

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

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December 2, 2025

Bryan Stice, Director
Community Development Department
City of Patterson
1 Plaza
Patterson, CA 95363

Dear Bryan Stice:

RE: City of Patterson's 6th Cycle (2023-2031) Revised Draft Housing Element

Thank you for submitting the City of Patterson's (City) revised draft housing element received for review on October 3, 2025, along with technical edits received on November 27, 2025. Pursuant to Government Code section 65585, the California Department of Housing and Community Development (HCD) is reporting the results of its review. Our review was facilitated by a conversation on November 13, 2025 with City staff and consultants. In addition, HCD considered comments from Rutan and Tucker, LLP on behalf of Keystone Rance, LLC, and YIMBY Law pursuant to Government Code section 65585, subdivision (c).

The revised draft element, including technical edits, meets the statutory requirements described in HCD's May 2, 2025 review. However, the housing element cannot be found in substantial compliance until the City has completed and submitted the necessary rezones (see below) to make prior identified sites available and accommodate the Regional Housing Needs Allocation (RHNA). The housing element will substantially comply with State Housing Element Law (Gov. Code, § 65580 et seq) when rezoning is completed and the element is adopted, submitted to, and approved by HCD, in accordance with Government Code section 65585.

A jurisdiction that did not adopt a compliant housing element within 120 days from the statutory deadline (December 31, 2023) must rezone sites within one year of the statutory deadline and meet requirements pursuant to Government Code sections 65583, subdivision (c)(1)(A) and 65583.2, subdivisions (c), (h) and (i), as applicable. As this year has passed and Programs 1.11 (Shortfall Rezoning) and 1.12 (Prior Identified Sites) have not been completed to meet all statutory requirements, the housing element is out of compliance and will remain out of compliance until the rezoning has been completed and submitted to HCD to meet all statutory requirements. Once the City completes the rezoning, a copy of the resolution or ordinance should be transmitted to

HCD. HCD will review the documentation and issue correspondence updating the status of the City's housing element compliance.

As a reminder, the City's 6th cycle housing element was due December 31, 2023. As of today, the City has not completed the housing element process for the 6th cycle. The City's 5th cycle housing element no longer satisfies statutory requirements. HCD encourages the City to expeditiously complete rezoning and adopt and submit the housing element to HCD to regain substantial compliance.

In addition, HCD is aware of ongoing efforts to address infrastructure constraints relating to the Delta-Mendota Subbasin and Del Puerto Creek Capture and Recharge Project, which are necessary to make sites suitable to accommodate the RHNA. Considering these constraints, the timely and effective implementation of Programs 1.14 (Zacharias and Baldwin Ranch Master Plan Areas) and 1.15 (Water Supply to Support Development) are especially crucial to the success of the housing element and the City's ability to regain and maintain housing element compliance.

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City must continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available while considering and incorporating comments where appropriate. The City should ensure that information is shared consistently through a variety of outreach methods and that public input is meaningfully considered and incorporated where appropriate. HCD encourages the City to continue working with the public, including commenters on this housing element review, and adjust policies and programs, as appropriate. Please be aware, any revisions to the element must be posted on the local government's website and to email a link to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD.

Pursuant to Government Code section 65583.3, subdivision (b), the City must utilize standards, forms, and definitions adopted by HCD when preparing the sites inventory. 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. Please note, upon adoption of the housing element, the City must submit an electronic version of the sites inventory with its adopted housing element to sitesinventory@hcd.ca.gov.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant, the Affordable Housing and Sustainable Communities program, and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Land Use and Climate Innovation: <https://www.lci.ca.gov/planning/general-plan/guidelines.html>.

HCD appreciates the efforts the housing element update team provided during the update and review of the housing element and looks forward to receiving the City's adopted housing element. HCD welcomes the opportunity to provide technical assistance through the adoption and rezone process, including reviewing draft rezoning documents. If you have any questions or need additional technical assistance, please contact Emily Hovda, of our staff, at Emily.Hovda@hcd.ca.gov.

Sincerely,



Paul McDougall
Senior Program Manager