

THE BOARD OF SUPERVISORS OF THE COUNTY OF STANISLAUS
ACTION AGENDA SUMMARY

DEPT: Planning and Community Development Af

BOARD AGENDA # 9:05 a.m.

Urgent Routine

AGENDA DATE May 5, 2015

CEO Concurs with Recommendation YES NO
(Information Attached)

4/5 Vote Required YES NO

SUBJECT:

Approval to Close the 30-day Public Comment Period, and Conduct a Public Hearing to Consider Approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice, and the Filing of a Notice of Exemption

STAFF RECOMMENDATIONS:

1. Close the 30-day public comment period and conduct a public hearing.
2. Approve the filing of a Notice of Exemption finding that the proposed approvals are Exempt under provisions of the California Environmental Quality Act (CEQA) pursuant to State Guidelines.
3. Approve the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice and authorize staff to submit to the Department of Housing and Urban Development (HUD).

(Continued on Page 2)

FISCAL IMPACT:

The funds for implementation of the Con Plan, AAP, and AI being considered as part of this item are derived entirely from special revenues administered by the United States Department of Housing and Urban Development (HUD). Approval of the proposed Con Plan, AAP, and AI has the potential to generate an estimated \$10,988,435 in federal Community Development Block Grant (CDBG), \$953,345 in Emergency Solutions Grant (ESG) funding to the Stanislaus Urban County over the next five years.

(Continued on Page 2)

BOARD ACTION AS FOLLOWS:

No. 2015-202

On motion of Supervisor O'Brien, Seconded by Supervisor De Martini
and approved by the following vote.

Ayes: Supervisors: O'Brien, Chiesa, De Martini, and Chairman Withrow

Noes: Supervisors: None

Excused or Absent: Supervisors: None

Abstaining: Supervisor: Monteith

1) X Approved as recommended

2) _____ Denied

3) _____ Approved as amended

4) _____ Other:

MOTION:



ATTEST:

CHRISTINE FERRARO TALLMAN, Clerk

File No.

Approval to Close the 30-day Public Comment Period, and Conduct a Public Hearing to Consider Approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice, and the Filing of a Notice of Exemption

Page 2

STAFF RECOMMENDATIONS: (Continued)

4. Authorize the Director of Planning and Community Development to sign and submit to HUD the Application for Federal Assistance (SF424) and Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG) Certifications.
5. Authorize the Chairman of the Board of Supervisors to sign the Fiscal Year 2015-2016 Allocation Agreements with each Stanislaus Urban County member.
6. Authorize the Director of Planning and Community Development to execute any related program agreements, contracts, or other documentation required for implementation of CDBG, ESG, HOME Investment Partnerships Program (HOME), Neighborhood Stabilization Programs (NSP), CalHome, and any other programs identified in the Annual Action Plan. This authorization includes the use of any program income in accordance with applicable program guidelines.
7. Authorize the Planning and Community Development Department to incorporate any comments received prior to the close of the public comment period and during the public hearing in the final documents and to make alternations to the documents as directed by HUD, provided alternations are technical in nature and do not alter the approved programs or funding allocations

FISCAL IMPACT: (Continued)

The Urban County's Fiscal Year 2015-2016 funding allocations are approximately \$2,388,356 for CDBG and ESG programs.

DISCUSSION:

This is a request to close the 30-day public comment period, and conduct a Public Hearing to consider approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice.

Federal regulations require a 30-day public comment period prior to local approval of a Con Plan, AAP, and/or AI. To comply with this requirement, the Stanislaus County Board of Supervisors authorized the release for public review of the Draft Con Plan, AAP, and AI for the Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG) Programs on March 31, 2015 (Attachment "1" – March 31, 2015 Board of Supervisors Report).

Copies of the Draft Con Plan, AAP, and AI have been available for public review since March 31, 2015 at the planning departments of each member of the Stanislaus Urban County, and online at <http://www.stancounty.com/planning/index-cdbg.shtm>. Over 500

Approval to Close the 30-day Public Comment Period, and Conduct a Public Hearing to Consider Approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice, and the Filing of a Notice of Exemption
Page 3

stakeholders were also notified via email of the 30-day public comment period, the availability of the draft documents, and the May 5, 2015 Board hearing. The versions being proposed for adoption include minor changes including formatting, the minor adjustments to program narratives to address consistency, the inclusion of statistical information not available as of the date of release, and the clarification of some statistical data.

Stanislaus County, along with the cities of Ceres, Hughson, Newman, Oakdale, Patterson, and Waterford, form what is known as the Stanislaus County Urban County (hereafter referred to as the "Urban County") for purposes of participating under HUD's Community Planning and Development (CPD) entitlement programs.

Traditionally, the Urban County has conducted the consolidated planning process independently; however, because the Urban County and the City of Turlock are partners in the City of Turlock/Stanislaus County HOME Investment Partnerships Program (HOME) Consortium (hereafter referred to as the "HOME Consortium") and both jurisdictions are due for a Consolidated Plan update in 2015, the Urban County and City of Turlock have joined efforts in preparing a regional Consolidated Plan. Like the Urban County, the City of Turlock is an entitlement jurisdiction receiving CDBG funding directly from HUD and serves as the "lead entity" of the HOME Consortium.

Although the consolidated planning process and creation of the Con Plan, AAP, and AI has been conducted jointly, it is important to note that Stanislaus County and the City of Turlock will independently approve each document. Stanislaus County will approve the documents as "lead entity" for the Stanislaus Urban County for its CDBG and ESG programs and the City of Turlock will approve the documents as "lead entity" for the HOME Consortium funds and Turlock's own CDBG entitlement funds.

The following is an overview, as it relates to the Urban County, of each document being presented to the Board of Supervisors for adoption:

FISCAL YEAR 2015-2020 REGIONAL CONSOLIDATED PLAN (Con Plan)

The Con Plan has been developed in accordance with HUD's Citizen Participation regulations consisting of a community outreach process which included a series of community workshops, stakeholder meetings, a print and online survey, and private and public agency phone and email consultations. A complete summary of the community outreach process is provided in the Community Participation Summary section of the attached Con Plan.

In Fiscal Year 2015-2016, the Urban County will be entering its fourteenth year as an Entitlement Jurisdiction for CDBG funds and the twelfth year as a recipient of ESG funds. There are three specific goals for the CDBG/ESG programs. They are:

1. Provide decent housing;
2. Provide a suitable living environment; and,
3. Expand economic opportunities

The proposed Con Plan was designed to address the above program goals by outlining the Urban County's needs and priorities for the plan period. CDBG program funds are designed to serve those at or below 80% of the Area Median Income (AMI). The current 100% AMI in Stanislaus County for one (1) person is \$39,900 and a family of four (4) is \$56,900. A current AMI table for Stanislaus County is provided in Attachment "2" of this report.

Further, if a project benefits a specific neighborhood or community, at least 51% of the population within that geographic boundary must be within this targeted income group; this is known as an "area benefit activity" and recognized by HUD as a Low/Moderate Area (LMA).

With HUD's release of 2010 Census data in 2014, a number of areas that previously qualified as LMA are no longer eligible. Two Urban County partner members (Newman and Patterson) no longer contain any LMA's, according to the new Census data, while the City of Waterford gained an LMA (historically, Waterford did not have any LMA's). The northeast portion of the unincorporated Empire community (north of Yosemite Boulevard and east of Santa Fe Avenue) is also no longer a recognized LMA according to the new data.

There is reason to believe that HUD-provided data does not reflect the actual majority income levels of several Urban County neighborhoods based on local knowledge and information of the community's demographics. In cases where Urban County members would like to undertake area benefit activities that are not identified as recognized as LMA's by HUD, door-to-door income surveys of the project areas will be conducted to ensure that they meet the required LMA standards.

The Fiscal Year 2015-2020 Regional Consolidated Plan identifies the following needs and priorities:

- Infrastructure Improvements
- Economic Development Programs
- Affordable Housing Programs/Housing Assistance
- Fair Housing Services
- Public Services
- Homeless Shelter Services
- Homeless Prevention and Rapid Re-Housing Services
- Homeless Services Data Collection

Approval to Close the 30-day Public Comment Period, and Conduct a Public Hearing to Consider Approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice, and the Filing of a Notice of Exemption

Page 5

With the development of the proposed Con Plan, some new tools have been incorporated to provide the Urban County members greater flexibility in funding projects. Those new tools include:

- The voluntary shifting of fiscal year allocations among Urban County members to allow members to benefit from larger sums of funding to complete infrastructure projects of larger scale. Because redevelopment funds are no longer an option for leveraging funding, annual CDBG allocations alone may not be enough to complete a larger scale project.

Any Urban County members wishing to shift their allocations must enter into an independent agreement to be recognized by the County. Cities entering into an agreement to shift funds will be responsible for working out repayment terms amongst themselves if future allocations decline.

The report to the Board of Supervisors on March 31, 2015 included information regarding the City of Waterford's intent to enter into an agreement with the City of Hughson to shift CDBG funding; however, the agreement with the City of Hughson was never reached, and an agreement with the City of Newman has now been executed. The agreement allows for the shift of \$100,000, in both Fiscal Year 2015-2016 and 2016-2017, with the City Waterford receiving \$100,000 of City of Newman funds in Fiscal Year 2015-2016 and the City of Newman receiving \$100,000 of City of Waterford's funds in Fiscal Year 2016-2017. The executed agreement will be reflected in the Urban County's allocation agreements with each of the cities.

- The use of State CDBG Program Income (PI) through the Urban County. Prior to joining the Urban County, several Urban County members received CDBG funds directly from the State of California. Since joining the Urban County, some of these members have been collecting program income derived from loans made from their State grants.

The City of Waterford, has formally requested to report and use the State PI through the Urban County. Use of the funds through the Urban County simplifies the process for cities, which would otherwise have to establish a reuse plan with the State Department of Housing and Community Development. As the lead entity for the Urban County, Stanislaus County ultimately assumes the reporting and monitoring liabilities for State PI reported and used through the Urban County. In order to limit liability, the following criteria will need to be met in order for Stanislaus County to accept the oversight of State PI:

- Adequate notice to Stanislaus County of the intent to use PI will need to be provided to allow for reporting via the Urban County's AAP.

- A re-use plan detailing the timely use of the PI, within the same AAP fiscal year, will need to be established by the city and accepted by Stanislaus County.
- PI will need to be used towards a CDBG eligible activity reflected in an adopted AAP and approved for funding by HUD.

In addition to CDBG and ESG funding, the Con Plan also recognizes the continued use of Neighborhood Stabilization Program (NSP) 1 and 3 funding, including PI, for activities authorized and made eligible under the previous Con Plan and AAP's. Those activities include:

- Continuing to use NSP 1 and 3 PI to remove blighted properties via the Abandoned and Dangerous Building Program (ADB). The ADB is responsible for investigating requests from the public and public agencies regarding structures that pose a threat to the health and safety of unincorporated Stanislaus County communities. The ADB was integrated into the NSP program to effectively address issues of blight resulting from abandoned and dangerous buildings declared a nuisance in NSP target areas.
- Continuing efforts at liquidating NSP inventory (six properties) by finding eligible first time homebuyers to purchase the properties. The six remaining properties are located in the Airport, Empire, Grayson, Parklawn and Salida neighborhoods.
- Development of a vacant NSP property within the City of Oakdale for a multi-family affordable housing project, or other eligible development, or liquidation.

FISCAL YEAR 2015-2016 ANNUAL ACTION PLAN (AAP)

The AAP is an integral component of the Urban County's Con Plan, and describes the specific programs and projects that will be undertaken during Fiscal Year 2015-2016. The following is an overview of the funding allocations and projects identified in the AAP:

Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG) Funding Allocations

In February 2015, HUD announced the Fiscal Year 2015-2016 official program allocations. The Stanislaus Urban County CDBG and ESG combined allocations for Fiscal Year 2015-2016 will be:

● CDBG	\$2,197,687
● ESG	\$ 190,669
TOTAL	\$2,388,356

The Fiscal Year 2015-2016 allocations reflect an increase of 2% (CDBG) and 11% (ESG) over the previous fiscal year (Fiscal Year 2014-2015).

Approval to Close the 30-day Public Comment Period, and Conduct a Public Hearing to Consider Approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice, and the Filing of a Notice of Exemption
Page 7

CDBG formula allocations to each respective Urban County member are determined based on U.S. Census poverty and population data formula, after deducting administration, fair housing, and public service allocations from the original allocation.

The following is a summary of funding distribution among Urban County members and special programs based on the above specified allocation method:

**TABLE ONE
CDBG AND ESG ALLOCATION**

Urban County Member	Activities	Administration	Total
Ceres	\$244,987	\$15,209	\$260,196
Hughson	122,532	15,209	137,741
Newman	139,147	15,209	154,356
Oakdale	153,530	15,209	168,739
Patterson	138,993	15,209	154,202
Waterford	127,609	15,209	142,818
Stanislaus County	611,854	323,013	934,867
Public Services Grants	219,768		219,768
Fair Housing		25,000	25,000
FY 2015-2016 CDBG Subtotal	\$1,758,420	\$439,267	\$2,197,687
ESG	176,369	14,300	190,669
Total	\$1,934,789	\$453,567	\$2,388,356

In addition to the Fiscal Year 2015-2016 allocation identified above, Stanislaus County will plan to utilize approximately \$128,383 in program income collected from repayment of housing assistance loans to fund CDBG activities to be undertaken during the fiscal year. Stanislaus County and Urban County member cities will also carry over any unspent CDBG funds from prior years to use on their respective existing and/or proposed activities.

Approval to Close the 30-day Public Comment Period, and Conduct a Public Hearing to Consider Approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice, and the Filing of a Notice of Exemption
Page 8

Activities identified within the AAP must be consistent with the Urban County's proposed Con Plan, which outlines the communities' needs and priorities for the plan period. The proposed Fiscal Year 2015-2020 Con Plan identifies the need for infrastructure improvements. To address these needs, the Urban County participants will utilize their respective yearly CDBG fund allocations for infrastructure improvements in U.S. Census designated low-income residential neighborhoods and/or neighborhoods found to be income eligible via project area income surveys. Infrastructure improvements include, but are not limited to, sewer/water line installation/replacement, curb, gutter, storm drain, and sidewalks.

The following is an overview of the proposed Fiscal Year 2015-2016 infrastructure projects for all the Urban County jurisdictions:

Stanislaus County:

Airport Neighborhood Sewer Infrastructure Project: Stanislaus County will seek State Water Board funds to finance the remaining phases of the sanitary sewer system in the Airport Neighborhood.

Empire Storm Drain Infrastructure Project: Stanislaus County will continue seeking viable alternatives for addressing storm drainage within the community, including sidewalks to help facilitate a safer path of travel in storm water impacted areas. On September 9, 2014, the Board of Supervisors approved the Empire Community Storm Drainage Report detailing an alternative, low impact design, swale system and the initiation of a Proposition 218 vote for the funding of the project; however, initial feedback from the community has not indicated support for the alternative swale system. In response to the feedback, the County is working with the Empire community to identify alternative targeted storm drain and sidewalk solutions.

The County's Fiscal Year 2015-2016 allocation will be split equally among both projects for HUD reporting purposes; however, the funds will be reallocated, as necessary, in response to future actions of the Board of Supervisors authorizing the projects to proceed.

City of Ceres: Conduct infill construction to include curb, gutter, sidewalk, storm drain, ADA accessible ramps (if needed), and pavement overlay improvements in the eligible residential area of Nadine Avenue and Evans Road.

City of Hughson: Conduct infrastructure improvements along 2nd Street between Walker Lane and Fox Road. Improvements may consist of installation of curb, gutter, sidewalks storm drain and ADA accessible rams as needed.

City of Oakdale: Conduct Davitt Avenue Project Phase II construction to include sewer and water main line replacement and curb, gutter, sidewalk, and pavement overlay infrastructure improvements.

Approval to Close the 30-day Public Comment Period, and Conduct a Public Hearing to Consider Approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice, and the Filing of a Notice of Exemption
Page 9

City of Patterson: Continue construction of sewer infrastructure improvements on Fourth Street Project. Improvements will consist of water main replacement along Fourth Street.

City of Waterford: Continue the La Gallina Infrastructure Improvements Project. The project may consist of installing curb, gutter, sidewalk, and ADA accessible ramps as needed along La Gallina Avenue. The City of Waterford plans to use State CDGB PI, with County approval of re-use plan, for this project.

The AAP reflects the City of Newman as intending to conduct Inyo Avenue Infrastructure Project Phase II to install/replace curb, gutter, and sidewalk along Inyo Avenue from R to Merced Streets. As previously discussed, the City of Newman has entered into an agreement with the City of Waterford to shift their Fiscal Year 2015-2016 funds to the City of Waterford. As such, the City of Newman's project will be placed on hold until Fiscal Year 2016-2017.

In addition to infrastructure, CDBG funds will be used for the following activities:

Economic Development

The use of CDBG funds for Economic Development (ED) activities can be challenging due to restrictive HUD regulations; however, the Stanislaus Urban County has identified the following potential economic development activities to be undertaken throughout the 2015-2020 Consolidated Planning period:

Americans with Disabilities (ADA) Compliance Assistance Program

This program will provide technical assistance on ADA compliance requirements to eligible business and property owners by qualified professionals to be contracted by the County. Assistance will be focused on, but not limited to, the following:

- How to protect against unwarranted ADA lawsuits
- Federal and State accessibility requirements
- The Certified Access Specialist (CASp) inspection process.

In addition to technical assistance, the program may also cover costs to eligible businesses for inspections and associated on-site improvements.

Small Business Technical Assistance Program

Stanislaus Urban County will partner with the Alliance Small Business Development Center (SBDC) to provide technical assistance to small businesses throughout the County. While SBDC technical assistance programs already exist, Stanislaus County will work with the Alliance to facilitate a more "hands on" role by County staff in the assistance process as a means of gathering better insight into the constraints facing small business development. The insight gain will allow the Urban County to measure the value of its funding and to use information gained to develop future ED programs.

Other HUD eligible economic development activities, such as a façade improvement program, may also be undertaken during the 2015-2020 Regional Consolidated Planning period. However, such projects would be presented to the Board of Supervisors prior to implementation in the appropriate fiscal year's Annual Action Plan.

Fair Housing Program

As a HUD mandated requirement, the Urban County must provide a fair housing program designed to combat impediments to fair housing choice through education, investigation, and litigation. The Urban County annually complies with this requirement by contracting with a fair housing service provider to seek cooperation of owners and managers, and provide appropriate information and referrals in the effort to prevent housing discrimination. Fiscal Year 2015-2016 funding includes an allocation of \$25,000 for Fair Housing and Tenant/Landlord Services to be provided by Project Sentinel.

Public Services Grants

CDBG funds allow for opportunities for the Urban County to fund non-profit organizations that provide a public service. In accordance with HUD regulations, approximately ten percent of the total CDBG allocation, \$219,768 for Fiscal Year 2015-2016, is proposed to be set-aside for this purpose. A portion of these funds (\$40,000) was set aside to provide one Focus on Prevention Grant which would provide services beyond that of the usual public service program activity and will align with the goals of the County's Focus on Prevention Platform.

As part of this funding cycle, the Urban County received and reviewed twenty-six (26) Public Services Grant (PSG) and five (5) Focus on Prevention Grant (FPG) competitive applications for funds. Organizations that have applied for public services funding include, but are not limited to, those providing services to at-risk youth, seniors, and the homeless.

As reflected in the draft AAP, Attachment "3" includes a list of all PSG and FPG applications received (in the order of highest to lowest ranking) with applications recommended for funding reflected in bold and italic print. Recommendations for funding were made by a review panel that consists of representatives from the Urban County members, a representative from the Stanislaus County Continuum of Care, and a representative from the Stanislaus County Chief Executive office.

The PSG and FSG applications recommended for funding are as follow:

Public Services Grants*

Court Appointed Special Advocates (CASA) – *Direct Services*

Center for Human Services – *Ceres Partnership for Healthy Children*

Center for Human Services – *Westside Family Resource Center*

Approval to Close the 30-day Public Comment Period, and Conduct a Public Hearing to Consider Approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice, and the Filing of a Notice of Exemption
Page 11

Center for Human Services – *Oakdale Family Resource Center*
Children’s Crisis Center – *Guardian House*
The Salvation Army Red Shield – *Tutoring and Mentoring Program*
Second Harvest – *Food Assistance Program*
Second Harvest – *Food 4 Thought Program*
We Care – *Emergency Cold Weather Shelter*

Focus on Prevention Grant*

Central Valley Youth for Christ – *Family Counseling Concern Strength thru Guidance*

* *The sum of all amounts proposed to be awarded to the ten PSG and FPG applications is \$417 less the \$219,768 set aside for Public Services as two applicants did not request maximum grant amounts. To address this, the \$417 will be spread equally amongst all ten grantees as part of the final contract awards.*

Attachment “4” provides a summary of all five FPG grant application’s received. In recognition of this year’s FPG being a first step towards alignment with the County’s efforts, staff has met with the Central Valley Youth for Christ (CVYFC) to begin exploring opportunities to strengthen the scope of their grant. The CVYFC’s FPG grant application proposes to offer follow-up counseling services, a new service, to youth and families identified primarily through their existing Point Break program in partnership with the Ceres Unified School District. In addition to the Ceres Unified School District, FVYFC’s Point Break program has also been successfully implemented in the Newman-Crows Landing Unified and Oakdale Joint Unified School Districts. If awarded the FPG, CVYFC has indicated the ability to expand the proposed follow-up counseling services to other school districts serving the Urban County members. In addition to CVYFC’s collaboration with the educational sector, the organization has established ties to faith based, non-profit, business and government sectors of the community.

As the County’s Focus on Prevention efforts evolve, so will the Urban County’s FPG grant program. If awarded the FPG, staff will continue to meet with CVYFC to more fully define the program success indicators that will be measured throughout the program’s implementation.

Emergency Solutions Grants

As with CDBG Public Service funding, ESG funds allow the opportunity for the Urban County to fund non-profit organizations that provide public services to homeless. ESG funds will be used to provide operational and essential services funding for transitional and emergency homeless shelters, for the development of the Homeless Management Information System (HMIS), and to provide financial assistance, in combination with case management, to stabilize housing for persons experiencing homelessness or who are at-risk of becoming homeless. This year, the Urban County received and reviewed ten (10)

Approval to Close the 30-day Public Comment Period, and Conduct a Public Hearing to Consider Approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice, and the Filing of a Notice of Exemption
Page 12

ESG competitive applications for funds (the application review was conducted by the same review panel identified above for CDBG Public Services funding).

As reflected in the draft AAP, Attachment "3" includes a list of all ESG applications received (in the order of highest to lowest ranking) with applications recommended for funding reflected in bold print. The ESG applications recommended for funding are as follow:

Children's Crisis Center – Verda's Children Shelter
Children's Crisis Center – Martha's High Risk Infant/Toddler Shelter
Community Housing and Shelter Services – *Homeless Prevention Rapid Re Housing*
Community Housing and Shelter Services – *Homeless Management Information Systems Data Entry*
Family Promise – *New Beginnings – Shelter to Solutions*
We Care of Turlock – *Emergency Cold Weather Shelter*
We Care of Turlock – *Rapid Re-Housing Program*

ESG funding is divided into four different funding pools (Administration, HMIS, Emergency Shelter, and Homeless Prevention and Rapid Re-housing). The recommended funding allows for 7.5% of the total ESG allocation to be used for administration, up to \$15,000 set aside for Homeless Management Information Systems (HMIS) data entry, and the remaining funds are then split 50/50 between emergency shelter programs and homeless prevention and rapid re-housing programs.

While Community Housing Shelter Services (CHSS) –HMIS Data Entry application was scored competitively, the recommendation for award was based on the service provided, not the scoring results. HUD annually provides direct funding to local agencies participating in the Stanislaus County Continuum of Care (CoC) through a competitive process. The HMIS funding is set aside annually to assist the Stanislaus CoC in capturing data from the Modesto Gospel Mission, which does not independently collect the information, in an effort to ensure that annual CoC program dollars remain in Stanislaus County by showing the need for services. If more than one application for the HMIS data entry funds were received, then the funds would have been awarded to the agency with the highest scoring application. However, as CHSS was the only application received for these funds, they were recommended for funding despite how their application scored.

While both HOST and Salvation Army scored higher than CHSS, their applications were for emergency shelter funds and not for funding to provide HMIS services. All available emergency shelter funds were recommended to be awarded to applicants who scored higher than HOST and the Salvation Army.

Approval to Close the 30-day Public Comment Period, and Conduct a Public Hearing to Consider Approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice, and the Filing of a Notice of Exemption

Page 13

Non-Profit Agency Responses to PSG, FPG, and ESG Recommended Awards

Staff has received three requests for follow-up (The Stanislaus County Commission on Aging, the Salvation Army, and the United Samaritans Foundation) regarding the PSG, FPG, and ESG funding recommendations, which do not include funding for any of the three agencies. In response to the requests, staff has met with representatives of all three agencies to review the scoring criteria, final scores, and to provide feedback on their respective applications.

The Stanislaus County Commission on Aging has raised concerns regarding the lack of senior programs recommended for funding, specifically the Healthy Aging Association, and whether consideration was given during the evaluation process in regard to target populations (See Attachment "5" – Stanislaus County Commission on Aging Letter Dated April 20, 2015). The Commission on Aging is concerned that no senior services have been recommended for funding, despite senior services being identified as a high priority in the draft Con Plan. In response to these concerns, staff has met with representatives of the Healthy Aging Association to explain the criteria considered during scoring. In addition to populations served, other scoring criteria include: Agency Capacity and Experience; Soundness of Approach; Methodology; Funding Resources; Achieving Results and Program Evaluation; and Grant Submittal/Completeness.

Depending on the service provided each application receives a score between 0-5, based off of how high that service is prioritized within the Con Plan. The priorities for public services reflected in the draft Con Plan and AAP are as follow:

- High Priority: Services for at-risk children/youth, senior services, and services for physically/mentally disabled persons.
- Medium Priority: homeless services, services for victims of domestic violence, emergency food assistance, and parent education.
- Low Priority: utility assistance, financial literacy, services for persons recently incarcerated or on parole, services for persons with substance abuse problems, and other general low/moderate income services.

The priorities are based on public participation and survey responses received during the Con Plan and AAP development process and are reflective of input received from approximately 587 responses. The total maximum point score for conformance with Con Plan priorities is 5 out of 100 points. In the case of Healthy Aging Association, senior services are considered a high priority, and as such they received a maximum of 5 points within this category. The agency submitted the only application including a program targeted to seniors and tied with two other applicants for twelfth place, with only the top nine ranking applications being recommended for PSG funding.

The Salvation Army requested a re-evaluation of their PSG, FPG, and ESG applications and clarification on why the CHSS-HMIS Data Entry application was recommended for

Approval to Close the 30-day Public Comment Period, and Conduct a Public Hearing to Consider Approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice, and the Filing of a Notice of Exemption

Page 14

ESG funding when it was ranked lower than the Salvation Army's application. As discussed above, CHSS is being recommended for HMIS funding set-aside for a needed service and not based on the competitive scores. In response to the meeting with staff, the Salvation Army has provided a follow-up letter requesting that their organization be considered for funding in the event funds go unused or extraordinary funding becomes available (See Attachment "5" – The Salvation Army Letter Dated April 21, 2015).

The United Samaritans Foundation (USF) requested information to better understand the funding recommendations. After reviewing their scores and discussing the general competitive grant process, USF commented that, while they support the Focus on Prevention effort, they hope that there will still be room reserved in the CDBG and ESG programs for supporting services that meet the basic needs of low-income residents, such as emergency food.

This Fiscal Year there have been two program changes to how the award of grant funds have been recommended. First, as reflected in the letter from the Commission on Aging, \$40,000 in PSG funds have been set-aside for a FPG. This is a first step in beginning to align public service program activity with the goals of the County's Focus on Prevention Platform. Second, in years past the percentage of PSG funding awarded to individual applications was weighted based on final scores. Under the weighted method, top ranked application would receive 100% of what they requested and then the funding would be incrementally reduced to 60% of the funding request. This method allowed more applications to be recommended for funding, but at a lower funding level than requested. In an effort to provide a funding level that would permit applicants to provide the range of services included in their proposals, this year 100% of the requested funding is recommended for all top ranking applications. These two changes to the competitive grant process reduced the typical 14-16 PSG awards to the proposed nine award recommendations for this Fiscal Year.

Neighborhood Revitalization Strategy Areas (NRSA) -- Airport and Parklawn Neighborhoods

Neighborhood Revitalization Strategy Areas (NRSA) for the Airport and Parklawn neighborhoods were established via the Fiscal Year 2012-2015 Consolidated Plan. Progress toward meeting the goals and objectives identified in the NRSA has been made in each neighborhood via the funding of PSG's to service providers, providing affordable housing opportunities to area residents, and installation of sewer systems in both neighborhoods (fully completed in Parklawn and partially completed in Airport).

Because the NRSA was a five year plan, NRSA activities will continue to be implemented, using CDBG funds allocated in prior years, and reported over the next two fiscal years. These activities include but are not limited to affordable housing and sewer infrastructure improvements (in the Airport Neighborhood).

Approval to Close the 30-day Public Comment Period, and Conduct a Public Hearing to Consider Approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice, and the Filing of a Notice of Exemption
Page 15

HOME Investment Partnerships Program (HOME)

HOME program funds are used by localities to provide the following activities:

- Affordable housing development;
- Low-income first time homebuyer down payment assistance;
- Owner-occupied housing rehabilitation assistance; and
- Program administration.

The Fiscal Year 2015-2016 estimated HOME Consortium allocation is \$911,823 (allocation amount for entire HOME Consortium). Fiscal Year 2015-2016 award amounts are determined and adopted by the City of Turlock. Stanislaus County's Fiscal Year 2015-2016 HOME allocation is proposed to be \$124,607 (includes \$2,500 for administrative activities).

Currently, the City of Turlock contracts independently with each of the Urban County participants and, as discussed earlier, is the "lead entity" with responsibility for implementing and administering HOME funds to the HOME Consortium. Please refer to the City of Turlock's Fiscal Year 2015-2016 AAP for specific HOME activities.

Administration and Monitoring

Stanislaus County Planning and Community Development Department staff will continue to provide administrative services to each of the Urban County's participants, as well as to its own activities. As the "lead entity" of the Urban County, HUD recognizes Stanislaus County as the sole grantee responsible for the administration of CDBG and ESG funds. Accordingly, the Planning and Community Development Department is responsible for the receipt and expenditure of funds, environmental documentation for projects, eligibility determination of programs and those persons accessing the services of the programs, and program monitoring.

Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice

Along with the Regional Consolidated Plan and Annual Action Plan, a Regional Analysis of Impediments to Fair Housing Choice (AI) has also been prepared.

The Fiscal Year 2015-2020 AI contains housing demographics and employment profiles, an evaluation of the mortgage lending practices, real estate laws, private practices, fair housing claims and enforcement, and identification of any impediments to fair housing that exist within the Urban County and the City of Turlock, along with suggested measures for addressing those impediments. The following were identified as impediments to fair housing:

Approval to Close the 30-day Public Comment Period, and Conduct a Public Hearing to Consider Approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice, and the Filing of a Notice of Exemption
Page 16

- Shortage of affordable housing supply.
- Shortage of subsidies and strategies to promote affordable, accessible housing for lower income households, including protected classes.
- Differential origination rates based on race, ethnicity, and location.
- Improved coordination with real estate industry.
- Improved knowledge of fair housing rights.
- Discrimination in rental housing.
- Possible constrain of local development standards and their implementation on housing opportunities for minority and low-income households.
- Improved access to employment opportunities, transportation, and public and social services, and infrastructure.

As mentioned earlier, each impediment identified in the AI includes planned actions to address each impediment. For a complete list of planned actions, please refer to the Executive Summary or “Identification of Impediments and Actions to Address” section of the AI.

It is important to note that the identification of an impediment does not necessarily identify a deficiency. By identifying the presence of an impediment, the AI states the nature of a problem that the recommended actions will serve to mitigate. These may be affirmative actions as much as responses to current conditions.

POLICY ISSUES:

Approval of the proposed Con Plan, AAP, and AI furthers the Board’s priorities of A Safe Community, A Healthy Community, Effective Partnerships, A Well Planned Infrastructure System, and Efficient Delivery of Public Services by providing the community with the necessary funds to implement needed programs and projects.

The programs and projects represented in the Con Plan, AAP, and AI are consistent with the goals and objectives of the Stanislaus County General Plan, and the comparable plans of the cities of Ceres, Hughson, Newman, Oakdale, Patterson, and Waterford.

STAFFING IMPACT:

The Stanislaus County Planning and Community Development Department is ultimately responsible for the administration of all CDBG, and ESG funds allocated to the Urban County. In addition to monitoring the program and project files of each of the participating Urban County cities, planning staff is responsible for monitoring the program and project files of each organization receiving funds from the Urban County. Annually, the number of different activities receiving CDBG and/or ESG funds varies between 18 and 27. Planning

Approval to Close the 30-day Public Comment Period, and Conduct a Public Hearing to Consider Approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice, and the Filing of a Notice of Exemption

Page 17

staff also assists participating Urban County cities in the development of eligible projects and programs to ensure that they meet or exceed regulatory guidelines. Existing staff will perform these duties and no additional staff is required.

CONTACT PERSON:

Angela Freitas, Director of Planning & Community Development.
Telephone: 209-525-6330

ATTACHMENTS:

1. Board of Supervisors Report, March 31, 2015
2. Area Median Income (AMI) Table for Stanislaus County
3. Public Services Grant (PSG), Focus on Prevention Grant (FPG), and Emergency Solutions Grant (ESG) Listing of Applications Received and Ranking.
4. Focus on Prevention Grant (FPG) Application Summary
5. Response to Recommended Awards
 - a. The Salvation Army, Letter Dated April 21, 2015
 - b. Stanislaus County Commission on Aging, Letter Dated April 20, 2015
6. Draft Fiscal Year 2015-2020 Regional Consolidated Plan
7. Draft Fiscal Year 2015-2016 Annual Action Plan
8. Draft Fiscal Year 2015-2020 Regional Analysis of Impediments to Fair Housing Choice

THE BOARD OF SUPERVISORS OF THE COUNTY OF STANISLAUS
ACTION AGENDA SUMMARY

DEPT: Planning and Community Development *DrC* BOARD AGENDA # *D-1
Urgent Routine AGENDA DATE March 31, 2015
CEO Concurs with Recommendation YES NO 4/5 Vote Required YES NO
(Information Attached)

SUBJECT:

Approval to Open a 30-day Public Comment Period and Set a Public Hearing on May 5, 2015 at 9:05 a.m. to Consider Approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice

STAFF RECOMMENDATIONS:

1. Open the 30-day public comment period to consider approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice.
2. Set a Public Hearing for May 5, 2015 at 9:05 a.m. to close the public comment period and consider approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice.

FISCAL IMPACT:

The funds for implementation of the Con Plan, AAP, and AI being considered as part of this item are derived entirely from special revenues administered by the United States Department of Housing and Urban Development (HUD). A delay in opening the public comment period or setting a public hearing may impact receipt of the Fiscal Year 2015-2016 funding, approximately \$2,388,356, for the Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG).

BOARD ACTION AS FOLLOWS:

No. 2015-I40

On motion of Supervisor Chiesa, Seconded by Supervisor Monteith
and approved by the following vote,
Ayes: Supervisors: O'Brien, Chiesa, Monteith, De Martini, and Chairman Withrow
Noes: Supervisors: None
Excused or Absent: Supervisors: None
Abstaining: Supervisor: None

- 1) X Approved as recommended
- 2) _____ Denied
- 3) _____ Approved as amended
- 4) _____ Other:

MOTION:

I hereby certify that the foregoing is a full, true and correct copy of the Original entered in the Minutes of the Board of Supervisors.

CHRISTINE FERRARO TALLMAN
Clerk of the Board of Supervisors of the County of Stanislaus, State of California

By Christine Ferraro Tallman



ATTEST:

Christine Ferraro Tallman
CHRISTINE FERRARO TALLMAN, Clerk

File No.

Approval to Open a 30-day Public Comment Period and Set a Public Hearing on May 5, 2015 at 9:05 a.m. to Consider Approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice
Page 2

DISCUSSION:

This is a request to open a 30-day public comment period and set a public hearing on May 5, 2015 at 9:05 a.m. to consider approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice

Federal regulations require a 30-day public comment period prior to local approval of a Con Plan, AAP, and/or AI. Draft copies of the Con Plan, AAP, and AI to be considered for approval on May 5, 2015 and are available for review between March 31, 2015 and May 5, 2015 at the Planning Departments of each member of the Stanislaus Urban County, and online at <http://www.stancounty.com/planning/index-cdbg.shtm>.

Background:

The adoption of the Regional Consolidated Plan (Con Plan), Annual Action Plan (AAP), and Regional Analysis of Impediments to Fair Housing (AI) are a requirement of the U.S. Department of Housing and Urban Development (HUD) for jurisdictions that receive and administer certain HUD block grants on an entitlement basis.

The Con Plan is a five year strategic plan that details the goals for HUD Community Planning and Development (CPD) entitlement programs. The consolidated planning process serves as the framework for a community-wide dialogue to identify housing and community development priorities that align and focus funding from programs such as CPD formula block grant programs: the Community Development Block Grant (CDBG) Program, the HOME Investment Partnerships (HOME) Program, and the Emergency Solutions Grant (ESG) Program. These programs are targeted to serve low- and moderate-income persons and the neighborhoods where they live, in addition to the activities which aid in the prevention or elimination of slums and blight.

The AAP is a component of the Con Plan in which the jurisdiction identifies the activities it will undertake during the upcoming fiscal year with CPD formula grant funds to address the goals and priorities identified in the Con Plan. Further, the AAP serves as an annual funding "application" for CDBG, ESG, and HOME funds.

The AI is also a mandatory comprehensive housing analysis of the jurisdiction's fair housing activities. As part of the Con Plan, HUD funded recipients are required to: (1) examine and attempt to alleviate housing discrimination within their jurisdiction; (2) promote fair housing choice for all persons; (3) provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion, sex, disability, familial status, or national origin; (4) promote housing that is accessible to and usable by persons with disabilities; and (5) comply with the non-discrimination requirements of the Fair Housing Act.

Approval to Open a 30-day Public Comment Period and Set a Public Hearing on May 5, 2015 at 9:05 a.m. to Consider Approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice
Page 3

Regional Approach:

Currently, Stanislaus County, along with the cities of Ceres, Hughson, Newman, Oakdale, Patterson, and Waterford, form what is known as the Stanislaus County Urban County (hereafter referred to as the "Urban County") for purposes of participating under HUD's CPD entitlement program. As an entitlement jurisdiction, the Urban County receives both Community Development Block Grant (CDBG) and Emergency Solution Grant (ESG) grant funds.

Traditionally, the Urban County has conducted the consolidated planning process independently; however, because the Urban County and the City of Turlock are partners in the City of Turlock/Stanislaus County HOME Consortium (hereafter referred to as the "HOME Consortium") and both jurisdictions are due for a Consolidated Plan update in 2015, the Urban County and City of Turlock have joined efforts in preparing a regional Consolidated Plan. Like the Urban County, the City of Turlock is an entitlement jurisdiction receiving CDBG funding directly from HUD and serves as the "lead entity" of the HOME Consortium.

To facilitate the consolidated planning process and prepare the five-year Con Plan (for Fiscal Years 2015-2020), AAP (for Fiscal Year 2015-2016), and AI to Fair Housing Choice (for Fiscal Years 2015-2020) documents, the Board of Supervisors approved the award of a contract, following a request for proposal process, on August 12, 2014 to Pacific Municipal Consultants (PMC) based out of Rancho Cordova, California.

Although the consolidated planning process and creation of the Con Plan, AAP, and AI has been conducted jointly, it is important to note that Stanislaus County and the City of Turlock will independently approve each document. Stanislaus County will approve the documents as "lead entity" for the Stanislaus Urban County for its CDBG and ESG programs and the City of Turlock will approve the documents as "lead entity" for the HOME Consortium funds and Turlock's own CDBG entitlement funds.

The following is an overview, as it relates to the Urban County, of each document being presented to the Board of Supervisors for adoption:

FISCAL YEAR 2015-2020 REGIONAL CONSOLIDATED PLAN (Con Plan)

The Con Plan has been developed in accordance with HUD's Citizen Participation regulations consisting of a community outreach process which included a series of community workshops, stakeholder meetings, a print and online survey, and private and public agency phone and email consultations. A complete summary of the community outreach process is provided in the Community Participation Summary section of the attached Con Plan.

In Fiscal Year 2015-2016, the Urban County will be entering its fourteenth year as an Entitlement Jurisdiction for CDBG funds and the twelfth year as a recipient of ESG funds.

Approval to Open a 30-day Public Comment Period and Set a Public Hearing on May 5, 2015 at 9:05 a.m. to Consider Approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice
Page 4

There are three specific goals for the CDBG/ESG programs. They are:

1. Provide decent housing;
2. Provide a suitable living environment; and,
3. Expand economic opportunities

The Con Plan was designed to address the above program goals by outlining the Urban County's needs and priorities for the plan period. CDBG program funds are designed to serve those at or below 80% of the Area Median Income (AMI). The current 100% AMI in Stanislaus County for one (1) person is \$39,900 and a family of four (4) is \$56,900. If a project benefits a specific neighborhood or community, at least 51% of the population within that geographic boundary must be within this targeted income group (this is known as an "area benefit activity"). A current AMI table for Stanislaus County is provided in Attachment "1" of this report.

