

**City of Riverbank**  
**6<sup>th</sup> Cycle Housing Element Update**  
**Response Matrix to HCD’s Comment Letter of February 27, 2025**  
**June 4, 2025**

<b>HCD Comment</b>	<b>Page Number/Response</b>
<b>Review and Revision</b>	
<p>The element must provide an evaluation of the cumulative effectiveness of goals, policies, and related actions in meeting the housing needs of special-needs populations (e.g., elderly, persons with disabilities, large households, female-headed households, farmworkers, and persons experiencing homelessness). Programs should be revised as appropriate to reflect the results of this evaluation.</p>	<p>IX-2 through IX-4. Added cumulative effectiveness of the 5<sup>th</sup> Cycle Housing Element goals and policies.</p>
<p>Additionally, to demonstrate adequate sites from the prior planning period, the prior element included Program 1.1c to rezone sites to accommodate the regional housing needs allocation (RHNA) for lower-income households. The element should demonstrate that the sites were rezoned to meet by-right requirements pursuant to Government Code 65583.2(h) and (i), including but not limited to permitting multifamily development without discretionary action and requiring minimum densities.</p>	<p>IX-6 and IX-7, X-5 and X-6. Added Program 1.1d to address by-right approval requirements.</p>
<b>Housing Needs, Resources, and Constraints</b>	
<p>The element generally describes some of the requirements regarding an analysis of Affirmatively Furthering Fair Housing (AFFH); however, it then describes the analysis is pending and generally does not address this requirement. For your information, subsequent submittals of the housing element must address the AFFH requirements. For example, the element, among other things, must include an assessment of fair housing, including discussion of patterns of integration and segregation, Racially and Ethnically Concentrated Areas of Poverty and Affluence, (RECAP and RCAA) disparities in access to opportunity, disproportionate housing needs, analysis of fair housing issues in relation to identified sites and identification and prioritization of contributing factors to fair housing issues. This analysis must be supplemented by local data and knowledge and other relevant factors and based on the outcomes of a complete analysis, goals and actions must be added to the element and should be sufficient to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity. HCD will send sample analyses to assist the City in meeting this requirement. For further guidance, please visit HCD’s AFFH in California webpage at <a href="https://www.hcd.ca.gov/planning-and-community-development/affirmatively-furthering-fair-housing">https://www.hcd.ca.gov/planning-and-community-development/affirmatively-furthering-fair-housing</a>.</p>	<p>V-1 through V-58  AFFH Section has been updated.  The analysis includes a Sites Inventory Analysis of the AFFH Factors.</p>

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<p>Population, Employment, and Household Characteristics: The element does not address this requirement. The element must include a description and analysis of current population trends and employment data, including an identification of significant employers, industries, and typical wages. In addition, it must also include an analysis of household characteristics, such as tenure (rental or homeownership), growth rate, and trends. For additional information, please see the Building Blocks at <a href="https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/population-employment-and-household-characteristics">https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/population-employment-and-household-characteristics</a>.</p>	<p>II-1 through II-11. Section II, Household and Employment Characteristics.</p>
<p>Housing Costs: While the element includes information on rental and sales prices, rental information from the American Community Survey (ACS) does not fully reflect market conditions and the element should include current local data from additional data sources.</p>	<p>III-6. Added updated home price statistics.</p>
<p>Extremely Low-Income (ELI) Households: While the element includes some information about ELI households, given the unique and disproportionate needs of ELI households, the element should expand the analysis to include coincidences with other special housing needs, disproportionate housing needs (i.e., cost burden, overcrowding compared to other income groups), impacts on related issues such as transportation opportunities and health outcomes, then examine the availability of resources to determine gaps in housing needs.</p>	<p>IV-3 and IV-4. Updated analysis and added Program references for ELI households.</p>
<p>Additionally, the element must also identify projected housing needs. The projected housing need for ELI households can be calculated by using available census data to determine the number of very low-income households that qualify as ELI households or presume that 50 percent of the RHNA for very low-income households qualify as ELI households. For additional information, see the Building Blocks at <a href="https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/extremely-low-income-housing-needs">https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/extremely-low-income-housing-needs</a>.</p>	<p>VI-1. Updated Table VI-1 to include ELI households as 50 percent of the RHNA for very low-income households.</p>

