

City of Riverbank
6th Cycle Housing Element Update
Response Matrix to HCD’s Comment Letter of August 22, 2025
November 4, 2025

HCD Comment	Page Number/Response
A. Housing Needs, Resources, and Constraints	
<p><u>Disproportionate Housing Needs:</u> While the element now addresses some requirements of an Affirmatively Furthering Fair Housing (AFFH) analysis, it must still discuss areas of the City with a higher concentration of substandard housing conditions and are thus of higher need. In addition, while the element discusses areas of the City with more incidence of persons experiencing homelessness, it should also discuss access to resources and opportunities, including transportation, services and geographically targeted programs. Based on the outcomes of a complete analysis, the element should add or modify program(s) as appropriate.</p>	<p>Added analysis regarding substandard housing rates and age of housing stock. Page V-35 through V-37.</p>
<p><u>Local Data, Knowledge, and Other Relevant Factors:</u> The element must include local data, knowledge, and other relevant factors to discuss and analyze any unique attributes about the City related to fair housing issues. This information should complement federal, state, and regional data with local data and knowledge where appropriate to capture emerging trends and issues, including utilizing knowledge from city officials, local and regional advocates and service providers. Also, the element must include other relevant factors that contribute to fair housing issues in the jurisdiction. For instance, the element can analyze historical land use, zoning, proximity to industrial uses and public housing, major physical dividers such as highways and railroad tracks, recent annexations, waves of development and master planned areas compared to older areas, and investment practices or other information and demographic trends.</p>	<p>Added Local knowledge related to income, female headed households, and race. Page V-22.</p> <p>Added Historical Development Trends and Major Physical Dividers. Page V-48 through V-50.</p>
<p><u>Contributing Factors to Fair Housing Issues:</u> Based on the outcomes of a complete analysis, the element should re-assess and prioritize contributing factors to fair housing issues.</p>	<p>Updated Table V-12 with additional Meaningful Actions. Added Program 5.1d, Affirmatively Market Fair Housing</p>

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	<p>Resources. Page X-28.</p> <p>Added Program 5.1e, State and Federal Housing Program and Funding Opportunities. Page X-29.</p> <p>Added Program 5.1f, Targeted Capital Improvement Program Investment. Page X-30.</p> <p>Added Program 5.1g, First-Time Homebuyers Program. Page X-31.</p>
<p><u>Housing Costs</u>: While the element includes information on rental and sales prices, as noted in prior review, 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>Added updated rental information. Page III-6</p>
<p><u>Progress in Meeting the Regional Housing Needs Allocation (RHNA)</u>: While the element includes additional information about each pipeline project, the element must still demonstrate the affordability and availability of these units during the planning period, especially for Pocket Avenue Senior Apartments, Lucky House, Riverbank Village, and Sierra Village, which are planned to accommodate lower- and moderate-income households. Please see HCD’s prior review for additional information.</p>	<p>Added detail to Table VI-14 and Project information on Pages VI-30 through VI-32.</p>

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<p><u>Candidate Sites to Accommodate a Shortfall of Capacity:</u> The element identifies a shortfall of adequate sites to accommodate a total of 790 lower- and moderate-income units and further identifies 11 candidate sites to be rezoned to accommodate this shortfall. The identification of candidate sites must address all components specified in Section 65583.2. While the element lists sites by existing and proposed general plan designation and zoning, existing uses and anticipated affordability levels, it must still 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>Added detail to each of the Rezone sites in Table VI-16 to include an expanded analysis of existing uses, infrastructure availability and constraints to development within the Cycle. Page VI-40 and VI-41.</p> <p>Added Program 1.1g to the Housing Element related to water and wastewater infrastructure extension to Sites 1 through 4 in Table VI-16.</p>
<p><u>Realistic Capacity:</u> While the element now analyzes assumptions for calculating realistic capacity on residentially zoned sites, it must still demonstrate realistic residential capacity on sites with zoning that allows 100 percent nonresidential uses. For example, the element should include development trends in nonresidential zones, including how often residential development occurs and adjust residential capacity calculations, policies, and programs accordingly. Please see HCD’s prior review for additional information.</p>	<p>Updated Capacity Assumptions and Analysis for Mixed Use Sites. Page VI-3 through VI-6.</p>

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	<p>Added detail to Cannery District discussion. Page VI-16 and VI-17.</p> <p>Updated Program 1.1a to require amendment to Riverbank Municipal Code to allow 100 percent residential uses Page X-3 and X-4.</p>
<p><u>Environmental Constraints:</u> The element now discusses some environmental constraints, but as noted in the prior review, should analyze any other known constraints (e.g., shape, access, easements, conservation easements, contamination, environmental overlay, airport and military compatibility) that could impact housing development on identified sites in the planning period.</p>	<p>Added analysis to the Environmental Constraints discussion in Section VI. Added Conservation Easements, Hazardous Materials, Parcel Shape, Easements, and Airport Land Use Compatibility. Page VI-37 through VI-41.</p>
<p><u>Suitability of Nonvacant Sites:</u> While the element now briefly describes criteria used to select nonvacant sites, it must still provide analysis to demonstrate the redevelopment potential of identified sites, as follows:</p>	<p>Added additional criteria and</p>