As stated above, CDBG area benefit activities must address the needs of low and moderate income persons residing in an area where at least 51% of the residents are of low-income. This is recognized by HUD as a Low/Moderate Area (LMA). With HUD's release of 2010 Census data in 2014, a number of areas that previously qualified as LMA are no longer eligible. Two Urban County partner members (Newman and Patterson) no longer contain any LMA areas according to the new Census data. The northeast portion of the unincorporated Empire community (north of Yosemite Boulevard and east of Santa Fe Avenue) is also no longer a recognized LMA according to the new data.

There is reason to believe that HUD-provided data does not reflect the actual majority income levels of several Urban County neighborhoods based on the visible physical conditions of the project areas and local knowledge and information of the community's demographics. In cases where Urban County members would like to undertake area benefit activities that are not identified as recognized LMA areas by HUD, door-to-door income surveys of the project areas will be conducted to ensure that they meet the required LMA standards.

The Fiscal Year 2015-2020 Regional Consolidated Plan identifies the following needs and priorities:

- Infrastructure Improvements
- Economic Development Programs
- Affordable Housing Programs/Housing Assistance
- Fair Housing Services
- Public Services
- Homeless Shelter Services
- Homeless Prevention and Rapid Re-Housing Services
- Homeless Services Data Collection

Approval to Open a 30-day Public Comment Period and Set a Public Hearing on May 5, 2015 at 9:05 a.m. to Consider Approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice
Page 5

With the development of the proposed Con Plan some new tools have been incorporated to provide the Urban County members greater flexibility in funding projects. Those new tools include:

- The voluntary shifting of fiscal year allocations among Urban County members to allow members to benefit from larger sums of funding to complete infrastructure projects of larger scale. Because redevelopment funds are no longer an option for leveraging funding, annual CDBG allocations alone may not be enough to complete a larger scale project.

Any Urban County members wishing to shift their allocations must enter into an independent agreement to be recognized by the County in the appropriate AAP in which the shifting is to occur. The Cities of Hughson and Waterford have notified the County of their intent to shift allocations starting with the Fiscal Year 2015-2016 funding. The terms of their agreement will be reflected in the final AAP presented to the Board of Supervisors for approval on May 5, 2015.

Cities entering into agreement to shift funds, will be responsible for negotiating repayment terms amongst themselves if future allocations decline.

- The use of State CDBG Program Income (PI) through the Urban County. Prior to joining the Urban County, several Urban County members received CDBG funds directly from the State of California. Since joining the Urban County, some of these members have been collecting program income derived from loans made from their State grants.

At least one Urban County member, the City of Waterford, has formally requested to report and use the State PI through the Urban County. Use of the funds through the Urban County simplifies the process for cities, which would otherwise have to establish a reuse plan with the State Department of Housing and Community Development. As the lead entity for the Urban County, Stanislaus County ultimately assumes the reporting and monitoring liabilities for State PI reported and used through the Urban County. In order to limit liability, the following criteria will need to be met in order for Stanislaus County to accept the oversight of State PI:

- Adequate notice to Stanislaus County of the intent to use PI will need to be provided to allow for reporting via the Urban County's AAP.
- A re-use plan detailing the timely use of the PI, within the same AAP fiscal year, will need to be established by the city and accepted by Stanislaus County.
- PI will need to be used towards a CDBG eligible activity reflected in an adopted AAP and approved for funding by HUD.

Approval to Open a 30-day Public Comment Period and Set a Public Hearing on May 5, 2015 at 9:05 a.m. to Consider Approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice
Page 6

In addition to CDBG and ESG funding, the Con Plan also recognizes the continued use of Neighborhood Stabilization Program (NSP) 1 and 3 funding, including PI, for activities authorized and made eligible under the previous Con Plan and AAP's. Those activities include:

- Continuing to use NSP 1 and 3 PI to remove blighted properties via the Abandoned and Dangerous Building Program (ADB). The ADB is responsible for investigating requests from the public and public agencies regarding structures that pose a threat to the health and safety of unincorporated Stanislaus County communities. The ADB was integrated into the NSP program to effectively address issues of blight resulting from abandoned and dangerous buildings declared a nuisance in NSP target areas.
- Continuing efforts at liquidating NSP inventory (six properties) by finding eligible first time homebuyers to purchase the properties. The six remaining properties are located in the Airport, Empire, Grayson, Parklawn and Salida neighborhoods.
- Development of a vacant NSP property within the City of Oakdale for a multi-family affordable housing project, or other eligible development, or liquidation.

FISCAL YEAR 2015-2016 ANNUAL ACTION PLAN (AAP)

The AAP is an integral component of the Urban County's Consolidated Plan, and describes the specific programs and projects that will be undertaken during Fiscal Year 2015-2016. The following is an overview of the funding allocations and projects identified in the AAP:

Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG) Funding Allocations

In February 2015, HUD announced the Fiscal Year 2015-2016 official program allocations. The Stanislaus Urban County CDBG and ESG combined allocations for Fiscal Year 2015-2016 will be:

• CDBG	\$2,197,687
• ESG	\$ <u>190,669</u>
TOTAL	\$2,388,356

The Fiscal Year 2015-2016 allocations reflect an increase of 2% (CDBG) and 11% (ESG) over the previous fiscal year (Fiscal Year 2014-2015).

CDBG formula allocations to each respective Urban County member are determined based on U.S. Census poverty and population data formula, after deducting administration, fair housing, and public service allocations from the original allocation.

Approval to Open a 30-day Public Comment Period and Set a Public Hearing on May 5, 2015 at 9:05 a.m. to Consider Approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice
Page 7

The following is a summary of funding distribution among Urban County members and special programs based on the above specified allocation method:

**TABLE ONE
CDBG AND ESG ALLOCATION**

Urban County Member	Activities	Administration	Total
Ceres	\$244,987	\$15,209	\$260,196
Hughson	122,532	15,209	137,741
Newman	139,147	15,209	154,356
Oakdale	153,530	15,209	168,739
Patterson	138,993	15,209	154,202
Waterford	127,609	15,209	142,818
Stanislaus County	611,854	323,013	934,867
Public Services Grants	219,768		219,768
Fair Housing		25,000	25,000
FY 2015-2016 CDBG Subtotal	\$1,758,420	\$439,267	\$2,197,687
ESG	176,369	14,300	190,669
Total	\$1,934,789	\$453,567	\$2,388,356

In addition to the Fiscal Year 2015-2016 allocation identified above, Stanislaus County will plan to utilize approximately \$128,383 in program income collected from repayment of housing assistance loans to fund CDBG activities to be undertaken during the fiscal year.

Activities identified within the AAP must be consistent with the Urban County's adopted Con Plan, which outlines the communities' needs and priorities for the plan period. The Fiscal Year 2015-2020 Con Plan identifies the need for infrastructure improvements. To address these needs, the Urban County participants utilize their respective yearly CDBG fund allocations for infrastructure improvements in U.S. Census designated low-income residential neighborhoods and/or neighborhoods found to be income eligible via project

Approval to Open a 30-day Public Comment Period and Set a Public Hearing on May 5, 2015 at 9:05 a.m. to Consider Approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice
Page 8

area income surveys. Infrastructure improvements include, but are not limited to, sewer/water line installation/replacement, curb, gutter, storm drain, and sidewalks.

The following is an overview of the proposed Fiscal Year 2015-2016 infrastructure projects for all the Urban County jurisdictions:

Stanislaus County:

Airport Neighborhood Sewer Infrastructure Project: Stanislaus County will seek State Water Board funds to finance the remaining phases of the sanitary sewer system in the Airport Neighborhood. CDBG funding will remain allocated to the project until sufficient funding is secured to complete the project.

Empire Storm Drain Infrastructure Project: Stanislaus County will continue seeking viable alternatives for addressing storm drainage within the community, including sidewalks to help facilitate a safer path of travel in storm water impacted areas. On September 9, 2014, the Board of Supervisors approved the Empire Community Storm Drainage Report detailing an alternative, low impact design, swale system and the initiation of a Proposition 218 vote for the funding of the project; however, initial feedback from the community has not indicated support for the alternative swale system. In response to the feedback, the County will be working with the community to identify alternative targeted storm drain and sidewalk solutions.

City of Ceres: Conduct infill construction to include curb, gutter, sidewalk, storm drain, ADA accessible ramps (if needed), and pavement overlay improvements in the eligible residential area of Nadine Avenue and Evans Road.

City of Hughson: Conduct infrastructure improvements along 2nd Street between Walker Lane and Fox Road. Improvements will consist of installation of curb, gutter, sidewalks storm drain and ADA accessible rams as needed. As previously discussed, the City of Hughson is working to shift its allocation with the City of Waterford. If an agreement is reached, the City of Hughson's project may be placed on hold.

City of Newman: Conduct Inyo Avenue Infrastructure Project Phase II to install/replace curb, gutter and sidewalk along Inyo Avenue from R to Merced Streets.

City of Oakdale: Conduct Davitt Avenue Project Phase II construction to include sewer and water main line replacement and curb, gutter, sidewalk, and pavement overlay infrastructure improvements.

City of Patterson: Continue construction of sewer infrastructure improvements on Fourth Street Project. Improvements will consist of water main replacement along Fourth Street.

City of Waterford: Continue the La Gallina Infrastructure Improvements Project. The project will install curb, gutter, sidewalk, and ADA accessible ramps as needed along La Gallina Avenue. As previously discussed, the City of Waterford is working to shift its

Approval to Open a 30-day Public Comment Period and Set a Public Hearing on May 5, 2015 at 9:05 a.m. to Consider Approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice
Page 9

allocation with the City of Hughson and to use State CDGB PI. If an agreement is reached to shift funds and a re-use plan is established for use of State PI, the City of Waterford will undertake construction of a larger phase of the La Gallina project.

In addition to infrastructure, CDBG funds will be used for the following activities:

Public Services Grants

CDBG funds allow for opportunities for the Urban County to fund non-profit organizations that provide a public service. In accordance with HUD regulations, approximately ten percent of the total CDBG allocation, \$219,768 for Fiscal Year 2015-2016, is proposed to be set-aside for this purpose. A portion of these funds (\$40,000) was set aside to provide one Focus on Prevention Grant which would provide services beyond that of the usual public service program activity and will align with the goals of the County's Focus on Prevention Platform.

As part of this funding cycle, the Urban County received and reviewed twenty-six (26) Public Services Grant (PSG) and five Focus on Prevention Grant (FPG) competitive applications for funds. Organizations that have applied for public services funding include, but are not limited to, those providing services to at-risk youth, seniors, and the homeless.

Attachment "2" includes a list of all PSG and FPG applications received (in the order of highest to lowest ranking) with applications recommended for funding reflected in bold print. Recommendations for funding were made by a review panel that consists of seven representatives from the Urban County members, a representative from the Stanislaus County Continuum of Care, and a representative from the Stanislaus County Chief Executive office.

As reflected in Attachment "2", the draft AAP includes CDBG Public Services funding recommendations for the following organizations:

Public Services Grants

Court Appointed Special Advocates (CASA) – *Direct Services*
Center for Human Services – *Ceres Partnership for Healthy Children*
Center for Human Services – *Westside Family Resource Center*
Center for Human Services – *Oakdale Family Resource Center*
Children's Crisis Center – *Guardian House*
The Salvation Army Red Shield – *Tutoring and Mentoring Program*
Second Harvest – *Food Assistance Program*
Second Harvest – *Food 4 Thought Program*
We Care – *Emergency Cold Weather Shelter*

Approval to Open a 30-day Public Comment Period and Set a Public Hearing on May 5, 2015 at 9:05 a.m. to Consider Approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice
Page 10

Focus on Prevention Grant

Central Valley Youth for Christ – *Family Counseling Concern Strength thru Guidance*

Final approval of the CDBG Public Services funding will be requested during the May 5, 2015 public hearing.

Fair Housing Program

As a HUD mandated requirement, the Urban County must provide a fair housing program designed to combat impediments to fair housing choice through education, investigation, and litigation. The Urban County annually complies with this requirement by contracting with a fair housing service provider to seek cooperation of owners and managers, and provide appropriate information and referrals in the effort to prevent housing discrimination. Fiscal Year 2015-2016 funding includes an allocation of \$25,000 for Fair Housing and Tenant/Landlord Services to be provided by Project Sentinel.

Economic Development

The use of CDBG funds for Economic Development (ED) activities can be challenging due to restrictive HUD regulations; however, the Stanislaus Urban County has identified the following potential economic development activities to be undertaken throughout the 2015-2020 Consolidated Planning period:

Americans with Disabilities (ADA) Compliance Assistance Program

This program will provide technical assistance on ADA compliance requirements to eligible business and property owners by qualified professionals to be contracted by the County. Assistance will be focused on, but not limited to, the following:

- How to protect against unwarranted ADA lawsuits
- Federal and State accessibility requirements
- The Certified Access Specialist (CASp) inspection process.

In addition to technical assistance, the program may also cover costs to eligible businesses for inspections and associated on-site improvements.

Small Business Technical Assistance Program

Stanislaus Urban County will partner with the Alliance Small Business Development Center (SBDC) to provide technical assistance to small businesses throughout the County. While SBDC technical assistance programs already exist, Stanislaus County will work with the Alliance to facilitate a more “hands on” role by County staff in the assistance process as a means of gathering better insight into the constraints facing small business development. The insight gain will allow the Urban County to measure the value of its funding and to use information gained to develop future ED programs.

Approval to Open a 30-day Public Comment Period and Set a Public Hearing on May 5, 2015 at 9:05 a.m. to Consider Approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice
Page 11

Other HUD eligible economic development activities, such as a façade improvement program, may also be undertaken during the 2015-2020 Regional Consolidated Planning period. However, such projects would be presented to the Board of Supervisors prior to implementation in the appropriate fiscal year's Annual Action Plan.

Neighborhood Revitalization Strategy Areas (NRSA) -- Airport and Parklawn Neighborhoods

Neighborhood Revitalization Strategy Areas (NRSA) for the Airport and Parklawn neighborhoods were established via the Fiscal Year 2012-2015 Consolidated Plan (Con Plan). Progress toward meeting the goals and objectives identified in the NRSA has been made in each neighborhood via the funding of Public Service grants to service providers, providing affordable housing opportunities to area residents, and installation of sewer systems in both neighborhoods (fully completed in Parklawn and partially completed in Airport).

Because the NRSA was a five year plan, NRSA activities will continue to be implemented and reported over the next two fiscal years. These activities include but are not limited to affordable housing and sewer infrastructure improvements (in the Airport Neighborhood).

Administration and Monitoring

Stanislaus County Planning and Community Development Department staff will continue to provide administrative services to each of the Urban County's participants, as well as to its own activities. As the "lead entity" of the Urban County, HUD recognizes Stanislaus County as the sole grantee responsible for the administration of CDBG and ESG funds. Accordingly, the Planning and Community Development Department is responsible for the receipt and expenditure of funds, environmental documentation for projects, eligibility determination of programs and those persons accessing the services of the programs, and program monitoring.

Other Federal HUD funds to be utilized by the Urban County include Emergency Solution Grant (ESG) and Home Investment Partnerships Program (HOME) funds. The following is an overview of activities to be undertaken with ESG and HOME funds:

Emergency Solution Grants

As with CDBG Public Service funding, ESG funds allow the opportunity for the Urban County to fund non-profit organizations that provide public services to homeless. ESG funds will be used to provide operational and essential services funding for transitional and emergency homeless shelters, for the development of the Homeless Management Information System (HMIS), and to provide financial assistance, in combination with case management, to stabilize housing for persons experiencing homelessness or who are at-risk of becoming homeless. This year, the Urban County received and reviewed ten (10) ESG competitive applications for funds (the application review was conducted by the same

Approval to Open a 30-day Public Comment Period and Set a Public Hearing on May 5, 2015 at 9:05 a.m. to Consider Approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice
Page 12

review committee identified above for CDBG Public Services funding).

Attachment "2" includes a list of all ESG applications received (in the order of highest to lowest ranking) with applications recommended for funding reflected in bold print. The draft AAP includes ESG funding recommendations for the following organizations:

Children's Crisis Center – Verda's Children Shelter
Children's Crisis Center – Martha's High Risk Infant/Toddler Shelter
Community Housing and Shelter Services – *Homeless Prevention Rapid Re Housing*
Community Housing and Shelter Services – *Homeless Management Information Systems Data Entry*
Family Promise – *New Beginnings – Shelter to Solutions*
We Care of Turlock – *Emergency Cold Weather Shelter*
We Care of Turlock – *Rapid Re-Housing Program*

Final approval of ESG funds will be requested during the May 5, 2015 public hearing.

HOME Investment Partnerships Program (HOME)

HOME program funds are used by localities to provide the following activities:

- Affordable housing development;
- Low-income first time homebuyer down payment assistance;
- Owner-occupied housing rehabilitation assistance; and
- Program administration.

The Fiscal Year 2015-2016 estimated HOME Consortium allocation is \$911,823 (allocation amount for entire HOME Consortium). Final Fiscal Year 2015-2016 award amounts will be determined and adopted by the City of Turlock.

Currently, the City of Turlock contracts independently with each of the Urban County participants and, as discussed earlier, is the "lead entity" with responsibility for implementing and administering HOME funds to the HOME Consortium. Please refer to the City of Turlock's Fiscal Year 2015-2016 AAP for specific HOME activities.

Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice

Along with the Regional Consolidated Plan and Annual Action Plan, a Regional Analysis of Impediments to Fair Housing Choice (AI) has also been prepared.

The 2015 AI contains housing demographics and employment profiles, an evaluation of the mortgage lending practices, real estate laws, private practices, fair housing claims and enforcement, and identification of any impediments to fair housing that exist within the Urban County and the City of Turlock, along with suggested measures for addressing

Approval to Open a 30-day Public Comment Period and Set a Public Hearing on May 5, 2015 at 9:05 a.m. to Consider Approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice
Page 13

those impediments.

The following were identified as impediments to fair housing:

- Shortage of affordable housing supply.
- Shortage of subsidies and strategies to promote affordable, accessible housing for lower-income households, including protected classes.
- Differential origination rates based on race, ethnicity, and location.
- Improved coordination with real estate industry.
- Improved knowledge of fair housing rights.
- Discrimination in rental housing.
- Possible constrain of local development standards and their implementation on housing opportunities for minority and low-income households.
- Improved access to employment opportunities, transportation, and public and social services, and infrastructure.

As mentioned earlier, each impediment identified in the AI includes planned actions to address each impediment. For a complete list of planned actions, please refer to the Executive Summary or "Identification of Impediments and Actions to Address" section of the AI.

It is important to note that the identification of an impediment does not necessarily identify a deficiency. By identifying the presence of an impediment, the AI states the nature of a problem that the recommended actions will serve to mitigate. These may be affirmative actions as much as responses to current conditions.

POLICY ISSUES:

Approval of the proposed Con Plan, AAP, and AI furthers the Board's priorities of A Safe Community, A Healthy Community, Effective Partnerships, A Well Planned Infrastructure System, and Efficient Delivery of Public Services by providing the community with the necessary funds to implement needed programs and projects.

The programs and projects represented in the Con Plan, AAP, and AI are consistent with the goals and objectives of the Stanislaus County General Plan, and the comparable plans of the cities of Ceres, Hughson, Newman, Oakdale, Patterson, and Waterford.

STAFFING IMPACT:

The Stanislaus County Planning and Community Development Department is ultimately responsible for the administration of all CDBG, and ESG funds allocated to the Urban County. In addition to monitoring the program and project files of each of the participating Urban County cities, planning staff is responsible for monitoring the program and project files of each organization receiving funds from the Urban County. Annually, the number of

Approval to Open a 30-day Public Comment Period and Set a Public Hearing on May 5, 2015 at 9:05 a.m. to Consider Approval of the Fiscal Year 2015-2020 Regional Consolidated Plan (Con Plan); the Fiscal Year 2015-2016 Annual Action Plan (AAP); and the Fiscal Year 2015-2020 Regional Analysis of Impediments (AI) to Fair Housing Choice
Page 14

different activities receiving CDBG and/or ESG funds varies between 18 and 27. Planning staff also assists participating Urban County cities in the development of eligible projects and programs to ensure that they meet or exceed regulatory guidelines. Existing staff will perform these duties and no additional staff is required.

CONTACT PERSON:

Angela Freitas, Director of Planning & Community Development.
Telephone: 209-525-6330

ATTACHMENTS:

1. Area Median Income (AMI) Table for Stanislaus County
2. Public Services Grant (PSG), Focus on Prevention Grant (FPG), and Emergency Solutions Grant (ESG) Listing of Applications Received and Ranking.
3. Draft Fiscal Year 2015-2020 Regional Consolidated Plan
4. Draft Fiscal Year 2015-2016 Annual Action Plan
5. Draft Fiscal Year 2015-2020 Regional Analysis of Impediments to Fair Housing Choice

FY 2015 Income Limits Summary

Stanislaus County, California										
FY 2015 Income Limit Area	<u>Median Income</u>	FY 2015 Income Limit Category	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Stanislaus County	\$53,300	Extremely Low (30%)	\$11,950	\$15,930	\$20,090	\$24,250	\$28,410	\$32,570	\$35,300*	\$37,600*
		Very Low (50%)	\$19,950	\$22,800	\$25,650	\$28,450	\$30,750	\$33,050	\$35,300	\$37,600
		Low (80%)	\$31,850	\$36,400	\$40,950	\$45,500	\$49,150	\$52,800	\$56,450	\$60,100
		Median (100%)	\$39,900	\$45,600	\$51,300	\$56,900	\$61,500	\$66,100	\$70,600	\$75,200
		Moderate (120%)	\$47,880	\$54,720	\$61,560	\$68,280	\$73,800	\$79,320	\$84,720	\$90,240

* The FY 2014 Consolidated Appropriations Act changed the definition of extremely low-income to be the greater of 30/50ths (60 percent) of the Section 8 very low-income limit or the poverty guideline as [established by the Department of Health and Human Services \(HHS\)](#), provided that this amount is not greater than the Section 8 50% very low-income limit. Consequently, the extremely low (30%) income limits may equal the very low (50%) income limits.

Income Limit areas are based on FY 2015 Fair Market Rent (FMR) areas. For information on FMRs, please see our associated FY 2015 [Fair Market Rent documentation system](#).

Effective March 6, 2015

**Public Service Grant (PSG), Focus on Prevention Grant (FPG), and Emergency Solutions Grant (ESG)
Requests FY 2015-2016**

Applications Received and Recommended Awards

PUBLIC SERVICES GRANTS (PSG)									
RANKING	SCORE	AGENCY	PROGRAM NAME	PROGRAM TYPE	FOCUS AREA*	GRANT	OTHER FUNDING	AMOUNT REQUEST	FUNDING RECOMMENDATION
1	90.67	Salvation Army -Red Shield	Tutoring and Computer Program	After School Program	South Modesto	PSG	Foundations, Donors, Events	\$ 19,812.00	\$ 19,812.00
2	89.90	Second Harvest	Food Assistance	Emergency Food Assistance	County-wide	PSG	Corporate Grants, Donations, United Way, Sponsors	\$ 20,000.00	\$ 20,000.00
3	89.50	CASA of Stanislaus County	Direct Service Project	Court Advocacy	County-wide	PSG	Federal IVE, State, Foundation, Donors	\$ 20,000.00	\$ 20,000.00
4	89.50	Center for Human Services	Westside Family Resource Center-Supportive Services	Family Resource Center	Patterson	PSG	Health Services Agency (HSA), First 5 CA, BHRS, Donors	\$ 20,000.00	\$ 20,000.00
5	89.33	Center for Human Services	Ceres Partnership for Healthy Children	Family Resource Center	Ceres	PSG	First 5 CA, Dept. of Ed, Donors	\$ 20,000.00	\$ 20,000.00
6	89.33	Center for Human Services	Oakdale Family Resource Center-Crisis Support Program	Family Resource Center	Oakdale	PSG	Health Services Agency (HSA), First 5 CA, BHRS, Donors	\$ 20,000.00	\$ 20,000.00
7	89.20	Second Harvest	Food 4 Thought	Food Assistance	County-wide	PSG	Corporate Grants, Donations, United Way, Sponsors	\$ 20,000.00	\$ 20,000.00
8	88.50	We Care Program	Emergency Cold Weather Shelter	Emergency Food Shelter	County-wide	PSG	HUD, Donors, Federal-Emergency Food & Shelter Program (EFSP), Foundations	\$ 20,000.00	\$ 20,000.00
9	88.33	Children's Crisis Center	Children's Guardian Project in Oakdale	Shelter	Oakdale	PSG	Cal Fresh, Health Services Agency (HSA), First 5 CA, BHRS, Foundation, Donors	\$ 20,000.00	\$ 20,000.00
12	87.50	Healthy Aging Association	Young at Heart Program	Health/Education/Outreach	County-wide	PSG	United Way, Donors, Sponsorships, Foundations	\$ 20,000.00	\$ -
12	87.50	Inter-Faith Ministries of Greater Modesto	Free Mobile Farmers Market	Food Assistance	County-wide	PSG	Donors, Foundations	\$ 10,000.00	\$ -
12	87.50	NAMI	Life Skills		County-wide	PSG	County Probation Dept., Donors	\$ 7,080.00	\$ -
13	87.40	Salvation Army -Red Shield	Summer Swimming Program	Recreational Activity	South Modesto	PSG	Foundations, Donors, Events	\$ 19,428.06	\$ -
14	87.00	United Samaritans Foundation	Daily Bread Mobile Lunch Program- Hughson	Food Assistance	Hughson	PSG	Kaiser Permanente, Donors, United Way, Foundations, Rental Fees	\$ 20,000.00	\$ -
15	86.00	United Samaritans Foundation	Daily Bread Mobile Lunch Program- Keyes/Ceres	Food Assistance	Keyes/Ceres	PSG	Kaiser Permanente, Donors, United Way, Foundations, Rental Fees	\$ 20,000.00	\$ -
16	83.83	The Salvation Army	Child Development Center	After School Program	County-wide	PSG	State Dept. of Education, Donors	\$ 20,000.00	\$ -
17	83.82	The Salvation Army	Homeless Meals Program	Food Assistance	County-wide	PSG	Private Donations, Fundraising	\$ 20,000.00	\$ -
18	83.40	Community Housing & Shelter Services	Emergency Motel Vouchers	Emergency Shelter	County-wide	PSG	Continuum of Care (CoC)-HUD	\$ 20,000.00	\$ -
19	83.33	H.O.S.T	HOST House Operations	Temporary Shelter Assistance	PA, NE, UN	PSG	American Red Cross, Donors	\$ 20,000.00	\$ -
20	79.83	West Modesto/King Kennedy Neighborhood Collaborative	Partnership for Change	Parent Engagement Program	West Modesto	PSG	Kaiser Permanente, Modesto City Schools, Private, Donations	\$ 20,000.00	\$ -
21	78.70	Haven Women's Center	Haven's Women Center Shelter Legal Advocacy Program	Legal Advocacy Program	County-wide	PSG	State Dept. of Public Health, Donors	\$ 20,000.00	\$ -
22	78.33	Parent Resource Center	Airport Neighborhood Partnership-Ensenanza con Amor	Parenting Education	Airport	PSG	First 5 CA, Health Services Agency (HSA), Donors	\$ 20,000.00	\$ -
24	76.67	Stanislaus County PAL	Keyes After School Program	Recreational Activity	Keyes	PSG	Fundraising	\$ 19,732.80	\$ -
24	76.67	Stanislaus County PAL	Grayson After School Program	Recreational Activity	Grayson	PSG	Fundraising	\$ 19,732.80	\$ -
25	75.10	Haven Women's Center	Domestic Violence Shelter Youth Services	DV Case Management	County-wide	PSG	Donors	\$ 20,000.00	\$ -
26	73.33	Stanislaus County PAL	Supporting Family Unity through Aquatics & Nutrition	Recreational Activity	Empire	PSG	Fundraising	\$ 5,013.31	\$ -
Total PSG Grant Amounts Requested/Recommended for Award								\$ 480,798.97	\$ 179,812.00

* Ceres- CE; Hughson- HU; Newman- NE; Patterson- PA; Waterford- WA; Unincorporated- UN
Bold, Italic, and Shaded = Recommended for Funding

**Public Service Grant (PSG), Focus on Prevention Grant (FPG), and Emergency Solutions Grant (ESG)
Requests FY 2015-2016**

Applications Received and Recommended Awards

FOCUS ON PREVENTION GRANTS (FPG)									
RANKING	SCORE	AGENCY	PROGRAM NAME	PROGRAM TYPE	FOCUS AREA*	GRANT	OTHER FUNDING	AMOUNT REQUEST	FUNDING RECOMMENDATION
1	83.33	<i>Central Valley Youth for Christ</i>	<i>Family Counseling Concern Strength thru Guidance</i>	<i>Counseling</i>	<i>Ceres</i>	<i>FPG</i>	<i>Private Donations</i>	\$ 39,539.00	\$ 39,539.00
2	82.61	The Salvation Army	Homeless Prevention Program	Homeless Prevention	County-wide	FPG	Foundations, Donors, Events	\$ 40,000.00	\$ -
3	80.67	Children's Crisis Center	Project C.A.F.E (Child and Family Enrichment)	Daytime Resource Center	County-wide	FPG	State Dept. of Education	\$ 39,996.00	\$ -
4	75.92	Stanislaus Multi-Cultural Community Health Coalition West Modesto/King Kennedy Neighborhood Collaborative (WMKKNC)	Partnership for Change	Parent Engagement Program	West Modesto	FPG	Kaiser Permanente, Modesto City Schools, Private, Donations	\$ 40,000.00	\$ -
5	73.75	Parent Resource Center	Daddy Skills Project	Parent Education	County-wide	FPG	Health Services Agency (HSA), First 5 CA	\$ 25,471.60	\$ -
Total FPG Grant Amounts Requested/Recommended for Award								\$ 185,006.60	\$ 39,539.00

* Ceres- CE; Hughson- HU; Newman- NE; Patterson- PA; Waterford- WA; Unincorporated- UN
Bold, Italic, and Shaded = Recommended for Funding

EMERGENCY SOLUTIONS GRANTS (ESG)									
RANKING	SCORE	AGENCY	PROGRAM NAME	PROGRAM TYPE	FOCUS AREA*	GRANT	OTHER FUNDING	AMOUNT REQUEST	FUNDING RECOMMENDATION
1	96.40	<i>Family Promise</i>	<i>New Beginnings- Shelter to Solutions</i>	<i>Rental Assistance</i>	<i>County-wide</i>	<i>ESG</i>	<i>Donors, Fundraising</i>	\$ 41,344.00	\$ 41,344.00
2	90.17	<i>We Care Program</i>	<i>Rapid- Re-Housing Program</i>	<i>Rental Assistance</i>	<i>County-wide</i>	<i>ESG</i>	<i>Foundations, Donors, Events</i>	\$ 29,420.00	\$ 29,420.00
3	86.83	<i>We Care Program</i>	<i>Emergency Cold Weather Shelter</i>	<i>Shelter</i>	<i>County-wide</i>	<i>ESG</i>	<i>Federal-Emergency Food & Shelter Program (EFSP), Donors, Sponsorships</i>	\$ 27,500.00	\$ 27,500.00
4	86.83	<i>Community Housing & Shelter Services</i>	<i>Homeless Prevention Rapid Re-Housing</i>	<i>Rental Assistance</i>	<i>County-wide</i>	<i>ESG</i>	<i>U.S. Housing and Urban Development (HUD)</i>	\$ 50,000.00	\$ 24,777.00
5	85.00	<i>Children's Crisis Center</i>	<i>Verda's Children Shelter</i>	<i>Shelter</i>	<i>HU,NE, PA,WA</i>	<i>ESG</i>	<i>First 5 CA, State Dept. of Education, Donors</i>	\$ 22,200.00	\$ 22,200.00
6	84.92	<i>Children's Crisis Center</i>	<i>Marsha's High Risk Infant/toddler Shelter</i>	<i>Respite Shelter</i>	<i>CE,PA,UN</i>	<i>ESG</i>	<i>First 5 CA, State Dept. of Education, Donors</i>	\$ 21,600.00	\$ 16,129.00
7	84.67	Helping Others Sleep Tonight (H.O.S.T)	HOST House Operations	Temporary Shelter Assistance	PA, NE, UN	ESG	American Red Cross, Donors	\$ 10,000.00	\$ -
8	84.49	The Salvation Army	Emergency Shelter	Shelter	County-wide	ESG	Donors, Fundraising	\$ 60,000.00	\$ -
9	82.60	<i>Community Housing & Shelter Services</i>	<i>Homeless Management Information System (HMIS) Project</i>	<i>Information System</i>	<i>County-wide</i>	<i>ESG</i>	<i>HUD-Supportive Housing Program (SHP)</i>	\$ 32,385.60	\$ 14,999.00
10	80.40	Haven Women's Center	Crisis Response	Shelter with Case Management	County-wide	ESG	State Office of Emergency Services, Donors	\$ 38,736.00	\$ -
Total ESG Grant Amounts Requested/Recommended for Award								\$ 333,185.60	\$ 176,369.00
Total All Grant Amounts Requested/Recommended for Award								\$ 998,991.17	\$ 395,720.00

* Ceres- CE; Hughson- HU; Newman- NE; Patterson- PA; Waterford- WA; Unincorporated- UN
Bold, Italic, and Shaded = Recommended for Funding

**Focus on Prevention Grant (FPG) Program Grant Requests
FY 2015- 2016**

CENTRAL VALLEY YOUTH FOR CHRIST - *Family Counseling Concern Strength thru Guidance*

Request Amount: \$39,539.00

Other Funding Sources: Private Donations \$7,028

Program Location(s): Ceres Junior High and High Schools, Central Valley Youth for Christ

Project Partner(s): Ceres Unified School District

Prevention Focus Area: Strengthening Families and Youth Early Intervention

Proposed Number Served: 160 Individuals, made up of youth and their parents

Program Description: To provide youth and families with individual and family counseling to improve peer and family relationships and reduce at-risk behavior, school failure and family conflict. CVYFC will provide follow-up counseling services to 160 youth and families identified primarily through CVYFC's Point Break workshops conducted at schools in the Ceres Unified School District. Point Break is an intervention strategy designed to develop resiliency skills, break down educational and social barriers among youth, and teach the value of conflict resolution and respect for others. Following Point Break workshops, CVYFC Family Concern Counselors will provide counseling to low- and moderate-income, high-risk students and their families identified by school counselors, teachers, and administrators. CDBG funding will allow Marriage and Family Therapist internists (qualified by education and obtaining experience and hours for full licensure) to provide at least six weekly, one-hour counseling sessions per youth/family. Spanish language counseling will be provided by bilingual-bicultural personnel, as needed. Anticipated results are improved academic achievement and behavior and strengthened family and peer relationships.

CHILDREN'S CRISIS CENTER OF STANISLAUS COUNTY - *Project C.A.F.E. (Child and Family Enrichment)*

Request Amount: \$39,996.00

Other Funding Sources: Department of Education-State CCTR \$52,329

Program Location(s): Modesto Gospel Mission

Project Partner(s): Modesto Gospel Mission

Prevention Focus Area: Strengthening Families

Proposed Number Served: 90 children, 126 Individuals, made up of 36 Households

Program Description: The Children's Crisis Center, in a new collaboration with the Modesto Gospel Mission, proposes to provide a daytime resource for high-risk, homeless and impoverished families with children, called Project C.A.F.E. This new project will address the needs of homeless children and those at risk of abuse and neglect ages birth to 14 years, living in the Airport District. A key strategy of this partnership will be to invite high-risk families to a daytime drop-in Center located within walking distance of our target communities at 1400 Yosemite Blvd for activities, meals, education and support. Through this project, children will be fed and engaged in activities that encourage healthy attachments, rebuild trust, promote positive coping skills and expand cognitive abilities. Parents will be empowered through group discussions that will be supportive, informative and enlightening; and will be aided to overcome family conditions endangering their children and disrupting family stability. Children will receive medical, dental, vision, and developmental screenings and

family members will receive nutritional meals. The aim of this innovative program will be to strengthen high-risk families in a supportive, respectful manner that will affirm the parents' leadership role.

PARENT RESOURCE CENTER - *Daddy Skills Project*

Request Amount: \$25,471.60

Other Funding Sources: Health Services Agency \$55,000; Children & Families Commission \$53,008.50

Program Location(s): PRC Airport Office, Modesto Gospel Mission, Other locations/schools to be confirmed

Project Partner(s): Modesto Gospel Mission, The Salvation Army Red Shield

Prevention Focus Area: Strengthening Families

Proposed Number Served: 100 Individuals, made up of 30 Households

Program Description: As a way to prevent child abuse/neglect among low-income families in the unincorporated area of Stanislaus County, the Parent Resource Center (PRC) proposes Daddy Skills workshops and classes for fathers and male guardians. The workshops and classes will provide an environment where fathers and their children learn to interact in a healthy manner and gain experiences that will provide fathers/guardians confidence in their fathering skills. The project would include evidence-based curriculum to increase parenting knowledge, skills and confidence. The PRC proposes holding Saturday workshops, followed by weekly classes, and activities that are both engaging and educational for fathers and their children. Child care would be offered during class sessions. Proposed workshops and classes would be offered at the PRC Airport Neighborhood Office, the Modesto Gospel Mission and other locations in the unincorporated areas of the county. Father-child activities would take place at area parks, libraries, businesses and venues. Participants who enroll in the project will also be offered case management and supportive services available at the PRC as a way to help bring stability to the family.

THE SALVATION ARMY - *Homeless Prevention Program*

Request Amount: \$40,000

Other Funding Source(s): Contributions/Fundraising \$38,725.16

Program Location(s): Salvation Army Berberian Shelter (9th Street)

Project Partner(s): Stanislaus County Sheriff's Department, STANCO, CICV

Prevention Focus Area: Homeless Prevention, Reducing Recidivism

Proposed Number Served: 75 Individuals

Program Description: The Salvation Army Homeless Prevention Program is designed to interrupt the cycle of homelessness and recidivism using extensive case management and partnerships to move the qualified individual from being homeless to permanent housing. This program will utilize the different programs of The Salvation Army Shelter and Transitional Living Center as well as partnerships with Community Impact Central Valley, Stanislaus County Affordable Housing Corporation, The Stanislaus County Sheriff's Department and many other collaborated resources to identify clients who show stability and desire to move from homelessness to permanent housing. Once identified, the case manager and client will fill out a goal plan and identify a path to assist the client into the correct program for his/her needs. Many clients may qualify for direct housing, HUD subsidized housing, or transitional housing. With the assistance of our partnerships, the client will have access to resources to obtain their goals towards permanent housing, income/increased income, and

a greater self-determination. Six month follow up case management will be provided to ensure a successful transition to permanent housing and the ability to remain housed.

STANISLAUS MULTI-CULTURAL COMMUNITY HEALTH COALITION WEST MODESTO/KING KENNEDY NEIGHBORHOOD COLLABORATIVE (WMKKNC) - *Partnership for Change*

Request Amount: \$40,000

Other Funding Source(s): Kaiser Permanente \$20,000, Modesto City Schools/Kaiser Permanente Regional \$92,372; Private \$24,960; Donations \$24,960

Program Location(s): Mellis Park

Project Partner(s): Modesto City Schools, Stanislaus County HSA, Boys and Girls Club of Stanislaus County

Prevention Focus Area: Strengthening Families

Proposed Number Served: 140 youth, made up of 40 households

Program Description: Parent and family engagement activities will be implemented in the park in an effort to "take back the park." Thereby creating a safe and nurturing environment where children and families can engage in healthy activities and learning while increasing social networking. In addition, there will be provision of child care for parents participating in education sessions or volunteering. The expected time for trainings is as follows: Two to four (2-4) hours per training session and one to two (1-2) hours/volunteer service. Classes for parents will include: parenting skills, computer skills and job training, healthy eating, nutrition and physical activity; advocacy and influencing policy development and/or change.



The Salvation Army
MODESTO CORPS

625 I Street, Modesto, CA 95354

Majors Kyle and Martha Trimmer, Corps Officers

Founded in 1865 by
William Booth

General André Cox
International Leader

Commissioner James Knaggs
Territorial Commander

Lt. Colonel Stephen Smith
Divisional Commander

Mail: P.O. Box 1663, Modesto, CA 95353, Phone: (209) 522-3209, Fax: (209) 522-2033, www.salvationarmymodesto.org

April 21, 2015

Angela Freitas
Director
Department of Planning and Community Development
County of Stanislaus
1010 10th Street, Suite 3400
Modesto, CA 95354

Re: **Grant Funding Process**

Dear Ms. Freitas,

Thank you for allowing Brian Aird, Debra Qualls and I to meet with you, Kristin Doud and Ana San Nicolas regarding the various grant applications made by The Salvation Army Modesto Citadel during the most recent round of Community Development Block Grant & Emergency Solutions Grant Public Service Grant Programs.

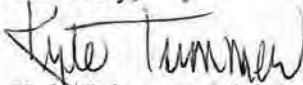
The Salvation Army plays a huge role in serving unmet needs in sheltering, feeding and clothing thousands of homeless persons annually in Stanislaus County. Additionally, we provide transitional housing and Veteran's housing, distribute commodities, assist low income persons with utility payments and we provide preschool for the children of low income families. No agency in the county provides a more comprehensive level of service to struggling individuals than the Salvation Army.

Success to us is defined as lovingly meeting the most basic needs of people with the intent of empowering those, who are willing, to move towards self-sufficiency within our community.

We appreciate that you shared the rationale for the ranking of various proposals in response to the Notice of Funding Availability for the various grants. While we appreciate the rationale which was provided, we nevertheless disagree with certain of the funding decisions. Despite our disagreement, we respect that we had an opportunity to meet with you and we have elected to defer to your judgment and determination and not to pursue our appeal any further.

We respectfully ask that in the event certain funds go unused or extraordinary funding becomes available, please consider our organization. Meanwhile, we will continue to serve those who most need our services.