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<p>Persons with Disabilities: While the element quantifies persons with disabilities, including developmental disabilities, in the City, it should also discuss and analyze the availability of resources and the magnitude and nature of the gap between resources and housing needs. Additionally, the element should discuss the unique housing needs and challenges experienced by persons with developmental disabilities. For additional information, see the Building Blocks at <a href="https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/people-disabilities-including-developmental-disabilities">https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/people-disabilities-including-developmental-disabilities</a>.</p>	<p>IV-15 and IV-16. Added analysis related to gap between resources and housing needs.</p>
<p>Farmworkers: While the element quantifies farmworkers in the City, the analysis should be expanded to include discussion of characteristics of this group (e.g., permanent, seasonal, housing tenure, disproportionate housing needs) and the magnitude and nature of the gap between resources and housing needs and characteristics.</p>	<p>IV-22 and IV-23. Added analysis.</p>
<p>Seniors: While the element quantifies seniors in the City, it should also analyze senior households by tenure, and discuss and analyze the availability of resources and the magnitude and nature of the gap between resources and housing needs.</p>	<p>IV-12. Added availability of resources. IV-14 and 15. Added a new table for Tenure by Age and analysis.</p>
<p>Large and Female-Headed Households: While the element quantifies large households and female-headed households in the City, it should also discuss and analyze the availability of resources and the magnitude and nature of the gap between resources and housing needs.</p>	<p>IV-20. Added analysis related to Large and Female-Headed Households.</p>
<b>Site Inventory</b>	
<p>Progress in Meeting the RHNA: While Table VI-9 (p. VI-17) quantifies the number of units expected to be accommodated both within and outside City limits, the number of lower-income units should be divided between low- and very low-income categories.</p>	<p>VI-22. Updated the RHNA table to remove the sites outside of City Limits.</p>

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<p>Additionally, the element identifies 366 units that are either pending, approved, or under construction. If utilizing pending development toward the RHNA, the element must demonstrate the affordability and availability of these units during the planning period. Affordability should be demonstrated based on actual or anticipated rents or sales prices or other mechanisms ensuring affordability (e.g., deed restrictions). To demonstrate the availability of units within the planning period, the element could analyze infrastructure schedules, the City’s past completion rates on pipeline projects, outreach with developers, and should describe any expiration dates on entitlements, anticipated timelines for final approvals, and any remaining steps for projects to receive final entitlements. The element must also include a program to monitor the development of the pipeline projects and identify alternative actions, such as rezoning or identification of additional sites, should the projects not make sufficient progress within the planning period.</p>	<p>VI-19. The Approved and Pending Table (Table VI-9) has been updated to provide additional information related to affordability for each project. X-6 and X-7. Program 1.1f has been added to monitor development of the pipeline projects.</p>
<p>Parcel Listing: While the element includes a parcel listing of identified sites, it should separate the moderate- and above moderate-income categories by site or by number of units.</p>	<p>Appendix H. Appendix has been updated.</p>
<p>Candidate Sites to Accommodate a Shortfall of Capacity: The element identifies a shortfall of adequate sites to accommodate a total of 790 lower- and moderate-income units and further identifies 15 candidate sites to be rezoned to accommodate this shortfall. The identification of candidate sites must address all components specified in Section 65583.2, including listing of sites by existing and proposed general plan designation and zoning, existing uses and anticipated affordability levels. The element must also demonstrate their suitability and availability in the planning period, including but not limited to calculation of realistic capacity, availability of infrastructure, appropriate size and density, mapping and any known constraints or conditions that could preclude development in the planning period.</p>	<p>VI-23 and VI-24. Updated Candidate Sites for Rezoning with additional information. X-3 and X-4. Program 1.1a updated to facilitate rezoning of candidate sites.</p>