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<ul style="list-style-type: none"> • <i>Criteria:</i> The element basically only uses one criteria to indicate redevelopment potential. However, the element should utilize additional criteria such as improvement to land value ratio, age of structure and existing versus allowable units. Further, the element should list the values of these criteria for each of the nonvacant sites (e.g., an improvement to land value ratio of 0.3). Finally, the element should support the validity of these criteria using recent development trends in the City or nearby region by listing development on nonvacant sites with similar criteria values. The inventory should be adjusted as appropriate based on the outcomes of a complete analysis. • <i>Extent Existing Uses Impede Additional Development:</i> As noted in the prior review, the element should account for the extent existing uses impeded 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. This analysis may be conducted on a site by site or representative site basis. 	<p>discussion related to the non-vacant sites. Page VI-10.</p> <p>Added additional detail related to development trends that support redevelopment of non-vacant sites. Page VI-11 and VI-12.</p> <p>Added Table VI-6 to analysis historical reuse of sites within Riverbank and recent examples from the region. Page VI-13.</p> <p>Added Table VI-7 to analyze Non-Vacant identified in the Housing Element. Page VI-14.</p>
<p><u>Accessory Dwelling Units (ADU):</u> As noted in the prior review, the element must still 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>Added review of affordability memorandum prepared by ABAG. Updated affordability</p>

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	<p>for anticipated ADUs for Riverbank. Page VI-24.</p> <p>Updated Table VI-15, <i>City’s Ability to Meet its Regional Housing Needs</i>. Page VI-33.</p>
<p><u>Emergency Shelters</u>: The element states that emergency shelters are permitted by-right in the R-3 zone (Table D-1, p. D-2); however, the element should clarify whether emergency shelters are permitted <i>without discretionary approval</i> and add or modify program(s) as appropriate. In addition, the element must analyze the R-3 zone for proximity to transportation and services and hazardous conditions.</p> <p>Finally, Program 3.1j (Amendments to the Riverbank Municipal Code and Specific Plans) should be revised to establish a definition of emergency shelter pursuant to AB 2339.</p>	<p>Language clarifying that emergency shelters are permitted without discretionary approval has been added. Pages IV-26 and VII-15.</p> <p>Additional analysis on proximity to transit and services and hazards has been added. Page IV-27.</p> <p>This program has been updated. Pages IV-27 and X-23.</p>
<p><u>Electronic Sites Inventory</u>: 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 https://www.hcd.ca.gov/planning-and-community-development/housing-elements for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance.</p>	<p>Noted.</p>

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<p><u>Local Processing and Permit Procedures:</u> While the element includes information on the City’s processing and permitting procedures, as noted in prior review, the element should also list and analyze approval findings for impacts on approval certainty and add or modify program(s), as appropriate.</p>	<p>Analysis on use permits and site plan review have been added. Pages VII-8, VII-9, and VII-11.</p>
B. Housing Programs	
<p>As noted in Finding A3, 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:</p> <ul style="list-style-type: none"> • <i>Program 1.1a (Adequate Sites for RHNA and Rezone Program):</i> The Program commits to establish a minimum density of 20 units per acre and a maximum allowable density of at least 20 units per acre. For your information, while a minimum density of 20 units per acre meets statutory requirements, establishing a minimum density that is the same as the maximum allowable density would require a precise development proposal and does not allow a range of allowable densities. This lack of a range of allowable densities presents a constraint on development. The Program should commit to a range of allowable densities to promote development feasibility (e.g., 20 to 30 units per acre). • <i>Program 3.1i (Wastewater Treatment Plant Upgrades):</i> The Program should commit to a schedule of actions to facilitate infrastructure improvements, including monitoring actions (e.g., mid-cycle review) and the implementation of alternative actions, such as rezoning or the identification of alternative sites, should sufficient progress not be made. 	<p>Removed language in Program 1.1a regarding maximum density. Page X-3.</p> <p>Program 3.1i has been updated to include additional schedule of actions. Page X-22.</p>
<p><u>Special Housing Needs (Farmworkers):</u> The element must include specific actions to address the needs of farmworkers. 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>	<p>Additional actions have been added to Program 2.1d. Pages X-12.</p>
<p>As noted in Finding A4, the element requires a complete analysis of potential governmental 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>	<p>Noted.</p>

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<p>In addition, as noted on page IIV-24, the City’s Crossroads Specific Plan requires a floor area ratio of 0.35, which is too restrictive on housing types and imposes further restrictions on potential developers. As a result, Program 3.1J (Amendments to the Riverbank Municipal Code and Specific Plans) should commit to adjust floor area ratios and address the identified constraint to housing production.</p>	<p>The 0.35 floor area ratio in the Crossroads West Specific Plan only applies to mixed-use commercial development and therefore does not present a constraint to housing production. The discussion has been updated to reflect this. Page VII-25.</p>
<p>As noted in Finding A1, 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, geographic targeting, metrics and milestones and, as appropriate, must address housing mobility enhancement, new housing choices and affordability in relatively higher income and opportunity areas, place-based strategies for community revitalization and displacement protection.</p>	<p>Updated Program 4.c, Housing Condition Survey. Page X-25. Updated Table V-12 with additional Meaningful Actions. Added Program 5.1d, Affirmatively Market Fair Housing Resources. Page X-28. Added Program 5.1e, State and Federal Housing Program and Funding</p>

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	<p>Opportunities. Page X-29. Added Program 5.1f, Targeted Capital Improvement Program Investment. Page X-30. Added Program 5.1g, First-Time Homebuyers Program. Page X-31.</p>
C. Public Participation	
<p>While the element includes a summary of public comments received on previous version(s) of the element, it should also describe how public comments received on the current housing element draft were considered and incorporated. In addition, the element should describe any additional outreach efforts made since the prior draft beyond the City Council meeting held on May 27, 2025, particularly if any specific efforts were made to reach lower-income and special needs households or their representatives.</p> <p>Moving forward, the City should employ additional methods for public outreach efforts, particularly to include lower-income and special needs households. For additional information, see the Building Blocks at https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/public-participation.</p>	<p>Noted. Appendix L has been updated to provide a more detailed review of the Public Comments and where in the Housing Element Public Comments have been incorporated.</p>