Sincerely,


Kyle Trimmer, Major
County Coordinator



COMMISSION ON AGING
 Area Agency on Aging Advisory Council

121 Downey Avenue, Suite 102
 Modesto, CA 95354

Phone: 209.558.7825 Fax: 209.558.8648

BOARD OF SUPERVISORS

2015 APR 24 P 2:54

April 20, 2015

Stanislaus County Board of Supervisors
 1010 10th St, Suite 6500
 Modesto, Ca 95354

Dear Members of the Board of Supervisors,

Re: Stanislaus Urban County 2015-2016 Annual Action Plan and Community Development Block Grant (CDBG) funding

The twenty members of the Stanislaus County Commission on Aging (COA) have serious concerns about the discrepancy between the stated priorities in the 2015 - 2016 Annual Action Plan (draft) and the lack of actual grant funding that reflects those priorities. This issue was highlighted at the April 13, 2015 COA meeting when it came to our attention that no CDBG grant funding for the 2015-16 cycle is allocated to support older members of our community.

In preparation for developing the Annual Action Plan, community members were asked to provide a ranking in several key areas to determine the priorities for awarding grant funds to programs that provide public services to low-income persons in the community. Community members identified senior services as a high priority need for program funding. Other high priority needs are services for at-risk children/youth and services for physically/mentally disabled persons. The intent of seeking community input is to insure that distribution of grant funds reflects the perceived need of community members. Yet a review of Public Service Grants (PSG) awardees does not include a single program that specifically serves older adults.

Of the nine programs that did receive PSG funding, seven are programs serving youth, one serves adult homeless men, and one targets food insecurity for qualified individuals. In addition, of the nine programs that received funding, three separate grant awards went to the same organization all funding similar children's programs. Also, a second organization received funding for two separate programs (one for children and one for general population).

It is also of note that this year \$40,000 of PSG funding was "set aside" into a newly created category for the Focus on Prevention 2015 county plan, making those funds unavailable to general PSG applicants. Focus on Prevention target areas do not

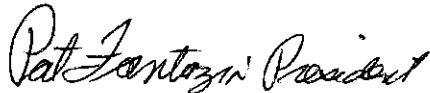
include any mention of the needs of older populations, nor are all four areas reflective of the expressed priorities of the community detailed in the 2015-2016 Annual Action Plan. The Focus on Prevention funding was also awarded to a program serving youth. The COA believes that there is a strong case to be made for including senior populations in the Focus on Prevention strategy for community transformation.

The Commission on Aging members recognize the CDBG funded programs as important and needed. We are supportive of programs that serve youth and other identified high priority groups. However, we are not supportive of CDBG grantors ignoring the expressed priorities of the community with grant awards that are skewed toward one priority group to the detriment of an equally important and high need segment of our community - older adults/seniors. We believe that an equitable allocation of resources across needs is essential when limited funding is available. Equity is not apparent in this year's disbursement of grant funds given that, despite being a high priority category, no funding is awarded to senior services programs.

Our request to the Stanislaus County Executive Office and the County Board of Supervisors is two-fold. We ask for a review of the CDBG grant funding allocations prior to the May 5, 2015 Board of Supervisors meeting to determine a fair and reasonable distribution of awards that includes funding for older adult services. We also ask the County Executive Office and the County Board of Supervisors to be responsive to the expressed concerns of the community and include senior service needs when developing community-wide prevention policies and strategies such as Focus on Prevention 2015.

The Commission on Aging looks forward to your response and thanks you for your attention to this matter.

Respectfully,

A handwritten signature in cursive script that reads "Pat Fantazia, President".

Pat Fantazia, President
Stanislaus County Commission on Aging

cc: Stan Risen, CEO
Stanislaus County

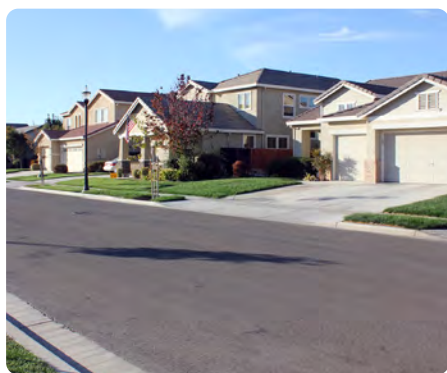
/ks

STANISLAUS URBAN COUNTY AND CITY OF TURLOCK

REGIONAL CONSOLIDATED PLAN

FISCAL YEARS 2015–2020

MAY 2015



STANISLAUS URBAN COUNTY/ CITY OF TURLOCK



*Prepared by PMC for Stanislaus County
1010 10th Street, Suite 3400
Modesto, CA 95354
209.525.6330*

REGIONAL CONSOLIDATED PLAN FISCAL YEARS 2015-2020

MAY 2015

Stanislaus County
1010 10th Street
Suite 6700
Modesto, CA 95354



City of Ceres
2720 2nd Street
Ceres, CA 95307



City of Hughson
7018 Pine Street
Hughson, CA 95326



City of Newman
938 Fresno Street
Newman, CA 95360



City of Oakdale
280 N 3rd Avenue
Oakdale, CA 95361



City of Patterson
1 Plaza
Patterson, CA 95363



City of Turlock
156 S Broadway
Turlock, CA 95380



City of Waterford
312 E Street
Waterford, CA 95386



Table of Contents

Executive Summary

ES-05 Executive Summary – 24 CFR 91.200(c), 91.220(b).....	ES-1
--	------

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b).....	PR-1
PR-10 Consultation - 91.100, 91.200(b), 91.215(l).....	PR-2
PR-15 Citizen Participation - 91.105, 91.200 (c)	PR-8

Needs Assessment

NA-05 Overview	NA-1
NA-10 Housing Needs Assessment – 24 CFR 91.205 (a, b, c).....	NA-2
NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)	NA-31
NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2).....	NA-40
NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2).....	NA-50
NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)	NA-52
NA-35 Public Housing – 91.205(b)	NA-54
NA-40 Homeless Needs Assessment – 91.205(c).....	NA-58
NA-45 Non-Homeless Special Needs Assessment – 91.205 (b, d).....	NA-65
NA-50 Non-Housing Community Development Needs – 91.215 (f)	NA-68

Housing Market Analysis

MA-05 Overview.....	MA-1
MA-10 Number of Housing Units – 91.210(a) & (b)(2)	MA-2
MA-15 Housing Market Analysis: Cost of Housing – 91.210(a).....	MA-7
MA-20 Housing Market Analysis: Condition of Housing – 91.210(a).....	MA-12
MA-25 Public and Assisted Housing – 91.210(b)	MA-20
MA-30 Homeless Facilities and Services – 91.210(c)	MA-23
MA-35 Special Needs Facilities and Services - 91.210(d).....	MA-33
MA-40 Barriers to Affordable Housing – 91.210(e).....	MA-37
MA-45 Non-Housing Community Development Assets – 91.215 (f).....	MA-40
MA-50 Needs and Market Analysis Discussion	MA-57

Strategic Plan

SP-05 Overview	SP-1
SP-10 Geographic Priorities – 91.215 (a)(1).....	SP-1
SP-25 Priority Needs – 91.215(a)(2).....	SP-2
SP-30 Influence of Market Conditions – 91.215 (b).....	SP-9
SP-35 Anticipated Resources – 91.215(a)(4), 91.220(c)(1,2)	SP-10
SP-40 Institutional Delivery Structure – 91.215(k).....	SP-14
SP-45 Goals Summary – 91.215(a)(4)	SP-19
SP-50 Public Housing Accessibility and Involvement – 91.215(c).....	SP-25
SP-55 Barriers to affordable housing – 91.215(h)	SP-26
SP-60 Homelessness Strategy – 91.215(d).....	SP-29
SP-65 Lead-Based Paint Hazards (LBP) – 91.215(i)	SP-34
SP-70 Anti-Poverty Strategy – 91.215(j).....	SP-35
SP-80 Monitoring – 91.230	SP-42

Appendices

Appendix 1 – Areas of Minority Concentration Maps

Appendix 2 – Areas of Hispanic Concentration Maps

Appendix 3 – Areas of Low-Income and Very Low-Income Concentration Maps

Appendix 4 – Severe Housing Problems Maps

Appendix 5 – Outreach Summary

List of Tables

Table PR-1 – Responsible Agencies	PR-1
Table PR2 – Agencies, groups, organizations who participated	PR-6
Table PR3 – Other local / regional / Federal planning efforts.....	PR-6
Table PR-4 – Citizen Participation Outreach	PR-9
Table NA-1.1 – FY 2015 Income Limits Summary.....	NA-3
Table NA-1 – Housing Needs Assessment Demographics	NA-4
Table NA-2 – Total Households Table.....	NA-5
Table NA-3 – Housing Problems Table	NA-8
Table NA-4 – Housing Problems 2	NA-16
Table NA-5 – Cost Burden >30%.....	NA-20
Table NA-6– Cost Burden >50%.....	NA-22

Table NA-7 – Crowding Information.....	NA-24
Table NA-8 – Crowding Information.....	NA-26
Table NA-9 – Disproportionally Greater Need 0–30% AMI	NA-32
Table NA-9.1 – Disproportionally Greater Need 0–30% AMI	NA-33
Table NA-10 – Disproportionally Greater Need 30–50% AMI	NA-34
Table NA-10.1 – Disproportionately Greater Need 30–50% AMI	NA-35
Table NA-11 – Disproportionally Greater Need 50–80% AMI	NA-36
Table NA-11.1 – Disproportionately Greater Need 50–80% AMI	NA-37
Table NA- 12 – Disproportionally Greater Need 80–100% AMI	NA-38
Table NA-12.1 – Disproportionately Greater Need 80–100% AMI	NA-39
Table NA-13 – Severe Housing Problems 0–30% AMI	NA-42
Table NA-13.1 – Disproportionately Greater Need 0–30% AMI	NA-43
Table NA-14 – Severe Housing Problems 30–50% AMI	NA-44
Table NA-14.1 – Disproportionately Greater Need 30–50% AMI	NA-45
Table NA-15 – Severe Housing Problems 50–80% AMI	NA-46
Table NA-15.1 – Disproportionately Greater Need 50–80% AMI	NA-47
Table NA-16 – Severe Housing Problems 80–100% AMI	NA-48
Table NA-16.1 – Disproportionately Greater Need 80–100% AMI	NA-49
Table NA-17 – Greater Need: Housing Cost Burdens AMI	NA-51
Table NA-18 – Public Housing by Program Type	NA-54
Table NA-19 – Characteristics of Public Housing Residents by Program Type	NA-55
Table NA-20 – Race of Public Housing Residents by Program Type	NA-56
Table NA-21 – Ethnicity of Public Housing Residents by Program Type	NA-57
Table NA-22.1 – HUD’s 2014 Continuum of Care Homeless Assistance Programs.....	NA-59
Table NA-22.2 – HUD’s 2014 Continuum of Care Homeless Assistance Programs.....	NA-60
Table NA-22.3 – HUD’s 2014 Continuum of Care Homeless Assistance Programs.....	NA-61
Table NA-22.4 – HUD’s 2014 Continuum of Care Homeless Assistance Programs.....	NA-62
Table NA-22.5 – Nature and Extent of Homelessness	NA-62
Table NA-22.6 – Nature and Extent of Homelessness by Race and Ethnic Group.....	NA-64
Table NA-22.7 – Age Differences between Households with Children and without Children	NA-65
Table MA-1 – Residential Properties by Unit Number	MA-2
Table MA-2 – Unit Size by Tenure	MA-4
Table MA-3 – Cost of Housing	MA-7
Table MA-4 – Rent Paid	MA-8

Table MA-5 – Housing Affordability	MA-10
Table MA-6 – Monthly Rent	MA-11
Table MA-7 – Condition of Units	MA-14
Table MA-8 – Year Unit Built.....	MA-16
Table MA-9 – Risk of Lead-Based Paint.....	MA-18
Table MA-10 – Vacant Units*	MA-19
Table MA-11 – Total Number of Units by Program Type.....	MA-20
Table MA-11.1 – Conventional Public Housing	MA-21
Table MA-11.2 – Housing Authority of the County of Stanislaus.....	MA-22
Table MA-11.3 – Housing Authority of the County of Stanislaus.....	MA-23
Table MA-13 – Facilities and Housing Targeted to Homeless Households	MA-24
Table MA-14.1 – HOPWA Assistance Baseline.....	MA-34
Table MA-15 - Business Activity	MA-41
Table MA-16 - Labor Force.....	MA-42
Table MA-17 – Occupations by Sector	MA-43
Table MA-18 – Travel Time.....	MA-45
Table MA-19 - Educational Attainment by Employment Status	MA-46
Table MA-20 – Educational Attainment by Age	MA-48
Table MA-21 – Educational Attainment	MA-50
Table MA-21.1 – Major Manufacturing Employers	MA-52
Table MA-21.2 – Major Non-Manufacturing Employers.....	MA-53
Table SP-1 Priority Needs Summary.....	SP-3

Executive Summary

ES-05 Executive Summary – 24 CFR 91.200(c), 91.220(b)

1. Introduction

Each year the United States Department of Housing and Urban Development (HUD) provides funding for housing and community development programs to the Stanislaus Urban County and the City of Turlock, specifically Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnerships Program (HOME) grant. In order to receive these funds, the City of Turlock and the Stanislaus Urban County must complete a report every three to five years called a consolidated plan. In this case, the plan is called the Fiscal Year 2015-2020 Stanislaus Urban County / City of Turlock Regional Consolidated Plan (Con Plan).

Geographic Terms

Throughout this document the following geographic terms will be used.

- ◆ **Stanislaus Planning Area:** Includes the entirety of the planning area considered under this Con Plan: the cities of Turlock, Ceres, Hughson, Newman, Oakdale, Patterson, and Waterford and the unincorporated area of the County.
- ◆ **Stanislaus Urban County:** A multi-jurisdictional CDBG entitlement, made up of the cities of Ceres, Hughson, Newman, Oakdale, Patterson, and Waterford and the unincorporated area of the County. Stanislaus County is the “lead entity” for the Stanislaus Urban County.
- ◆ **Unincorporated County:** Includes the entire unincorporated area of the County (this area is not a part of any municipality).
- ◆ **Entitlement Cities:** The CDBG entitlement cities in the County are Modesto and Turlock.
- ◆ **Home Investment Partnerships Program (HOME) Consortium:** The members of the HOME Consortium are Stanislaus Urban County and the City of Turlock. The City of Turlock is the “lead entity” for the HOME Consortium.

Purpose

The purpose of the Con Plan is to identify the Stanislaus Urban County and the City of Turlock’s housing and community development needs, priorities, goals, and strategies and to stipulate how funds will be allocated to housing and community development activities over the period of the regional Con Plan, which in the case of the Stanislaus Urban County and the City of Turlock is five years.

The Stanislaus County Department of Planning and Community Development, Community Development Division, is the lead agency in developing the Con Plan. The Con Plan was prepared in accordance with HUD’s Office of Community and Planning Development (CPD) eCon Planning Suite (launched in May 2012), including the consolidated plan template in Integrated Disbursement and Information System (IDIS). Most of the data tables in the regional Con Plan are populated with default data from the US Census Bureau, mainly 2007–2011 Comprehensive Housing Affordability Strategy (CHAS) and American Community Survey (ACS) data. Other sources are noted throughout the Con Plan, including the addition of more recent data where practical. The research process involved the analysis of the following key components: demographic, economic, and housing data; affordable housing market; special needs

populations (homeless and non-homeless); consultation with public and private agencies; and citizen participation.

The Con Plan process also included the development of the first-year Annual Action Plan, which is the annual plan that the Stanislaus Urban County and the City of Turlock prepares pursuant to the goals outlined in the Con Plan. A separate Annual Action Plan is prepared for each entity, called the Fiscal Year 2015-2016 Stanislaus Urban County Annual Action Plan (Stanislaus AAP) and the Fiscal Year 2015-2016 City of Turlock Annual Action Plan (City of Turlock AAP). These AAPs detail the activities that the Stanislaus Urban County and City of Turlock will undertake to address the housing and community development needs and local objectives using CDBG and other housing funds received during Fiscal Year 2015-2016.

The regional Con Plan is divided into five sections, with the Needs Assessment, Market Analysis, and Strategic Plan forming the key sections. The sixth section is placed in a separate document:

1. Executive Summary
2. Process
3. Needs Assessment
4. Market Analysis
5. Strategic Plan
6. Annual Action Plan

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The Stanislaus Urban County and City of Turlock have organized their priority needs according to the structure presented in HUD regulations (24 CFR 91.215): affordable housing, homelessness, and non-housing community development. Priority is assigned based on the level of need demonstrated by the data that has been collected during the preparation of the Con Plan, specifically in the Needs Assessment and Market Analysis; the information gathered during the consultation and citizen participation process; and the availability of resources to address these needs. Based on all of these components, housing needs are considered a high priority, followed by homelessness and non-housing community development needs.

The Stanislaus Urban County and City of Turlock have identified six goals to address housing and community development needs between Fiscal Year 2015-2016 and Fiscal Year 2019-2020:

1. Increase supply of affordable rental housing for Stanislaus Urban County and City of Turlock's lowest-income households.
2. Preserve existing affordable housing stock.
3. Provide housing and services to special needs populations.
4. Increase access to homeownership opportunities for Stanislaus Urban County and City of Turlock residents.
5. Provide funding for public facilities and improvements.
6. Promote economic development activities in the Stanislaus Urban County and City of Turlock.

During the five-year Con Plan period, the Stanislaus Urban County expects to receive approximately \$2,197,687 annually in CDBG funding, for a five-year total of \$10,988,435. During the five-year Con Plan period, the Stanislaus Urban County expects to receive approximately \$190,669 annually in Emergency Solutions Grant (ESG) funding, for a five-year total of \$953,345. During the five-year Con Plan period, the City of Turlock expects to receive \$548,076 annually in CDBG funding, for a five-year total of \$2,740,380. The HOME Consortium also anticipates at least \$911,823 in annual HOME funds, for a five-year total of \$4,559,115, and \$1.6 million in one-time State CalHome funding for City of Turlock housing activities and administrative costs, over the five-year Con Plan period.

CDBG funds are used by the Stanislaus Urban County and City of Turlock for public services, public facilities and improvements, and planning and administrative costs. City of Turlock also uses its own CDBG funds for housing activities in addition. The CDBG program's primary objective is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low and moderate income. Funds can be used for a wide array of activities, including housing rehabilitation, homeownership assistance, lead-based paint detection and removal, construction or rehabilitation of public facilities and infrastructure, removal of architectural barriers, public services, rehabilitation of commercial or industrial buildings, and loans or grants to businesses.

The Stanislaus Urban County and City of Turlock receive HOME funding through HUD for additional housing activities. The HOME program provides Federal funds for the development and rehabilitation of affordable rental and ownership housing for low- and moderate-income households. HOME funds can be used for activities that promote affordable rental housing and homeownership by low- and moderate-income households, including building acquisition, new construction and reconstruction, moderate or substantial rehabilitation, homebuyer assistance, and tenant-based rental assistance.

The Stanislaus Urban County and City of Turlock may also apply for CalHome funding from HCD when funding announcements are made by the State. These funds are awarded on a competitive basis for mortgage assistance for low- or very low-income first-time homebuyers or for owner-occupied rehabilitation for low- or very low-income homeowners.

CDBG and HOME funds could be coupled with local funds if available, allowing affordable housing projects to compete for additional funding provided by tax credits, bonds, and state financing programs. An investment by the Stanislaus Urban County and City of Turlock makes the projects more competitive in various funding competitions. All sources and types of funds are more limited now due to the current economic climate, along with the demise of statewide redevelopment tax-increment funds and housing set-aside funds. However, as in the past, the Stanislaus Urban County and City of Turlock will be as creative as possible in finding other sources of funding from local, State, Federal, and private sources in order to develop and deliver efficient and cost-effective projects.

3. Evaluation of past performance

As lead entity of the Stanislaus Urban County, Stanislaus County staff assumes overall responsibility for administration of CDBG and ESG funds. The City of Turlock assumes overall responsibility for administration of its own CDBG funds, as well as the HOME Consortium funds.

One of HUD's requirements is that entitlement communities must not have more than 1.5 times their annual allocation amount on account by April of every fiscal year. Stanislaus Urban County has successfully incorporated the 1.5 annual allocation timeliness guidelines to apply to all participating Stanislaus Urban County members individually. The City of Turlock has successfully incorporated the 1.5 annual allocation timeliness guidelines to apply to all participating HOME Consortium members individually. This reduces the burden being placed upon any one participating member in the Stanislaus Urban County and the HOME Consortium, and evenly distributes the responsibility of expending CDBG and HOME funds in a timely manner to all members and their respective projects in a more uniform manner.

Performance of all Stanislaus Urban County members and public service grantees, as well as, HOME Consortium members are tracked in various categories from appropriate use of administrative funds to verifying that outputs (numbers served) and outcomes (how those served are better off after receiving the service) are being met for all awarded public service-related activities and County and City projects.

Public Service/ESG grantees that are not meeting the thresholds they pledged to meet during key points throughout the year are in jeopardy of receiving only partial or no funding in future fiscal years if they reapply for funding. Stanislaus County staff also monitors nonprofit organization processes used to better track and follow up with participants to ascertain participant outcomes (how the participant is better off after receiving a given service). This process helps to better justify the need for the service they provide within the community.

County and city infrastructure projects are tracked by timeline criteria. Stanislaus Urban County members are encouraged to begin their environmental work on projects in early March of each year so that the construction phase of the project can begin in July at the beginning of the fiscal year. Requests for funds are made on a quarterly basis and timeline compliance is confirmed at that time to assure that the Stanislaus Urban County's collective projects are on task.

Stanislaus County staff continues to collaboratively work with its Stanislaus Urban County members to ensure that timeliness deadlines continue to be met in a timely manner.

4. Summary of citizen participation process and consultation process

The community outreach process included four community workshops, one stakeholder meeting, a print and online survey, and agency phone and email consultations on the Con Plan, on the Fiscal Year 2015-2020 Regional Analysis of Impediments to Fair Housing Choice (AI), and the Stanislaus County 2015–2023 Housing Element Update (Housing Element Update). Complete meeting notes, sign-in sheets, survey data, and agency consultations are provided in the Outreach Summary appendix.

5. Summary of public comments

The outreach effort for the Con Plan, the AI, and the Housing Element Update reached more than 600 interested participants and more than 40 local agencies. Overall, some general themes emerged throughout the process which help guide the development of the Con Plan and Housing Element Update. The themes can be broken down into the following six topic areas:

- ◆ Housing for seniors, disabled persons, and youth/families
- ◆ Public services and facilities for youth, seniors, and disabled persons
- ◆ Homeless services
- ◆ Housing for homeless households with children
- ◆ Job creation and retention
- ◆ Fair housing

6. Summary of comments or views not accepted and the reasons for not accepting them

None.

7. Summary

The Stanislaus Urban County and City of Turlock have engaged in a process of community outreach, consultations, and analysis of relevant community indicators to establish housing and community development goals for the five-year planning period.

These goals will be used to plan for the use of CDBG, HOME, and ESG funds received by the Stanislaus Urban County and City of Turlock for the five-year period of 2015–2020 (Fiscal Year 2015-2016 through Fiscal Year 2019-2020). The Stanislaus Urban County and City of Turlock plan individually for the use of CDBG funds. They plan cooperatively for the use of HOME funds as a HOME Consortium. The County plans independently for the use of ESG funds.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

Describe agency/entity responsible for preparing the Con Plan and those responsible for administration of each grant program and funding source

Table PR-1 – Responsible Agencies

The following are the agencies/entities responsible for preparing the Con Plan and those responsible for administration of each grant program and funding source.		
Agency Role	Name	Department/Agency
Lead Agency	Stanislaus County	Planning and Community Development
CDBG Administrator	Stanislaus County	Planning and Community Development
HOME & CDBG Administrator	City of Turlock	Housing Program Services
ESG Administrator	Stanislaus County	Planning and Community Development

Overview

Stanislaus County is a county located in the Central Valley of the State of California. As of the 2010 census, the population was 514,453. The county seat is Modesto.

Stanislaus County comprises the Modesto Metropolitan Statistical Area. For purposes of the Community Development Block Grant (CDBG) program, the Stanislaus Urban County includes the cities of Ceres, Hughson, Newman, Oakdale, Patterson, and Waterford (as well as the balance of the county less the cities of Modesto and Riverbank), and the City of Turlock.

Stanislaus County was formed from part of Tuolumne County in 1854. The county seat was first situated at Adamsville, then moved to Empire in November, La Grange in December, and Knights Ferry in 1862, and was fixed at the present location in Modesto in 1871.

According to the US Census Bureau, the county has a total area of 1,515 square miles (3,920 km²), of which 1,495 square miles (3,870 km²) is land and 20 square miles (52 km²) (1.3%) is water.

The City of Turlock is the second largest city in Stanislaus County after Modesto. It is located between Modesto and Merced at the intersection of State Routes 99 and 165.

According to the U.S. Census Bureau, the City of Turlock has a total area of 16.9 square miles, all of which is land.

Con Plan's Public Contact Information

Angela Freitas, Director
 Department of Planning and Community Development
 1010 10th Street, Suite 3400
 Modesto, CA 95354
 Tel: 209-525-6330
 Fax: 209-525-5911
 E-mail: angela@stancounty.com

PR-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).

In preparing the Con Plan, the Stanislaus Urban County and City of Turlock consulted with various organizations located in the Urban County and City of Turlock that provide services to residents. In many instances, these consultations are part of ongoing interactions between Stanislaus Urban County, City of Turlock, and the agency or group described.

A detailed description of the outreach process, the results, and the documentation of the outreach process is included in Appendix 5.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

STAKEHOLDERS MEETING – STANISLAUS HOUSING AND SUPPORT SERVICES COLLABORATIVE COMMITTEE (Stanislaus CoC)

One stakeholders meeting was held on October 16, 2014, at the Housing Authority of the County of Stanislaus in Modesto. The presentation and input regarding the Con Plan, the AI, and Housing Element Update were part of the agenda for the regularly scheduled Stanislaus CoC meeting. The meeting was attended by 33 people from the following agencies and organizations:

- ◆ Disability Resource Agency for Independent Living (DRAIL)
- ◆ Golden Valley Health Center (GVHC) – Corner of Hope
- ◆ United Samaritans Foundation
- ◆ Community Impact Central Valley (CICV)
- ◆ City of Modesto
- ◆ Turning Point Community Program
- ◆ Telecare Shop
- ◆ Stanislaus Team of Active Retired Seniors (STARS) Citizen Volunteers
- ◆ Community Housing and Shelter Services (CHSS)
- ◆ Stanislaus County
- ◆ Golden Valley Health Center
- ◆ Health Plan of San Joaquin
- ◆ Valley Recovery Resources

- ◆ Parent Resource Center
- ◆ Housing Authority of the County of Stanislaus (HACS)
- ◆ Stanislaus County Affordable Housing
- ◆ City of Turlock
- ◆ Behavioral Health and Recovery Services
- ◆ American Red Cross
- ◆ Salvation Army
- ◆ We Care
- ◆ Helping Others Sleep Tonight
- ◆ Center for Human Services
- ◆ Modesto City Council
- ◆ Community representative

The meeting started with an overview presentation on the Con Plan and Housing Element Update. The presentation included an overview of the update process and schedule as well as demographic information on housing needs. Following the presentation, meeting participants were asked to provide their perspective on a number of discussion questions. In addition to the group discussion, two written feedback forms were also completed. See also the Outreach Summary appendix for additional detail.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

Stanislaus County and City of Turlock staff consults and collaborates with the Stanislaus CoC in multiple ways. The Stanislaus CoC is made up of representatives from the City of Modesto, the City of Turlock, Housing Authority of the County of Stanislaus, Stanislaus County Behavioral Health and Recovery Services, Stanislaus County Child Support Services, housing service providers, social service providers, fair housing service providers, health service providers, and homeless service providers. Announcements for all funding opportunities through the County are routinely advertised at the Stanislaus CoC meetings. A representative from the Stanislaus CoC participates on the panel which scores applications for the competitive CDBG Public Service and Emergency Solutions Grant (ESG) grants. In addition, draft ESG and CDBG Public Services funding recommendations are presented to the Stanislaus CoC during its committee meeting for comment.

A more detailed consultation for how ESG funds are allocated and implemented occurs at the Emergency Solutions Grant / Supportive Housing Program / Homeless Management Information System (ESG/SHP/HMIS) sub-committee, which takes place monthly after the general Stanislaus CoC meeting. In recent years, the sub-committee has worked hard to implement the revised ESG, SHP, and HMIS regulations, both in practice and in the HMIS system itself. In general, the sub-committee has agreed that its goal is to develop coordinated intake and data collection processes that still maintain the flexibility to work for each individual or family's unique needs. The sub-committee will continue to work on refining a list of barriers that impede housing stability, on identifying and implementing a coordinated assessment process, on streamlining HMIS data entry, and on standardizing ESG policies and procedures. The sub-committee has an ultimate goal to utilize HMIS data to draw meaningful patterns of homelessness within the County which will allow for more effective targeting of homeless funds.

Representatives from Stanislaus County Behavioral Health and Recovery Services and the Community Services Agency regularly attend the monthly Stanislaus CoC meetings and are active participants in program planning for homeless fund utilization throughout Stanislaus County. The Stanislaus County Health Services Agency has been contacted in regard to health care reform legislation, some of which encourages incorporating rental assistance and case management into discharge planning. Because Stanislaus County does not have a public hospital, private hospitals will ultimately need to be consulted in the future as to which health care reform measures they will be implementing. On October 1, 2011, California passed a corrections realignment plan, which shifts responsibility from the state to counties for the custody, treatment, and supervision of individuals convicted of specified nonviolent, non-serious, non-sex crimes. In anticipation for the huge impact this will have on Stanislaus County in terms of discharging persons released from County jails into homelessness, the Stanislaus CoC has collaborated with Stanislaus County Sheriff's and Probation Departments to discuss what services are available for recently discharged parolees.

Consultation with public and private agencies that provide assisted housing, health services, and social services to determine what resources are available to address the needs of any persons that are chronically homeless was addressed via coordination with the local Stanislaus CoC.

Funds are set aside to allow nonprofit organizations and service providers to apply through a competitive process for an ESG program grant. The ESG grant is intended for services provided to eligible Stanislaus Urban County and City of Turlock residents. Applications are released annually, and are due for submittal in December. Submitted applications are received by the Stanislaus County Planning and Community Development Department and reviewed and scored by a review team, consisting of a representative from each Stanislaus Urban County member, the Stanislaus County Chief Executive Office, and a representative from the Stanislaus CoC.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

INTRODUCTION

Five public workshops were conducted during the preparation of the Fiscal Year 2015-2020 Stanislaus Urban County / City of Turlock Regional Consolidated Plan (Con Plan) at the following dates and places.

- ◆ Community Workshop 1: City of Ceres, Ceres Community Center, October 15, 2014
- ◆ Stakeholders Meeting: Housing Authority of the County of Stanislaus, Modesto, October 16, 2014
- ◆ Community Workshop 2: City of Turlock, City Hall, October 20, 2014
- ◆ Community Workshop 3: City of Oakdale, Bianchi Community Center, October 22, 2014
- ◆ Community Workshop 4: City of Patterson, City Council Chambers 1, October 29, 2014

All meetings were publicly noticed in a newspaper of general circulation (Ceres Courier, Hughson/Denair Dispatch, Modesto Bee, Newman/Gustine Westside Index, Oakdale Leader, and Patterson Irrigator) as well as the Stanislaus County Planning Department website. In addition, flyers were hand distributed in Ceres, Turlock, and Oakdale, and the Patterson meeting was noticed in the Vida en el Valle. The stakeholders meeting on October 16, 2014, was by invitation to area service providers.

A print and online survey was also conducted to determine priority needs for the Con Plan, AI, and Housing Element Update.

MEETING AND SURVEY SUMMARIES

COMMUNITY WORKSHOP 1 – CITY OF CERES

Workshop 1 was held at the Ceres Community Center on the evening of October 15, 2014.. The workshop was attended by four participants and began with an overview presentation on the Con Plan and Housing Element Update. Following the presentation, workshop participants were invited to provide their feedback at four activity stations set up around the room:

- ◆ Station 1 – Consolidated Plan: Housing
- ◆ Station 2 – Consolidated Plan: Public Service and Facilities
- ◆ Station 3 – Consolidated Plan: Fair Housing
- ◆ Station 4 – Housing Element Update

STAKEHOLDERS MEETING – STANISLAUS HOUSING AND SUPPORT SERVICES COLLABORATIVE COMMITTEE (Stanislaus CoC)

See earlier section for a description of the meeting with the Stanislaus CoC.

COMMUNITY WORKSHOP 2 – CITY OF TURLOCK

Workshop 2 was held on October 20, 2014, at the City of Turlock City Hall with approximately 17 community members attending the meeting that evening or providing comments at City Hall the following day. The workshop began with an overview presentation on the Con Plan and Housing Element Update followed by activity stations (as described under Workshop 1).

COMMUNITY WORKSHOP 3 – CITY OF OAKDALE

Workshop 3 was held at the Bianchi Community Center in Oakdale on October 22, 2014. No participants attended this workshop.

COMMUNITY WORKSHOP 4 – CITY OF PATTERSON

Three community members attended Workshop 4, which was held in the Patterson Council Chambers on the evening of October 29, 2014. The workshop began with an overview presentation on the Con Plan and Housing Element Update followed by activity stations (as described under Workshop 1).

SURVEY

An online survey was provided on the Stanislaus County website from October 20, 2014, to December 1, 2014. The option was also available to complete a written hard copy survey during this same time period. A total of 588 completed surveys were received: 586 English surveys and 2 Spanish surveys.

CONSULTATIONS AND COORDINATION

The consolidated planning process requires jurisdictions to contact and consult with other public and private agencies when developing the Con Plan. The Con Plan itself must include a summary of the consultation process, including identification of the agencies that participated in the process. Jurisdictions are also required to summarize their efforts to enhance coordination between public and private agencies.

CONSULTATIONS

Stanislaus Urban County and City of Turlock consulted with a wide range of service providers and stakeholders. These involved both the public sector and private nonprofit sector. These personal contacts asked those who help to meet the housing and social services needs of Stanislaus County and City of Turlock residents to describe the level of needs in the community, the relative priority of needs, and what they believe can be done to better meet the needs of the county's residents.

Stakeholders were consulted via e-mail and telephone during January 2015. More than 60 stakeholders were contacted. Successful interviews/responses were received from 10 stakeholders.

See also the Outreach Summary appendix for additional detail.

Table PR2 – Agencies, groups, organizations who participated

Identify any Agency Types not consulted and provide rationale for not consulting

All groups were either consulted or invited to participate in the Con Plan process. There was no decision to exclude any group.

Other local/regional/state/Federal planning efforts considered when preparing the Plan

Table PR3 – Other local / regional / Federal planning efforts

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Stanislaus CoC Consolidated Application	Housing Authority of the County of Stanislaus	Shelter for Homeless Persons; Rapid Re-Housing for Homeless Persons; Homeless Prevention for Extremely Low Income Households and Individuals; Capacity Building for Homeless Service Providers; Homeless Services Data Collection; Focus on Prevention Coordination.
Opening Doors Federal Strategic Plan to Prevent and End Homelessness	The United States Interagency Council on Homelessness	Target homeless and housing services to chronically homeless, veterans, families, youth and children. Increase leadership, collaboration, and civic engagement Increase access to stable and affordable housing Improve health and safety Retool the homeless crisis response system
San Joaquin Valley Fair Housing Equity Assessment	The Smart Valley Places Consortium	Improve Infrastructure in Low-income Neighborhoods; Acquisition and Single-Multifamily Rehabilitation; Affordable Housing for Seniors

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
		Improve Accessibility; Fair Housing and Tenant/Landlord Services; Rehabilitate Existing Housing; First-time Homebuyer Assistance.
Stanislaus County Housing Element	County of Stanislaus	Acquisition and Single-Multifamily Rehabilitation; Affordable Housing for Seniors Improve Accessibility; Rehabilitate Existing Housing; First-time Homebuyer Assistance; Shelter for Homeless Persons.
City of Turlock Housing Element.	City of Turlock	Acquisition and Single-Multifamily Rehabilitation; Affordable Housing for Seniors Improve Accessibility; Rehabilitate Existing Housing; First-time Homebuyer Assistance; Shelter for Homeless Persons.
Public Housing Agency Plan (PHA Plan)	Housing Authority of the County of Stanislaus	Acquisition and Single-Multifamily Rehabilitation; Affordable Housing for Seniors Improve Accessibility; Rehabilitate Existing Housing; First-time Homebuyer Assistance; Shelter for Homeless Persons.
Stanislaus County Capital Improvement Plan	County of Stanislaus	Improve Infrastructure in Low-income Neighborhoods.

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Con Plan (91.215(I))

In addition to the organizations that were invited to and participated in public meetings on the Con Plan, significant aspects of the Con Plan development process included consultations with the Stanislaus CoC and its membership which comprises both public and private nonprofit and for-profit entities, as well as private citizens.

PR-15 Citizen Participation - 91.105, 91.200 (c)

Summary of citizen participation process/Efforts made to broaden citizen participation

See earlier section for a description of the citizen participation process and efforts made to broaden citizen participation. See also the Outreach Summary appendix for additional detail.

Summarize citizen participation process and how it impacted goal-setting

In order to ensure maximum participation in the Con Plan process among all populations and special needs groups and to ensure that their issues and concerns are adequately addressed, the Stanislaus Urban County and City of Turlock have Citizen Participation Plans in place. The Citizen Participation Plans describe the actions to be taken to encourage citizen participation in the development of the Con Plan, any substantial amendments to the Con Plan, the AAP, and Consolidated Annual Performance Evaluation Report (CAPER).

The community outreach process included four community workshops, one stakeholder meeting, a print and online survey, and agency phone and email consultations. Overall, more than 600 people provided their feedback on the Con Plan and Housing Element Update. The Community Outreach Summary following this section provides a detailed summary of the responses received during each portion of the outreach process. Overall trends and themes identified are located in the Community Themes section at the end of that summary. The Community Themes section takes into account results and feedback from all input events and methods. Complete meeting notes, sign-in sheets, survey data, and agency consultations are provided.

The Community Themes identified were used to determine the priority needs and goals of the Strategic Plan as well as the planned activities.

Table PR-4 – Citizen Participation Outreach

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
Community Workshops		Four community workshops were held throughout the County in October 2014. Each workshop began with a presentation; then, workshop participants were invited to provide their feedback at four activity stations set up around the room. The stations included posters where participants were asked to place dots (stickers) on the posters to prioritize issues and needed services and funding. The full dot voting results for all workshops are included at the end of this appendix. See Outreach Summary document for more details (pages 1 to 3).			
Stakeholders Meeting – Stanislaus Housing and Support Services Collaborative Committee (Stanislaus CoC)		A Stakeholder Meeting was held at the Stanislaus Housing and Support Services Collaborative Committee (COC) on October 16, 2014. The meeting was attended by 33 people from various County agencies and organizations. See Outreach Summary document for more details (pages 3 to 4).			
Online Survey		An online survey was provided on the Stanislaus County website from October 20, 2014, to December 1, 2014. The option was also available to complete a written hard copy survey during this same time period. A total of 587 completed surveys were received: 585 English surveys and 2 Spanish surveys. See Outreach Summary document for survey results from both the online and print surveys completed (pages 4 to 14).			
Print Survey		An online survey was provided on the Stanislaus County website from October 20, 2014, to December 1, 2014. The option was also available to complete a written hard copy survey during this same time period. A total of 587 completed surveys were received: 585 English surveys and 2 Spanish surveys. See Outreach Summary document for survey results from both the online and print surveys completed (pages 4 to 14).			
Municipal Advisory Council meetings		Stanislaus County staff received general comments regarding the desire for sidewalks and other infrastructure improvements at several Municipal Advisory Council meetings.			
Public Noticing		All meetings were publicly noticed in a newspaper of general circulation (Ceres Courier, Hughson/Denair Dispatch, Modesto Bee, Newman/Gustine Westside Index, Oakdale Leader, and Patterson Irrigator) as well as the Stanislaus County Planning Department website. In addition, flyers were hand distributed in Ceres, Turlock, and Oakdale, and the Patterson meeting was noticed in the Vida en el Valle. The stakeholders meeting on October 16, 2014, was by invitation to area service providers. A print and online survey was also conducted to determine priority needs for the Con Plan, Analysis of Impediments, and Housing Element Update.			

Needs Assessment

NA-05 Overview

Needs Assessment Overview

This section of the Con Plan provides a summary of Stanislaus County's needs related to affordable housing, special needs housing, community development, and homelessness. The Needs Assessment includes the following sections:

- ◆ Housing Needs Assessment
- ◆ Disproportionately Greater Need
- ◆ Public Housing
- ◆ Homeless Needs Assessment
- ◆ Non-Homeless Needs Assessment
- ◆ Non-Housing Community Development Needs

The Needs Assessment identifies those needs with the highest priority, which forms the basis for the Strategic Plan section and the programs and projects to be administered. Most of the data tables in this section are populated with default data from the Comprehensive Housing Affordability Strategy (CHAS) developed by the U.S. Census Bureau for HUD based on the 2007–2011 American Community Survey (ACS). Other sources are noted throughout the Con Plan.