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<p>Realistic Capacity: While the element provides realistic capacity estimates, it must also include analysis support these capacity assumptions. The estimate of the number of units for each site must be adjusted as necessary, based on the land use controls and site improvements, typical densities of existing or approved residential developments at a similar affordability level, and on the current or planned availability and accessibility of sufficient water, sewer, and dry utilities. For example, the element could list recent projects by number of units, zone, allowable densities, built densities and affordability. The analysis may utilize recent development trends in the City and broader region.</p>	<p>VI-2 through VI-5. Added analysis related to realistic capacity based on recent projects and regional projects.</p>
<p>In addition, the element appears to assume residential development on sites with zoning that allow nonresidential uses. As such, the element should include realistic capacity calculations for sites in nonresidential zones and account for the likelihood of nonresidential uses. The element should include analysis based on factors such as development trends, performance standards or other relevant factors. For example, the element could analyze all development activity in these nonresidential zones, how often residential development occurs and adjust residential capacity calculations, policies, and programs accordingly. For additional information, see the Building Blocks at <a href="https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/analysis-sites-and-zoning">https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/analysis-sites-and-zoning</a>.</p>	<p>VI-7 and VI-8. Added methodology of utilizing non-vacant sites.</p>
<p>Small and Large Sites: Sites smaller than half an acre or greater than ten acres are deemed inadequate to accommodate housing for lower-income households unless it is demonstrated, with sufficient evidence, that sites of equivalent size with affordability were successfully developed during the prior planning period or other evidence demonstrates the suitability of these sites. The element should provide analysis of past trends or present other evidence to demonstrate the suitability of these sites. For example, for small sites, the analysis could describe the City’s role or track record in facilitating past lot consolidation, common ownership, policies, or incentives offered or proposed to encourage and facilitate lot consolidation or other conditions rendering parcels suitable and ready-for-lot consolidation. For large sites, the element could discuss past developments, including developments in the broader region and how appropriate parceling or other measures were taken to facilitate affordability to lower-income households.</p>	<p>Appendix H. No sites that are smaller than 0.5-acre and larger than 10 acres are being utilized.</p>

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<p>Zoning for Lower-Income Households: The element must demonstrate densities appropriate to accommodate housing for lower-income households. For communities with densities that meet specific standards (at least 20 units per acre for Riverbank), no analysis is required (Government Code section 65583.2(c)(3)). Otherwise, an analysis must demonstrate appropriate densities based on factors such as market demand, financial feasibility, and development experience within identified zones. The element identifies several sites designated Mixed Use (MU) with an allowable density of 18 units per acre. As a result, the element should either demonstrate the appropriateness of this zone through analysis, remove or shift the sites toward other income groups or revise the allowable density to 20 or more units per acre.</p>	<p>V-4. MU sites adjusted to a realistic density of 12 du/ac and assumed income category of Moderate, including sites within the Crossroads West Specific Plan. Appendix H. Updated Sites Inventory Tables to reflect update.</p>
<p>Environmental Constraints: While the element discusses environmental constraints in relation to nonvacant sites, it should also discuss and analyze environmental constraints in relation to vacant sites, which should include analysis of any other known environmental or other constraints (e.g., shape, access, easements, conservation easements, Williamson Act contracts, military and other compatibility, contamination) that could impact housing development on identified sites in the planning period.</p>	<p>VI-25 and VI-26. Added Environmental Constraints.</p>
<p>Sites Identified in Prior Planning Periods: Sites identified in prior planning periods shall not be deemed adequate to accommodate the housing needs for lower-income households unless a program, meeting statutory requirements, requires rezoning within the timeframe specified in Government Code section 65583.2(c). The element should clarify if sites were identified in prior planning periods and if so, which sites and add or modify a program pursuant to Government Code section 65583.2(c). For more information on program requirements, please see HCD’s Housing Element Sites Inventory Guidebook at <a href="https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sites_inventory_memo_final06102020.pdf">https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sites_inventory_memo_final06102020.pdf</a>.</p>	<p>VI-12. Added Table VI-7 to list the sites utilized in the 5<sup>th</sup> Cycle to accommodate the needs of lower-income RHNA. X-5. Program 1.1d to address by-right approval.</p>

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<p>Suitability of Nonvacant Sites: The element must include an analysis demonstrating the potential for redevelopment of nonvacant sites. The description of existing uses should be sufficiently detailed to facilitate an analysis demonstrating the potential for additional development in the planning period. The analysis may utilize representative sites to address this requirement and should consider factors such as degree of underutilization, past experiences converting existing uses to higher density residential development, current demand for the existing use, any existing leases or other conditions precluding redevelopment, condition of the existing structure, vacancies, recent turnover, recent improvements and developer or property owner interest.</p>	<p>VI-7 and VI-8. Added analysis for nonvacant sites and suitability for development.</p>
<p>Replacement Requirements: For your information, if the element identifies sites with existing residential uses meeting specified criteria, absent a replacement housing policy, these sites are not adequate sites to accommodate lower-income households. The replacement housing policy has the same requirements as set forth in Government Code section 65915, subdivision (c), paragraph (3).</p>	<p>X-6. Added Program 1.1e to address replacement housing requirements.</p>
<p>Annexation: If the element relies on sites that need to be annexed to accommodate the regional housing need, it must demonstrate their suitability and availability in the planning period. For example, the element should discuss the status of the annexation; remaining steps necessary to complete the annexation; anticipated timeframe for each step; and any barriers to annexation. Upon a complete analysis, the element should add or modify programs as necessary to facilitate the annexation; including phasing multifamily zoned sites earlier in the planning period; establishing appropriate zoning including meeting by right requirements pursuant to Government Code section 65583.2, subdivisions (h) and (i) and to rezone other sites if the annexation is not completed by a specified date.</p>	<p>Noted. The City is not relying on sites that need to be annexed.</p>
<p>Accessory Dwelling Units (ADU): The element projects 42 ADUs or approximately 5 ADUs per year over the eight-year planning period. However, this projection is inconsistent with HCD's records (1 ADU permitted in 2021, 1 permitted in 2022, and 5 permitted in 2023) and the element should reconcile trends between the City and HCD. Additionally, the element must demonstrate the anticipated affordability of ADUs based on actual or anticipated rents. For example, the element may utilize a rent survey or other information from Stanislaus County that examines rents and ADU affordability in the region.</p>	<p>V-15. Updated Table to reflect number of ADUs permitted and annual average.</p>

