"> • As funding permits, continue the City’s funding commitments to the VCHTC. 26 • Annually explore available funding sources at the State and Federal levels. Pursue funding to implement the City’s 10-Year Strategy to End Homelessness and housing programs set forth in this Housing Element. • Continue to explore other funding mechanisms for affordable housing.” 	
Ventura County	<p>Program E. Farmworker Housing Study: “The County, working with advocacy groups, agricultural organizations and Ventura County cities, will: (1) take on a coordinating role to seek funding for, and to implement, a countywide survey of farmworkers, employers, and housing providers to further define housing conditions, needs</p>	<p>Program O. Funding for the Housing Trust Fund: “The County shall continue to support the efforts of the Housing Trust Fund Ventura County, a local nonprofit organization that provides short term, acquisition and pre-development funding to developers of affordable housing. In addition, the County will coordinate with local agencies and community stakeholders on the creation of a countywide dedicated</p>	<ul style="list-style-type: none"> • Public Review Draft Final HE of August 27, 2021 • Planning Commission Public Hearing September 2, 2021 • Board of Supervisors approved at Public

	<p>and barriers to farmworker housing; and, (2) utilize the survey results to develop targeted programs and strategies to address the identified housing needs of farmworkers and to support agricultural businesses with a stable and healthy workforce. In implementing this program, the County shall strive to affirmatively further fair housing by providing housing opportunities (farmworker units or complexes) under the County's RHNA obligation and for both County and cities to provide services for the farmworker population throughout the County."</p>	<p>source of funding for housing. In June 2020, the County Board of Supervisors approved \$300,000 in General Funds to be contributed to the Housing Trust Fund of Ventura County, \$100,000 per year over three years (FYs 2020-2023). Additionally, approximately \$1 million in PLHA funding to the VC Housing Trust Fund has been approved and is anticipated to be distributed over three years (FY2021-2024). In implementing this program, the Housing Trust Fund of Ventura County has the opportunity to match this funding dollar for dollar under HCD's Local Housing Trust Fund program. These funds may be used countywide."</p>	<p>Hearing October 12, 2021</p> <ul style="list-style-type: none"> Submitted to HCD October 14, 2021
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*A typical comment within HCD Comment letters:” **Public Participation:** Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element, and the element shall describe this effort. (Gov. Code, § 65583, subd.(c)(8).) While the element includes a general summary of the public participation process (p. C-1), it must also demonstrate diligent efforts were made to involve all economic segments of the community in the development of the housing element. The element should be revised to discuss outreach to lower-income and special needs groups during the public participation efforts, solicitation efforts for survey responses, and participation in community workshops, and if translation services were provided. The element should also describe when the draft was made available to the public for review, the efforts to circulate the housing element among low- and moderate-income households and organizations that represent them and to involve such groups and persons in the element throughout the process. **Finally, the element should also summarize the public comments and describe how they were considered and incorporated into the element.** For additional information, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/gettingstarted/public-participation.shtml>”