Data in this section has been provided by HUD's Integrated Disbursement and Information System (IDIS) for the entire planning area, which encompasses the Stanislaus Urban County and the City of Turlock. Data for the individual jurisdictions has been provided from IDIS and Community Planning and Development (CPD) Maps when available. The following maps are attached in **Appendix 4**:

- ◆ Map 14: Extremely low-income households with any of the four severe housing problems (North)
- ◆ Map 15: Extremely low-income households with any of the four severe housing problems (South)
- ◆ Map 16: Low-income households with any of the four severe housing problems (North)
- ◆ Map 17: Low-income households with any of the four severe housing problems (South)
- ◆ Map 18: Moderate-income households with any of the four severe housing problems (North)
- ◆ Map 19: Moderate-income households with any of the four severe housing problems (South)

NA-10 Housing Needs Assessment – 24 CFR 91.205 (a, b, c)

Summary of Housing Needs

The data in this section analyzes households with housing problems, those experiencing (1) overcrowding; (2) substandard housing; (3) cost burden (paying more than 30 percent of household income for housing costs); or (4) severe cost burden (spending over 50 percent of household income for housing costs).

The following income categories are used throughout the Con Plan and are applied to the area median income (AMI) contained in the Median Income section of the table below:

- ◆ Extremely low – households with income less than 30 percent of AMI
- ◆ Very low – households with income between 30 and 50 percent of AMI
- ◆ Low – households with income between 51 and 80 percent of AMI
- ◆ Moderate – households with income between 81 and 120 percent of AMI
- ◆ Above moderate – households with income above 120 percent of AMI

It should be noted that data used in this Con Plan uses the most recent data available, which is for 2011. For reference, Table NA-1.1 shows the income limits for 2015.

Table NA-1.1 – FY 2015 Income Limits Summary

Stanislaus County, California										
FY 2015 Income Limit Area	Median Income	FY 2015 Income Limit Category	1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 Persons	8 Persons
Stanislaus County	\$53,300	Extremely Low (30%)	\$11,950	\$15,930	\$20,090	\$24,250	\$28,410	\$32,570	\$35,300*	\$37,600*
		Very Low (50%)	\$19,950	\$22,800	\$25,650	\$28,450	\$30,750	\$33,050	\$35,300	\$37,600
		Low (80%)	\$31,850	\$36,400	\$40,950	\$45,500	\$49,150	\$52,800	\$56,450	\$60,100
		Median (100%)	\$39,900	\$45,600	\$51,300	\$56,900	\$61,500	\$66,100	\$70,600	\$75,200
		Moderate (120%)	\$47,880	\$54,720	\$61,560	\$68,280	\$73,800	\$79,320	\$84,720	\$90,240

* The FY 2014 Consolidated Appropriations Act changed the definition of extremely low income to be the greater of 30/50ths (60 percent) of the Section 8 very low-income limit or the poverty guideline as established by the Department of Health and Human Services (HHS), provided that this amount is not greater than the Section 8 50 percent very low-income limit. Consequently, the extremely low (30 percent) income limits may equal the very low (50 percent) income limits.

Income limit areas are based on FY 2015 fair market rent (FMR) areas. For information on FMRs, please see our associated FY 2015 Fair Market Rent documentation system.

Effective March 6, 2015

Based on the data below, 288,385 people reside in the Stanislaus Planning Area, comprising approximately 90,472 households. The Stanislaus Planning Area encompasses Stanislaus Urban County and City of Turlock geographies (see Executive Summary section for definitions). Of these 90,472 households, approximately 37.7 percent are at or below 80 percent of AMI and considered low income per HUD regulations. According to the 2008–2012 ACS 5-Year Demographic and Housing Estimates, 59.1 percent of households in the entirety of Stanislaus County are owner-occupied and 40.9 percent are renter-occupied. In addition, approximately 48.5 percent of Stanislaus County’s households overpaid for housing. The percentage of overpaying households was split between homeowners (41.2 percent) and renters (59.5 percent). This data aligns with Table NA-1 below in that the most prevalent housing problem among both renter and owner households is housing cost burden. Overcrowding for renters is also a housing problem, which reflects the inability of households to afford larger units, possibly as a result of a shortage of affordable housing for larger households.

Demographics

Table NA-1 shows the demographic characteristics for the Stanislaus Planning Area and cities within the Planning Area. The year 2000 population data in this table comes from the 2007-2011 CHAS which is different than the 2000 population data source in the Analysis of Impediments to Fair Housing Choice (AI) document. The source in that document is the Department of Finance. The data in Table NA-1 is from the IDIS data download. The data in the AI is in a table that also includes projections. All of the population data works together in that table. The source cannot be changed to match the source in Table NA-1.

Table NA-1 – Housing Needs Assessment Demographics

Demographics	Base Year: 2000	Most Recent Year: 2011	% Change
Population			
Stanislaus Planning Area*	242,297	288,385	19%
Turlock	55,940	67,953	21%
Ceres	34,609	44,153	28%
Hughson	3,980	6,267	57%
Newman	7,093	9,806	38%
Oakdale	15,503	20,076	29%
Patterson	11,606	19,110	65%
Waterford	6,924	8,315	20%
Households			
Stanislaus Planning Area	75,497	90,472	20%
Turlock	18,427	22,780	24%
Ceres	10,435	12,922	24%
Hughson	1,223	1,891	55%
Newman	2,079	2,912	40%
Oakdale	5,610	6,802	21%
Patterson	3,146	5,496	75%
Waterford	1,990	2,277	14%

Demographics	Base Year: 2000	Most Recent Year: 2011	% Change
Median Income			
Stanislaus Planning Area	\$40,101	\$50,671	26%
Turlock	\$39,050	\$50,862	30%
Ceres	\$41,515	\$50,124	21%
Hughson	\$39,398	\$49,997	27%
Newman	\$39,239	\$47,416	21%
Oakdale	\$39,197	\$59,842	53%
Patterson	\$47,849	\$54,187	13%
Waterford	\$38,990	\$54,413	40%

Data Source: 2007–2011 CHAS

*Note: The Stanislaus Urban County includes the entirety of the Planning Area considered under this plan: the cities of Turlock, Ceres, Hughson, Newman, Oakdale, Patterson, and Waterford and the unincorporated area of Stanislaus County.

Number of Households Table

Table NA-2 shows the number of households by HUD Area Median Family Income (HAMFI) for the Stanislaus Planning Area and cities within the Planning Area.

Table NA-2 – Total Households Table

	0–30% HAMFI*	>30–50% HAMFI	>50–80% HAMFI	>80–100% HAMFI	>100% HAMFI
Stanislaus Planning Area					
Total Households	9,061	10,824	14,224	7,913	48,464
Small Family Households	3,671	4,219	6,002	3,576	26,724
Large Family Households	930	1,939	2,709	1,815	7,682
Household contains at least one person 62–74 years of age	1,178	1,853	2,702	1,226	8,648
Household contains at least one person age 75 or older	993	2,007	1,948	978	3,066
Households with one or more children 6 years old or younger	2,689	2,734	3,937	2,050	8,579
City of Turlock					
Total Households	2,050	2,840	3,745	1,660	12,480
Small Family Households	710	970	1,580	830	7,010
Large Family Households	95	405	475	285	1,610
Household contains at least one person 62–74 years of age	355	520	545	180	2,145

	0–30% HAMFI*	>30–50% HAMFI	>50–80% HAMFI	>80–100% HAMFI	>100% HAMFI
Household contains at least one person age 75 or older	295	610	660	270	665
Households with one or more children 6 years old or younger	360	650	725	315	2,445
City of Ceres					
Total Households	1,490	1,695	2,115	1,230	6,705
Small Family Households	730	760	900	455	3,770
Large Family Households	165	265	525	460	1,285
Household contains at least one person 62–74 years of age	195	255	390	220	1,070
Household contains at least one person age 75 or older	110	245	230	145	475
Households with one or more children 6 years old or younger	650	354	700	380	1,410
City of Hughson					
Total Households	115	265	290	340	1,010
Small Family Households	45	195	110	155	650
Large Family Households	15	-	45	110	130
Household contains at least one person 62–74 years of age	15	15	45	15	95
Household contains at least one person age 75 or older	30	55	70	80	150
Households with one or more children 6 years old or younger	15	130	80	120	295
City of Newman					
Total Households	255	385	480	400	1,505
Small Family Households	95	180	260	185	880
Large Family Households	35	35	145	145	285
Household contains at least one person 62–74 years of age	45	60	70	35	280
Household contains at least one person age 75 or older	15	70	30	-	30
Households with one or more children 6 years old or younger	85	85	205	200	195
City of Oakdale					
Total Households	720	550	875	420	4,420
Small Family Households	340	150	390	190	2,550

	0–30% HAMFI*	>30–50% HAMFI	>50–80% HAMFI	>80–100% HAMFI	>100% HAMFI
Large Family Households	-	40	45	55	615
Household contains at least one person 62–74 years of age	85	95	230	85	820
Household contains at least one person age 75 or older	165	110	140	70	180
Households with one or more children 6 years old or younger	140	10	220	85	805
City of Patterson					
Total Households	330	510	745	540	3,355
Small Family Households	210	175	325	210	1,785
Large Family Households	25	145	185	125	810
Household contains at least one person 62–74 years of age	65	45	180	65	425
Household contains at least one person age 75 or older	10	105	60	60	115
Households with one or more children 6 years old or younger	145	180	315	150	925
City of Waterford					
Total Households	275	180	365	210	1,300
Small Family Households	80	50	105	135	755
Large Family Households	40	70	90	50	245
Household contains at least one person 62–74 years of age	75	50	80	24	220
Household contains at least one person age 75 or older	25	40	65	-	60
Households with one or more children 6 years old or younger	105	120	105	145	270

Data Source: 2007–2011 CHAS

*HAMFI is the median family income calculated by HUD for each jurisdiction, in order to determine FMRs and income limits for HUD programs. HAMFI will not necessarily be the same as other calculations of median incomes (such as a simple Census number), due to a series of adjustments that are made. (For full documentation of these adjustments, consult the HUD Income Limit Briefing Materials.) If you see the terms "area median income" (AMI) or "median family income" (MFI) used in the CHAS, assume it refers to HAMFI. (From http://www.huduser.org/portal/datasets/cp/CHAS/bg_chas.html)

Housing Needs Summary Tables

Table NA-3 shows housing problems for the Stanislaus Planning Area and cities within the Planning Area. The four housing problems are (1) lacks a complete kitchen; (2) lacks complete plumbing facilities; (3) more than one person per room; and (4) cost burden greater than 30 percent of the gross income. Due to large margins of error in the ACS data in smaller jurisdictions, data in income categories may not equal to total data.

Table NA-3 – Housing Problems Table

	Renter					Owner				
	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total
NUMBER OF HOUSEHOLDS										
Stanislaus Planning Area										
Substandard Housing – lacking complete plumbing or kitchen facilities	199	113	195	0	507	95	15	20	25	155
Severely Overcrowded – with >1.51 people per room (and complete kitchen and plumbing)	315	205	155	60	735	20	30	90	90	230
Overcrowded – with 1.01–1.5 people per room (and none of the above problems)	493	722	717	294	2,226	105	208	374	282	969
Housing cost burden greater than 50% of income (and none of the above problems)	4,184	3,185	1,242	69	8,680	1,227	1,978	2,157	1,205	6,567

	Renter					Owner				
	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	334	1,571	2,898	758	5,561	418	822	1,357	1,621	4,218
Zero/negative Income (and none of the above problems)	568	0	0	0	568	359	0	0	0	359
City of Turlock										
Substandard Housing – Lacking complete plumbing or kitchen facilities	20	25	115	0	160	0	0	0	10	10
Severely Overcrowded – With >1.51 people per room (and complete kitchen and plumbing)	65	25	60	10	160	10	0	30	0	40
Overcrowded – With 1.01-1.5 people per room (and none of the above problems)	55	255	90	80	480	10	10	65	15	100
Housing cost burden greater than 50% of income (and none of the above problems)	1,230	1,055	415	15	2,715	150	425	450	280	1,305

	Renter					Owner				
	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	120	400	1,200	180	1,900	90	190	330	235	845
Zero/negative Income (and none of the above problems)	155	0	0	0	155	80	0	0	0	80
City of Ceres										
Substandard Housing – Lacking complete plumbing or kitchen facilities	0	40	30	0	135	0	0	10	0	80
Severely Overcrowded – With >1.51 people per room (and complete kitchen and plumbing)	0	0	60	0	110	0	0	0	20	20
Overcrowded – With 1.01–1.5 people per room (and none of the above problems)	155	120	100	60	490	20	4	110	90	340
Housing cost burden greater than 50% of income (and none of the above problems)	710	485	135	25	1,350	195	365	350	180	1,480

	Renter					Owner				
	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	90	275	355	35	865	40	95	250	325	2,235
Zero/negative Income (and none of the above problems)	110	0	0	0	110	25	0	0	0	25
City of Hughson										
Substandard Housing – Lacking complete plumbing or kitchen facilities	0	0	0	0	0	0	0	0	0	0
Severely Overcrowded – With >1.51 people per room (and complete kitchen and plumbing)	0	20	0	0	20	0	0	0	0	0
Overcrowded – With 1.01–1.5 people per room (and none of the above problems)	0	0	15	40	55	0	0	15	0	35
Housing cost burden greater than 50% of income (and none of the above problems)	60	75	65	0	260	0	60	40	65	175

	Renter					Owner				
	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	0	55	55	35	190	15	0	45	65	395
Zero/negative Income (and none of the above problems)	0	0	0	0	0	45	0	0	0	45
City of Newman										
Substandard Housing – Lacking complete plumbing or kitchen facilities	0	0	0	0	0	0	0	10	0	25
Severely Overcrowded – With >1.51 people per room (and complete kitchen and plumbing)	0	0	0	0	80	0	0	30	15	45
Overcrowded – With 1.01–1.5 people per room (and none of the above problems)	0	40	30	0	75	0	0	10	0	30
Housing cost burden greater than 50% of income (and none of the above problems)	420	160	20	0	600	105	120	170	95	690

	Renter					Owner				
	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	15	70	170	130	515	0	40	120	35	1,020
Zero/negative Income (and none of the above problems)	50	0	0	0	50	15	0	0	0	15
City of Oakdale										
Substandard Housing – Lacking complete plumbing or kitchen facilities	0	0	0	0	0	0	0	10	0	25
Severely Overcrowded – With >1.51 people per room (and complete kitchen and plumbing)	0	0	0	0	80	0	0	30	15	45
Overcrowded – With 1.01–1.5 people per room (and none of the above problems)	0	40	30	0	75	0	0	10	0	30
Housing cost burden greater than 50% of income (and none of the above problems)	420	160	20	0	600	105	120	170	95	690

	Renter					Owner				
	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	15	70	170	130	515	0	40	120	35	1,020
Zero/negative Income (and none of the above problems)	50	0	0	0	50	15	0	0	0	15
City of Patterson										
Substandard Housing – Lacking complete plumbing or kitchen facilities	4	0	0	0	35	10	0	0	0	10
Severely Overcrowded – With >1.51 people per room (and complete kitchen and plumbing)	0	30	25	35	130	0	0	0	0	10
Overcrowded – With 1.01–1.5 people per room (and none of the above problems)	25	0	85	0	150	0	10	10	20	125
Housing cost burden greater than 50% of income (and none of the above problems)	125	165	95	0	385	150	110	135	145	870

	Renter					Owner				
	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	0	80	90	35	255	0	45	85	160	995
Zero/negative Income (and none of the above problems)	15	0	0	0	15	0	0	0	0	0
City of Waterford										
Substandard Housing – Lacking complete plumbing or kitchen facilities	0	0	0	0	10	0	0	0	0	0
Severely Overcrowded – With >1.51 people per room (and complete kitchen and plumbing)	0	40	0	0	40	0	30	10	0	40
Overcrowded – With 1.01–1.5 people per room (and none of the above problems)	10	15	15	0	65	0	0	15	35	60
Housing cost burden greater than 50% of income (and none of the above problems)	160	10	4	0	180	25	50	45	25	195

	Renter					Owner				
	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	0	40	55	0	110	10	0	85	65	485
Zero/negative Income (and none of the above problems)	25	0	0	0	25	0	0	0	0	0

Data Source: 2007–2011 CHAS

Note: Due to large margins of error in the ACS data in smaller jurisdictions, data in income categories may not equal to total data.

2. Housing Problems 2 (households with one or more severe housing problems: lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

Table NA-4 shows severe housing problems for the Stanislaus Planning Area and cities within the Planning Area. The four severe housing problems are (1) lacks complete kitchen facilities; (2) lacks complete plumbing facilities; (3) more than 1.5 persons per room; and (4) cost burden greater than 50 percent of the gross income. Due to large margins of error in the ACS data in smaller jurisdictions, data in income categories may not equal to total data.

Table NA-4 – Housing Problems 2

	Renter					Owner				
	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total
NUMBER OF HOUSEHOLDS										
Stanislaus Planning Area										
Having one or more of four housing problems	5,189	4,230	2,308	434	12,161	1,443	2,229	2,657	1,590	7,919
Having none of four housing problems	842	2,382	5,024	2,161	10,409	649	2,007	4,228	3,717	10,601

	Renter					Owner				
	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total
Household has negative income, but none of the other housing problems	568	0	0	0	568	359	0	0	0	359
City of Turlock										
Having one or more of four housing problems	1,370	1,355	680	110	3,515	170	430	545	305	1,450
Having none of four housing problems	180	620	1,625	605	3,030	95	430	900	645	2,070
Household has negative income, but none of the other housing problems	155	0	0	0	155	80	0	0	0	80
City of Ceres										
Having one or more of four housing problems	865	640	330	90	2,090	215	370	470	285	1,920
Having none of four housing problems	190	350	630	310	2,530	80	335	690	545	6,565
Household has negative income, but none of the other housing problems	110	0	0	0	110	25	0	0	0	25
City of Hughson										
Having one or more of four housing problems	60	95	80	40	340	0	60	55	65	210

	Renter					Owner				
	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total
Having none of four housing problems	0	90	55	35	340	15	15	100	200	1,085
Household has negative income, but none of the other housing problems	0	0	0	0	0	45	0	0	0	45
City of Newman										
Having one or more of four housing problems	160	90	195	0	445	35	95	55	60	370
Having none of four housing problems	30	120	150	85	610	15	80	80	250	1,585
Household has negative income, but none of the other housing problems	0	0	0	0	0	15	0	0	0	15
City of Oakdale										
Having one or more of four housing problems	420	195	45	0	750	105	120	220	110	790
Having none of four housing problems	105	100	305	155	1,825	20	135	300	155	3,560
Household has negative income, but none of the other housing problems	50	0	0	0	50	15	0	0	0	15
City of Patterson										

	Renter					Owner				
	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total
Having one or more of four housing problems	155	195	210	35	700	160	120	145	165	1,020
Having none of four housing problems	0	110	185	95	1,070	0	85	210	245	2,675
Household has negative income, but none of the other housing problems	15	0	0	0	15	0	0	0	0	0
City of Waterford										
Having one or more of four housing problems	175	65	20	0	295	25	80	75	60	295
Having none of four housing problems	30	40	110	40	355	20	0	155	110	1,360
Household has negative income, but none of the other housing problems	25	0	0	0	25	0	0	0	0	0

Data Source: 2007–2011 CHAS

Note: Due to large margins of error in the ACS data in smaller jurisdictions, data in income categories may not equal to total data.

3. Cost Burden >30%

Table NA-5 shows households with a cost burden (paying more than 30 percent of their income on housing) for the Stanislaus Planning Area and the cities in the Planning Area. Due to large margins of error in the ACS data in smaller jurisdictions, data in income categories may not equal to total data.

Table NA-5 – Cost Burden >30%

	Renter				Owner			
	0–30% AMI	>30– 50% AMI	>50– 80% AMI	Total	0–30% AMI	>30– 50% AMI	>50– 80% AMI	Total
NUMBER OF HOUSEHOLDS								
Stanislaus Planning Area								
Small Related	2,651	2,912	2,215	7,778	512	805	1,636	2,953
Large Related	550	1,149	627	2,326	194	593	977	1,764
Elderly	768	762	874	2,404	715	1,325	800	2,840
Other	1,408	813	777	2,998	358	262	418	1,038
Total need by income	5,377	5,636	4,493	15,506	1,779	2,985	3,831	8,595
City of Turlock								
Small Related	620	725	750	2,215	55	150	370	2,205
Large Related	65	310	110	580	10	60	180	770
Elderly	350	365	424	1,284	110	380	205	1,015
Other	425	330	465	1,355	75	29	65	609
Total need by income	1,705	1,980	2,305	10,100	345	860	1,445	12,680
City of Ceres								
Small Related	560	565	260	1,455	80	160	210	1,695
Large Related	125	160	125	470	15	105	270	1,190
Elderly	115	85	60	270	105	100	105	555
Other	150	105	90	374	35	105	120	620
Total need by income	1,170	990	960	4,730	320	710	1,160	8,510
City of Hughson								
Small Related	0	130	50	180	0	45	60	375
Large Related	15	0	15	65	0	0	30	130
Elderly	30	0	50	180	15	15	0	50
Other	15	0	25	40	0	0	10	20

	Renter				Owner			
	0–30% AMI	>30– 50% AMI	>50– 80% AMI	Total	0–30% AMI	>30– 50% AMI	>50– 80% AMI	Total
Total need by income	60	190	140	685	60	75	150	1,340
City of Newman								
Small Related	40	85	170	330	20	50	25	445
Large Related	35	10	95	175	0	25	14	169
Elderly	30	15	0	45	15	45	20	100
Other	40	30	30	100	15	10	0	90
Total need by income	190	210	345	1,055	65	175	135	1,970
City of Oakdale								
Small Related	265	85	99	559	10	50	125	825
Large Related	0	40	4	44	0	0	15	215
Elderly	115	20	60	310	70	90	125	405
Other	55	125	30	255	25	25	30	289
Total need by income	575	295	355	2,620	145	255	520	4,365
City of Patterson								
Small Related	115	110	150	435	90	35	135	1,045
Large Related	25	105	0	130	0	30	70	405
Elderly	10	20	35	65	60	55	10	200
Other	4	40	0	69	0	30	10	325
Total need by income	170	300	395	1,785	160	205	350	3,690
City of Waterford								
Small Related	65	50	4	129	0	0	50	365
Large Related	30	40	14	84	0	30	60	209
Elderly	30	10	50	94	35	50	25	124
Other	40	0	0	40	0	0	15	45
Total need by income	230	105	130	675	45	80	230	1,655

Data Source: 2007–2011 CHAS

Note: Due to large margins of error in the ACS data in smaller jurisdictions, data in income categories may not equal to total data.

4. Cost Burden >50%

Table NA-6 shows households with a severe cost burden (paying more than 50 percent of their income on housing) for the Stanislaus Planning Area and cities within the Planning Area. Due to large margins of error in the ACS data in smaller jurisdictions, data in income categories may not equal to total data.

Table NA-6– Cost Burden >50%

	Renter				Owner			
	0–30% AMI	>30–50% AMI	>50–80% AMI	Total	0–30% AMI	>30–50% AMI	>50–80% AMI	Total
NUMBER OF HOUSEHOLDS								
Stanislaus Planning Area								
Small Related	2,512	1,920	638	5,070	413	653	1,102	2,168
Large Related	520	515	184	1,219	184	354	475	1,013
Elderly	648	443	225	1,316	457	813	383	1,653
Other	1,303	594	184	2,081	258	227	293	778
Total need by income	4,983	3,472	1,231	9,686	1,312	2,047	2,253	5,612
City of Turlock								
Small Related	620	535	160	1,315	45	140	245	780
Large Related	65	100	10	175	10	60	90	220
Elderly	240	215	144	644	30	225	80	455
Other	400	255	95	765	75	4	55	194
Total need by income	1,705	1,980	2,305	10,100	345	860	1,445	12,680
City of Ceres								
Small Related	515	300	35	850	60	120	110	575
Large Related	125	150	70	345	15	105	130	465
Elderly	105	30	10	145	85	45	40	215
Other	115	95	20	255	35	105	85	310
Total need by income	1,170	990	960	4,730	320	710	1,160	8,510
City of Hughson								
Small Related	0	75	50	125	0	45	30	115
Large Related	15	0	0	15	0	0	0	20
Elderly	30	0	15	105	0	15	0	25
Other	15	0	0	15	0	0	10	10

	Renter				Owner			
	0–30% AMI	>30–50% AMI	>50–80% AMI	Total	0–30% AMI	>30–50% AMI	>50–80% AMI	Total
Total need by income	60	190	140	685	60	75	150	1,340
City of Newman								
Small Related	40	60	75	175	20	50	25	165
Large Related	35	0	30	65	0	10	10	55
Elderly	30	15	0	45	15	30	20	65
Other	40	15	15	70	0	10	0	10
Total need by income	190	210	345	1,055	65	175	135	1,970
City of Oakdale								
Small Related	250	75	4	329	10	50	70	310
Large Related	0	30	0	30	0	0-	15	95
Elderly	115	20	0	135	70	50	95	235
Other	55	65	15	135	25	25	0	54
Total need by income	575	295	355	2,620	145	255	520	4,365
City of Patterson								
Small Related	115	60	80	255	90	20	70	465
Large Related	25	45	0	70	0	15	50	75
Elderly	10	20	15	45	60	45	10	165
Other	4	40	0	44	0	30	10	170
Total need by income	170	300	395	1,785	160	205	350	3,690
City of Waterford								
Small Related	65	10	4	79	0	0	40	90
Large Related	30	0	4	34	0	0	10	29
Elderly	30	0	0	30	25	50	0	75
Other	40	0	0	40	0	0	0	0
Total need by income	230	105	130	675	45	80	230	1,655

Data Source: 2007–2011 CHAS

Note: Due to large margins of error in the ACS data in smaller jurisdictions, data in income categories may not equal to total data.

5. Crowding (more than one person per room)

Table NA-7 shows the number of households with more than one person per room broken down by income category for the Stanislaus Planning Area and the cities in the Planning Area. Due to large margins of error in the ACS data in smaller jurisdictions, data in income categories may not equal to total data.

Table NA-7 – Crowding Information

	Renter					Owner				
	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total
NUMBER OF HOUSEHOLDS										
Stanislaus Planning Area										
Single-family households	733	722	784	199	2,438	100	153	318	268	839
Multiple, unrelated family households	100	189	103	170	562	25	85	149	99	358
Other, non-family households	30	45	65	0	140	0	0	0	0	0
Total need by income	863	956	952	369	3,140	125	238	467	367	1,197
City of Turlock										
Single-family households	65	240	135	75	515	20	10	90	15	135
Multiple, unrelated family households	25	40	0	20	85	0	0	4	0	4
Other, non-family households	30	0	40	0	70	0	0	0	0	0
Total need by income	120	280	175	95	670	20	10	94	15	139
City of Ceres										
Single-family households	155	115	125	30	555	20	4	90	80	299
Multiple, unrelated family households	0	4	40	35	104	0	0	20	30	90
Other, non-family households	0	0	25	0	25	0	0	0	0	0
Total need by income	1,170	990	960	395	4,730	320	710	1,160	835	8,510
City of Hughson										
Single-family households	0	20	15	0	35	0	0	0	0	0
Multiple, unrelated family households	0	0	0	40	40	0	0	15	0	35
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	60	190	140	80	685	60	75	150	265	1,340

	Renter					Owner				
	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total	0–30% AMI	>30–50% AMI	>50–80% AMI	>80–100% AMI	Total
City of Newman										
Single-family households	45	0	55	0	100	0	0	0	0	50
Multiple, unrelated family households	0	0	10	0	10	0	0	0	0	15
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	190	210	345	85	1,055	65	175	135	310	1,970
City of Oakdale										
Single-family households	0	10	30	0	120	0	0	14	15	39
Multiple, unrelated family households	0	30	0	0	40	0	0	25	0	40
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	575	295	355	155	2,620	145	255	520	265	4,365
City of Patterson										
Single-family households	30	0	100	35	235	0	10	0	20	70
Multiple, unrelated family households	0	30	10	0	80	0	0	10	0	65
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	170	300	395	125	1,785	160	205	350	410	3,690
City of Waterford										
Single-family households	10	55	15	0	105	0	30	15	20	65
Multiple, unrelated family households	0	0	0	0	0	0	0	10	10	30
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	230	105	130	40	675	45	80	230	170	1,655

Data Source: 2007–2011 CHAS

Note: Due to large margins of error in the ACS data in smaller jurisdictions, data in income categories may not equal to total data.

6. Households with Children Present

Table NA-8 shows households with children broken down by income category for the Stanislaus Planning Area and the cities in the Planning Area.

Table NA-8 – Crowding Information

	Renter				Owner			
	0–30% AMI	>30–50% AMI	>50–80% AMI	Total	0–30% AMI	>30–50% AMI	>50–80% AMI	Total
Households with children present								
Stanislaus Planning Area								
City of Turlock	350	560	565	2,375	10	90	160	2,580
City of Ceres	580	270	400	1,745	70	84	300	1,879
City of Hughson	15	130	50	285	0	0	30	375
City of Newman	75	40	175	355	10	45	30	450
City of Oakdale	140	10	170	565	0	0	50	795
City of Patterson	100	120	185	805	45	60	130	965
City of Waterford	105	90	45	285	0	30	60	475

Data Source: 2007–2011 CHAS

Note: Due to large margins of error in the ACS data in smaller jurisdictions, data in income categories may not equal to total data.

Describe the number and type of single person households in need of housing assistance.

According to the 2007–2011 ACS 5-Year Estimates, there were 90,472 households in the Stanislaus Planning Area, of which approximately 20.2 percent were single-person households. Of the approximately 73,441 housing units in the Stanislaus Planning Area, 7.3 percent were studios and one bedroom, with almost 92.8 percent of housing units containing two or three bedrooms. Furthermore, data by household type showed that the majority of Stanislaus County’s homeless population (78.3 percent) comprised people in households without children (2014 Homeless Count). These sources indicate that the anticipated housing needs for single-person households in Stanislaus County are affordable housing studio and one-bedroom units.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

As of 2014, the Housing Authority of the County of Stanislaus (Housing Authority) has 3,930 Housing Choice Vouchers in use.

According to data provided by HUD, approximately 28 percent of voucher households have disabilities. The percentage of current voucher households with disabilities makes evident the need for affordable housing for individuals with disabilities.

The following 2014 Homeless Count data further illustrates the need for affordable housing for persons with disabilities or victims of violent attacks, domestic violence, or abuse:

- ◆ An estimated 310 homeless individuals (27 percent) of the homeless population in 2014 (sheltered and unsheltered) in Stanislaus County have experienced severe mental illness, including chronic depression, post-traumatic stress disorder (PTSD), or another mental illness such as bipolar disorder or schizophrenia.
- ◆ Substance abuse is another important issue for the homeless population, with 16 percent reporting experiencing chronic substance abuse.
- ◆ Domestic violence is a primary cause of homelessness for women and families. Financial stress can make it more difficult for victims to leave violent situations. Stanislaus County's shortage of affordable housing and the increase in the cost of basic needs create a problematic barrier for women who are trying to leave a violent home. An estimated 222 homeless individuals (19 percent) of the homeless population in 2014 (sheltered and unsheltered) in Stanislaus County have experienced domestic violence.

What are the most common housing problems?

Based on the data in Tables NA-3 through NA-6 and similar data provided by HCD, the most prevalent housing problem is housing cost burden. Approximately 24,101 of the Stanislaus Planning Area's lower-income households overpaid for housing. Of those lower-income households paying more than 30 percent or more on housing, 54.9 percent were from the City of Ceres. The City of Turlock had approximately 22,780 lower-income households that were paying over 30 percent of their income on housing.

Are any populations/household types more affected than others by these problems?

The data in Tables NA-5 and NA-6 indicates that small related households experience cost burden greater than 30 percent of their total income to a significantly greater degree than other family types, followed closely by other households among renters and the elderly among owners. Single-family renter households experience overcrowding at a significantly greater degree than other household types (see Table NA-7). Single-family households are those with only one family with related members residing in them.

Describe the characteristics and needs of low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Households, both individuals and families with children, in the extremely low-income group are at high risk of becoming homeless due to limited or lack of income, or high housing cost burden. Job loss, coupled with a shortage of affordable housing, further increases the risk of homelessness for individuals

and families with children in the extremely low-income group. A total of 1,156 homeless individuals were counted as part of Stanislaus County's 2014 Point-In-Time (PIT) Homeless Count, the results of which are summarized in NA-40, 38 percent of whom were unsheltered. Because of the severe shortage of emergency shelter for households with children and for unaccompanied adults that are already homeless, the Continuum of Care Housing and Supportive Services Collaborative Committee of Stanislaus County (hereafter referred to as the Stanislaus CoC) includes providers of shelter and services who have focused non-housing services on assisting homeless persons and families. Homeless intervention is focused on households that are at the most imminent risk of homelessness from entering the homeless services system. Intervention providers aim to stabilize such households and improve their housing stability to avoid future housing crises. These services are funded by various sources.

The Stanislaus CoC standards define those most at risk of homelessness as those meeting the federal definition of homelessness:

- 1) People at imminent risk of homelessness (with less than 14 days to vacate housing or an institutional setting) who lack resources to resolve their housing crisis;
- 2) People who would be considered homeless under definitions used by the U.S. Department of Education such as unaccompanied youth or families with children who have not had a legal tenancy in permanent housing and experienced persistent instability (e.g., two or more moves) in the 60 days prior to the homeless assistance application, and who lack resources to resolve their housing crisis; or
- 3) People who are fleeing (or attempting to flee) domestic violence, who lack resources to resolve their housing crisis.

Homeless prevention funds in the Stanislaus Urban County come from the Emergency Solutions Grant (ESG), not from the Stanislaus CoC programs.

Rapid re-housing is a critical strategy for ending homelessness for households with children due to the extreme shortage of affordable housing. Rapid re-housing is considered to be a higher priority to the Stanislaus Urban County and the Stanislaus CoC than homeless prevention. It is also a good tool for chronically homeless individuals who have been through a transitional shelter period. It is also a high priority for single adults who assess as self-sufficient and can address affordability through a combination of shared housing and increasing income. Rapid re-housing also works well in housing families with children who generally have been homeless for shorter periods of time.

With funding from the ESG program, support can be provided for individuals and families in need of housing. Assistance may include short- or medium-term rental assistance and stabilization services, including mediation, credit counseling, security or utility deposits, utility payments, moving cost assistance, and case management. Recipients must be Stanislaus County residents and have sustainable income to qualify. Funding is limited by ESG—first come, first served.

The impact of ESG, for homeless prevention assistance, is hampered by the extremely low-income targeting requirement. Such deep targeting limits the program's ability to respond to families and individuals in crisis to prevent homelessness. The lack of affordable units limits the ability of families and individuals to find appropriate housing under this program. Another challenge is finding landlords who are willing to rent to clients who do not have ideal credit ratings. A greater number of units might be available with increased landlord/property owner outreach. Regardless, rapid re-housing and homeless prevention assistance continue to be utilized as a successful tool for both preventing and ending homelessness in Stanislaus County.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

Data on Stanislaus County's homeless population is tracked through the Homeless Management Information System (HMIS), a federally mandated online data system for all dedicated homeless, prevention, and housing programs that receive Stanislaus CoC funding. The HMIS collects data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness.

The HRCS utilizes HUD's official definition of homelessness, including the at-risk definition, as required by the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act), the definition of which was updated on December 5, 2012. The criteria for defining at risk of homelessness are as follows:

Category 1 – Individuals and Families

An individual or family who:

- (i) Has an annual income below 30% of median family income for the area; AND
- (ii) Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the "homeless definition"; AND
- (iii) Meets one of the following conditions:
 - (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for assistance; OR
 - (B) Is living in the home of another because of economic hardship; OR
 - (C) Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; OR
 - (D) Lives in a hotel or motel and the cost is not paid for by charitable organizations or by federal, state, or local government programs for low-income individuals; OR
 - (E) Lives in an SRO or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than one and a half persons per room; OR
 - (F) Is exiting a publicly funded institution or system of care; OR
 - (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved Consolidated Plan.

Category 2 – Unaccompanied Children and Youth

A child or youth who does not qualify as homeless under the homeless definition but qualifies as homeless under another federal statute.

Category 3 – Families with Children and Youth

An unaccompanied youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under Section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) or that child or youth if living with him or her.

Although Stanislaus County has no exact count as to the number of persons who lose their housing and become homeless each year, the risk factors that contribute to causing homelessness are known. Persons who are “at risk of homelessness” include individuals or families that are experiencing one or more of the risk factors described below. When evaluating these risk factors within the context of Stanislaus County, a rise in persons at risk of homelessness is anticipated. These factors will be taken into consideration when evaluating a client’s risk of entering homelessness.

- a) Sudden and significant increase in utility costs
- b) Mental health and substance abuse issues
- c) Physical disabilities and other chronic health issues, including HIV/AIDS
- d) Severe housing cost burden (greater than 50 percent of income for housing costs)
- e) Homeless in last 12 months
- f) Young head of household (under 25 with children or pregnant)
- g) Current or past involvement with child welfare, including foster care
- h) Pending foreclosure of housing (rental or homeownership)
- i) Extremely low income (less than 30 percent of AMI)
- j) Past institutional care (prison, treatment facility, hospital)
- k) Recent traumatic life event, such as death of a spouse or primary care provider, abandonment of spouse or primary care provider, or recent health crisis that prevented the household from meeting its financial responsibilities
- l) Credit problems that preclude obtaining of housing
- m) Significant amount of medical debt
- n) Eviction within two weeks from a private dwelling (including housing provided by family or friends)
- o) Discharge within two weeks from an institution in which the person has been a resident for more than 180 days (including prisons, mental health institutions, hospitals)
- p) Residency in housing that has been condemned by housing officials and is no longer meant for human habitation
- q) Sudden and significant loss of income

The Stanislaus CoC has developed a unified intake form and documentation checklist that all homeless service providers, who enter data into HMIS, utilize for client eligibility assessments and record keeping. Quarterly monitoring visits and remote HMIS data quality audits ensure that the criteria for qualifying a household for homeless prevention assistance are both regionally uniform and in conformance with HUD regulations.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

The housing characteristics most commonly linked with instability and an increased risk of homelessness include high cost burden (the gap between income and the high cost of housing; see Tables NA-5 and NA-6), a tight rental market, and a shortage of affordable housing. These are further compounded by job loss and high unemployment rate and personal circumstances such as health conditions, mental illness, substance abuse, and trauma.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Introduction

According to HUD, a disproportionately greater need exists when the members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. As shown in the tables below, data is analyzed based on income categories based on the AMI.

The four housing problems are (1) lacking a complete kitchen; (2) lacking complete plumbing facilities; (3) more than one person per room; and (4) cost burden greater than 30 percent. In the tables below, the column title “number of households whose income is zero or negative” is due to self-employment, dividends, and net rental income. Households with zero or negative income cannot actually have a cost burden, but still require housing assistance and therefore are counted separately.

In this section, Housing Problems, four racial groups experience a disproportionate housing need throughout the income spectrum in the Stanislaus Planning Area, which includes the Stanislaus Urban County and the City of Turlock:

- ◆ 0–30% of AMI range: No disproportionate housing need
- ◆ 30–50% of AMI range: Disproportionate housing need exists for Pacific Islander, Asian, and American Indian/Alaska Native populations
- ◆ 50–80% of AMI range: Disproportionate housing need exists for Black/African American and American Indian/Alaska Native populations
- ◆ 80–100% of AMI range: Disproportionate housing need exists for Black/African American, Asian, and Pacific Islander populations

Four racial groups experience a disproportionate housing need throughout the income spectrum in the City of Turlock when analyzed as a separate and distinct area:

- ◆ 0–30% of AMI range: Disproportionate housing need exists for Asian, American Indian/Alaska Native, Black/African American, and Pacific Islander populations
- ◆ 30–50% of AMI range: Disproportionate housing need exists for Asian and American Indian/Alaska Native populations
- ◆ 50–80% of AMI range: Disproportionate housing need exists for American Indian/Alaska Native populations

- ◆ 80–100% of AMI range: Disproportionate housing need exists for Asian and American Indian/Alaska Native populations

Notes Regarding Tables Below:

- 1) Data on disproportionately greater need is only produced by IDIS for grantee geographies.
- 2) These are HUD-generated tables. Columns may not add up because not all races are included in the table per HUD, and race and ethnicity (Hispanic) are enumerated separately by the U.S. Census Bureau. The universe of households is presented in these tables first by race, then by the total households (all races) who indicated Hispanic ethnicity. For example, the White category may include those of Hispanic origin. Data is not available that identifies Hispanic as a race rather than an ethnicity that includes some people of mixed race.

0–30% of Area Median Income

Table NA-9 shows the number of households with one or more housing problems for households earning 0–30% of AMI.

Table NA-9 – Disproportionally Greater Need 0–30% AMI

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Stanislaus Planning Area			
Jurisdiction as a whole	16,235	1,870	1,080
White (race)	7,835	1,235	615
Black/African American (race)	1,010	135	30
Asian (race)	885	10	45
American Indian/Alaska Native (race)	60	20	0
Pacific Islander (race)	55	10	0
Hispanic (ethnicity)	6,110	450	380
City of Turlock			
Jurisdiction as a whole	1,745	70	235
White (race)	915	65	175
Black/African American (race)	185	0	0
Asian (race)	60	0	0
American Indian/Alaska Native (race)	10	0	0
Pacific Islander (race)	30	0	0
Hispanic (ethnicity)	495	4	50

Data Source: 2007–2011 CHAS

Table NA-9.1 shows the percentage of households with one or more housing problems for households earning 0–30% of AMI.