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<p>Electronic Sites Inventory: For your information, pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD. Please see HCD’s housing element webpage at <a href="https://www.hcd.ca.gov/planning-and-community-development/housing-elements">https://www.hcd.ca.gov/planning-and-community-development/housing-elements</a> for a copy of the form and instructions. The City can reach out to HCD at <a href="mailto:sitesinventory@hcd.ca.gov">sitesinventory@hcd.ca.gov</a> for technical assistance.</p>	<p>Noted.</p>
<b>Zoning for a Variety of Housing Types</b>	
<p>Emergency Shelters: The element indicates emergency shelters are permitted by-right in the R-3 zone (p. IV-20); however, it should clarify whether emergency shelters are permitted without discretionary approval and if necessary, add or modify programs. Further, the element indicates emergency shelters are allowed with a conditional use permit in the C-1, C-2, and CM zones. The element should describe the development standards of these zones, including any special standards for emergency shelters and whether those standards are appropriate for emergency shelters, especially relating to parking. Specifically, the element must evaluate the City’s emergency shelter parking requirements pursuant to AB 139/Government Code section 65583, subdivision (a)(4)(A) or include a program to comply with this requirement. The element should also provide an analysis of capacity, including acreage, parcel size, vacancy status, and proximity to transportation and services for potential sites, hazardous conditions, and any conditions inappropriate for human habitability. Finally, the element should discuss the City’s definition of emergency shelters and whether it is consistent with AB 2339 and add or modify programs, if necessary.</p>	<p>IV-22 and IV-23. Added analysis related to emergency shelters and permitting in the Riverbank Municipal Code. X-19. Added Program 3.1j to establish objective standards for Emergency Shelters.</p>

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<p>Housing for Farmworkers: The element indicates farmworker housing is allowed by-right in the R-1 zone (p. D-2). However, the element should address whether the City complies with the Employee Housing Act (Health and Safety Code, § 17000 et seq.), specifically, sections 17021.5, 17021.6 and 17021.8. Section 17021.5 requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. Section 17021.6 requires employee housing consisting of no more than 12 units or 36 beds to be permitted in the same manner as other agricultural uses in the same zone. Section 17021.8 requires that a development is subject to a streamlined, ministerial approval process and is not subject to a conditional use permit (CUP) if the development is an eligible agricultural employee housing development. Based on a complete analysis, the element should add or modify programs, if necessary.</p>	<p>VII-15. Added analysis related to farmworker housing and compliance with State law.  X-19. Added Program 3.1j to update the Riverbank Municipal Code pursuant to Health and Safety Code.</p>
<p>Low-Barrier Navigation Centers: Low-barrier navigation centers shall be a use by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses pursuant to Government Code section 65660. The element must demonstrate compliance with this requirement and add or modify programs as appropriate.</p>	<p>IV-25. Added analysis and reference to Program 3.1j.  X-19. Added Program 3.1j to update Riverbank Municipal Code pursuant to Government Code Section 65651.</p>
<p>Permanent Supportive Housing: Supportive housing shall be a use by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses, pursuant to Government Code section 65651. The element must demonstrate compliance with this requirement and add or modify programs, if necessary.</p>	<p>IV-23. Added analysis related to Supportive Housing.  X-19. Added Program 3.1j to amend the RMC to permit supportive housing pursuant to AB 2162.</p>