Table NA-9.1 – Disproportionally Greater Need 0–30% AMI

Housing Problems by Percent	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Stanislaus Planning Area			
Jurisdiction as a whole	84.6%	9.7%	5.6%
White (race)	80.9%	12.8%	6.4%
Black/African American (race)	86.0%	11.5%	2.6%
Asian (race)	94.1%	1.1%	4.8%
American Indian/Alaska Native (race)	75.0%	25.0%	0.0%
Pacific Islander (race)	84.6%	15.4%	0.0%
Hispanic (ethnicity)	88.0%	6.5%	5.5%
City of Turlock			
Jurisdiction as a whole	85.1%	3.4%	11.5%
White (race)	79.2%	5.6%	15.2%
Black/African American (race)	100.0%	0.0%	0.0%
Asian (race)	100.0%	0.0%	0.0%
American Indian/Alaska Native (race)	100.0%	0.0%	0.0%
Pacific Islander (race)	100.0%	0.0%	0.0%
Hispanic (ethnicity)	90.2%	0.7%	9.1%

Data Source: 2007–2011 CHAS

30–50% of Area Median Income

Table NA-10 shows the number of households with one or more housing problems for households earning 30–50% of AMI.

Table NA-10 – Disproportionally Greater Need 30–50% AMI

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Stanislaus Planning Area			
Jurisdiction as a whole	18,605	4,360	0
White (race)	9,600	3,005	0
Black/African American (race)	390	45	0
Asian (race)	820	55	0
American Indian/Alaska Native (race)	130	10	0
Pacific Islander (race)	15	0	0
Hispanic (ethnicity)	7,410	1,185	0
City of Turlock			
Jurisdiction as a whole	2,380	460	0
White (race)	1,265	335	0
Black/African American (race)	60	10	0
Asian (race)	140	0	0
American Indian/Alaska Native (race)	85	0	0
Pacific Islander (race)	0	0	0
Hispanic (ethnicity)	805	110	0

Data Source: 2007–2011 CHAS

Table NA-10.1 shows the percentage of households with one or more housing problems for households earning 30–50% of AMI.

Table 10.1 – Disproportionately Greater Need 30–50% AMI

Housing Problems by Percent	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Stanislaus Planning Area			
Jurisdiction as a whole	81.0%	19.0%	0.0%
White (race)	76.2%	23.8%	0.0%
Black/African American (race)	89.7%	10.3%	0.0%
Asian (race)	93.7%	6.3%	0.0%
American Indian/Alaska Native (race)	92.9%	7.1%	0.0%
Pacific Islander (race)	100.0%	0.0%	0.0%
Hispanic (ethnicity)	86.2%	13.8%	0.0%
City of Turlock			
Jurisdiction as a whole	83.8%	16.2%	0.0%
White (race)	79.1%	20.9%	0.0%
Black/African American (race)	85.7%	14.3%	0.0%
Asian (race)	100.0%	0.0%	0.0%
American Indian/Alaska Native (race)	100.0%	0.0%	0.0%
Pacific Islander (race)	0.0%	0.0%	0.0%
Hispanic (ethnicity)	88.0%	12.0%	0.0%

Data Source: 2007–2011 CHAS

50–80% of Area Median Income

Table NA-11 shows the number of households with one or more housing problems for households earning 50–80% of AMI.

Table NA-11 – Disproportionally Greater Need 50–80% AMI

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Stanislaus Planning Area			
Jurisdiction as a whole	20,565	10,555	0
White (race)	10,085	6,575	0
Black/African American (race)	440	110	0
Asian (race)	970	455	0
American Indian/Alaska Native (race)	340	75	0
Pacific Islander (race)	105	40	0
Hispanic (ethnicity)	8,405	3,125	0
City of Turlock			
Jurisdiction as a whole	2,760	990	0
White (race)	1,635	630	0
Black/African American (race)	0	0	0
Asian (race)	35	0	0
American Indian/Alaska Native (race)	40	0	0
Pacific Islander (race)	0	345	0
Hispanic (ethnicity)	1,000	0	0

Data Source: 2007–2011 CHAS

Table NA-11.1 shows the percentage of households with one or more housing problems for households earning 50–80% of AMI.

Table NA-11.1 – Disproportionately Greater Need 50–80% AMI

Housing Problems by Percent	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Stanislaus Planning Area			
Jurisdiction as a whole	66.1%	33.9%	0.0%
White (race)	60.5%	39.5%	0.0%
Black/African American (race)	80.0%	20.0%	0.0%
Asian (race)	68.1%	31.9%	0.0%
American Indian/Alaska Native (race)	81.9%	18.1%	0.0%
Pacific Islander (race)	72.4%	27.6%	0.0%
Hispanic (ethnicity)	72.9%	27.1%	0.0%
City of Turlock			
Jurisdiction as a whole	73.6%	26.4%	0.0%
White (race)	72.2%	27.8%	0.0%
Black/African American (race)	0.0%	0.0%	0.0%
Asian (race)	77.8%	22.2%	0.0%
American Indian/Alaska Native (race)	100.0%	0.0%	0.0%
Pacific Islander (race)	0.0%	0.0%	0.0%
Hispanic (ethnicity)	74.3%		

Data Source: 2007–2011 CHAS

80–100% of Area Median Income

Table NA-12 shows the number of households with one or more housing problems for households earning 80–100% of AMI.

Table NA- 12 – Disproportionately Greater Need 80–100% AMI

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Stanislaus Planning Area			
Jurisdiction as a whole	9,205	8,685	0
White (race)	4,520	5,595	0
Black/African American (race)	440	85	0
Asian (race)	315	180	0
American Indian/Alaska Native (race)	30	140	0
Pacific Islander (race)	4	0	0
Hispanic (ethnicity)	3,685	2,505	0
City of Turlock			
Jurisdiction as a whole	835	830	0
White (race)	445	480	0
Black/African American (race)	0	10	0
Asian (race)	90	50	0
American Indian/Alaska Native (race)	10	0	0
Pacific Islander (race)	0	0	0
Hispanic (ethnicity)	275	260	0

Data Source: 2007–2011 CHAS

Table NA-12.1 shows the percentage of households with one or more housing problems for households earning 80–100% of AMI.

Table NA-12.1 – Disproportionately Greater Need 80–100% AMI

Housing Problems by Percent	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Stanislaus Planning Area			
Jurisdiction as a whole	51.5%	48.5%	0.0%
White (race)	44.7%	55.3%	0.0%
Black/African American (race)	83.8%	16.2%	0.0%
Asian (race)	63.6%	36.4%	0.0%
American Indian/Alaska Native (race)	17.6%	82.4%	0.0%
Pacific Islander (race)	100.0%	0.0%	0.0%
Hispanic (ethnicity)	59.5%	40.5%	0.0%
City of Turlock			
Jurisdiction as a whole	50.2%	49.8%	0.0%
White (race)	48.1%	51.9%	0.0%
Black/African American (race)	0.0%	100.0%	0.0%
Asian (race)	64.3%	35.7%	0.0%
American Indian/Alaska Native (race)	100.0%	0.0%	0.0%
Pacific Islander (race)	0.0%	0.0%	0.0%
Hispanic (ethnicity)	51.4%	48.6%	0.0%

Data Source: 2007–2011 CHAS

Discussion

0–30% of AMI Range

- ◆ Stanislaus Planning Area: All households in this range experience a housing problem above that of the Planning Area as a whole at 84.6 percent, with 94.1 percent of Asian households experiencing a housing problem, followed by Hispanics with 88.0 percent of households experiencing a housing problem. The need is the greatest for the 0–30% of AMI income group as a whole at 84.6 percent compared to the other income ranges: 30–50 percent of AMI (81.0 percent), 50–80 percent of AMI (66.1 percent), and 80–100 percent of AMI (51.5 percent), which strongly indicates that the extremely low income group (0–30% of AMI) needs better access to safe, decent, and affordable housing.

- ◆ City of Turlock: All households in this range experience a housing problem above that of the jurisdiction as a whole at 85.1 percent, with 100 percent of Asian, Black/African American, American Indian/Alaska Native, and Pacific Islander households experiencing a housing problem, followed by Hispanics with 90.2 percent of households experiencing a housing problem. The need is the greatest for the 0–30% of AMI income group as a whole at 85.1 percent compared to the other income ranges: 30–50 percent of AMI (83.8 percent), 50–80 percent of AMI (73.6 percent), and 80–100 percent of AMI (50.2 percent), which strongly indicates that the extremely low income group (0–30% of AMI) needs better access to safe, decent, and affordable housing.

30–50% of AMI Range

- ◆ Stanislaus Planning Area: Pacific Islander and Asian households have the greatest need, with 100 percent and 93.7 percent of households, respectively, experiencing a housing problem. American Indian/Alaska Native follows with 92.9 percent of households experiencing a housing problem.
- ◆ City of Turlock: Asians and American Indian/Alaska Natives have the greatest need with 100 percent of households experiencing a housing problem. Hispanic households follow with 88.0 percent of households experiencing a housing problem.

50–80% of AMI Range

- ◆ Stanislaus Planning Area: American Indian/Alaska Natives and Black/African Americans have the greatest need at 81.9 percent and 80.0 percent, respectively, of households experiencing a housing problem.
- ◆ City of Turlock: American Indian/Alaska Natives and Hispanics have the greatest need at 100 percent and 74.3 percent, respectively, of households experiencing a housing problem.

80–100% of AMI Range

- ◆ Stanislaus Planning Area: Pacific Islander and Black/African American households have the greatest need at 100 percent and 83.8 percent, respectively, of households experiencing a housing problem.
- ◆ City of Turlock: American Indian/Alaska Native and Asian households have the greatest need at 100 percent and 64.3 percent, respectively, of households experiencing a housing problem.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Introduction

According to HUD, a disproportionately greater need exists when the members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. Unlike the housing problems in section NA-15, severe housing problems include severe overcrowding and severe cost burdens. The four severe housing problems are (1) lacks complete kitchen facilities; (2) lacks complete plumbing facilities; (3) more than 1.5 persons per room; and (4) cost burden over 50 percent.

In this section, Severe Housing Problems, three groups experience severe housing problems throughout the income spectrum in the Stanislaus Planning Area:

- ◆ 0–30% of AMI range: Pacific Islanders and Black/African Americans experience a disproportionate housing need
- ◆ 30–50% of AMI range: Asians, Pacific Islanders, and Black/African Americans experience a disproportionate housing need
- ◆ 50–80% of AMI range: Black/African Americans experience a disproportionate housing need
- ◆ 80–100% of AMI range: Pacific Islanders and Black/African Americans experience a disproportionate housing need

In the City of Turlock, four groups experience severe housing problems throughout the income spectrum:

- ◆ 0–30% of AMI range: Pacific Islanders, Black/African Americans, American Indian/Alaska Natives experience a disproportionate housing need
- ◆ 30–50% of AMI range: Asians experience a disproportionate housing need
- ◆ 50–80% of AMI range: American Indian/Alaska Natives and Asians experience a disproportionate housing need
- ◆ 80–100% of AMI range: Asians experience a disproportionate housing need

In the tables below, the column title “number of households whose income is zero or negative” is due to self-employment, dividends, and net rental income. Households with zero or negative income cannot actually have a cost burden, but still require housing assistance and therefore are counted separately.

Notes Regarding Tables Below:

- 1) Data on disproportionately greater need is only produced by IDIS for grantee geographies.
- 2) These are HUD-generated tables. Columns may not add up because not all races are included in the table per HUD, and race and ethnicity (Hispanic) are enumerated separately by the U.S. Census Bureau. The universe of households is presented in these tables first by race, then by the total households (all races) who indicated Hispanic ethnicity.

0–30% of Area Median Income

Table NA-13 shows the number of households with one or more severe housing problems for households earning 0–30% of AMI.

Table NA-13 – Severe Housing Problems 0–30% AMI

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Stanislaus Planning Area			
Jurisdiction as a whole	14,065	4,045	1,080
White (race)	6,660	2,415	615
Black/African American (race)	1,000	145	30
Asian (race)	680	210	45
American Indian/Alaska Native (race)	60	20	0
Pacific Islander (race)	55	10	0
Hispanic (ethnicity)	5,345	1,215	380
City of Turlock			
Jurisdiction as a whole	1,540	275	235
White (race)	800	180	175
Black/African American (race)	185	0	0
Asian (race)	40	20	0
American Indian/Alaska Native (race)	10	0	0
Pacific Islander (race)	30	0	0
Hispanic (ethnicity)	430	75	50

Data Source: 2007–2011 CHAS

Table NA-13.1 shows the percentage of households with one or more severe housing problems for households earning 0–30% of AMI.

Table NA-13.1 – Disproportionately Greater Need 0–30% AMI

Severe Housing Problems by Percent	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Stanislaus Planning Area			
Jurisdiction as a whole	73.3%	21.1%	5.6%
White (race)	68.7%	24.9%	6.3%
Black/African American (race)	85.1%	12.3%	2.6%
Asian (race)	72.7%	22.5%	4.8%
American Indian/Alaska Native (race)	75.0%	25.0%	0.0%
Pacific Islander (race)	84.6%	15.4%	0.0%
Hispanic (ethnicity)	77.0%	17.5%	5.5%
City of Turlock			
Jurisdiction as a whole	75.1%	13.4%	11.5%
White (race)	69.3%	15.6%	15.2%
Black/African American (race)	100.0%	0.0%	0.0%
Asian (race)	66.7%	33.3%	0.0%
American Indian/Alaska Native (race)	100.0%	0.0%	0.0%
Pacific Islander (race)	100.0%	0.0%	0.0%
Hispanic (ethnicity)	77.5%	13.5%	9.0%

Data Source: 2007–2011 CHAS

30–50% of Area Median Income

Table NA-14 shows the number of households with one or more severe housing problems for households earning 30–50% of AMI.

Table NA-14 – Severe Housing Problems 30–50% AMI

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Stanislaus Planning Area			
Jurisdiction as a whole	12,290	10,680	0
White (race)	6,030	6,580	0
Black/African American (race)	305	130	0
Asian (race)	650	220	0
American Indian, Alaska Native (race)	70	65	0
Pacific Islander (race)	15	0	0
Hispanic (ethnicity)	5,040	3,550	0
City of Turlock			
Jurisdiction as a whole	1,785	1,050	0
White (race)	945	655	0
Black/African American (race)	50	20	0
Asian (race)	140	0	0
American Indian, Alaska Native (race)	20	65	0
Pacific Islander (race)	0	0	0
Hispanic (ethnicity)	605	310	0

Data Source: 2007–2011 CHAS

Table NA-14.1 shows the percentage of households with one or more severe housing problems for households earning 30–50% of AMI.

Table NA-14.1 – Disproportionately Greater Need 30–50% AMI

Severe Housing Problems by Percent	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Stanislaus Planning Area			
Jurisdiction as a whole	53.5%	46.5%	0.0%
White (race)	47.8%	52.2%	0.0%
Black/African American (race)	70.1%	29.9%	0.0%
Asian (race)	74.7%	25.3%	0.0%
American Indian/Alaska Native (race)	51.9%	48.1%	0.0%
Pacific Islander (race)	100.0%	0.0%	0.0%
Hispanic (ethnicity)	58.7%	41.3%	0.0%
City of Turlock			
Jurisdiction as a whole	63.0%	37.0%	0.0%
White (race)	59.1%	40.9%	0.0%
Black/African American (race)	71.4%	28.6%	0.0%
Asian (race)	100.0%	0.0%	0.0%
American Indian/Alaska Native (race)	23.5%	76.5%	0.0%
Pacific Islander (race)	0.0%	0.0%	0.0%
Hispanic (ethnicity)	66.1%	33.9%	0.0%

Data Source: 2007–2011 CHAS

50–80% of Area Median Income

Table NA-15 shows the number of households with one or more severe housing problems for households earning 50–80% of AMI.

Table NA-15 – Severe Housing Problems 50–80% AMI

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Stanislaus Planning Area			
Jurisdiction as a whole	10,580	20,540	0
White (race)	4,795	11,870	0
Black/African American (race)	305	240	0
Asian (race)	505	915	0
American Indian, Alaska Native (race)	170	250	0
Pacific Islander (race)	39	105	0
Hispanic (ethnicity)	4,615	6,920	0
City of Turlock			
Jurisdiction as a whole	1,225	2,520	0
White (race)	705	1,565	0
Black/African American (race)	0	0	0
Asian (race)	25	25	0
American Indian, Alaska Native (race)	30	10	0
Pacific Islander (race)	0	0	0
Hispanic (ethnicity)	445	900	0

Data Source: 2007–2011 CHAS

Table NA-15.1 shows the percentage of households with one or more severe housing problems for households earning 50–80% of AMI.

Table NA-15.1 – Disproportionately Greater Need 50–80% AMI

Severe Housing Problems by Percent	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Stanislaus Planning Area			
Jurisdiction as a whole	34.0%	66.0%	0.0%
White (race)	28.8%	71.2%	0.0%
Black/African American (race)	56.0%	44.0%	0.0%
Asian (race)	35.6%	64.4%	0.0%
American Indian/Alaska Native (race)	40.5%	59.5%	0.0%
Pacific Islander (race)	27.1%	72.9%	0.0%
Hispanic (ethnicity)	40.0%	60.0%	0.0%
City of Turlock			
Jurisdiction as a whole	32.7%	67.3%	0.0%
White (race)	31.1%	68.9%	0.0%
Black/African American (race)	0.0%	0.0%	0.0%
Asian (race)	50.0%	50.0%	0.0%
American Indian/Alaska Native (race)	75.0%	25.0%	0.0%
Pacific Islander (race)	0.0%	0.0%	0.0%
Hispanic (ethnicity)	33.1%	66.9%	0.0%

Data Source: 2007–2011 CHAS

80–100% of Area Median Income

Table NA-16 shows the number of households with one or more severe housing problems for households earning 80–100% of AMI.

Table NA-16 – Severe Housing Problems 80–100% AMI

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Stanislaus Planning Area			
Jurisdiction as a whole	3,840	14,050	0
White (race)	1,615	8,500	0
Black/African American (race)	215	305	0
Asian (race)	145	355	0
American Indian, Alaska Native (race)	0	165	0
Pacific Islander (race)	4	0	0
Hispanic (ethnicity)	1,830	4,365	0
City of Turlock			
Jurisdiction as a whole	415	1,245	0
White (race)	225	705	0
Black/African American (race)	0	10	0
Asian (race)	50	85	0
American Indian, Alaska Native (race)	0	10	0
Pacific Islander (race)	0	0	0
Hispanic (ethnicity)	140	395	0

Data Source: 2007–2011 CHAS

Table NA-16.1 shows the percentage of households with one or more severe housing problems for households earning 80–100% of AMI.

Table NA-16.1 – Disproportionately Greater Need 80–100% AMI

Severe Housing Problems by Percent	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Stanislaus Planning Area			
Jurisdiction as a whole	21.5%	78.5%	0.0%
White (race)	16.0%	84.0%	0.0%
Black/African American (race)	41.3%	58.7%	0.0%
Asian (race)	29.0%	71.0%	0.0%
American Indian/Alaska Native (race)	0.0%	100.0%	0.0%
Pacific Islander (race)	100.0%	0.0%	0.0%
Hispanic (ethnicity)	29.5%	70.5%	0.0%
City of Turlock			
Jurisdiction as a whole	25.0%	75.0%	0.0%
White (race)	24.2%	75.8%	0.0%
Black/African American (race)	0.0%	100.0%	0.0%
Asian (race)	37.0%	63.0%	0.0%
American Indian/Alaska Native (race)	0.0%	100.0%	0.0%
Pacific Islander (race)	0.0%	0.0%	0.0%
Hispanic (ethnicity)	26.2%	73.8%	0.0%

Data Source: 2007–2011 CHAS

Discussion

0–30% of AMI Range

- ◆ Stanislaus Planning Area: Black/African Americans (85.1 percent), Pacific Islanders (84.6 percent), Hispanics (77.0 percent), and American Indian/Alaska Natives (75.0 percent) in this range experienced a severe housing need above that of the Planning Area as a whole at 73.3 percent. The need is the greatest for the 0–30% of AMI income group as a whole at 73.3 percent compared to the other income ranges: 30–50% of AMI (53.5 percent), 50–80% of AMI (34.0 percent), and 80–100% of AMI (21.5 percent), which strongly indicates that this income group needs better access to safe, decent, and affordable housing.
- ◆ City of Turlock: Black/African Americans (100 percent), Pacific Islanders (100 percent), Hispanics (77.5 percent), and American Indian/Alaska Natives (100 percent) in the 0–30% of AMI range experienced a severe housing need above that of the jurisdiction as a whole at 75.1 percent. The need is the greatest for this income group as a whole at 75.1 percent compared to the other

income ranges: 30–50% of AMI (63.0%), 50–80% of AMI (32.7%), and 80–100% of AMI (25.0%), which strongly indicates that this income group needs better access to safe, decent, and affordable housing.

30–50% of AMI Range

- ◆ Stanislaus Planning Area: Pacific Islanders and Asians have the greatest need with 100 percent and 74.7 percent, respectively, of households experiencing a housing problem. Black/African Americans follow with 70.1 percent of households experiencing a housing problem.
- ◆ City of Turlock: Asians and Black/African Americans have the greatest need with 100 percent and 71.4 percent, respectively, of households experiencing a housing problem. Hispanic households follow with 66.1 percent of households experiencing a housing problem.

50–80% of AMI Range

- ◆ Stanislaus Planning Area: Black/African Americans have the greatest need with 56.0 percent of households experiencing a housing problem. American Indian/Alaska Natives follow with 40.5 percent of households experiencing a housing problem.
- ◆ City of Turlock: American Indian/Alaska Natives have the greatest need with 75.0 percent of households experiencing a housing problem. Asian households follow with 50.0 percent of households experiencing a housing problem.

80–100% of AMI Range

- ◆ Stanislaus Planning Area: Pacific Islanders and Black/African Americans have the greatest need with 100 percent and 41.3 percent, respectively, of households experiencing a housing problem.
- ◆ City of Turlock: Asian households have the greatest need with 37 percent of households experiencing a housing problem.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Introduction

Table NA-17 displays cost burden information for the jurisdiction and each racial and ethnic group, including no cost burden (housing cost to income ratio is less than 30 percent of the gross household income), cost burden (housing cost to income ratio between 30 percent and 50 percent of the gross household income), severe cost burden (housing cost burden more than 50 percent of the gross household income), and no/negative income.

In the Stanislaus Planning Area, 24.5 percent of households were overpaying for housing and 21.0 percent were severely overpaying for housing. Similarly, 31.4 percent of Turlock's households were overpaying for housing and 41.7 percent of households were severely overpaying.

Housing Cost Burden

Table NA-17 below identifies the housing cost burden by race.

Table NA-17 – Greater Need: Housing Cost Burdens AMI

Housing Cost Burden	≤30% (No cost burden)	30–50% (Cost burden)	>50% (Severe cost burden)	No/negative income (not computed)
Stanislaus Planning Area				
Jurisdiction as a whole	98,645	44,260	38,035	1,135
White (race)	66,270	24,755	19,235	655
Black/African American (race)	1,840	1,140	2,000	30
Asian (race)	4,255	2,055	1,965	55
American Indian, Alaska Native (race)	745	460	205	0
Pacific Islander (race)	320	295	120	0
Hispanic (race)	23,505	14,915	13,960	380
City of Turlock				
Jurisdiction as a whole	2,700	3,160	4,200	235
White (race)	8,695	2,905	2,715	175
Black/African American (race)	110	20	210	0
Asian (race)	560	420	240	0
American Indian, Alaska Native (race)	170	115	35	0
Pacific Islander (race)	45	0	30	0
Hispanic (ethnicity)	2,620	1,965	1,220	50

Data Source: 2007–2011 CHAS

Discussion:

Housing Costs Less Than 30% of Total Gross Household Income Field:

- ◆ Stanislaus Planning Area: 60.1 percent of Whites had a cost burden less than 30 percent, followed in order by American Indian/Alaska Natives (52.8 percent), Asians (51.4 percent), Hispanics (44.9 percent), Black/African Americans (36.9 percent), and Pacific Islanders (43.5 percent).
- ◆ City of Turlock: 60.7 percent of Whites had a cost burden less than 30 percent, followed in order by Pacific Islanders (60.0 percent), American Indian/Alaska Natives (53.1 percent), Asians (45.9 percent), Hispanics (45.1 percent), and Black/African Americans (32.4 percent).

Housing Costs 30–50% Field of Total Gross Household Income Field:

- ◆ Stanislaus Planning Area: 40.1 percent of Pacific Islanders had a cost burden between 30 and 50 percent, followed by American Indian/Alaska Natives (32.6 percent), Hispanics (28.5 percent), Asians (24.8 percent), Black/African Americans (22.9 percent), and Whites (22.5 percent).
- ◆ City of Turlock: 34.4 percent of Asians had a cost burden between 30 and 50 percent, followed by American Indian/Alaska Natives (35.9 percent), Hispanics (33.9 percent), Whites (20.3 percent), and Black/African Americans (5.9 percent). Pacific Islanders had no households with a cost burden between 30 and 50 percent.

Housing Costs Greater Than 50% of Total Gross Household Income Field:

- ◆ Stanislaus Planning Area: Black/African American (40.2 percent) had the greatest burden, followed by Hispanics (26.7 percent), Asians (23.7 percent), Whites (17.4 percent), Pacific Islanders (16.3 percent), and American Indian/Alaska Natives (14.5 percent).
- ◆ City of Turlock: Black/African Americans (61.8 percent) had the greatest burden, followed by Pacific Islanders (40.0 percent), Hispanics (21.0 percent), Asians (19.7 percent), Whites (19.0 percent), and American Indian/Alaska Natives (10.9 percent).

No/Negative Income field:

- ◆ Stanislaus Planning Area: Whites (0.6 percent), Hispanics (0.7 percent), Black/African Americans (0.6 percent), and Asians (0.7 percent) that did not report an income were cost burdened. American Indian/Alaska Natives and Pacific Islanders were not cost burdened (all reporting zero households). The population numbers in this field are quite small in comparison to the overall population figures.
- ◆ City of Turlock: Whites (1.2 percent) and Hispanics (0.9 percent) that did not report an income were cost burdened. American Indian/Alaska Natives, Black/African Americans, Asians, and Pacific Islanders were not cost burdened (all reporting zero households). The population numbers in this field are quite small in comparison to the overall population figures.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Review of the housing needs of racial and ethnic groups revealed that each group has housing problems, with four groups experiencing a disproportionate housing need throughout the income spectrum in the Stanislaus Planning Area and four groups experiencing a disproportionate need in the City of Turlock.

In terms of housing problems, four groups experience a disproportionate housing need throughout the income spectrum in the Stanislaus Planning Area: none at the 0–30% of AMI range; Pacific Islanders, Asians, and American Indian/Alaska Natives at the 30–50% of AMI range; Black/African Americans and American Indian/Alaska Natives at the 50–80% of AMI range; and Black/African Americans, Asians, and Pacific Islanders at the 80–100% of AMI range.

Four groups experience a disproportionate housing need throughout the income spectrum in the City of Turlock: Asians, American Indian/Alaska Natives, Black/African Americans, and Pacific Islanders at the 0–30% of AMI range; Asians and American Indian/Alaska Natives at the 30–50% of AMI range; American Indian/Alaska Natives at the 50–80% of AMI range; and Asians and American Indian/Alaska Natives at the 80–100% of AMI range.

For severe housing problems, three groups experience severe housing problems throughout the income spectrum in the Stanislaus Planning Area: Pacific Islanders and Black/African Americans experience a disproportionate housing need at the 0–30% of AMI range; Asians, Pacific Islanders, and Black/African Americans at the 30–50% of AMI range; Black/African Americans experience a disproportionate housing need at the 50–80% of AMI range; and Pacific Islanders and Black/African Americans experience a disproportionate housing need at the 80–100% of AMI range.

In the City of Turlock, four groups experience severe housing problems throughout the income spectrum: Pacific Islanders, Black/African Americans, and American Indian/Alaska Natives experience a disproportionate housing need at the 0–30% of AMI range; Asians experience a disproportionate housing need at the 30–50% of AMI range; American Indian/Alaska Natives and Asians experience a disproportionate housing need at the 50–80% of AMI range; and Asians at the 80–100% of AMI range.

If they have needs not identified above, what are those needs?

According to the data supplied by HUD in the development of this Con Plan, the needs have been identified in this section of the Con Plan.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

Data on race and ethnicity was examined at the block group level to determine areas of minority and ethnic concentration (2010 U.S. Decennial Census, Summary File 3). Minority population is defined as the total population less those who responded “White alone” to the U.S. Census. Census tract areas where the percentage of total minority population exceeds the group’s countywide total percentage by at least one percentage point are considered to be areas of “minority concentration.” Areas that have a minority population at least 1.5 times the countywide total percentage are considered to be areas of “high minority concentration.”

The areas which show an overall minority concentration include unincorporated areas north of Modesto, including Salida, unincorporated areas east of Ceres, northern portions of Turlock, western portions of Patterson, and unincorporated areas south of Patterson.

Since the U.S. Census enumerates Hispanic as a distinct ethnic category, this characteristic was examined separately. Census tract areas where the percentage of total Hispanic population exceeds the countywide percentage by at least one percentage point are considered to be areas of Hispanic concentration. Areas that have a Hispanic population at least 1.5 times the countywide percentage are considered to be areas of high Hispanic concentration. Areas on high concentration include portions of western unincorporated county and portions of Patterson, Bystrom, and Ceres. Concentration maps are located in **Appendix 1** and **Appendix 2**.

NA-35 Public Housing – 91.205(b)

Introduction

The Housing Authority of the County of Stanislaus’s (Housing Authority) mission is to address the unmet housing needs of residents and communities in Stanislaus County consistent with Federal, State, and local law. The Housing Authority owns and operates public housing units in addition to operating a housing voucher program. Based on the data supplied by HUD in the table below, the Housing Authority has 3,930 housing choice vouchers in use. As of October 2014, the Housing Authority has a waiting list of 3,514 families in the Stanislaus Urban County and 752 in the City of Turlock.

Source: 2014 Public Housing Authority Plan (PHA Plan)

The data in the tables below, supplied by HUD, is utilized for discussion purposes throughout the Plan. HUD generates housing authority table data based on countywide data and not by Stanislaus Planning Area geographies.

Totals in Use

Table NA-18 shows the number of units vouchers in use in Stanislaus County (HUD generates housing authority table data per county designations).

Table NA-18 – Public Housing by Program Type

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-Based	Tenant-Based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
Number of units vouchers in use									
Stanislaus County	0	0	636	3,930	10	3,832	0	88	0

**Note: Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-Year, and Nursing Home Transition*

Data Source: Public Information Center (PIC)

Characteristics of Residents

Table NA-19 shows the characteristics of residents by program type for Stanislaus County.

Table NA-19 – Characteristics of Public Housing Residents by Program Type

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project-Based	Tenant-Based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Stanislaus County								
Average Annual Income (in dollars)	0	0	17,079	13,338	12,270	13,393	0	11,080
Average Length of Stay (in days)	0	0	6	6	1	7	0	0
Average Household Size	0	0	3	2	1	2	0	3
Number of Homeless at Admission	0	0	0	0	0	0	0	0
Number of Elderly Program Participants (>62)	0	0	113	1,042	6	1,034	0	2
Number of Disabled Families	0	0	142	1,089	4	1,071	0	14
Number of Families Requesting Accessibility Features	0	0	636	3,930	10	3,832	0	88
Number of HIV/AIDS Program Participants	0	0	0	0	0	0	0	0
Number of Domestic Violence Victims	0	0	0	0	0	0	0	0

Data Source: Public Information Center (PIC)

Race of Residents

Table NA-20 shows the race of residents by program type in Stanislaus County.

Table NA-20 – Race of Public Housing Residents by Program Type

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-Based	Tenant-Based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
Stanislaus County									
White	0	0	560	3,072	8	2,988	0	76	0
Black/African American	0	0	24	595	1	585	0	9	0
Asian	0	0	45	192	1	188	0	3	0
American Indian/Alaska Native	0	0	4	48	0	48	0	0	0
Pacific Islander	0	0	3	23	0	23	0	0	0
Other	0	0	0	0	0	0	0	0	0

Data Source: Public Information Center (PIC)

Ethnicity of Residents

Table NA-21 shows the ethnicity of residents by program type in Stanislaus County.

Table NA-21 – Ethnicity of Public Housing Residents by Program Type

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-Based	Tenant-Based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
Stanislaus County									
Hispanic	0	0	392	1,133	6	1,096	0	31	0
Not Hispanic	0	0	244	2,797	4	2,736	0	57	0

Data Source: Public Information Center (PIC)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

In both the public housing units and Housing Choice Voucher (HCV) program, the Housing Authority acts in accordance with federal regulations as they relate to persons with disabilities, up to and including a fair, thorough, and accessible reasonable accommodations request process. Private owners participating in the public housing and voucher programs are expected to understand and comply with all Federal, State, and local laws as they relate to nondiscrimination and accessibility for persons with disabilities.

The HUD data provided indicates that a number of voucher holders are disabled households (see Table NA-19), which may suggest that some of these households require accessible units or modifications.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

To qualify for the HCV program, applicants must be at or below 50 percent of AMI. A majority of new admissions to the HCV program are families at or below 30 percent of AMI. Families at this income level have difficulty meeting their basic needs even with the assistance of the voucher program. The voucher program staff is well versed in available resources and frequently refers voucher holders to other community organizations. In addition, the Housing Authority of the County of Stanislaus offers the Family Self-Sufficiency (FSS) program to help voucher holders augment their education, find employment, build assets, and achieve economic independence.

How do these needs compare to the housing needs of the population at large

According to the 2009–2013 ACS 5-Year Estimates, 9.3 percent of the population under age 65 who lived in Stanislaus County reported a disability. The percentage of disabled voucher holders, out of the total voucher holders, is 28 percent.

While 37.7 percent of the total households in Stanislaus County are classified as low income, which includes the extremely low-income category, the average annual income of 100 percent of voucher holders is less than 30 percent of AMI. In general, the race and ethnicity of voucher holders is comparable to the jurisdiction, with some variations between data sources. The rate of voucher households that identified as Black or African American was higher than the jurisdiction (15.1 percent versus 2.9 percent), while a smaller percentage of voucher holders identified as Hispanic or Latino (28.8 percent versus 41.9 percent). For the jurisdiction as a whole, 45.8 percent of households experience housing cost burden greater than 30 percent of their household income and are in need of affordable housing.

Whereas there are differences in the demographics among voucher holders and the population at large, the need for affordable housing exists among both groups, especially for those extremely low-income cost-burdened households without vouchers.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction

This section is still in the process of being edited. Final version will be provided with the May 5, 2015, Board of Supervisors staff report for the Consolidated Plan.

At the local level, the most comprehensive analysis of the homeless population and service availability in Stanislaus County is conducted by the Stanislaus CoC.

The Stanislaus CoC was created to address these issues and comprises over 88 members and more than 50 agencies and organizations representing all cities in Stanislaus County. Representation includes nonprofit organizations, homeless persons, formerly homeless persons, local government, disability service organizations, the public housing authority, police and fire service departments, faith-based and other community-based organizations, service agencies, community members, government agencies, and housing developers.

The Stanislaus CoC system consists of three components:

- ◆ An emergency shelter/assessment effort that provides immediate shelter and can identify an individual's needs.
- ◆ Transitional housing and necessary social services. Such services include substance abuse treatment, short-term mental health services, independent living skills, job training, etc.
- ◆ Permanent supportive housing arrangements.

While not all homeless individuals and families in a community will need to access all three components, unless all three are coordinated in a community, none will be successful. A strong homeless prevention strategy is also key to the success of the Continuum of Care system. The Stanislaus CoC also focuses on community collaboration, coordinating discharge with health and law enforcement agencies and with mental health and addiction recovery service providers to try to ensure a coordinated community effort in terms of implementation of homeless programs.

In July 2001, the Stanislaus County Board of Supervisors and the City of Modesto officially recognized the Stanislaus CoC as the coordinating body for homeless programs and services in Stanislaus County.

In 2012, the Stanislaus Stanislaus CoC adopted the Stanislaus County Homeless Management Information System (HMIS), which is a collaborative project that will enable homeless service providers to collect uniform client information over time.

Homeless Needs Assessment

Table NA-22.1 through Table NA-22.6 include Stanislaus County’s 2014 Point-In-Time (PIT) Homeless Count and all the information that was collected as part of that survey.

Table NA-22.1 – HUD’s 2014 Continuum of Care Homeless Assistance Programs

HUD’s 2014 Continuum of Care Homeless Assistance Programs Point-In-Time Homeless Count 1/30/2014 Stanislaus County, City of Turlock, and City of Modesto+			
Population	Number of persons experiencing homelessness on a given night Sheltered++	Number of persons experiencing homelessness each year Unsheltered	Total
Persons in households with children*	226	106	332
Persons in households without children**	481	337	818
Persons in households with only children***	6	0	6
Totals	713	443	1,156

Data Source: HUD, Point-In-Time Homeless Count 1/30/2014

+ 2014 survey data is not available for Stanislaus Urban County. The unpublished 2015 survey has measurements by city; however, those survey results will not be ready by time of publication.

++ This category includes households in transitional housing (includes Safe Haven programs).

* This category includes households with one adult and at least one child under age 18.

**This category includes single adults, adult couples with no children, and groups of adults.

*** This category includes configurations of households composed only of children under age of 18.

Table NA-22.2 – HUD’s 2014 Continuum of Care Homeless Assistance Programs

HUD’s Continuum of Care Homeless Assistance Programs Stanislaus County, City of Turlock, and City of Modesto Total Persons Experiencing Homelessness Multi-Year Comparison (2009–2014)				
Population	2009 Total Persons Experiencing Homelessness Sheltered and Unsheltered	2011 Total Persons Experiencing Homelessness Sheltered and Unsheltered	2013 Total Persons Experiencing Homelessness Sheltered and Unsheltered	2014 Total Persons Experiencing Homelessness Sheltered and Unsheltered
Household with children*	682	453	260	332
Household without children**	1,118	981	983	818
Household with only children***	Unavailable	Unavailable	9	6
Total (Change in total from previous year)	1,800 (N/A)	1,434 (-366)	1,201 (-233)	1,156 (-45)
Percentage of homeless population to countywide population	0.35%	0.27%	0.22%	Unavailable

Data Source: Stanislaus County Comparison Chart 2009–2013; HUD, Point-In-Time Homeless Count 1/30/2014

* This category includes households with one adult and at least one child under age 18.

**This category includes single adults, adult couples with no children, and groups of adults.

*** This category includes configurations of households composed only of children under age of 18.

Table NA-22.3 – HUD’s 2014 Continuum of Care Homeless Assistance Programs

HUD’s Continuum of Care Homeless Assistance Programs Stanislaus County, City of Turlock, and City of Modesto Total Persons Experiencing Chronic Homelessness Multi-Year Comparison (2009–2014)						
Population	2009 Number of persons that are chronically+ homeless each year	2011 Number of persons that are chronically homeless each year	2013 Number of persons that are chronically homeless each year	2014 Number of persons that are chronically homeless each year	Number of persons exiting homelessness each year (2014 estimate) ++	Number of days persons experience homelessness
Sheltered	68	96	61	69	652	NA
Unsheltered	181	122	66	54	389	NA
Total (Difference from previous year)	181 (N/A)	218 (+37)	127 (-91)	146 (+19)	1,029	NA
Percentage of chronic homeless persons to total homeless persons, each year	16%	15%	11%	13%	N/A	NA

Source: Stanislaus County Comparison Chart 2009–2013; HUD, Point-In-Time Homeless Count 1/30/2014

+People surveyed are asked whether this is their first time being homeless. If they respond “no,” then they are counted as chronic.

++Calculated by subtracting the number of chronically homeless from the total homeless.

Table NA-22.4 – HUD’s 2014 Continuum of Care Homeless Assistance Programs

HUD’s 2014 Continuum of Care Homeless Assistance Programs Stanislaus County, City of Turlock, and City of Modesto Homeless Subpopulations			
Subpopulation	Number of homeless persons, sheltered	Number of homeless persons, unsheltered	Total
Severely Mentally Ill	139	171	310
Chronic Substance Abuse	57	122	179
Veterans	41	28	69
HIV/AIDS	9	4	13
Victims of Domestic Violence	111	111	222

Source: HUD, Point-In-Time Homeless Count 1/30/2014

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Table NA-22.3 provides data on numbers of persons becoming and exiting homelessness each year (see table above). As for the average number of days that a person experiences homelessness, that data is not available. The 2015 Point-In-Time Homeless Count may have this data available later this year.

Nature and Extent of Homelessness: (Optional) See below.

Table NA-22.5 – Nature and Extent of Homelessness

	Race:	Sheltered:	Unsheltered (optional)
Stanislaus County, City of Turlock, and City of Modesto	White	White – 569 Black or African American – 46 Asian – 9 American Indian or Alaska Native – 43 Native Hawaiian or Other Pacific Islander – 20 Multiple Races – 23	White – 350
	Black or African American		Black or African American – 39
	Asian		Asian – 2
	American Indian or Alaska Native		American Indian or Alaska Native – 40
	Native Hawaiian or Other Pacific Islander		Native Hawaiian or Other Pacific Islander – 5
	Multiple Races		Multiple Races – 7
	Ethnicity:	Sheltered:	Unsheltered (optional)
Stanislaus County, City of Turlock, and City of Modesto	Non-Hispanic/Non-Latino	Non-Hispanic/Non-Latino – 499	Non-Hispanic/Non-Latino – 270
	Hispanic/Latino	Hispanic/Latino – 214	Hispanic/Latino – 173

Nature and Extent of Homelessness:

Homelessness in Stanislaus County has experienced a steady decline over the last five years (2009–2014), both in the number and as a percentage of the overall total.¹ Reasons for this decline will need to be analyzed using additional community data. Additionally, across 2009 to 2014, the number of persons in households with children/only children has seen a steady decline, with the exception of a spike in 2014. To illustrate, in 2013, 22 percent of the total homeless population is part of households with children/only children and in 2014 this increased to 29 percent.

Using the Point-In-Time Homeless Count of 2014, one can estimate that approximately 1,156 people experienced homelessness during 2014. Of those, more than 70 percent are individuals in households without children, and approximately 30 percent were individuals in households with children or households of only children.

2014 experienced a marked increase in the percentage of sheltered versus unsheltered homeless persons. Said another way, 2014 saw the lowest number of homeless unsheltered since the point-in-time survey started in 2009. Additionally, the percentage of sheltered homeless, compared to unsheltered, steadily increased from 2009 to 2013. This recent increase will need to be analyzed, taking into consideration community information.

Chronic homelessness declined overall from 2009 to 2014 but was higher in 2014 compared to 2013 and 2011. 2014's Point-In-Time Count reported that 13 percent of homeless were chronically homeless, which is a decline from 16 percent in 2009. Reasons for this decline will need to be analyzed using additional community information.

Stanislaus County's 2014 Point-In-Time (PIT) Homeless Count reports an overall increase in the occurrence of special homeless subpopulation categories (severely mentally ill, chronic substance abuse, persons with HIV/AIDS, and victims of domestic violence) with the exception of veterans. This appears to be a result of increased reporting by participants (individuals can select to fit in more than one category), but additional research will be needed to analyze this further. Additionally, homeless people that experience severe mental illness make up the largest percentage of special homeless populations in Stanislaus County. They represent 29 percent of the total population, compared to (in order) victims of domestic violence (20 percent), chronic substance abuse (15 percent), veterans (6 percent), and persons with HIV/AIDS (1 percent).

Supplemental race/ethnic data

Whites (including Hispanic/Latino) make up the largest race category that experience homeless at 80 percent, followed by Black/African Americans (7 percent) tied with American Indian/Alaska Natives (7 percent), multiple races (3 percent), Native Hawaiian or Other Pacific Islanders (2 percent), and Asians (0.9 percent). Homeless that are Hispanic/Latino represent 33 percent of the total homeless population, which is less than the percentage of Hispanic/Latinos in Stanislaus County (43 percent). See Table NA-22.6.

¹ "Percentage of overall total" excludes 2014 due to County population data for 2014 being unavailable.

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

Based on the findings of the 2014 homeless count:

- ◆ There were 114 households with at least one adult and one child, for a total of 332 persons. Of these, 67 percent were living in emergency or transitional housing and 33 percent were unsheltered.
- ◆ 23 families were chronically homeless, with 39 percent unsheltered.
- ◆ 69 veterans were homeless; 41 percent of those were unsheltered.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

Surveys collected as part of the 2014 homeless count show the following:

Table NA-22.6 – Nature and Extent of Homelessness by Race and Ethnic Group

Race/Ethnicity	Homeless Population – Percentage (Actual Number)	Overall Population Percentage (Actual Number)
Stanislaus County, City of Turlock, and City of Modesto		
White (includes Hispanic/Latino)	80% (919)	76% (396,550)
Black/African American	7% (85)	3% (14,635)
American Indian/Alaska Native	7% (83)	1% (4,243)
Asian	0.9% (11)	5% (27,351)
Native Hawaiian or Other Pacific Islander	2% (28)	0.7% (3,810)
Multiple Races	3% (30)	4% (22,568)
Hispanic/Latino*	33% (387)	43% (220,267)

Data Source: U.S. Census, 2009–2013, ACS 5-year estimates for Stanislaus County.

**If numbers were totaled, they would not add up to the actual total homeless population because the Hispanic/Latino category is a separate measurement than measurements by race.*

Age Differences between Households with Children and Households without Children

Table NA-22.7 – Age Differences between Households with Children and without Children

Age Range	Households with Children Sheltered and Unsheltered	Households without Children Sheltered and Unsheltered
Stanislaus County, City of Turlock, and City of Modesto		
Number of Children (under age 18)	173	NA
Number of Persons (18 to 24)	33	92
Number of Persons (over 24)	126	723

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Of the 1,156 homeless individuals counted as part of the 2014 homeless count, 38 percent were unsheltered. Data by household type showed that the majority of the homeless population was composed of people in households without children. Comparing homelessness by race, 46 percent of Black/African Americans were unsheltered as compared to 38 percent of Whites who were unsheltered. Additionally, 16 percent of the unsheltered homeless were female and 22 percent were male. Lastly, veterans represent 6 percent of the homeless, both sheltered and unsheltered.

NA-45 Non-Homeless Special Needs Assessment – 91.205 (b, d)

Introduction:

Many non-homeless individuals need supportive housing and services to enable them to live independently and to avoid homelessness or institutionalization, including the elderly, persons with physical, mental, or developmental disabilities, persons with HIV/AIDS, victims of domestic violence, children leaving group homes or aging out of foster care, farmworkers, and substance abusers. Within Stanislaus County, subpopulations include the elderly, mentally ill, physically disabled, persons with HIV/AIDS, persons with substance dependence or abuse, youth, victims of domestic violence, and farmworkers. The following is a brief analysis of the needs of these subpopulations. The facilities and services available to these subpopulations are discussed in greater detail in the Market Analysis (MA-35) section of this Plan.

Describe the characteristics of special needs populations in your community:

Elderly: According to the 2008–2012 American Community Survey 5-Year Estimates, there were 32,651 households over the age of 65 in Stanislaus County, 19.7 percent of total households. The majority of elderly have a fixed income and deal with physical constraints, which makes them a group with special housing needs. Estimates also indicate that approximately 17.4 percent of elderly households fall under the extremely low-income category, approximately 15.3 percent are in the very low-income category, and about 19.0 percent fall in the low-income category. Since the elderly often live alone and have limited mobility, housing units best suited to their needs are smaller units located near public transportation, medical facilities, shopping, and other services. Security is also a concern for the elderly, primarily because they often are more vulnerable to crime. The elderly often require special design considerations such as ramps and handrails to assist with mobility. Retirement complexes and convalescent homes offer alternative housing choices, but most of the elderly live in independent residences, often in substandard conditions.

Persons with Disabilities: Disabilities vary in type and severity and can have a significant impact on a household's housing needs and ability to pay for appropriate housing. Based on the 2000 U.S. Census, there are 37,333 persons over age 5 with disabilities (9.09 percent of the population) in Stanislaus County. According to the 2008–2012 ACS 5-Year Estimates for 2012, approximately 23.8 percent and 16.1 percent, respectively, of persons with a disability fall under the extremely low- and very low-income categories.

Youth: In 2013, there were approximately 402,378 youth in the national foster care system (U.S. Department of Health and Human Services, Administration for Children and Families), including 58,699 children and youth in California and 736 in Stanislaus County (kidsdata.org). Typically, the foster care system expects youth to exit the system and live independently at age 18, which can create challenges for young adults who “age out” of the system. California has opted to extend care up to age 21. While many of these young people go on to lead successful lives, others fare poorly. A high percentage experience inadequate housing, low educational and career attainment, early parenthood, substance abuse, physical and mental health problems, and involvement with the legal system (kidsdata.org).

Farmworkers. Since agriculture is one of the top industries in Stanislaus County, farm labor is integral to Stanislaus County's economy. According to the 2012 Agricultural Census conducted by the U.S. Department of Agriculture, there were 14,657 farmworkers in Stanislaus County. State and Federal housing programs for farmworkers in Stanislaus County are administered by the Housing Authority of the County of Stanislaus (Housing Authority), which is an independent public agency entirely separate from County government. Other efforts to provide farmworker housing come mainly from individual farms and farmers. The Stanislaus County Department of Environmental Resources is the local agency responsible for enforcing state regulations on farmworker housing. Farmworkers are housed predominantly in labor camps owned and operated by a Housing Authority, privately owned camps, and individual units in the unincorporated area. Housing shortages exist during peak seasonal labor periods, in the months of July through September, when a large influx of migrant workers enters the workforce.

Because farmworkers are usually low income and their employment status is often tenuous, they are unable to compete for housing on the open market. Housing that is available to farmworkers is often of substandard condition and located in areas of the community lacking adequate services. However, Stanislaus County is fortunate in that the Housing Authority maintains 580 farm labor and migrant housing units throughout the agricultural areas of Stanislaus County that offer a decent living environment for farmworkers. The Housing Authority maintains 94 migrant housing units in Empire, 42 units in Patterson, and 88 units in Westley. These units are occupied six months out of the year, from May through October. The labor housing program provides 356 units, including 104 units in Ceres, 76 units in Patterson, 91 units in Modesto, and 85 units in Westley. Stanislaus County is continually supportive of the Housing Authority's efforts to maintain and increase the supply of farmworker housing throughout Stanislaus County.

What are the housing and supportive service needs of these populations and how are these needs determined?

The needs of the populations discussed above, combined with the difficulties in estimating the extent of such needs, can be challenging. High housing costs and low vacancy rates (as described in the Market Analysis section of this Plan) are especially problematic for those with special needs (2015–2023 Draft Housing Element Update). There is a broad-based array of objectives throughout this and related plans. Some of the housing and supportive housing needs are addressed strategically through funding categories used to meet multiple needs, including the creation of affordable housing, which will benefit the special needs populations discussed in this section.

The majority of the elderly have physical constraints which limit mobility, are on a fixed income, and often live alone. Housing best suited for the elderly is typically located near public transportation, medical facilities, shopping, and other services. Special design considerations to alleviate physical constraints can include ramps and handrails. Local agencies that provide supportive services for the elderly include

the Area Agency on Aging, the Howard Training Center, Healthy Aging Association, the Catholic Charities/Stanslaus Elder Abuse Prevention Alliance (SEAPA), the Senior Opportunity Service Program, and the Catholic Charities Homemaker Ombudsman Program. Housing assistance, in the form of Section 8 and housing rehabilitation and repair programs, is available through the Housing Authority of the County of Stanislaus and the Stanislaus County Department of Social Services (2015–2023 Draft Housing Element Update).

Persons with disabilities also often have physical and mental constraints which limit mobility within and outside of the home. Typically, housing best suited for persons with disabilities will also be located near transit, medical facilities, shopping, and other services. Supportive services provided in Stanislaus County include centralized information and emergency housing rehabilitation to address handicap accommodation retrofits. Local agencies that provide assistance to persons with disabilities include the Disability Resource Agency for Independent Living (DRAIL), the Howard Training Center, United Cerebral Palsy of Stanislaus and Tuolumne Counties, National Alliance for the Mentally Ill, Society for Disabilities, and Modesto Independent Living Center, (2015–2023 Housing Element Update).

Typically, shortages for farmworker housing exist during peak seasonal labor periods of July through September. Farm work is usually low paying and employment can be tenuous, making it hard for farmworkers to compete for housing. Where they do find housing, it is often substandard, and isolated from community services such as shopping, transit, medical, and other supportive services (2015–2023 Draft Housing Element Update).

For the elderly and those aging out of foster care, smaller and more affordable housing units designed for people living alone such as studios and one-bedroom units are in short supply. Housing that can affordably and comfortably accommodate larger families is also needed. For many of these special needs populations, employment services and financial stabilization services such as credit counseling, help with utility and other housing-related payments, relocation assistance, and case management are also needed within convenient access to residents.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area.

In California and the rest of the United States, HIV infections and AIDS diagnoses are reported through a combination of passive and active surveillance. Passive surveillance is conducted through State-required reporting of HIV and AIDS cases by health care providers and reporting of HIV-positive test results from laboratories to local health departments (LHD). Active surveillance is accomplished through routine visits by LHD staff to hospitals, physician offices, laboratories, counseling and testing clinics, and outpatient clinics to ensure completeness, timeliness, and accuracy of reported data. To improve timeliness and completeness of reporting and ensure prompt identification and response to emerging problems in the field, the California Department of Public Health, Center for Infectious Diseases, Office of AIDS supports a decentralized reporting system where HIV and AIDS case reports are identified through passive and active surveillance efforts coordinated by California’s 61 LHDs.

According to the California Department of Public Health, Office of AIDS, HIV/AIDS Surveillance Section, data as of June 30, 2014, which is reported by county and not metropolitan statistical area, shows the following for Stanislaus County:

HIV Total Cases:	179
HIV Living Cases:	172
HIV Deceased:	7
AIDS Total Cases:	826

AIDS Living Cases: 392

AIDS Deceased: 434

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction’s need for Public Facilities:

The Stanislaus Planning Area has extensive needs for public facilities. These include, but are not limited to, the following:

Parks/Community Facilities: There is a need for facilities serving youth/after-school programs and facilities serving seniors.

Accessibility Improvements to Public Facilities: Most existing public facilities in the Stanislaus Planning Area do not meet ADA (Americans with Disabilities Act) accessibility standards.

Energy Efficiency Improvements to Public Facilities: Many community facilities require upgrading to improve energy efficiency.

How were these needs determined?

A survey was conducted as part of the consolidated plan process. When asked about what parks and community center services were most important to fund, respondents identified the top three priorities as facilities serving youth/after-school programs, facilities serving seniors, and improvements to accessibility for seniors and disabled persons. The information contained in this Market Analysis also identified these needs. See Community Outreach Summary for individual responses.

Describe the jurisdiction’s need for Public Improvements:

In many neighborhoods and communities of the Stanislaus Planning Area, public infrastructure is minimal or nonexistent. Infrastructure such as sewer, water, curb, gutter, sidewalk, and storm drainage are typical development standards in newer neighborhoods. Projects have been identified in the Stanislaus County and City of Turlock Annual Action Plans that will address this. In addition the following needs have been identified.

Water and Sewer Infrastructure and Services: Extension/improvement of water and sewer lines is needed to serve low- and moderate-income households and to facilitate economic development activities.

Street and Sidewalk Improvements: Improvements are needed to address safety and traffic issues. In addition, ramps and curb cuts are needed to meet ADA accessibility requirements.

Streetlights: Many streets and public facilities (such as parks and recreation areas) lack adequate street lighting.

How were these needs determined?

A survey was conducted as part of the consolidated plan process. Results of the survey identified street improvements, improving water supply, and installing or improving street lighting to be the highest priority among infrastructure improvements surveyed. See Community Outreach Summary for individual responses.

Additionally, for Stanislaus County projects, the Stanislaus County Board of Supervisors adopted (August 23, 2011) Residential Neighborhood Infrastructure Project Ranking Criteria to be used in determining the priority of future infrastructure spending projects, beyond those already programmed and reflected in past Annual Action Plans and Implementation Plans of Stanislaus County's former redevelopment agency.

The ranking criteria focus on the following factors:

- a) Health and safety needs of the program/project and how those needs compare with the needs of other programs/projects (i.e., high per capita septic system failures).
- b) The willingness and ability of the local community to assess itself for purposes of contributing toward project costs and costs of ongoing maintenance and operation of improvements inclusive of support of the program/project by the area's municipal advisory council or an organized community group (if no council exists to represent the area).
- c) Identified and available funding sources for the specific program/project (the ability to leverage local agency dollars with outside funding sources are critical to ensuring a successful program/project).
- d) A project's geographical and fiscal equity in terms of equitable distribution throughout the various communities, service to income-qualified residents, and, when needed, proximity to needed infrastructure connects.

Describe the jurisdiction's need for Public Services:

Given the geographic spread of the Planning Area, many communities do not have adequate access to public and supportive services. Service needs in the Planning Area include, but are not limited to, the following:

- ◆ Youth services, especially services for at-risk youth
- ◆ Senior services, including case management and advocacy
- ◆ Physically/mentally disabled persons services
- ◆ Homeless and homeless prevention services
- ◆ Employment services

How were these needs determined?

A survey was conducted as part of the consolidated plan process. Survey participants were asked to rank the importance of providing grant funds to programs that provide public services to low-income persons in their community. Respondents felt that the highest priority should be given to services for at-risk children/youth, seniors, and physically/mentally disabled persons. Lowest priority was to persons recently incarcerated or on parole, to persons with substance abuse problems, and for financial literacy. The information contained in this Needs Assessment and the Market Analysis also identified these needs.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The purpose of this section of the Con Plan is to provide a clear picture of the environment in which the Stanislaus Urban County and City of Turlock will administer its CDBG program over the term of the Con Plan. The Market Analysis includes the following sections:

- ◆ Number of Housing Units, Cost of Housing, Condition of Housing
- ◆ Public and Assisted Housing
- ◆ Homeless Facilities and Services
- ◆ Special Needs Facilities and Services
- ◆ Barriers to Affordable Housing
- ◆ Non-Housing Community Development Assets
- ◆ Needs and Market Analysis Discussion

In conjunction with the Needs Assessment, the Market Analysis provides the basis for the Strategic Plan and the programs and projects to be administered. Most of the data tables in this section are populated with default data developed by the Census Bureau for HUD based on 2007–2011 American Community Survey (ACS). Other sources are noted throughout the Con Plan.

Data in this section has been provided by HUD's Integrated Disbursement and Information System (IDIS) for the entire planning area including Stanislaus Urban County and the City of Turlock. Data for the individual jurisdictions has been provided from IDIS and Community Planning and Development (CPD) Maps where available. The following maps are attached in **Appendix 4**:

- ◆ Map 14: Extremely low-income households with any of the four severe housing problems (North)
- ◆ Map 15: Extremely low-income households with any of the four severe housing problems (South)
- ◆ Map 16: Low-income households with any of the four severe housing problems (North)
- ◆ Map 17: Low-income households with any of the four severe housing problems (South)
- ◆ Map 18: Moderate-income households with any of the four severe housing problems (North)
- ◆ Map 19: Moderate-income households with any of the four severe housing problems (South)

MA-10 Number of Housing Units – 91.210(a) & (b)(2)

Introduction

Based on the data below, there are 98,036 housing units in the Stanislaus Planning Area (includes the Stanislaus Urban County and City of Turlock); approximately 57.9 percent of these units are owner-occupied and 42.1 percent are renter-occupied. The majority (77 percent) of all units in the Planning Area are single-family detached. Another 4 percent of the housing units in the Stanislaus Planning Area are single-family attached, 5 percent have 2-4 units per structure, and 8 percent have 5 or more units. The majority of the housing units in the Planning Area are three or more bedrooms.

The City of Turlock has 24,595 housing units with approximately 51.6 percent owner-occupied and 48.4 percent renter-occupied units. The majority (67.7 percent) of all units are single-family detached. Another 6.6 percent of the housing units are single-family attached, 7.1 percent have 2-4 units per structure, and 15.9 percent have 5 or more units. The majority of the housing units in the City of Turlock are three or more bedrooms.

The tables below show the number and type of housing units for Stanislaus Planning Area, which includes Stanislaus Urban County (which includes the six cities listed plus the unincorporated area of the County) and the City of Turlock.

All residential properties by number of units

Table MA-1 shows residential properties by number of units for the Stanislaus Planning Area as well as individual jurisdictions.

Table MA-1 – Residential Properties by Unit Number

Property Type	Number	%
Stanislaus Planning Area		
1-unit detached structure	75,758	77%
1-unit, attached structure	4,360	4%
2–4 units	4,721	5%
5–19 units	3,527	4%
20 or more units	3,476	4%
Mobile home, boat, RV, van, etc	6,194	6%
Total	98,036	100%
City of Turlock		
1-unit detached structure	16,654	67.71%
1-unit, attached structure	1,613	6.56%
2–4 units	1,742	7.08%
5–19 units	1,816	7.38%
20 or more units	2,084	8.47%
Mobile home, boat, RV, van, etc	686	2.79%
Total	24,595	100%

Property Type	Number	%
City of Ceres		
1-unit detached structure	10,501	75.70%
1-unit, attached structure	726	5.23%
2-4 units	675	4.87%
5-19 units	768	5.54%
20 or more units	434	3.13%
Mobile home, boat, RV, van, etc	767	5.53%
Total	13,871	
City of Hughson		
1-unit detached structure	1,656	84.27%
1-unit, attached structure	13	0.66%
2-4 units	37	1.88%
5-19 units	111	5.65%
20 or more units	94	4.78%
Mobile Home, boat, RV, van, etc	54	2.75%
Total	1,965	
City of Newman		
1-unit detached structure	2,695	83.23%
1-unit, attached structure	137	4.23%
2-4 units	157	4.85%
5-19 units	91	2.81%
20 or more units	158	4.88%
Mobile Home, boat, RV, van, etc	-	0.00%
Total	3,238	
City of Oakdale		
1-unit detached structure	5,733	77.05%
1-unit, attached structure	401	5.39%
2-4 units	424	5.70%
5-19 units	289	3.88%
20 or more units	290	3.90%
Mobile Home, boat, RV, van, etc.	304	4.09%
Total	7,441	
City of Patterson		
1-unit detached structure	5,690	88.37%
1-unit, attached structure	181	2.81%

Property Type	Number	%
2-4 units	159	2.47%
5-19 units	153	2.38%
20 or more units	121	1.88%
Mobile Home, boat, RV, van, etc.	135	2.10%
Total	6,439	
City of Waterford		
1-unit detached structure	1,874	79.51%
1-unit, attached structure	54	2.29%
2-4 units	98	4.16%
5-19 units	321	13.62%
20 or more units	0	0.00%
Mobile Home, boat, RV, van, etc.	10	0.42%
Total	2,357	

Data Source: 2007-2011 ACS

Unit Size by Tenure

Table MA-2 shows housing units by tenure for the Planning Area and individual jurisdictions.

Table MA-2 – Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
Stanislaus Planning Area				
No bedroom	261	0%	767	2%
1 bedroom	953	2%	4,468	13%
2 bedrooms	8,175	14%	13,816	41%
3 or more bedrooms	47,075	83%	14,957	44%
Total	56,464	99%	34,008	100%
City of Turlock				
No bedroom	46	0.36%	290	2.87%
1 bedroom	127	1.00%	1,845	18.27%
2 bedrooms	1,542	12.16%	4,768	47.20%
3 or more bedrooms	10,964	86.47%	3,198	31.66%
Total	12,679	99%	10,101	100%
City of Ceres				
No bedroom	47	0.54%	12	0.28%
1 bedroom	102	1.18%	557	13.02%

	Owners		Renters	
	Number	%	Number	%
2 bedrooms	696	8.05%	1,834	42.87%
3 or more bedrooms	7,799	90.22%	1,875	43.83%
Total	8,644		4,278	
City of Hughson				
No bedroom	0	0.00%	32	4.49%
1 bedroom	0	0.00%	159	22.33%
2 bedrooms	32	2.71%	291	40.87%
3 or more bedrooms	1,147	97.29%	230	32.30%
Total	1,179		712	
City of Newman				
No bedroom	0	0.00%	12	1.28%
1 bedroom	0	0.00%	130	13.82%
2 bedrooms	124	6.29%	290	30.82%
3 or more bedrooms	1,847	93.71%	509	54.09%
Total	1,971		941	
City of Oakdale				
No bedroom	0	0.00%	0	0.00%
1 bedroom	98	2.22%	327	13.68%
2 bedrooms	620	14.06%	896	37.47%
3 or more bedrooms	3,693	83.72%	1,168	48.85%
Total	4,411		2,391	
City of Patterson				
No bedroom	41	1.10%	109	6.19%
1 bedroom	52	1.39%	230	13.07%
2 bedrooms	164	4.39%	426	24.20%
3 or more bedrooms	3,479	93.12%	995	56.53%
Total	3,736		1,760	
City of Waterford				
No bedroom	0	0.00%	0	0.00%
1 bedroom	0	0.00%	81	10.90%
2 bedrooms	251	16.36%	453	60.97%
3 or more bedrooms	1,283	83.64%	209	28.13%
Total	1,534		743	

Data Source: 2007-2011 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

With the dissolution of the redevelopment agencies, the Stanislaus Urban County's and City of Turlock's ability to provide affordable housing has been seriously compromised. The Stanislaus Urban County's and City of Turlock's CDBG allocations are limited, and HOME funds are not guaranteed. With limited resources, the Stanislaus Urban County and City of Turlock anticipate the following housing activities:

- ◆ CDBG Funds: The Stanislaus Urban County does not use CDBG funds for housing activities. The main use of CDBG funds is infrastructure activities. The infrastructure funded serves low-income areas. The City of Turlock uses CDBG funds for down payment assistance and housing rehabilitation.
- ◆ HOME Funds: City of Turlock/ Stanislaus Urban County are entitlement communities for HOME Funds. These funds are used for low-income households.
- ◆ Other Funding Sources: The Stanislaus Urban County will pursue additional funding to address housing needs in the unincorporated areas and may collaborate with the City of Turlock in funding applications. Potential funding sources include bonds and the State Energy Upgrade California Program and existing PG&E Rebate Program. Additional funding sources include the NSP and ESG programs. All of these programs serve low-income households.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

The Housing Authority of the County of Stanislaus (Housing Authority) is the largest landlord of multi-family and senior housing for the lower-income population. The Housing Authority owns and manages over 1,300 rental units (including public housing, farm labor housing, and seasonal migrant farm worker housing). Based upon data collected, Stanislaus County does not foresee a loss of available public housing units in Stanislaus County.

Does the availability of housing units meet the needs of the population?

The Housing Authority currently has waiting lists for publicly assisted housing and Housing Choice Vouchers have a wait period of many years. In addition to issues relating to affordability, issues relating to housing conditions are also prevalent. With more than half (66 percent) of the housing units older than 30 years of age, a large portion of Stanislaus County's housing stock may need substantial rehabilitation. The extent of housing needs far exceeds the resources available to address those needs.

Describe the need for specific types of housing:

There are a range of housing needs, including farm worker housing, transitional housing, housing for seniors and housing suitable for families, persons with disabilities, and single-bedroom affordable units for homeless individuals without children. Each of these groups has a need for more affordable housing.

MA-15 Housing Market Analysis: Cost of Housing – 91.210(a)

Introduction

One of the most important factors in evaluating a community's housing market is the cost of housing and, even more significant, whether the housing is affordable to households who live there or would like to live there. Housing problems directly relate to the cost of housing in a community. If housing costs are relatively high in comparison to household income, a correspondingly high prevalence of housing cost burden and overcrowding occurs.

The cost of homeownership varies quite dramatically within Stanislaus County depending on the community. For example, the median sales price in 2013 for a home in Hughson was \$250,000. In other areas of Stanislaus County, such as Waterford, the median sales price was \$143,500, according to real estate data compiled by DataQuick (www.dqnews.com). Overall, the median home price in Stanislaus County was \$175,000 in 2013, a 39 percent increase compared to 2000 Census data.

Rental rates in Stanislaus County also vary dramatically by community. Rents were highest in Patterson and Hughson, while Waterford, Newman and Ceres had the lowest average rents.

Cost of Housing

Table MA-3 shows housing costs for Stanislaus County and jurisdictions, and the City of Turlock, including median home value (sales price) and median contract rent.

Table MA-3 – Cost of Housing

	Base Year: 2000 ¹	Most Recent Year: 2013 ²	% Change
Stanislaus County³			
Median Home Value	\$125,300	\$175,000	39%
Median Contract Rent	\$521	\$825 ⁴	58%
City of Turlock			
Median Home Value	\$128,300	\$195,000	52%
Median Contract Rent	\$509	\$823	62%
City of Ceres			
Median Home Value	\$119,900	\$160,000	33%
Median Contract Rent	\$528	\$794	50%
City of Hughson			
Median Home Value	\$117,900	\$250,000	112%
Median Contract Rent	\$415	\$1,014	144%
City of Newman			
Median Home Value	\$108,500	\$145,000	34%
Median Contract Rent	\$428	\$793	85%
City of Oakdale			
Median Home Value	\$125,300	\$210,000	68%
Median Contract Rent	\$497	\$886	78%

	Base Year: 2000 ¹	Most Recent Year: 2013 ²	% Change
City of Patterson			
Median Home Value	\$130,900	\$210,000	60%
Median Contract Rent	\$423	\$1,073	154%
City of Waterford			
Median Home Value	\$100,800	\$143,500	42%
Median Contract Rent	\$478	\$710	49%

Data Source:

- 1) 2000 US Census
- 2) DataQuick, 2013 Median Homes Sales Prices
- 3) Data is only available for Stanislaus County as a whole
- 4) 2009-2013 ACS. Due the sample size of the ACS, smaller jurisdictions may have large margins of error.

Rent Paid

Table MA-4 shows the number of households by the amount each household pays in rent.

Table MA-4 – Rent Paid

Rent Paid	Number	%
Stanislaus Planning Area		
Less than \$500	6,363	18.7%
\$500–\$999	19,173	56.4%
\$1,000–\$1,499	6,793	20.0%
\$1,500–\$1,999	1,263	3.7%
\$2,000 or more	416	1.2%
Total	34,008	100.0%
City of Turlock		
Less than \$500	1,343	13.3%
\$500-999	6,122	60.6%
\$1,000-1,499	2,244	22.2%
\$1,500-1,999	308	3.1%
\$2,000 or more	84	0.8%
Total	10,101	100.0%
City of Ceres		
Less than \$500	712	16.7%
\$500-999	2,580	60.3%
\$1,000-1,499	753	17.6%
\$1,500-1,999	190	4.4%
\$2,000 or more	43	1.0%
Total	4,278	100%

Rent Paid	Number	%
City of Hughson		
Less than \$500	150	21%
\$500-999	242	34%
\$1,000-1,499	203	29%
\$1,500-1,999	0	0%
\$2,000 or more	117	16%
Total	712	100%
City of Newman		
Less than \$500	202	21%
\$500-999	570	61%
\$1,000-1,499	169	18%
\$1,500-1,999	0	0%
\$2,000 or more	0	0%
Total	941	100%
City of Oakdale		
Less than \$500	307	12.84%
\$500-999	1,294	54.12%
\$1,000-1,499	695	29.06%
\$1,500-1,999	69	2.89%
\$2,000 or more	26	1.09%
Total	2,391	100%
City of Patterson		
Less than \$500	242	13.75%
\$500-999	766	43.52%
\$1,000-1,499	615	34.95%
\$1,500-1,999	101	5.74%
\$2,000 or more	36	2.05%
Total	1,760	100%
City of Waterford		
Less than \$500	213	29%
\$500-999	438	59%
\$1,000-1,499	79	11%
\$1,500-1,999	13	2%
\$2,000 or more	0	0%
Total	743	100%

Data Source: 2007-2011 ACS

Housing Affordability

The HUD-Adjusted Area Median Family Income (HAMFI) is used to define housing affordability. It is the median family income calculated by HUD for each jurisdiction, in order to determine Fair Market Rents and income limits for HUD programs. Therefore, the HAMFI may differ from median income in the US Census or other data sources. Table MA-5 shows the number of number of affordable rental and owner units for each income range. A rental unit is considered affordable if gross rent, including utilities, is no more than 30 percent of the household income. An owner unit is considered affordable if monthly housing costs, including principal and interest, taxes, and insurance, are no more than 30 percent of the household income.

Table MA-5 – Housing Affordability

Units Affordable to Households Earning	Number of Renter Units	Number of Owner Units
Stanislaus Planning Area		
30% HAMFI	966	No Data
50% HAMFI	3,312	2,175
80% HAMFI	15,157	6,542
100% HAMFI	No Data	10,030
Total	19,435	18,747
City of Turlock		
30% HAMFI	215	No Data
50% HAMFI	785	310
80% HAMFI	4,420	1,044
100% HAMFI	No Data	1,634
Total	5,420	2,988
City of Ceres		
30% HAMFI	No Data	230
50% HAMFI	390	445
80% HAMFI	1,135	2,150
100% HAMFI	1,829	No Data
Total	3,354	2,825
City of Hughson		
30% HAMFI	No Data	-
50% HAMFI	-	75
80% HAMFI	10	260
100% HAMFI	210	No Data
Total	220	335
City of Newman		
30% HAMFI	No Data	30
50% HAMFI	35	150

Units Affordable to Households Earning	Number of Renter Units	Number of Owner Units
80% HAMFI	199	540
100% HAMFI	474	No Data
Total	708	720
City of Oakdale		
30% HAMFI	130	No Data
50% HAMFI	240	100
80% HAMFI	1,040	365
100% HAMFI	No Data	505
Total	1,410	970
City of Patterson		
30% HAMFI	-	No Data
50% HAMFI	90	89
80% HAMFI	540	439
100% HAMFI	No Data	723
Total	1,251	630
City of Waterford		
30% HAMFI	45	No Data
50% HAMFI	80	20
80% HAMFI	470	250
100% HAMFI	No Data	388
Total	595	658

Data Source: 2007-2011 CHAS

Note: HAMFI is defined as HUD-Adjusted Area Median Family Income.

Monthly Rent

Table MA-6 shows the Fair Market Rent, High HOME Rent and Low HOME Rent for the Modesto Metropolitan Statistical Area (MSA).

Table MA-6 – Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedrooms	3 Bedrooms	4 Bedrooms
Modesto MSA					
Fair Market Rent	\$575	\$710	\$910	\$1,341	\$1,556
High HOME Rent	\$575	\$710	\$886	\$1,014	\$1,556
Low HOME Rent	\$542	\$581	\$697	\$806	\$900

Data Source: HUD 2014 Fair Market Rents, Modesto MSA

Is there sufficient housing for households at all income levels?

While approximately 38 percent of the Stanislaus Planning Area households, both renter and owner, are low income (at or below 80 percent of AMI; see Needs Assessment), only 29 percent of housing units (based on a total of 98,036 units) are affordable to these households. A majority of these units are affordable to households earning 80 percent of AMI, followed by households at 50 percent (very low income) and 30 percent (extremely low income) of AMI. This indicates that there is a lack of affordable housing stock in the Stanislaus Planning Area to meet the existing needs of low- and very low-income households.

How is affordability of housing likely to change considering changes to home values and/or rents?

Given the way the market is trending, it is likely that affordability will continue to be a challenge for both renters and owners. The market has become increasingly difficult for low-income buyers due to a variety of factors, including a shrinking inventory of affordably priced homes, fierce competition from cash investors bidding on the same homes, and the more restrictive credit market that has made it difficult for many homebuyers to obtain financing. As a result of these challenges, Stanislaus County prioritizes its limited resources for affordable rental housing.

Forced sales, which are actions taken in civil court forcing the owners of a piece of real property to sell their property and divide the profits, and foreclosures have forced many homeowners into the rental market, further stressing an already tight market. This increase in renter households has contributed to low rental vacancy rates and increased rental prices throughout Stanislaus County.

How do HOME rents/Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

Based on the data tables in this section, the area's median rent (\$825 in 2013) is affordable for a one-bedroom unit, but would not be affordable for a two- or more bedroom unit. This data supports the Stanislaus County's strategy to produce or preserve affordable housing, per HUD's Office of CPD guidance.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

Based on data from the 2007-2011 ACS, 48.2 percent (43,675 households) of both owner-occupied and renter-occupied households in the Stanislaus Planning Area, which includes the City of Turlock, have one or more of the following housing conditions: (1) lacks complete plumbing facilities; (2) lacks complete kitchen facilities; (3) more than one person per room; and (4) cost burden greater than 30 percent. Renter-occupied households have the highest rate of housing conditions at 58 percent while 43 percent of owner-occupied households have none of the housing conditions. With regard to the age and condition of the housing stock, the majority of Planning Area's housing units were built between 1950 and 1979 (34 percent) followed by between 1980 and 1999 (32 percent), 2000 or later (20 percent), and before 1950 (14 percent). Older units are generally in greater need of repair, including possible lead-based paint remediation: 48 percent of both owner-occupied and renter-occupied units were built before 1980. Approximately 30 percent of units built before 1980 have children present. These units pose the greatest risk of lead poisoning.

In the City of Turlock, 44.8 percent (10,747 households) of both owner-occupied and renter-occupied households have one or more of the following housing conditions: (1) lacks complete plumbing facilities; (2) lacks complete kitchen facilities; (3) more than one person per room; and (4) cost burden greater than 30 percent. Renter-occupied households have the highest rate of housing conditions at 58 percent, while

43 percent of owner-occupied households have none of the housing conditions. With regard to the age and condition of the housing stock, the majority of housing units were built between 1980 and 1999 (36 percent), followed by between 1950 and 1979 (33 percent), 2000 or later (23 percent), and before 1950 (9 percent). Older units are generally in greater need of repair, including possible lead-based paint remediation: 44 percent of both owner-occupied and renter-occupied units were built before 1980. Approximately 33 percent of units built before 1980 have children present. These units pose the greatest risk of lead poisoning.

Definitions

According to HUD, substandard housing conditions in the Stanislaus Planning Area include the following:

- ◆ Violation of State building and housing codes;
- ◆ Lack of adequate plumbing, kitchen, or heating facilities; and
- ◆ Overcrowding conditions (defined as being occupied by more than one person per room, including living and dining rooms but excluding bathrooms and kitchen).

Substandard units suitable for rehabilitation are those units where the total rehabilitation costs do not exceed 25 percent of the after-rehabilitation value.

According to Stanislaus County's 2012 ESG/PSG Guide, housing unit is considered to be in "Standard Condition" if the unit:

- i. Is structurally sound and provides adequate shelter from the weather elements and a securable interior environment.
- ii. Has operable indoor plumbing (a minimum of one of each: wash basin, water closet, bathing facilities, kitchen sink).
- iii. Has an adequate, safe electrical system.
- iv. Has sanitary food preparation facilities.
- v. Has no presence of environmental health concerns such as mold and lead.
- vi. Meets and or exceeds HUD Housing Quality Standards (HQS).

A housing unit is considered to be in "substandard condition but suitable for rehabilitation" if the housing unit:

- i. Does not meet one or more of the conditions required for a dwelling to be in "standard condition" and the cost to bring the dwelling into compliance does not exceed 75 percent of the value of the house and property.
- ii. Has been declared unfit or unsafe for occupancy by a government agency and the cost to bring the dwelling into compliance does not exceed 75 percent of the value of the house and property.

Condition of Units

Table MA-7 shows the housing conditions in the Stanislaus Planning Area by tenure. A majority (57 percent) of owner-occupied housing units have no selected housing conditions and 42 percent of renter-occupied housing units have no selected conditions.

Table MA-7 – Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Stanislaus Planning Area				
With one selected Condition	22,631	40%	17,241	51%
With two selected Conditions	1,303	2%	2,075	6%
With three selected Conditions	108	0%	266	1%
With four selected Conditions	0	0%	51	0%
No selected Conditions	32,422	57%	14,375	42%
Total	56,464	99%	34,008	100%
City of Turlock				
With one selected Condition	4,768	38%	5,303	53%
With two selected Conditions	116	1%	532	5%
With three selected Conditions	0	0%	28	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	7,795	61%	4,238	42%
Total	12,679	100%	10,101	100%
City of Ceres				
With one selected Condition	3,970	45.93%	2,222	51.94%
With two selected Conditions	313	3.62%	312	7.29%
With three selected Conditions	87	1.01%	62	1.45%
With four selected Conditions	0	0.00%	0	0.00%
No selected Conditions	4,274	49.44%	1,682	39.32%
Total	8,644	66.89%	4,278	33.11%
City of Hughson				
With one selected Condition	586	49.70%	523	73.46%
With two selected Conditions	13	1.10%	14	1.97%
With three selected Conditions	0	0.00%	0	0.00%
With four selected Conditions	0	0.00%	0	0.00%
No selected Conditions	580	49.19%	175	24.58%
Total	1,179	62.35%	712	37.65%
City of Newman				
With one selected Condition	1,026	52.05%	272	28.91%
With two selected Conditions	945	47.95%	515	54.73%
With three selected Conditions	0	0.00%	154	16.37%
With four selected Conditions	0	0.00%	0	0.00%

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
No selected Conditions	0	0.00%	0	0.00%
Total	1,971	67.69%	941	32.31%
City of Oakdale				
With one selected Condition	1,729	39.20%	1,178	49.27%
With two selected Conditions	62	1.41%	16	0.67%
With three selected Conditions	0	0.00%	0	0.00%
With four selected Conditions	0	0.00%	0	0.00%
No selected Conditions	2,620	59.40%	1,197	50.06%
Total	4,411	64.85%	2,391	35.15%
City of Patterson				
With one selected Condition	2,149	57.52%	911	51.76%
With two selected Conditions	104	2.78%	79	4.49%
With three selected Conditions	0	0.00%	0	0.00%
With four selected Conditions	0	0.00%	0	0.00%
No selected Conditions	1,483	39.69%	770	43.75%
Total	3,736	67.98%	1,760	32.02%
City of Waterford				
With one selected Condition	667	43.48%	299	40.24%
With two selected Conditions	78	5.08%	118	15.88%
With three selected Conditions	0	0.00%	0	0.00%
With four selected Conditions	0	0.00%	0	0.00%
No selected Conditions	789	51.43%	326	43.88%
Total	1,534	67.37%	743	32.63%

Data Source: 2007-2011 ACS

Year Unit Built

Table MA-8 shows the number of units by the year built in the Stanislaus Planning Area.

Table MA-8 – Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Stanislaus Planning Area				
2000 or later	13,169	23%	5,056	15%
1980–1999	18,797	33%	10,540	31%
1950–1979	17,130	30%	13,510	40%
Before 1950	7,368	13%	4,902	14%
Total	56,464	99%	34,008	100%
City of Turlock				
2000 or later	3,610	28%	1,580	16%
1980-1999	4,342	34%	3,827	38%
1950-1979	3,724	29%	3,699	37%
Before 1950	1,003	8%	995	10%
Total	12,679	99%	10,101	101%
City of Ceres				
2000 or later	2,083	24.10%	600	14.03%
1980-1999	3,413	39.48%	1,547	36.16%
1950-1979	2,780	32.16%	1,802	42.12%
Before 1950	368	4.26%	329	7.69%
Total	8,644	66.89%	4,278	33.11%
City of Hughson				
2000 or later	572	48.52%	250	35.11%
1980-1999	301	25.53%	127	17.84%
1950-1979	148	12.55%	144	20.22%
Before 1950	158	13.40%	191	26.83%
Total	1,179	62.35%	712	37.65%
City of Newman				
2000 or later	691	35.06%	270	28.69%
1980-1999	592	30.04%	276	29.33%
1950-1979	372	18.87%	177	18.81%
Before 1950	316	16.03%	218	23.17%
Total	1,971	67.69%	941	32.31%

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
City of Oakdale				
2000 or later	1,205	27.32%	161	6.73%
1980-1999	1,557	35.30%	980	40.99%
1950-1979	1,123	25.46%	1,110	46.42%
Before 1950	526	11.92%	140	5.86%
Total	4,411	64.85%	2,391	35.15%
City of Patterson				
2000 or later	1,782	47.70%	531	30.17%
1980-1999	1,291	34.56%	544	30.91%
1950-1979	343	9.18%	506	28.75%
Before 1950	320	8.57%	179	10.17%
Total	3,736	67.98%	1,760	32.02%
City of Waterford				
2000 or later	360	23.47%	219	29.48%
1980-1999	621	40.48%	240	32.30%
1950-1979	331	21.58%	175	23.55%
Before 1950	222	14.47%	109	14.67%
Total	1,534	67.37%	743	32.63%

Data Source: 2007-2011 CHAS

Risk of Lead-Based Paint Hazard

Table MA-9 shows the risk of lead-based paint hazard by tenure.