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<p>Mobilehomes and Manufactured Housing: Manufactured homes that are built on a permanent foundation must be allowed in the same manner and in the same zones as conventional or stick-built structures. Specifically, manufactured homes on a permanent structure should only be subject to the same development standards as a conventional single-family residential dwelling. The element must demonstrate compliance with this requirement and add or modify programs as appropriate.</p>	<p>VII-10. Clarified requirements for Manufactured Housing.</p>
<b>Governmental Constraints</b>	
<p>Land Use Controls: The element indicates that all multifamily housing developments must include fenced open space of at least 50 square feet per unit with a minimum area of 300 square feet (p. D-5). The element should further describe and analyze this requirement as a potential constrain on multifamily housing development. Based on a complete analysis, the element should add or modify programs as appropriate.</p>	<p>VII-22. Added analysis on open space requirements for multifamily uses. X-20. Added Program 3.1j to amend the Zoning Code.</p>
<p>Additionally, the Crossroads Specific Plan requires a floor-area-ratio of 0.35, which the element should discuss and analyze as a potential constraint on the ability to achieve maximum densities.</p>	<p>Crossroads West Specific Plan does not utilize a FAR of 0.35.</p>
<p>Parking: Program 3.1d of the previous housing element was intended to lower parking requirements for multifamily housing developments and is noted as being complete (p. IX-13); however, it is unclear whether these standards were amended, as Table D-2 and the parking requirements described on page D-6 contradict the new requirements established by Program 3.1d. The element should reconcile this information and add or modify programs to reduce parking requirements, if necessary.</p>	<p>D-3. Table D-2 has been updated to reflect updated parking requirements. D-6. Updated to reflect updated parking requirements and implementation of Program 3.1d from 5<sup>th</sup> Cycle.</p>

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Additionally, the element should analyze parking requirements for mobile homes as a potential constraint and add or modify programs as appropriate.	VII-11. Added off-street parking analysis for manufactured homes.
Density Limits: The element indicates in Table D-2 that the R-3 zone has a minimum density of 20 units per acre; however, elsewhere in the element, the R-3 zone is listed as having a minimum density of 16 units per acre (p. VI-10). The element should reconcile this information.	D-3. Table D-2 has been updated to reflect 16 as the minimum density requirement.
Additionally, the element should address comments from developers relating to density (p. I-6) and include discussion of how they were incorporated in the element. HCD encourages the City to incorporate these comments in the element's schedule of programs.	I-6. Added language and program references addressing comments received during the stakeholder consultations.
Zoning and Fees Transparency: The element should clarify compliance with transparency requirements for posting all fees, zoning, and development standards on the City's website and add a program to address these requirements, if necessary.	VII-7. Added analysis of Government Code Section 65940. X-18. Program 3.1h is added to update the City's website.

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Local Processing and Permit Procedures: While the element includes information on the City’s processing and permitting procedures, it should also analyze these procedures as a potential constraint on housing development. In particular, the element should list and analyze approval findings for impacts on approval certainty and the maximum three meetings per year to process General Plan and zoning modifications.	VII-7 and VII-8. Updated permit and processing procedures to clarify meetings per year.
Additionally, the element must clarify whether there are written procedures for the SB 35 (Chapter 366, Statutes of 2017) Streamlined Ministerial Approval Process and, if there are no written procedures, add a program to address these requirements.	VII-8. Added discussion related to SB35 and reference to Program 3.1j. X-19. Added Program 3.1j to establish procedures for SB 35.
Finally, the element should address public comments on this draft submittal and discuss compliance with the Permit Streamlining Act and intersections with CEQA and timing requirements, including streamlining determinations and add or modify programs as appropriate.	VII-8 and VII-9. Updated analysis and referenced Program 3.1j related to SB35 and SB330.
<b>Housing for Persons with Disabilities</b>	
Reasonable Accommodation: The element briefly mentions the City’s reasonable accommodation procedures; however, the element should also describe these procedures, decision-making criteria, application requirements, approval findings, fees, and analyze any potential constraints on housing for persons with disabilities. Based on a complete analysis, the element should add or modify programs as appropriate.	VII-13 and VII-14. Added description of procedures, decision-making criteria, etc.