Table MA-9 – Risk of Lead-Based Paint

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Stanislaus Planning Area				
Total number of units built before 1980	24,498	43%	18,412	54%
Housing Units built before 1980 with children present	7,754	14%	5,065	15%
City of Turlock				
Total Number of Units Built Before 1980	4,727	37%	4,694	46%
Housing Units build before 1980 with children present	1,885	15%	1,245	12%
City of Ceres				
Total Number of Units Built Before 1980	3,148	36%	2,131	50%
Housing Units build before 1980 with children present				

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
City of Hughson				
Total Number of Units Built Before 1980	306	26%	335	47%
Housing Units build before 1980 with children present				
City of Newman				
Total Number of Units Built Before 1980	688	35%	395	42%
Housing Units build before 1980 with children present				
City of Oakdale				
Total Number of Units Built Before 1980	1,649	37%	1,250	52%
Housing Units build before 1980 with children present				
City of Patterson				
Total Number of Units Built Before 1980	663	18%	685	39%
Housing Units build before 1980 with children present				
City of Waterford				
Total Number of Units Built Before 1980	553	36%	284	38%
Housing Units build before 1980 with children present				

Data Source: 2007-2011 ACS (Total Units) 2007-2011 CHAS (Units with Children present)

Vacant Units

Table MA-10 includes a listing of the total number of vacant units in Stanislaus County.

Table MA-10 – Vacant Units*

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Stanislaus County			
Vacant Units	N/A	N/A	14,323
Abandoned Vacant Units	N/A	N/A	N/A
Real Estate Owned (REO) Properties	N/A	N/A	N/A
Abandoned REO Properties	N/A	N/A	N/A

Data Source: 2007-2011 ACS

** Note: Table MA-10 is required by HUD, but that the data is not available for Stanislaus County.*

Describe the need for owner and rental rehabilitation based on the condition of the jurisdiction's housing.

Housing age can indicate general housing conditions within a community. Housing is subject to gradual deterioration over time. Deteriorating housing can depress neighboring property values, discourage reinvestment, and eventually impact the quality of life in a neighborhood. A Housing Conditions Survey was conducted from July 2002 to March 2003 in unincorporated portions of Stanislaus County. A subsequent 2009 windshield survey was conducted to verify that the earlier inventory was still a valid representation of the unincorporated housing stock. An assessment was completed for each residential structure found in the designated communities and neighborhoods but omitted housing units scattered beyond the concentrated neighborhoods. Housing units on large agricultural parcels and in distant rural areas beyond the concentrated housing tracts were deemed impractical to assess. A total of 11,000 housing units (68.4 percent) were in sound condition, with no repairs needed, while 3,593 units (22.3 percent) needed minor repairs. An additional 1,222 units (7.6 percent) needed moderate repairs, and only 185 units (1.2 percent) required substantial repair. A total of 74 housing units (0.5 percent) were found to be dilapidated. As a result, a total of 5,000 (31.1 percent) of the residential units were classified as qualifying for rehabilitation due to their state of disrepair. According to the Planning and Community Development Department, the percentage of units in need of rehabilitation from 2002 to 2003 to present remains similar.

Estimate the number of housing units within the jurisdiction that are occupied by low or moderate income families that contain lead-based paint hazards. 91.205(e), 91.405

Housing age is the key variable used to estimate the number of housing units with lead-based paint (LBP). Starting in 1978, the Federal government prohibited the use of LBP on residential properties. National studies estimate that 75 percent of all residential structures built prior to 1970 contain LBP. Housing built prior to 1940 is highly likely to contain LBP (estimated at 90 percent of housing units), and in housing built between 1960 and 1979, 62 percent of units are estimated to contain LBP.

All housing-related programs administered by the Stanislaus Urban County and the City of Turlock, including those in collaboration with the HOME Consortia and the Housing Authority, have policies in place which require that all units constructed before 1978 be screened for LBP hazards. The LBP regulation that became effective April 22, 2010, added a requirement that required contractors bidding on the rehabilitation of housing built prior to 1978 provide documentation of EPA Lead Renovation and Repair and Painting certification. If lead is found in any housing units, an LBP clearance test is conducted, after the work had been completed, by a licensed contractor with expertise in this type of work. Final payment is not released until the unit has passed the LBP testing requirement. These requirements will assist Stanislaus Urban County and the City of Turlock in their goal to eliminate the lead-based paint hazards in the units of the community.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

Totals Number of Units

Table MA-11 shows the total number of public and assisted housing units in Stanislaus County.

Table MA-11 – Total Number of Units by Program Type

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
Stanislaus County									
# of units vouchers available	0	0	647	4,096	6	4,090	0	1,207	0
# of accessible units	NA	NA	42	NA	NA	NA	NA	NA	16

**includes hearing and visually impaired.*

Data Source: Public Information Center and Housing Authority

Describe the supply of public housing developments:

The Housing Authority maintains 5 percent of its public housing units as accessible for disabled persons/families throughout its inventory. The Housing Authority’s remaining public housing units are designated as general occupancy and can be occupied by the elderly without requesting further designation.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The public housing units are inspected periodically by HUD’s Real Estate Assessment Center to score the physical condition of the property based on HUD’s Uniform Physical Condition Standards. These inspections are conducted by Asset Management Properties (AMP) and consist of full site and common area inspections and a random sampling of units based on the number of units in the AMP.

The Housing Authority operates conventional public housing in five Asset Management Properties (AMP) units that are located throughout Stanislaus County. Only AMP 1 and AMP 2 contain units within Stanislaus Urban County.

AMP 1 was last inspected in 2013 and received a score of 93 out of 100. Based on this score the property will next be inspected in 2016. AMP 2 was last inspected in 2014 and received a score of 86 out of 100. Based on this score the property will next be inspected in 2016.

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

Restoration and revitalization needs are typically identified through physical needs assessments completed for the public housing properties. These activities are then incorporated in the Housing Authority’s Five-Year Action Plan. Projects currently planned in these areas over the next five years range from interior and exterior modernization of buildings and units to replacement of mechanical systems. Table MA-11.1 below summarizes the Housing Authority’s restoration and revitalization project needs.

Table MA-11.1 – Conventional Public Housing

Conventional Public Housing – Stanislaus Urban County		
AMP 1		
Property Name	Repairs Needed	Expense
Patterson Units	Replace HVAC Systems	\$195,000
Westley Units	Interior Modernization, Kitchens, Baths, Electrical, Finishes	\$500,000
AMP 2		
Property Name	Repairs Needed	Expense
Ceres Units	Replace HVAC Systems	\$117,000
Oakdale Units	Replace HVAC Systems	\$364,000
Turlock Units	Interior Modernization, Kitchens, Baths, Electrical, Finishes	\$900,000
Hughson Units	Exterior & Interior Modernization	\$920,000

Source Data: Housing Authority of Stanislaus County, 2015

Describe the public housing agency’s strategy for improving the living environment of low- and moderate-income families residing in public housing:

The following are activities that the Housing Authority conducts to improve the living environment of low- and moderate-income families residing in public housing:

The Housing Authority:

- ◆ Pursues collaborative projects with other local agencies to provide non-housing services to our residents to further economic opportunity.

- ◆ Establishes a zero tolerance policy for illegal drug use/activity to provide a drug-free environment for residents.
- ◆ Works with local law enforcement to establish neighborhood watch programs and to obtain "Crime-Free" certification of our developments.
- ◆ Conducts periodic inspection of properties to ensure buildings, units and grounds are maintained in good repair and free of health and safety hazards.
- ◆ Conducts long-term planning of capital improvements to properties including physical and energy efficiency improvements which reduce the utility costs of residents.

In addition to ensuring safety and habitability through HUD's HQS compliance and other efforts, such as requirements for carbon monoxide detectors, the Housing Choice Voucher (HCV) program provides notices to landlords and tenants warning them of the hazards of LBP.

Discussion:

The Housing Authority operates several affordable housing programs including Public Housing, year round Farm Labor Housing, Seasonal Migrant Farm Worker Housing, and several smaller affordable housing properties including units funded under the Neighborhood Stabilization Program (NSP) and the HCV Program (Section 8).

Currently, there is no other funding or authorization from HUD to increase the number of public housing units; however, the Housing Authority is always working to increase the stock of affordable housing in Stanislaus County through other available resources, programs, and partnerships as opportunities arise.

The current need for public housing is identified by the number of persons on the program waitlists. Specific to public housing, the Housing Authority maintains nine site-based waiting lists countywide. Seven of these waiting lists are for units located in AMPs 1 and 2. On these seven lists there are currently a total of 3,994 families. Table MA-11.2 includes a detailed breakdown by area and bedroom size for AMPs 1 and 2.

Table MA-11.2 – Housing Authority of the County of Stanislaus

Housing Authority of the County of Stanislaus						
Number on Waiting List for Conventional Public Housing – Stanislaus Urban County						
Area	1 Bdrm	2 Bdrm	3 Bdrm	4 Bdrm	5 Bdrm	Total
AMP 1						
Ceres	638	733	144	19	0	1534
Hughson	192	210	24	6	0	432
Oakdale	270	247	34	0	0	551
Turlock	422	453	75	8	0	958
AMP 2						
Newman	134	86	19	0	0	239
Patterson	0	196	42	2	0	240
Westley	4	14	18	4	0	40
Totals	1660	1939	356	39	0	3994

Data Source: Housing Authority of Stanislaus County, 2015

The Housing Authority operates 647 conventional public housing units throughout Stanislaus County in five AMPs. AMP 1 contains a total of 149 units located in Oakdale, Hughson, Ceres, and City of Turlock. AMP 2 contains a total of 66 units located in Newman, Patterson and Westley. The remaining 432 units are located in AMPs 3, 4, and 5 in the City of Modesto. Table MA-11.3 below includes a detailed breakdown by area and bedroom size for AMPs 1 and 2.

Table MA-11.3 – Housing Authority of the County of Stanislaus

Housing Authority of the County of Stanislaus						
Number of Conventional Public Housing – Stanislaus Urban County						
Area	1 Bdrm	2 Bdrm	3 Bdrm	4 Bdrm	5 Bdrm	Total
AMP 1						
Ceres	8	10	22	6	2	48
Hughson	12	6	18	9	0	45
Oakdale	4	16	6	0	0	26
Turlock	4	17	8	1	0	30
AMP 2						
Newman	2	10	4	0	0	16
Patterson	0	8	12	8	2	30
Westley	0	0	12	6	2	20
Totals	30	67	82	30	6	215

Data Source: Housing Authority of Stanislaus County, 2015

The Housing Authority currently administers 1,781 properties of which 647 are “conventional” public housing units (90 of these are owned by the Riverbank Housing Authority but managed by the Housing Authority), 450 are “private stock,” 20 are mobile home spaces, and 356 are housing units for year-round farm workers, and 218 are for migrant farm laborers.

Although the Housing Authority did not specify their locations, it seems reasonable to assume that most if not all of the farm labor units are in Stanislaus County's unincorporated area. Of the 647 units categorized as conventional public housing, the Housing Authority indicated that 48 are located in Ceres, 30 in Patterson, 26 in Oakdale, and 16 in Newman. There are no conventional units in Waterford. Twenty conventional units are located in the unincorporated town of Westley. Thus, with respect to the 647 units that the Housing Authority defines as conventional, 120 are located within the Stanislaus Urban County area (18.5 percent). The Housing Authority did not identify the location of either the 450 units in its private stock or its 20 mobile homes.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

The most comprehensive analysis of the homeless population and service availability in Stanislaus County is conducted by the Stanislaus CoC. To obtain demographic data on the homeless and those at risk of becoming homeless, a point-in-time survey is conducted annually.

According to the HCD data for the Stanislaus County Housing Element, there are 322 family beds, 555 adult-only beds, and 61 children-only beds for a total 938 year-round beds in Stanislaus County. No seasonal beds were identified.

:

Facilities and Housing Targeted to Homeless Households

Table MA-13 shows the number of shelter beds in Stanislaus County by type.

Table MA-13 – Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year-Round Beds (Current & New)	Voucher/Seasonal/Overflow Beds	Current & New	Current & New	Under Development
Stanislaus County					
Households with Adult(s) and Child(ren)	314	0	118	262	N/A
Households with Only Adults	16	233	154	116	N/A
Chronically Homeless Households	0	0	0	141	N/A
Veterans	0	0	0	47	N/A
Unaccompanied Youth	62	0	0	0	N/A

Data Source: Stanislaus County's 2014 Point-In-Time (PIT) Homeless Count Inventory List

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons.

- ◆ Intake, Referral, Coordinated Assessment
- ◆ Health
- ◆ Mental Health
- ◆ Employment Services

The following represents a local inventory of these service providers and their respective services including but not limited to health, mental health, and employment services that can be accessed by homeless persons within the Stanislaus Urban County.

Alliance Worknet

Alliance Worknet offers a variety of resources including job search assistance, resume development, career counseling, occupational skills training, and job placement assistance in order to assist job seekers in obtaining employment in Stanislaus County. This includes three Career Resource Centers in Stanislaus County which provide these services free of charge to the general public.

AspiraNet

AspiraNet's Stanislaus Academy in the City of Turlock prepares students in fifth through twelfth grade in need of special education to once again be enrolled in a traditional public school setting. Among the many services provided, AspiraNet provides vocational education and job training through its California Department of Education Workability program.

BHRS (Inpatient, PSH Supportive Service, Street Outreach, Telecare, ACCESS Team)

Behavioral Health and Recovery Services (BHRS) administers Stanislaus County's behavioral health and recovery services. This includes providing integrated mental health services to adults with a serious mental illness and to children and youth with a serious emotional disturbance. BHRS provides outpatient and residential alcohol and drug treatment and prevention services. The Housing and Employment Services division of BHRS works to provide supportive housing to those in need. BHRS provides training courses to the general public to engage the community in assisting those who need treatment for a mental health illness in obtaining services.

California Conservation Corps

The California Conservation Corps provides young men and women between the ages of 18 and 25 the opportunity to work for a year outdoors to improve California's natural resources and to assist with emergency response.

Central Valley Opportunity Center (CVOC)

Central Valley Opportunity Center (CVOC) is a nonprofit employment training and service provider serving the counties of Stanislaus, Merced, and Madera. CVOC services include vocational education, remedial education, English language instruction, housing assistance, energy payment assistance, emergency supportive services, transportation, emergency food, youth employment, health care acquisition, child care services, and community education services. CVOC has effectively provided a comprehensive package of services to over 100,000 customers.

STANWORKS - Community Services Agency (CSA)

The Stanislaus County Community Services Agency (CSA) oversees the County's Welfare-To-Work program which helps CalWORKS customers find and keep a job. CalWORKS is a State welfare program that gives cash aid and services to eligible needy California families. The Welfare-To-Work program also includes assisting with job training to upgrade persons to higher paying jobs. This agency's mission is to protect children and adults who are at risk, preserve families, provide temporary economic assistance, promote personal responsibility in the areas of job readiness and self-sufficiency, and practice program and system integrity through innovative and effective business strategies.

Disability Resource Agency for Independent Living (DRAIL)

The Disability Resource Agency for Independent Living (DRAIL) is a nonprofit corporation that provides persons with disabilities assistance obtaining Social Security benefits, acquiring adaptive medical aids, and gaining necessary accommodations to participate in vocational training. DRAIL has offices located in Modesto, Stockton, and Sonora.

Employment Development Department (EDD)

The Employment Development Department (EDD) is a State agency that provides services to Californians under Unemployment Insurance, State Disability Insurance, workforce investment, and Labor Market Information programs. Particularly relevant services include helping job seekers obtain employment, administering workforce investment programs, and assisting disadvantaged recipients in becoming self-sufficient.

Golden Valley Health Center (Corner of Hope Homeless Outreach Program)

The Golden Valley Health Center's mission is to improve the health status of patients by providing quality, managed primary health care services to people in Stanislaus County, regardless of language, and financial, or cultural barriers. Free health services, including dental, vision, general medical and mental health services, are available for the homeless. There are currently thirteen medical facilities located in Stanislaus County. There are six facilities in Modesto, two in the City of Turlock, and one each in Ceres, Newman, Patterson, Riverbank, and Westley.

Health Services Agency (HSA)

The mission of the Stanislaus County HSA is to lead the development, implementation, and promotion of public policy and health care services to achieve physical, psychological and social well-being. In partnership with local hospitals and physician groups, it implements and promotes a health delivery system that ensures that Stanislaus County residents have access to quality health care. The Stanislaus County HSA offers a variety of programs aimed at supporting Stanislaus County residents living with HIV/AIDS including the Care Program and the AIDS Drug Assistance Program Services, including an anonymous, walk-in HIV clinic as well as an STD clinic with family planning services. HSA also operates a Medically Indigent Adult Program to indigent residents who would otherwise have little or no means of access to or coverage for medical services.

Interfaith Ministries

Interfaith Ministries of Greater Modesto serves thousands of individuals and families in Modesto, Ceres, Salida, Empire, and Waterford with emergency food and clothing and the food coalition.

Job Corps

The U.S. Department of Labor administers Job Corps which is a no-cost education and vocational training program for persons between the ages of 16 and 24 who qualify as low income. Job Corps helps young people learn a career, earn a high school diploma or GED, and find and keep a job.

NAMI

The National Alliance for Mental Illness (NAMI) is the nation's largest grassroots mental health organization. With regard to employment assistance, NAMI provides informational resources detailing vocational programs available to persons with a mental illness, legal protections, and health coverage options.

The Salvation Army of Stanislaus County

In addition to serving lunches to approximately 250 people per day, the Salvation Army also operates an emergency and transitional shelter for unaccompanied homeless veterans and non-veterans and adult women and men. The facility recently opened a health clinic which provides vision, dental, and basic medical care for homeless persons staying at the shelter. Currently, the Salvation Army is experiencing an increase in people needing food and clothing. This agency also offers a space for Narcotics Anonymous meetings, a medical care center for homeless persons, child care services, emergency response services, and a food and clothing closet for persons in need.

Stanislaus County Department of Aging & Veterans Services

The mission of this department is to maintain, enhance, and improve the quality of life for seniors in Stanislaus County by developing systems of home and community-based services, which promote independence and self-sufficiency. This department also provides assistance and advocacy to the men and women who served in the Armed Services of America, their dependents, and survivors and the general public in obtaining benefits and entitlements from the U.S. Department of Veterans Affairs, Department of Defense, and State and local agencies.

This department provides transportation services through Medi-Van to people in need of specialized medical attention in Bay Area hospitals and Veteran's Administration long-term care facilities. Through linkages with the CHSS, Central Valley Homeless Veterans, and the Housing Authority, homeless veterans are helped to find permanent housing. One of the main objectives of this department is to promote the value and benefit of hiring veterans, and to increase the understanding and awareness of veterans about entitlement and services.

TeleCare Corporation

Telecare Corporation is one of the nation's largest providers of adult mental health services to county and State governments and offers programs for individuals with co-occurring issues such as homelessness, substance abuse, developmental disabilities, or involvement in the forensic system. TeleCare manages one of Stanislaus County's Regional Service Teams, providing outpatient and intensive community support and mental health services to adults living in Stanislaus County. Services provided range from short-term interventions to long-term community treatment.

Turning Point (Empowerment Center)

Turning Point offers programs in seven California counties to assist persons with a mental illness. The Turning Point Empowerment Center in Modesto offers a variety of services to persons with a mental illness including housing and employment opportunities, links to treatment services for mental illness and co-occurring substance abuse problems, peer support, and reduced isolation.

United Samaritans Foundation

The United Samaritans Foundation, as referenced within its mission statement, is an advocate for the poor in the spirit of the Christian tradition. The foundation searches for areas of need and explores creative and holistic ways to meet those needs. The United Samaritans Foundation currently operates the Daily Bread Ministries, which include four mobile food service trucks from facilities in the communities of Turlock, Hughson, and Modesto that deliver nutritious lunches to nine Stanislaus County communities every day of the year. Volunteers help staff the food pantry, clothes closet, and various other services. In the City of Turlock, the foundation offers a place for homeless to receive mail, use the phone, shower, do laundry, and receive food and clothing. In Hughson, the Community Center complex includes a Stanislaus County Library, Stanislaus County medical office, pharmacy and cafe. This organization provides street outreach and free lunches to over 800 persons a day.

Valley Mountain Regional Center

The Valley Mountain Regional Center provides a variety of resources to children and adults with developmental disabilities in Stanislaus, San Joaquin, Amador, Calaveras, and Tuolumne counties. The Valley Mountain Regional Center provides some employment services for those with developmental disabilities including competitive employment, supported employment, sheltered employment, and pre-vocational training programs.

Veterans Administration

The U.S. Department of Veterans Affairs provides numerous benefits and services to veterans and their families including health care, vocational rehabilitation, education, and home loans. Some of the vocational training services provided include job training, employment accommodations, resume development, and job-seeking skills coaching. Additional services include assisting veterans in starting their own businesses or independent living services for those who are severely disabled.

Pacific Gas and Electric Company

The Pacific Gas and Electric Company (PG&E) operates the following programs for low-income people:

- ◆ California Alternate Rates for Energy (CARE) provides a monthly discount on energy bills for income-qualified households and housing facilities.
- ◆ Relief for Energy Assistance Through Community Help (REACH) provides emergency energy assistance to low-income families who are in jeopardy of losing their electric services. REACH is a one-time assistance program and is administered through the Salvation Army. Households who have experienced an uncontrollable or unforeseen hardship may receive an energy credit one time within an 18-month period.
- ◆ Energy Crisis Intervention Program uses State funds to provide assistance to low-income persons facing an energy-related crisis.
- ◆ Home Energy Assistance Program provides a direct energy assistance payment to a low-income customer's utility bill to help offset the high cost of heating and cooling.

Modesto Irrigation District

MID Cares Program: The Modesto Irrigation District offers a 23 percent discount to eligible low-income customers on their monthly bill.

Medical Life Support Program: A discount rate is offered to customers who depend on medical life support devices at home or whose qualified medical condition requires special heating or air conditioning needs. This discount halves the cost of the first 500 kilowatt hours (kWh) of electricity used in each billing cycle.

MID Weatherization Program: Provides energy-efficient measures to low-income rental or owner-occupied MID customers' homes. Work may include but is not limited to replacement of broken windows, refrigerator, and installation of insulation.

Turlock Irrigation District

TID Cares Program: The Turlock Irrigation District offers a discount to eligible low-income customers on their monthly bills.

Medical Life Support Program: A discount rate is offered to customers who depend on medical life support devices at home or whose qualified medical condition requires special heating or air conditioning needs. This discount halves the cost of the first 500 kWh of electricity used in each billing cycle.

TID Weatherization Program: Provides energy-efficient measures to low-income rental or owner-occupied TID customer's homes. Work may include but is not limited to replacement of broken windows, refrigerator, and installation of insulation.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Inventory of Facilities/Services related to Homelessness, AIDS, Mental Illness, or Substance Abuse.

Many of the agencies providing services to the homeless fall into more than one category. The most common overlap is between social service agencies serving the homeless and those that work with people in danger of becoming homeless. The agencies described in this section have been listed according to their primary function.

Center for Human Services (CHS)

The mission of CHS is to support the well-being of youth and families through quality prevention, education and counseling services, through programs that build and strengthen families and the neighborhoods in which they live, and in a way that honors and respects the diversity of the community. The following are facilities and services operated by CHS:

Hutton House

Hutton House is an emergency shelter for runaway, homeless, and youth in crisis who are ages 13-17. It provides services in a residential setting for eight youth at a time for a maximum of 15 days. Day services are available for youth and their families. Crisis line is available 24 hours a day.

Pathways

Pathways is a transitional living and support services program that focuses on youth who have "aged out" of the foster care placement system and have limited financial and emotional support. Pathways addresses several individual and community challenges such as homelessness, substance abuse, unemployment, lack of basic living skills, mental and health issues, limited education, and preparation for adulthood. Services include residential component with a 16-bed capacity in an apartment setting with support services. Supportive services that are available through the program are case management, mentoring basic/life skills, counseling and resource development. The program also serves teen moms and their infant toddler children. This program is offered through the CHS and is for young adults aged 18-21.

Children's Crisis Center (CCC) of Stanislaus County

The CCC is a nonprofit organization that provides child care and shelter services to abused, neglected, and at-risk children in the community. It also provides overnight emergency shelter on an as-needed basis. Clients generally come as referrals from the police department and the Stanislaus County's Child Protective Services. A 24-hour crisis intervention lines is also available for families in need. The following are facilities and services operated by CCC:

Cricket, Guardian, Marsha's, Sawyer, and Verda's Houses

The CCC Houses provide a shelter for up to 53 children, ages from birth to 17 years, who may be involved in a family crisis or a conflict situation. Individual, group, and family counseling is provided to residents. Program goals include the reunification of children with their families and the provision of follow-up and ongoing family counseling after the resident moves.

Homeless Prevention and Rapid Re-Housing Program (HPRP)

The CCC also provides rental assistance in conjunction with intensive case management to place homeless families into permanent housing and to prevent families from losing their current housing.

Community Housing and Shelter Services (CHSS)

CHSS is a nonprofit housing organization. This agency continues to be awarded funds to provide short-term rent, utility or mortgage assistance, tenant-based rental assistance, housing information, ESFP and TANF motel vouchers, housing for persons in recovery, and resource and referral services. This agency works with all city police departments, hospitals, mental health agencies, and all homeless providers throughout Stanislaus County including the Oakdale Seroptimists to provide opportunities to households with and without children to obtain and maintain permanent housing. The CHSS is also involved with the Homeless Prevention and Rapid Re-Housing Program discussed above.

Community Impact of Central Valley (CICV)

Community Impact of Central Valley (CICV) provides services to individuals with HIV/AIDS through the Housing Opportunities for Persons with AIDS Program. Under HOPWA, CICV is able to assist persons that qualify with security deposit, first-month rent, mortgage assistance, rental assistance, utilities, and food depending on their need. CICV can assist these individuals for up to six months and participants must show proof of hardship.

CICV also serves veterans. Additionally, CICV serves families through its tenant-based rental program, permanent housing placement services, and supportive services. Under the tenant-based program, individuals and their families will be provided rental assistance for up to one year. The program is renewed on a yearly basis, and if qualifying, the family can receive assistance past a year. People may also receive assistance, such as security deposit, first-month rent, credit check and utility hook-up, through CICV's permanent housing placement services. Lastly, CICV provides supportive services including transportation, food, and nutrition classes.

Family Promise

Family Promise of Greater Modesto is an interfaith ministry of 13 congregations in the Modesto area that provides transitional shelter at church sites and case management support for finding permanent affordable housing (Rapid Re-Housing) and other family support services to low-income homeless families with children.

Haven Women's Center of Stanislaus County

This center provides outreach to homeless women and children in the South Stanislaus County area and within the City of Modesto. Haven operates the Haven Shelter and Women's Haven. One is a four-bedroom house with kitchen, living room, children's room, three bedrooms, and an office. It provides 44 beds for women who have been abused or who are in life-threatening situations. The center also houses the children of abused women. Counseling services, weekly support groups, and legal advocacy programs are available.

Helping Others Sleep Tonight (HOST)

HOST is an emergency shelter in Patterson which houses up to eight homeless adult males throughout the coldest months of the winter. In collaboration with the Center for Human Services' Westside Family Resource Center, case managers also provide resource and referral services for all homeless persons in the area of Patterson.

Housing Authority of the County of Stanislaus (Housing Authority)

The Housing Authority administers 222 SPC Certificates (SOC 1 4 6,7) within Stanislaus County; of those 98 are utilized for individuals without children and 124 for families with children. Participants pay 30 percent of their income toward rent and receive supportive services through the Stanislaus County Assistance Project, the Stanislaus County Department of Mental Health, or Stanislaus County Integrated Services Agency. The Housing Authority also administers HUD-VASH vouchers which help provide permanent supportive housing to homeless veterans.

Miller Pointe

The Miller Pointe project is a collaborative effort involving the Housing Authority and BHRS. The Housing Authority and BHRS are working together in order to develop affordable housing for individuals who are receiving services through BHRS. Miller Pointe is a 15-unit permanent rental housing project serving very low-income households.

The Modesto Men's Gospel Mission and Women's Mission

This privately funded and faith-based shelter is located on a two-block campus that includes seven buildings. This agency provides a limited stay of seven nights on the floor, and three nights out, and also serves two meals a day (Monday through Friday), and three meals on the weekend. The mission serves 150,000 meals per year to clients and to the general public. The Gospel Mission serves approximately 2,500 people each year. The majority of men (95 percent) that arrive at the mission are locals raised in Stanislaus County and 60 percent are under 36 years of age. The following are facilities and services operated by Modesto Gospel Mission:

Mission Emergency Shelter

The mission provides beds for temporary shelter to house up to 100 unaccompanied adult men and women and up to 90 women and children for a maximum stay of fourteen days. Both missions require that those seeking shelter participate in religious activities (this requirement also exempts the missions from receiving any Federal or State funding assistance). Therefore, the missions must rely strictly on private donations from local churches and the community. Their program also includes Christian drug and alcohol rehabilitation group counseling to its clients.

New Life Program

Residential on-site program for up to 41 unaccompanied adult men and women who need specialized help to return to societal living including physical, spiritual, emotional, social, educational, vocational, employment, and financial programs designed to help them break the cycle of homelessness, despair and addiction.

Exodus

The Exodus Program offers up to 20 transitional beds to unaccompanied adult men and women who have successfully gone through the 30-day New Life Program, yet require additional supportive housing before transitioning into stable permanent housing.

The Salvation Army of Stanislaus County

In addition to serving lunches to approximately 250 people per day, the Salvation Army also operates an emergency and transitional shelter for unaccompanied homeless veterans and non-veterans and adult women and men. The facility also recently opened a health clinic which provides vision, dental, and basic medical care for homeless persons staying at the shelter. Currently, the Salvation Army is experiencing an increase in people needing food and clothing. This agency also offers a space for Narcotics Anonymous meetings, a medical care center for homeless persons, child care services, emergency response services, and a food and clothing closet for persons in need. The following are facilities and services operated by the Salvation Army:

Berberian Emergency Shelter

The Berberian Emergency Shelter provides 100 cold weather beds to unaccompanied homeless adult men and women and up to 30 year-round beds to homeless persons with special medical needs.

Berberian Transitional Living Facility

The Berberian Transitional Living Facility provides 20 beds for homeless male and female veterans and 20 beds for unaccompanied homeless males and females for up to 24 months. Participants of the Berberian Transitional Living Facility work with case managers to improve access to medical care, employment and permanent housing.

STANCO

STANCO's mission is to promote the construction and development of affordable housing opportunities for residents of Stanislaus County. It currently operates eight properties for permanent affordable housing. STANCO conducts outreach to place people in supportive housing. It also provides transitional housing to assist the homeless, housing advocacy for renters, and the development of affordable housing. The agency's objective is to transition program participants from the streets to temporary housing, with the eventual goal of independent and permanent living arrangements. STANCO operates 33 transitional beds for homeless families with children and 37 beds for unaccompanied adult homeless males and females.

Turlock Gospel Mission (TGM)

Working with a variety of different churches throughout the City of Turlock, TGM provides a hot meal to homeless and food insecure guests 365 days a year. From mid-November until early April, TGM provides overnight shelter for up to 30 women and children each night. Staff works with guests to build relationships, support and encourage, in every way possible and to maintain security. Overnight guests

eat dinner with other TGM guests, but instead of returning to the TGM building after dinner, they stay overnight at the host church for that week. A light breakfast is provided in the morning.

Turning Point

Turning Point Community Programs provides integrated, cost-effective mental health services, employment and housing for adults, children and their families that promote recovery, independence and self-sufficiency. They provide case management, crisis intervention, respite care, mentoring programs, and job training and transportation assistance to persons struggling to overcome mental illness throughout Stanislaus County. The following are facilities and services operated by Turning Point.

Garden Gate Respite

Turning Point Respite Center at Garden Gate in Modesto provides a safe home-like environment for up to 12 homeless mentally ill persons nightly. This program links mentally ill homeless individuals to community resources while providing basic care such as home cooked meals and clothing. Open 24/7, the center works together with law enforcement to reduce incarceration and victimization. The center works with an outreach team to engage and connect individuals with needed services. Garden Gate Innovation is also operated by Turning Point.

Affordable and Supportive Housing Projects

Through the Stanislaus CoC, Turning Point's Affordable and Supportive Housing Projects provide public support services to 21 unaccompanied adults with mental illness.

We Care Program

We Care originated from the Turlock Community Collaborative of 2003 as a result of the urgent need for an additional emergency shelter in Stanislaus County. The program is based in the City of Turlock, but serves the surrounding unincorporated communities with essential services for the homeless during inclement weather months. This program serves approximately 34 homeless individuals per night during the months of November through March. We Care is currently in the process of amending its Conditional Use Permit, through the City of Turlock, to add an additional 15 emergency shelter beds.

Rapid Re-Housing Program

We Care also provides rental assistance in conjunction with intensive case management to place homeless families into permanent housing through their Rapid Re-housing Program.

MA-35 Special Needs Facilities and Services - 91.210(d)

Introduction

Many non-homeless individuals need supportive housing and services to enable them to live independently and to avoid homelessness or institutionalization, including those persons returning from mental health and physical health institutions. As previously discussed in the Needs Assessment section of this Con Plan, these subpopulations include but, are not limited to, the elderly, persons with physical, mental, or developmental disabilities, persons with HIV/AIDS, victims of domestic violence, children leaving group homes or aging out of foster care, farm workers, and substance abusers. This section provides a brief summary of the facilities and services available to these subpopulations, as noted in the previous section (MA-30 Homeless Facilities and Services). This is not meant to be a comprehensive list of all the services, facilities, programs, or agencies that serve these subpopulations in Stanislaus County.

Additionally, many of the agencies noted below serve homeless persons as discussed in the previous section (MA-30 Homeless Facilities and Services).

Housing Opportunities for Persons with AIDS (HOPWA) Program

CICV provides services to individuals with HIV/AIDS through the Housing Opportunities for Persons with AIDS Program. Under HOPWA, CICV is able to assist persons that qualify with security deposit, first-month rent, mortgage assistance, rental assistance, utilities, and food depending on their need. CICV can assist these individuals for up to six months and participants must show proof of hardship.

Additionally, CICV serves these families through its tenant-based rental program, permanent housing placement services, and supportive services. Under the tenant-based program, individuals and their families will be provided rental assistance for up to one year. The program is renewed on a yearly basis, and if qualifying, the family can receive assistance past a year. People may also receive assistance, such as security deposit, first-month rent, credit check and utility hook-up, through CICV’s permanent housing placement services. Lastly, CICV provides supportive services, including transportation, food, and nutrition classes, to people and their families that are experiencing AIDS..

HOPWA Assistance Baseline Table

Table MA-14.1 shows the type of HOPWA assistance in Stanislaus County; however, the Housing Authority and CICV do not collect this data.

Table MA-14.1 – HOPWA Assistance Baseline

Type of HOWA Assistance	Number of Units Designated or Available for People with HIV/AIDS and their families
Stanislaus County	
TBRA	Data not available
PH in Facilities	Data not available
STRMU	Data not available
ST or TH Facilities	Data not available
PH Placement	Data not available

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Elderly/Frail Elderly

The majority of elderly persons have a fixed income and deal with physical constraints, which makes them a group with special housing needs. Since the elderly often live alone and have limited mobility, housing units best suited to their needs are smaller units located near public transportation, medical facilities, shopping, and other services. Security is also a concern for the elderly, primarily because they often are more vulnerable to crime. The elderly often require special design considerations such as ramps and handrails to assist with mobility. Retirement complexes and convalescent homes offer alternative housing choices, but most of the elderly live in independent residences, often in substandard conditions.

It is estimated that 7,801 of the total 40,704 households in unincorporated Stanislaus County were headed by persons over the age of 65 in 2012, representing approximately 19.2 percent of the total unincorporated household population, which is slightly lower than the 19.7 percent countywide.

Agencies that provide services and resources to the elderly include: Area Agency on Aging, Howard Training Center, Healthy Aging, Catholic Charities, CRLA Senior Law Project, Valley Mountain Regional Center (foster grandparent and senior companion program), Adult Protective Services, AARP, ATEX Care, In-home Support Services, Lifeline Response Services (Golden Valley Senior Life Line), Program to Encourage Active and Rewarding Lives for Seniors (PEARL), Stanislaus Elder Abuse Prevention Alliance (SEAPA), and Society for the Blind (Senior Impact Project).

Persons with Disabilities

There are a variety of disabilities, including sensory, physical, mental, and developmental. Disabilities can result in mobility, self-care, and employment limitations. According to the Stanislaus County Housing Element there are approximately 37,333 persons in unincorporated Stanislaus County with a disability.

Agencies that provide assistance to persons with disabilities include Disability Resource Agency for Independent Living (DRAIL), Modesto Independent Living Center, National Alliance for the Mentally Ill (NAMI), Howard Training Center, Stanislaus County Office of Education John F. Kennedy Center for Special Education, Valley Mountain Regional Center, Ear of the Lion, Society for Handicapped Children and Adults, Vision Impaired Person Support, United Cerebral Palsy, California State Rehabilitation Department, BHRS (Inpatient, Permanent Supportive Housing Service, Street Outreach, and ACCESS Team), TeleCare Corporation, Turning Point (Empowerment Center) that provides countywide information or referrals on services and resources for persons with disabilities, and Stanislaus County with its HOME fund activity of emergency and major housing rehabilitation to address handicap accommodation retrofits.

Developmentally Disabled

Many developmentally disabled persons can live and work independently in a conventional housing environment. More severely disabled individuals require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Because developmental disabilities exist before adulthood, the first issue in supportive housing for the developmentally disabled is the transition from the person's living situation as a child to an appropriate level of independence as an adult.

In addition to many of the services listed above, the California Department of Developmental Services currently provides community-based services to approximately 243,000 persons with developmental disabilities and their families through a statewide system of 21 regional centers, four developmental centers, and two community-based point of entry to services for people with developmental disabilities. The Valley Mountain Regional Center in Stockton serves all of Stanislaus County. The center is a private, nonprofit community agency that contracts with local businesses to offer a wide range of services to individuals with developmental disabilities and their families.

According to the 2015–2023 Stanislaus County Housing Element, there are approximately 3,070 persons living within zip codes of unincorporated Stanislaus County with a developmental disability. Refer to services above for services providers that support persons with developmental disabilities.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Residential care facilities provide supportive housing for persons with disabilities. The types of facilities available in the Stanislaus Urban County include:

- ◆ Group Homes: Facilities of any capacity and provide 24-hour non-medical care and supervision to children in a structured environment. Group homes provide social, psychological, and behavioral programs for troubled youths.
- ◆ Adult Residential Facilities: Facilities of any capacity that provide 24-hour nonmedical care for adults ages 18 through 59, who are unable to provide for their own daily needs. Adults may be physically handicapped, developmentally disabled, and/or mentally disabled.
- ◆ Residential Care Facilities for the Elderly: Facilities that provide care, supervision and assistance with activities of daily living, such as bathing and grooming. They may also provide incidental medical services under special care plans. These facilities are regulated by the State Department of Social Services (DSS).

Refer to programs listed above for service providers.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

Given the limited CDBG funding, the Stanislaus Urban County proposes to focus ESG public service funds for Fiscal Year 2015-2016 on emergency cold-weather shelter for homeless persons, emergency food assistance for seniors and low-income households, and services for strengthening families and at-risk youth. In addition, CDBG funds will be used to fund fair housing and tenant/landlord counseling, economic development in the form of technical assistance for qualified business owners, and infrastructure projects in low-income neighborhoods throughout the Stanislaus Urban County and City of Turlock. Some limited CDBG funds may be utilized for down payment assistance in the City of Turlock.

Jurisdictions in Stanislaus County are required to update the Housing Element of the General Plan by December 2015. As part of that update, the jurisdictions must address the provision of transitional and supportive housing for the homeless and persons with disabilities. Jurisdictions will be reviewing their zoning codes for constraints to housing for persons with disabilities.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

In Fiscal Year 2015, the Stanislaus Urban County and City of Turlock may fund the following housing and supportive services projects and programs:

1. Improve Infrastructure in Low-income Neighborhoods
2. Acquisition and Single-Multifamily Rehabilitation
3. Affordable Housing for Seniors
4. Rehabilitate Existing Housing
5. First-time Homebuyer Assistance
6. Technical Assistance for Small Businesses
7. Improve Accessibility

8. Fair Housing and Tenant/Landlord Services
9. Access to Public Services for Low-Income Households and Special Populations
10. Shelter for Homeless Persons
11. Rapid Re-Housing for Homeless Persons
12. Homeless Prevention for Extremely Low-Income Households and Individuals
13. Homeless Services Data Collection

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Potential constraints to housing development in Stanislaus County vary by area, but generally may include infrastructure, residential development fees, land use controls, development standards, development and building permit application processing times, and resource preservation. An analysis of some of these potential constraints is detailed in the 2015–2023 Stanislaus County Housing Element Update and the City of Turlock 2007–2014 Housing Element. Following is a summary of some potential constraints.