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<p>Group Homes: While the element indicates group homes of seven or more persons are conditionally permitted in the Multiple Family Residential Zone (p. VII-9), it should also analyze exclusion of these group homes from other zones allowing residential uses as a constraint on housing for persons with disabilities. In addition, the element should address the CUP requirement as a constraint, including listing and analyzing approval findings for impacts on approval certainty. The element should also clarify whether development standards for group homes are the same as development standards for similar uses in the same underlying zone. Based on a complete analysis, the element should add or modify programs as appropriate.</p>	<p>VII-10. Added analysis related to Residential Care Facilities.  X-19. Added Program 3.1j to amend the Riverbank Municipal Code to be consistent with State law.</p>
<b>Nongovernmental Constraints</b>	
<p>Availability of Financing: The element should describe whether housing financing, including private financing and government assistance programs, are generally available in the City.</p>	<p>VII-1 and VII-2. Added analysis.</p>
<p>Approval Time and Requests for Lesser Densities: The element must analyze requests to develop housing at densities below those assumed in the sites inventory. The element should also identify the typical length of time between receiving approval for housing development and submittal of applications for building permits. The analysis should address any hinderances on achieving the RHNA.</p>	<p>VII-2. Added analysis for requests to develop at densities below those permitted.  VII-9. Added analysis related length of time between entitlement and building permit.</p>
<b>Housing Programs</b>	
<p>To have a beneficial impact in the planning period and achieve the goals and objectives of the housing element, Programs must include discrete timing (e.g., at least annually, by 2026). Examples of programs that should be revised include Programs 3.1a (Planned Development and Tiny Homes), 4.1a (Rehabilitation Funding), and 4.1c (Housing Condition Survey).</p>	<p>X-14 (Program 3.1a), X-20 (Program 4.1a), and X-21 (Program 4.1c).</p>

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<i>As noted in Finding B3, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition, the element should be revised as follows:</i>	
Program 1.1a: While the element includes this Program to rezone necessary to accommodate the City’s shortfall of adequate sites, it must specifically commit to acreage, zone, allowable densities, and anticipated units.	X-2 through X-4 (Program 1.1a).
Program 1.1c: A cursory review of the City’s ADU ordinance by HCD discovered areas which appear to be inconsistent with State ADU Law. As a result, the Program should commit to updating the City’s ADU ordinance to comply with state law with discrete timing (e.g., six months).	X-19 (Program 3.1j). Language added to require the Zoning Code to be updated.
Program 2.1k: The Program should commit the City to establishing appropriate development standards for single-room occupancy units (SROs).	X-19. Program 3.1j added to establish SRO standards.
Housing for Farmworkers: Based on the outcomes of a complete analysis, the element should add or modify programs to adhere to requirements described in Health and Safety Code 17021.5, 17021.6, and 17021.8.	Noted. Program 2.1d and 2.1e are related to farmworker housing.
Infrastructure: The element identifies the need for the City’s wastewater treatment plant to be upgraded and expanded in order to accommodate the City’s RHNA. As such, the element should commit to a schedule of actions to complete the appropriate infrastructure improvements.	X-18. Program 3.1i added to track the progress of WWTP improvements.

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**Response Matrix to HCD’s Comment Letter of February 27, 2025**  
**June 4, 2025**

<b>HCD Comment</b>	<b>Page Number/Response</b>
<p>Special Housing Needs: The element must include specific actions to assist in the development of housing for ELI and special needs households. In addition, the element must include specific actions to address the needs of farmworkers. For farmworkers, specific efforts should be included based on the outcomes of a complete analysis. For example, the element could commit to proactive actions to coordinate with nonprofit developers, employers, and other related organizations, to explore funding and incentives, annually identify specific development opportunities, pursuing strategies to integrate affordable housing and targeting rehabilitation and conservation and improvement programs toward farmworkers.</p>	Noted.
<p>Density Bonus Ordinance: The element should add or modify programs to amend the City’s density bonus ordinance to comply with state law.</p>	X-7. Added Program 1.1f.
<p>As noted in Findings B4 and B5, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.</p>	Noted.
<b>Affirmatively Further Fair Housing</b>	
<p>As noted in Finding B1, the element requires a complete AFFH analysis. Depending upon the results of that analysis, the City may need to revise or add programs. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have specific commitment, metrics and milestones as appropriate and must address housing mobility enhancement, new housing choices and affordability in relatively higher income and opportunity areas, place-based strategies for community preservation and revitalization and displacement protection.</p>	Noted.

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<b>Public Participation</b>	
<p>While the City made efforts to include the public through workshops and surveys, moving forward, the City should employ additional methods for public outreach efforts in the future, particularly to include lower-income and special needs households. For example, the City could conduct targeted stakeholder interviews or establish a committee representative of lower-income households in future public outreach efforts. For additional information, see the Building Blocks at <a href="https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/public-participation">https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/public-participation</a>.</p>	<p>Noted.</p>