Fee Structure

Part of the cost associated with developing residential units is related to the fees or other exactions required of developers to obtain project approval consistent with State law. Lengthy review periods can increase financial and carrying costs, which in turn can increase project-related expenses that are passed along to project occupants in the form of higher purchase prices or rents.

Stanislaus County requires an application fee of \$4,056 or higher depending on processing time for a General Plan amendment and \$4,156 for a zone change. Stanislaus County's application fees are based on a full recovery of costs associated with the processing of land use applications. It is Stanislaus County's policy that all development "pay its own way" and not be subsidized by the General Fund.

According to the City of Turlock 2007–2014 Housing Element, a brief survey shows that the City of Turlock charges somewhat above-average planning application fees when compared to its neighboring jurisdictions. For example, the City of Turlock requires a deposit of \$8,275 for a General Plan amendment, while Stanislaus County (\$4,156), Ceres (\$2,000), and Patterson (\$2,760) fees are all less. In the City of Turlock, the average cost for a 20-lot subdivision would be between \$5,070 and \$7,230, while in Patterson (\$3,390), Ceres (\$1,020), and Stanislaus County (\$4,170), the total cost is several thousand dollars less. The City of Turlock's fees are similar to Stanislaus County and designed to recover costs for all City departments, not just the Planning Division's costs of reviewing the application.

Fees, land dedications, or improvements are also required in most instances to provide an adequate supply of necessary infrastructure (streets, sewers, and storm drains) to support the new development as well as public parkland. While such costs are charged to the developer, most, if not all, additional costs are passed to the ultimate product consumer.

There are numerous fire and school districts within Stanislaus County, and all charge impact fees. School fees range from \$2.60 to \$5.16 per square foot with an average of \$3.88 per square foot and can add significantly to the cost of development, but are consistent with the amounts and parameters

established by California Government Code Sections 65995 and 66000 et seq. Fire fees range from \$0.24 to \$0.60 per square foot with an average of \$0.42 per square foot.

Compliance with numerous governmental laws or regulations can also add to the cost of housing. Requirements relating to site coverage, parking, and open space in developments can indirectly increase costs by limiting the number of dwelling units that can occupy a given piece of land. This is especially true with larger units when the bulk of the buildings and increased parking requirements occupy a large share of the site. Connecting to public water and sewer systems, street improvements, storm drain, and fire suppressions requirements can also add significant costs to residential projects.

Other development and construction standards can also impact housing costs. Such standards may include the incorporation of additional design treatment (architectural details or trim, special building materials, landscaping, and textured paving) to improve the appearance of the development. Other standards included in the California Building Code requiring developers to address such issues as noise transmission and energy conservation can also result in higher construction costs. While some features (interior and exterior design treatments) are included by the developer as amenities to help sell the product in the competitive market, other features (i.e., those required to achieve compliance with energy conservation regulations) may actually reduce monthly living expenses. However, all these features may add to the initial sales price, resulting in an increasingly difficult hurdle for many new homebuyers to overcome.

Land Costs, Construction, and Financing

Land Costs: The cost of raw, developable land creates a direct impact on the cost for a new home and is considered a possible constraint. A higher cost of land raises the price of a new home. Therefore, developers sometimes seek to obtain approvals for the largest number of lots allowable on a parcel of land. Residential land prices in Stanislaus County average around \$35,000 per acre of raw single-family residential land and \$200,000 per acre of raw multi-family residential land based on information from LoopNet.com.

Construction: Factors that affect the cost of building a house include the type of construction, materials, site conditions, finishing details, amenities, and structural configuration. Stanislaus County estimates the construction cost of a single-family home to be approximately \$98 per square foot or \$245,000 for a 2,500-square-foot home; however, the cost can be much higher depending on the quality of construction. An internet source for construction cost data (www.building-cost.net), provided by the Craftsman Book Company, estimates the cost of a single-story four-cornered home in Stanislaus County to be approximately \$141 per square foot; actual cost will vary by area of Stanislaus County. This cost estimate is based on a 2,500-square-foot house of good quality construction including a two-car garage and central heating and air conditioning. The total construction costs excluding land costs are estimated at approximately \$353,076. A typical multi-family 500-square-foot unit, based on recent examples in Stanislaus County, is \$98 per square foot, resulting in a construction cost of \$49,000.

If labor or material costs increased substantially, the cost of construction in Stanislaus County could rise to a level that impacts the price of new construction and rehabilitation. Therefore, increased construction costs have the potential to constrain new housing construction and rehabilitation of existing housing, but are not a constraint at this time.

Financing: The cost of borrowing money to finance the construction of housing or to purchase a house affects the amount of affordably priced housing throughout Stanislaus County. Fluctuating interest rates can eliminate many potential homebuyers from the housing market or render a housing project that could have been developed at lower interest rates infeasible. When interest rates decline, sales increase. The reverse is true when interest rates increase. Over the past decade, there was dramatic growth in alternative mortgage products, including graduated mortgages and variable rate mortgages. These types of loans allow homeowners to take advantage of lower initial interest rates and to qualify for larger home loans. However, variable rate mortgages are not ideal for low- and moderate-income households that live

on tight budgets. In addition, the availability of variable rate mortgages has declined in the last few years due to greater regulation of housing lending markets. Variable rate mortgages may allow lower-income households to enter into homeownership, but there is a definite risk of monthly housing costs rising above the financial means of that household. Therefore, the fixed interest rate mortgage remains the preferred type of loan, especially during periods of low, stable interest rates.

Non-Governmental Constraints

Although recent economic conditions have seen housing prices increase and interest rates have remained low, it can be significantly more difficult to obtain a home loan. In particular, people with short credit history, lower incomes, self-employment incomes, or other unusual circumstances have had trouble qualifying for loans or are charged higher rates.

Fair Housing

Fiscal Year 2015–2020 Regional Analysis of Impediments to Fair Housing Choice (AI) identified a lack of multi-family affordable housing in the Stanislaus Urban County. Further the document provided the following recommendations:

- ◆ Action 1.1: Continue to provide assistance to preserve existing affordable housing and to create new affordable housing.
- ◆ Action 1.2: Continue to offer regulatory relief and incentives for the development of affordable housing.
- ◆ Action 1.3: Continue to ensure the availability of adequate sites for the development of affordable housing.
- ◆ Action 2.1: Continue to pursue available and appropriate State and Federal funding sources to support efforts to construct housing meeting the needs of lower-income households.
- ◆ Action 2.2: Continue to support the Stanislaus Housing Authority Section 8 Housing Choice Voucher (HCV) Rental Assistance Program, including distribution of program information at the public counters for the Stanislaus County Department of Planning and Community Development, City of Turlock Housing Services, and all Stanislaus Urban County member jurisdictions. Stanislaus County and the City of Turlock will hold periodic meetings with representatives of the Housing Authority of the County of Stanislaus to discuss actions Stanislaus County, the City of Turlock, and Stanislaus Urban County member jurisdictions can take to coordinate housing program implementation.
- ◆ Action 2.3: Follow through on the Housing Element policies and programs.
- ◆ Action 3.1: When selecting lending institutions for contracts and participation in local programs, Stanislaus County, the City of Turlock, and Stanislaus Urban County member jurisdictions may prefer those with a Community Reinvestment Act (CRA) rating of “Outstanding” and may exclude those with a rating of “Needs to Improve” or “Substantial Noncompliance” according to the most recent examination period published by the Federal Financial Institutions Examination Council (FFIEC). In addition, the Stanislaus Urban County and the City of Turlock may review an individual institution’s most recent HMDA reporting as most recently published by the FFIEC.
- ◆ Action 3.2: Strengthen partnerships with lenders to discuss lenders’ community reinvestment goals, including home mortgages, home improvement loans, and community development

investments to be made in low- and moderate-income neighborhoods in the Stanislaus Urban County and in the City of Turlock.

- ◆ Action 4.1: Work cooperatively with the real estate industry to develop ways for local agents to become more familiar with Stanislaus Urban County and City of Turlock housing and rental programs.
- ◆ Action 4.2 Encourage Realtors to seek fair housing training.
- ◆ Action 5.1: Conduct more outreach to educate tenants, and owners and agents of rental properties, regarding their fair housing rights and responsibilities.
- ◆ Action 5.2: Provide educational literature in English, Spanish, and other appropriate languages.
- ◆ Action 6.1: Support efforts to enforce fair housing rights and provide redress to persons who have been discriminated against.
- ◆ Action 6.2: Support efforts to increase the awareness of discrimination against all Federal and State protected classes.
- ◆ Action 7.1: Review zoning and related regulations to determine degree of adequate opportunity in the community for affordable housing to exist and to develop new affordable housing options.
- ◆ Action 8.1: Examine possible gaps in public infrastructure and services, especially for the needs of persons with disabilities, seniors, and low-income residents via a Disadvantaged Unincorporated Communities assessment. If significant gaps are found, explore methods to address the gaps and incorporate public improvements and services into local infrastructure and service plans.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

This section of the Con Plan describes the Stanislaus Planning Area's economic development asset needs, whereas the Needs Assessment section of this Con Plan, specifically NA-50 (Non-Housing Community Development Needs), described the Stanislaus Planning Area's needs for public facilities, improvements, and services.

Economic Development Market Analysis

Business Activity

Table MA-15 shows the major business activities in the Stanislaus Planning Area and individual jurisdictions within the Planning Area. In the Stanislaus Planning Area, the major business activities include manufacturing (34 percent share of all jobs), education and health services (28 percent), and retail trade (26 percent). In the City of Turlock, the major business activities are education and health care services (19 percent) manufacturing, and retail trade (16 percent). Note that for some individual cities, data is not collected by the Census Bureau.

Table MA-15 - Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Stanislaus Planning Area					
Agriculture, Mining, Oil & Gas Extraction	7,726	10,165	17	21	4
Arts, Entertainment, Accommodations	8,960	6,141	21	19	-1
Construction	4,674	3,956	10	10	-1
Education and Health Care Services	11,990	8,569	29	28	-1
Finance, Insurance, and Real Estate	3,508	2,307	8	7	-1
Information	1,101	329	2	1	-1
Manufacturing	12,631	12,684	29	34	4
Other Services	5,412	4,592	14	15	1
Professional, Scientific, Management Services	5,339	2,449	12	7	-5
Public Administration	0	0	0	0	0
Retail Trade	11,582	8,525	26	26	0
Transportation and Warehousing	3,711	4,648	8	10	2
Wholesale Trade	4,781	4,520	11	11	0
Total	81,415	68,885			
City of Turlock					
Agriculture, Mining, Oil & Gas Extraction	1,515	541	7	3	-5
Arts, Entertainment, Accommodations	2,123	2,505	10	13	2
Construction	1,009	745	5	4	-1
Education and Health Care Services	3,234	3,799	16	19	3
Finance, Insurance, and Real Estate	855	845	4	4	0
Information	240	129	1	1	-1
Manufacturing	3,005	3,125	15	16	1
Other Services	1,722	1,974	8	10	2
Professional, Scientific, Management Services	1,240	781	6	4	-2
Public Administration	0	0	0	0	0
Retail Trade	2,475	3,175	12	16	4
Transportation and Warehousing	840	499	4	3	-2
Wholesale Trade	1,017	724	5	4	-1
Total	19,275	18,842			

Data Source: 2007-2011 ACS (Workers), 2011 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Table MA-16 shows the number of person in the labor forces by age.

Table MA-16 - Labor Force

Stanislaus Planning Area	
Total Population in the Civilian Labor Force	135,478
Civilian Employed Population 16 years and over	116,008
Unemployment Rate	14.37%
Unemployment Rate for Ages 16–24	4.87%
Unemployment Rate for Ages 25–65	9.22%
City of Turlock	
Total Population in the Civilian Labor Force	33,789
Civilian Employed Population 16 years and over	29,215
Unemployment Rate	13.54%
Unemployment Rate for Ages 16-24	41.58%
Unemployment Rate for Ages 25-65	7.73%
City of Ceres	
Total Population in the Civilian Labor Force	21,337
Civilian Employed Population 16 years and over	18,382
Unemployment Rate	13.85%
Unemployment Rate for Ages 16-24	31.04%
Unemployment Rate for Ages 25-65	8.35%
City of Hughson	
Total Population in the Civilian Labor Force	2,723
Civilian Employed Population 16 years and over	2,333
Unemployment Rate	14.32%
Unemployment Rate for Ages 16-24	36.18%
Unemployment Rate for Ages 25-65	7.25%
City of Newman	
Total Population in the Civilian Labor Force	4,275
Civilian Employed Population 16 years and over	3,948
Unemployment Rate	7.65%
Unemployment Rate for Ages 16-24	8.24%
Unemployment Rate for Ages 25-65	5.17%
City of Oakdale	
Total Population in the Civilian Labor Force	9,771

Stanislaus Planning Area	
Civilian Employed Population 16 years and over	8,807
Unemployment Rate	9.87%
Unemployment Rate for Ages 16-24	19.02%
Unemployment Rate for Ages 25-65	6.25%
City of Patterson	
Total Population in the Civilian Labor Force	8,360
Civilian Employed Population 16 years and over	7,357
Unemployment Rate	12%
Unemployment Rate for Ages 16-24	23.50%
Unemployment Rate for Ages 25-65	6.85%
City of Waterford	
Total Population in the Civilian Labor Force	3,849
Civilian Employed Population 16 years and over	3,317
Unemployment Rate	13.82%
Unemployment Rate for Ages 16-24	59.69%
Unemployment Rate for Ages 25-65	7.64%

Data Source: 2007-2011 ACS

Table MA-17 provides occupations by sector for the Stanislaus Planning Area and individual jurisdictions within the Planning Area.

Table MA-17 – Occupations by Sector

Occupations by Sector	Number of People
Stanislaus Planning Area	
Management, business, and financial	18,644
Farming, fisheries, and forestry occupations	5,744
Service	11,511
Sales and office	27,360
Construction, extraction, maintenance, and repair	18,549
Production, transportation, and material moving	10,201
City of Turlock	
Management, business and financial	5,353
Farming, fisheries and forestry occupations	1,531
Service	3,238
Sales and office	7,543
Construction, extraction, maintenance and repair	2,728
Production, transportation and material moving	2,197

Occupations by Sector	Number of People
City of Ceres	
Management, business and financial	2,153
Farming, fisheries and forestry occupations	891
Service	1,911
Sales and office	2,997
Construction, extraction, maintenance and repair	3,004
Production, transportation and material moving	1,967
City of Hughson	
Management, business and financial	346
Farming, fisheries and forestry occupations	177
Service	272
Sales and office	488
Construction, extraction, maintenance and repair	209
Production, transportation and material moving	163
City of Newman	
Management, business and financial	603
Farming, fisheries and forestry occupations	190
Service	362
Sales and office	597
Construction, extraction, maintenance and repair	869
Production, transportation and material moving	446
City of Oakdale	
Management, business and financial	1,473
Farming, fisheries and forestry occupations	225
Service	874
Sales and office	1,473
Construction, extraction, maintenance and repair	1,147
Production, transportation and material moving	716
City of Patterson	
Management, business and financial	1,131
Farming, fisheries and forestry occupations	401
Service	583
Sales and office	947
Construction, extraction, maintenance and repair	1,633
Production, transportation and material moving	675

Occupations by Sector	Number of People
City of Waterford	
Management, business and financial	462
Farming, fisheries and forestry occupations	189
Service	297
Sales and office	578
Construction, extraction, maintenance and repair	728
Production, transportation and material moving	246

Data Source: 2007-2011 ACS

Travel Time

Table MA-18 shows the amount of travel time to work for residents in the Planning Area.

Table MA-18 – Travel Time

Travel Time	Number	Percentage
Stanislaus Planning Area		
<30 Minutes	69,501	65%
30–59 Minutes	23,786	22%
60 or More Minutes	12,958	12%
Total	106,245	100%
City of Turlock		
< 30 Minutes	19,943	74%
30-59 Minutes	5,286	20%
60 or More Minutes	1,837	7%
Total	27,066	100%
City of Ceres		
< 30 Minutes	12,178	72.57%
30-59 Minutes	2,532	15.09%
60 or More Minutes	2,072	12.35%
Total	16,782	100%
City of Hughson		
< 30 Minutes	1,524	71.02%
30-59 Minutes	540	25.16%
60 or More Minutes	82	3.82%
Total	2,146	100%
City of Newman		
< 30 Minutes	1,718	48.20%

Travel Time	Number	Percentage
30-59 Minutes	914	25.65%
60 or More Minutes	932	26.15%
Total	3,564	100%
City of Oakdale		
< 30 Minutes	4,873	59.85%
30-59 Minutes	2,525	31.01%
60 or More Minutes	744	9.14%
Total	8,142	100%
City of Patterson		
< 30 Minutes	2,448	36.02%
30-59 Minutes	2,345	34.50%
60 or More Minutes	2,004	29.48%
Total	6,797	100%
City of Waterford		
< 30 Minutes	1,373	45.27%
30-59 Minutes	1,347	44.41%
60 or More Minutes	313	10.32%
Total	3,033	100%

Data Source: 2007-2011 ACS

Education

Educational Attainment by Employment Status (Population 16 and Older)

Table MA-19 shows the level of educational attainment by employment status for person age 16 and older.

Table MA-19 - Educational Attainment by Employment Status

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Stanislaus Planning Area			
Less than high school graduate	19,426	4,117	12,663
High school graduate (includes equivalency)	26,634	4,080	10,373
Some college or associate's degree	31,478	3,414	9,638
Bachelor's degree or higher	18,025	878	3,596
City of Turlock			
Less than high school graduate	3,727	570	2,195

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
High school graduate (includes equivalency)	5,787	1,053	2,037
Some college or Associate's degree	7,318	716	2,386
Bachelor's degree or higher	6,874	298	1,121
City of Ceres			
Less than high school graduate	3,827	696	2,432
High school graduate (includes equivalency)	4,249	609	1,628
Some college or Associate's degree	5,100	446	1,210
Bachelor's degree or higher	1,781	122	315
City of Hughson			
Less than high school graduate	300	117	331
High school graduate (includes equivalency)	671	56	173
Some college or Associate's degree	770	48	143
Bachelor's degree or higher	364	0	77
City of Newman			
Less than high school graduate	813	76	433
High school graduate (includes equivalency)	1,038	42	356
Some college or Associate's degree	1,280	123	391
Bachelor's degree or higher	304	17	114
City of Oakdale			
Less than high school graduate	682	71	734
High school graduate (includes equivalency)	2,276	259	723
Some college or Associate's degree	2,773	276	729
Bachelor's degree or higher	1,322	30	270
City of Patterson			
Less than high school graduate	1,559	113	825
High school graduate (includes equivalency)	1,597	262	759
Some college or Associate's degree	2,264	170	456
Bachelor's degree or higher	803	79	200
City of Waterford			
Less than high school graduate	732	158	435
High school graduate (includes equivalency)	790	87	303
Some college or Associate's degree	769	56	192
Bachelor's degree or higher	383	0	36

Data Source: 2007-2011 ACS

Educational Attainment by Age

Table MA-20 shows educational attainment by age in the Stanislaus Planning Area and for individual jurisdictions within the Planning Area.

Table MA-20 – Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Stanislaus Planning Area					
Less than 9th grade	926	3,815	5,831	10,625	6,658
9th to 12th grade, no diploma	4,796	4,566	4,654	6,715	3,993
High school graduate, GED, or alternative	12,343	11,464	11,652	18,006	7,845
Some college, no degree	10,919	9,889	9,009	15,590	5,081
Associate's degree	925	2,435	2,242	5,461	1,604
Bachelor's degree	1,248	5,019	4,010	7,303	2,109
Graduate or professional degree	44	1,222	1,531	3,426	1,215
City of Turlock					
Less than 9th grade	159	440	733	2,154	1,424
9th to 12th grade, no diploma	1,202	863	859	1,443	934
High school graduate, GED, or alternative	2,711	2,313	2,691	3,873	2,109
Some college, no degree	3,747	2,714	1,692	3,514	1,313
Associate's degree	316	587	627	1,316	350
Bachelor's degree	633	2,200	1,509	2,164	752
Graduate or professional degree	24	735	615	1,082	427
City of Ceres					
Less than 9th grade	186	880	1,042	1,778	1,085
9th to 12th grade, no diploma	807	1,032	850	1,373	675
High school graduate, GED, or alternative	1,906	1,931	1,798	2,770	918
Some college, no degree	1,701	1,691	1,570	2,048	597
Associate's degree	187	493	241	713	98
Bachelor's degree	73	669	359	744	144
Graduate or professional degree	0	117	164	165	82
City of Hughson					
Less than 9th grade	0	90	97	269	86
9th to 12th grade, no diploma	35	90	38	164	67

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
High school graduate, GED, or alternative	350	425	183	292	167
Some college, no degree	133	170	256	313	83
Associate's degree	5	30	105	87	43
Bachelor's degree	33	33	116	168	21
Graduate or professional degree	0	21	47	56	50
City of Newman					
Less than 9th grade	19	91	197	468	239
9th to 12th grade, no diploma	40	339	173	54	109
High school graduate, GED, or alternative	457	452	330	654	209
Some college, no degree	280	625	322	520	127
Associate's degree	37	101	58	168	0
Bachelor's degree	0	83	66	246	16
Graduate or professional degree	0	0	14	26	38
City of Oakdale					
Less than 9th grade	33	64	207	286	277
9th to 12th grade, no diploma	360	255	225	450	358
High school graduate, GED, or alternative	850	818	803	1,637	984
Some college, no degree	486	652	1,027	1,280	482
Associate's degree	44	253	160	431	84
Bachelor's degree	86	366	349	526	278
Graduate or professional degree	0	66	148	167	105
City of Patterson					
Less than 9th grade	46	273	329	962	281
9th to 12th grade, no diploma	307	286	325	322	298
High school graduate, GED, or alternative	867	803	999	844	252
Some college, no degree	603	605	758	703	248
Associate's degree	66	158	205	461	109
Bachelor's degree	32	327	223	342	96
Graduate or professional degree	0	25	30	135	57
City of Waterford					
Less than 9th grade	171	87	195	433	179

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
9th to 12th grade, no diploma	261	237	137	236	124
High school graduate, GED, or alternative	300	445	273	462	96
Some college, no degree	214	304	186	324	115
Associate's degree	21	47	74	82	0
Bachelor's degree	9	57	71	141	30
Graduate or professional degree	0	41	21	88	9

Data Source: 2007-2011 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Table MA-21 shows educational attainments and median earnings in the past 12 months for residents in the Stanislaus County and jurisdictions within the Planning Area. Data for the Stanislaus Planning Area is not available.

Table MA-21 – Educational Attainment

Educational Attainment	Median Earnings in the Past 12 Months
Stanislaus County	
Less than high school graduate	19,163
High school graduate (includes equivalency)	30,173
Some college or associate's degree	35,753
Bachelor's degree	51,807
Graduate or professional degree	72,068
City of Turlock	
Less than high school graduate	19,436
High school graduate (includes equivalency)	26,690
Some college or Associate's degree	36,272
Bachelor's degree	50,621
Graduate or professional degree	70,741
City of Ceres	
Less than high school graduate	21,574
High school graduate (includes equivalency)	31,773
Some college or Associate's degree	30,665
Bachelor's degree	37,146
Graduate or professional degree	63,050
City of Hughson	
Less than high school graduate	22,191

Educational Attainment	Median Earnings in the Past 12 Months
High school graduate (includes equivalency)	27,204
Some college or Associate's degree	34,659
Bachelor's degree	57,727
Graduate or professional degree	75,375
City of Newman	
Less than high school graduate	17,973
High school graduate (includes equivalency)	32,768
Some college or Associate's degree	36,053
Bachelor's degree	41,806
Graduate or professional degree	81,071
City of Oakdale	
Less than high school graduate	36,250
High school graduate (includes equivalency)	32,148
Some college or Associate's degree	38,938
Bachelor's degree	53,165
Graduate or professional degree	64,875
City of Patterson	
Less than high school graduate	16,918
High school graduate (includes equivalency)	31,111
Some college or Associate's degree	41,357
Bachelor's degree	52,820
Graduate or professional degree	109,886
City of Waterford	
Less than high school graduate	19,522
High school graduate (includes equivalency)	33,681
Some college or Associate's degree	36,598
Bachelor's degree	55,192
Graduate or professional degree	63,148

Data Source: 2007-2011 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

This section provides an overview of employment trends in Stanislaus County and the City of Turlock. In the Stanislaus Planning Area, the major business activities include manufacturing (34 percent share of all jobs), education and health services (28 percent), and retail trade (26 percent). In the City of Turlock, the major business activities are education and health care services (19 percent) manufacturing and retail trade (16 percent). (See Table MA-15.) According to the Stanislaus County Housing Element, in unincorporated parts of Stanislaus County, the major industries are education (15.9 percent), agriculture (12.1 percent), and manufacturing (12.6 percent).

Major Manufacturing Employers – Stanislaus County

The manufacturing industry continues to be an important employer in Stanislaus County. Table MA-21.1 shows the top 12 employers in the manufacturing industry in 2014.

Table MA-21.1 – Major Manufacturing Employers

Employer	Description	Number of Employees
Zabaco Winery	Winery	1,000–4,999
Foster Farms	Poultry Processing Plants	1,000–4,999
Fairbanks Cellars	Winery	1,000–4,999
Ecco Domani Winery	Winery	1,000–4,999
E & J Gallo Winery	Winery	1,000–4,999
Del Monte Foods	Canning	1,000–4,999
Con Agra Foods Inc	Canning	1,000–4,999
Bartles & Jaymes Company	Winery	1,000–4,999
Andre Champagne Cellars	Winery	1,000–4,999
Carlo Rossi Winery	Winery	1,000–4,999
CVS Caremark Distribution Center	Distribution Center	500–999
Modesto Bee	Newspaper	500–999

Data Source: California EDD 2014

Major Non-Manufacturing Employers – Stanislaus County

Some of Stanislaus County’s largest employers are also in the non-manufacturing field. Table MA-21.2 shows the top 13 non-manufacturing employers for 2014.

Table MA-21.2 – Major Non-Manufacturing Employers

Employer	Description	Number of Employees
Stanislaus County Community Services	Government Office	1,000–4,999
Memorial Medical Center	Hospital	1,000–4,999
Doctors Medical Center	Hospital	1,000–4,999
Emanuel Medical Center	Hospital	1,000–4,999
Hornsby's Pub Draft Cider Ltd.	Beverages	1,000–4,999
Oak Valley Hospital	Hospital	500–999
Frito-Lay Inc.	Potato Chips/Snack Foods	500–999
California State University	Schools – Universities & Colleges Academic	500–999
Alliance Worknet	County Government –Social/Human Resources	500–999
Stanislaus County Community	Government Offices	500–999
Stanislaus County Welfare Dept	County Government	500–999
Women Infants Child Program – WIC	Social Service & Welfare Organization	500–999
Turlock Irrigation District	Electric Company	250–499

Data Source: California EDD 2014

Describe the workforce and infrastructure needs of the business community:

Stanislaus County Local Workforce Investment Area (LWIA) Local Plan Program Years 2013-17

The Stanislaus County Local Workforce Investment Board (LWIB) membership includes 25 employers from business and industry. These members represent some of the region’s biggest employers, including Foster Farms, Kaiser Permanente, and the Manufacturers Council of the Central Valley. In addition, eight of the largest organized labor unions are represented as is education with representation by the Superintendent of the County Office of Education and the President of Modesto Junior College. Finally, the unique structure of the Stanislaus Economic Development and Workforce Alliance (The Alliance) organization combines economic development and workforce development services under one roof and one Board of Directors. Consequently, economic development experts from each of the nine cities in Stanislaus County are represented on the board, and economic development specialists are employed by the organization.

This combination of key stakeholders is convened at least annually and more often if circumstances require it to identify the workforce challenges facing the local area and to develop solutions to address those challenges.

In the effort to ensure that local workers are being prepared for employment in current high demand and emergent industry sectors, the Stanislaus LWIB annually reviews and approves a list of the top 25 demand occupations authorized for WIA-funded training. The list is compiled based upon three sources of data: the Employment Development Department (EDD) Labor Market Information Division (LMID) 2008-2018 Occupational Employment Projections, Modesto Metropolitan Statistical Area; 2012 Alliance Worknet job orders from local employers; 2012 job postings in Stanislaus County from Wanted Technologies, Inc. The Stanislaus LWIB focuses its training efforts and dollars on the occupations on this list, thus helping to ensure that workers are being trained for jobs that currently exist and/or will exist in the near future.

As a member of the Central California Workforce Collaborative, the Stanislaus Alliance Worknet is able to collaborate with eight other LWIBS in the region to establish regional workforce development priorities. The Alliance is a member of the Central California Economic Development Corporation, from which information on regional education and training needs from an economic development perspective is gathered and used to help guide the education and training efforts for the region.

The Central California Workforce Collaborative (CCWC) has been a member of the California Partnership for the San Joaquin Valley (CPSJV) since designation by Executive Order in 2005. In 2006, the CPSJV conducted a sector study of the Valley and determined the high growth and high demand sectors to be manufacturing, health care, logistics, energy, and agribusiness. The CCWC adopted the five targeted sectors as priority for the region. Each CCWC LWIA targets its investments in high growth, high demand sectors in the region.

While each local area has its unique micro clusters, there is a great deal of commonality in the definition and focus of the targeted high growth cluster at the regional level.

The CPSJV recently commissioned an update to its 2005 cluster study of the Valley. The 2012 study is Regional Industry Cluster Analysis and Action Plan (Plan). For the complete report, go to the site provided below:

http://sjvpartnership.org/wpcontent/uploads/2013/03/SJV_RegionalIndustryClustersInitiative_Plan_Sep2012.pdf

The result was a continued confirmation of the importance of the five industry clusters identified in the 2006 report:

1. Agriculture
2. Energy
3. Health and Wellness
4. Transportation/Logistics
5. Manufacturing

In addition, two important industry clusters were identified and included in the target list:

1. Water Technology
2. Public Sector Infrastructure (Construction)

The report identified the issues and opportunities related to each industry cluster and provided an action plan targeted at resolving the issues and capitalizing on the opportunities.

According to the LWIA Plan, the clusters represent 52 percent of private sector employment in the region, but were responsible for 73 percent of private sector job growth. While the economy in the region experienced some minor growth during the past two years, it was especially hard hit by the Great Recession. Also according to the Plan, the Valley experienced rapid job growth from 2004-2007, but during the economic downturn, between 2008 and 2010, 92,000 jobs were lost. The Plan also highlighted the Valley's inability to capture the economic "value chain" of goods flow movements resulting in a leakage of economic potential, as well as a leakage of skilled workers who commute to jobs located outside of the Valley. To address these issues, a high level implementation blueprint has been included in the Plan with a focus on collaboration at a regional level.

County

Stanislaus County and the Central Valley region has not experienced a significant recovery from the Great Recession, Stanislaus County has 35,000–40,000 individuals unemployed in any given month, consequently a ready labor force exists who possess a variety of skills that cut across industry sectors. Given this dynamic, employers are not currently experiencing the skill gap shortage that perhaps other regions with booming industries and rapidly growing economies are experiencing.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

The Stanislaus LWIB fosters collaboration between community colleges and Department of Industrial Relations-Division of Apprenticeship Standards (DAS)-approved apprenticeship programs through a three-way partnership consisting of Modesto Junior College (MJC), the local manufacturing industry, and the LWIB. This DAS-approved registered apprenticeship program provides apprentices with training for the maintenance mechanic trade at MJC during the evenings and hands-on training through their employment with a local manufacturer during the day. The LWIB provides on-the-job training wage reimbursement support for the apprentices while they are in the hands-on training component.

In addition, the Stanislaus LWIB has partnered with the local Plumbers & Pipefitters, Electrical, and Sheet Metal Workers labor unions to fund a pre-apprenticeship program designed to prepare individuals for registered apprenticeships with any of the above unions.

The LWIB is constantly looking for opportunities to address skill gap needs that emerge. In many situations, partnerships with community colleges are used to provide programs that fill the gaps. Examples are psychiatric technician training, warehouse/distribution training, and maintenance mechanic training. In other instances, partnerships with local labor unions is the tool used.

An example is pre-apprenticeship training for plumbers/pipefitters, electricians, and sheet metal workers. In other situations the LWIB has turned to technical colleges for partnerships. An example is a medical billing certification program developed in partnership with Community Business College.

In every situation where skill gaps are identified, the input of local businesses is sought to confirm the existence of the skill gaps and for input into curriculum content. For example, the LWIB works closely with the Manufacturers Council of the San Joaquin Valley on any manufacturing and logistics projects.

Regional Clusters of Opportunity Grants (RICO)

The California Workforce Investment Board's (State Board) Sector Strategies approach to bolstering regional economic competitiveness requires the development of regional initiatives that are based upon a data driven analytical framework. In support of this framework, the Regional Industry Clusters of Opportunity Grant program was developed jointly by the State Board, the California Energy Commission (Energy Commission), and the California Economic Strategy Panel (ESP). These grants bolster regional economic competitiveness by building the capacity of regional collaborations to identify growing industries, undertake strategic planning and leverage public/private resources. The funding supports the utilization of the Industry Cluster of Opportunity Methodology to develop the data-driven analysis necessary for the formation of relevant regional sector initiatives. The State Board's intent is that the resulting data-driven analyses will serve as the foundation for developing and implementing regional clusters of opportunity strategies and for involving partners in advancing the competitive position of targeted clusters resulting in economic prosperity.

In February 2010, funding in the amount of \$200,000 was awarded to the Fresno County Workforce Investment Board which includes Amador, Calaveras, Fresno, Kern, Kings, Inyo, Madera, Mariposa, Merced, Mono, San Joaquin, Stanislaus, and Tuolumne counties.

The 14-county region focused on the health care cluster and implemented employer workforce surveys across the segments of the health care cluster to identify and target critical workforce shortages in health occupations, focusing first on implementing a skilled nursing internship program and applying for funding to meet specific needs such as psychiatric and radiation technicians, as well as working together on key regulatory issues (e.g., long-term care).

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

Yes.

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

The 2014-2017 update to the Comprehensive Economic Development Strategy (CEDS) was compiled in joint effort with the Economic Development Action Committee membership which includes Stanislaus County and the nine incorporated cities of Ceres, Hughson, Modesto, Newman, Oakdale, Patterson, Riverbank, City of Turlock, and Waterford with research assistance provided by the Stanislaus Economic Development and Workforce Alliance/Business Resource Center.

The strategy presents a socioeconomic overview of Stanislaus County, along with economic development activities and projects that will be undertaken by public and private entities in a mission to create new jobs and provide critical services to the residents of Stanislaus County. The CEDS update contains a summary of infrastructure projects that require support for future growth within Stanislaus County.

The priority objective of the CEDS strategic effort is to facilitate future investments in infrastructure – both physical and human so as to maintain a competitive place in the economic development future of the San Joaquin Valley. To that end, the CEDS development goals and priorities are consistent with regional objectives and include:

- ◆ Encourage and support new business innovation and entrepreneurs;
- ◆ Promote the region as a tourism destination;
- ◆ Develop specialized education including higher education and workforce development;

- ◆ Develop a college going culture in Stanislaus County;
- ◆ Continue to implement computer literacy outreach to align with community college curriculum;
- ◆ Enhance goods movement transportation projects that build capacity while increasing safety, decreasing congestion, improving air quality and promoting economic development;
- ◆ Participate in the development of a comprehensive San Joaquin Valley Regional Water Plan;
- ◆ Continue to promote accessibility and utilization of advanced communications services (through targeted technology training efforts, etc.) as fundamental and necessary for all residents and businesses.

Annual projects and programs in the Stanislaus Urban County and City of Turlock reflect the CEDS focus on infrastructure improvements and projects. The CEDS projects and strategies may in the future be coordinated with the Con Plan so that CDBG funding can be considered, based on area and project eligibility, for future infrastructure projects. However, based on needs data and limited funding, CDBG funds are not currently allocated for economic development purposes at this time.

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

Households with any one of four severe housing problems, those experiencing (1) overcrowding; (2) substandard housing; (3) cost burden (paying more than 30 percent of household income for housing costs); and (4) severe cost burden (spending over 50 percent of household income for housing costs) are concentrated in several areas of Stanislaus County. A concentration is defined as an area representing the upper quintile of incidence by percentage of the population. Tract level data was compared to county-wide data. The population is examined by income grouping. The following income categories are used throughout the Con Plan:

- ◆ Extremely low – households with income less than 30% of area median income (AMI)
- ◆ Very low – households with income between 30 and 50% of AMI
- ◆ Low – households with income between 51 and 80% of AMI
- ◆ Moderate – households with income between 81 and 120% of AMI
- ◆ Above moderate – households with income above 120% of AMI

For moderate-income households, a concentration is where more than 78 percent of households are experiencing four or more severe housing problems. Areas of concentration are found in the following areas (please see the maps included in **Appendix 6**):

- ◆ unincorporated area southeast of Oakdale;
- ◆ incorporated areas east and south of Salida;
- ◆ area in central Ceres;
- ◆ area in the east of the City of Turlock; and

- ◆ an unincorporated area surrounding Newman.

For low-income households, a concentration is where more than 85 percent of households are experiencing four or more severe housing problems. Areas of concentration are found in the following areas (please see the maps included in **Appendix 6**):

- ◆ unincorporated area of Valley Home;
- ◆ unincorporated area southeast of Oakdale and East Oakdale;
- ◆ unincorporated area of Salida and an unincorporated area to the south of Salida;
- ◆ areas of Ceres;
- ◆ Waterford and unincorporated area of Hickman;
- ◆ areas in the northwest and southwest of the City of Turlock;
- ◆ unincorporated area surrounding Newman.

For extremely low-income households, a concentration is where more than 89 percent of households are experiencing four or more severe housing problems. Areas of concentration are found in the following areas (please see the maps included in **Appendix 6**):

- ◆ unincorporated area of Valley Home;
- ◆ an unincorporated area southeast of Oakdale and East Oakdale;
- ◆ unincorporated area of Salida;
- ◆ unincorporated areas surrounding Modesto;
- ◆ unincorporated area of Shackelford;
- ◆ areas of Ceres;
- ◆ unincorporated areas of Keyes and an area north of Keyes;
- ◆ Waterford and unincorporated area of Hickman;
- ◆ several areas in the City of Turlock;
- ◆ unincorporated areas south of the City of Turlock;
- ◆ unincorporated area of Westley;
- ◆ areas of Patterson;
- ◆ unincorporated area of Crows Landing;
- ◆ incorporated area surrounding Newman.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

Significant areas of Stanislaus County have over 50 percent low-income households, most notably areas in Oakdale; unincorporated areas surrounding Modesto; areas of Ceres; areas of the City of Turlock; and the northern half of the southwestern portion of Stanislaus County including Westley and portions of Patterson.

The highest incidences of low-income households – over 75 percent -- are found in areas bordering the south of Modesto.

The top quartile of minority household percentage is 13-30 percent. No areas have a percentage higher than 30. The areas of high minority households are mostly in the more urbanized areas surrounding Modesto, Ceres, and the City of Turlock following State Highway 99. Areas of Patterson between State Route 33 and Interstate 5 also show a concentration of minority households.

The top quartile of Hispanic household percentage is 59-88 percent. No areas have a percentage higher than 88. The areas of high Hispanic households are disbursed throughout Stanislaus County. They are found in the unincorporated areas south of Modesto and Shackelford; areas of Ceres, the City of Turlock, Westley, Patterson, and Crows Landing.

What are the characteristics of the market in these areas/neighborhoods?

The characteristics of the market are discussed in detail in earlier sections MA-05 through MA-25. Most of the same characteristics as described in those discussions apply to the market in these areas.

Are there any community assets in these areas/neighborhoods?

Community assets generally include facilities such as schools, libraries, community centers, parks, and access to commercial establishments such as grocery stores, general merchandise stores, and pharmacy retailers, among others. Community assets are disbursed throughout the Stanislaus Urban County and City of Turlock, although more urban areas provide a larger concentration of community assets than non-urban areas.

Are there other strategic opportunities in any of these areas?

No.

Article II Strategic Plan

SP-05 Overview

Strategic Plan Overview

In conjunction with the Needs Assessment and Market Analysis sections of this Con Plan, the Strategic Plan identifies the Stanislaus Urban County and City of Turlock's priority needs and describes strategies that will be undertaken to serve the priority needs. The Strategic Plan includes the following sections:

- ◆ Geographic Priorities
- ◆ Priority Needs
- ◆ Influence of Market Conditions
- ◆ Anticipated Resources
- ◆ Institutional Delivery Structure
- ◆ Goals
- ◆ Public Housing
- ◆ Barriers to Affordable Housing
- ◆ Homelessness Strategy
- ◆ Lead-Based Paint Hazards
- ◆ Anti-Poverty Strategy
- ◆ Monitoring

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

Geographic Priority Areas

The Stanislaus Urban County and City of Turlock allocate funds on a geographic basis in eligible Census Block Groups and low income areas.

General Allocation Priorities - Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The Stanislaus Urban County and City of Turlock allocate funds to organizations that provide low-income households with housing and supportive services. On an annual basis, the Stanislaus Urban County and City of Turlock prioritize the use of their CDBG and HOME funding for the improvement or provision of community development activities such as infrastructure, economic development, public services, homeless services, and affordable housing (including preservation and conservation) that serve low-income households.

The Stanislaus Urban County and City of Turlock allocate investment of resources on a Stanislaus Urban County and City-wide basis for affordable housing programs such as the First-Time Homebuyer and the Owner-Occupied Housing Rehabilitation programs. Project priorities within City of Turlock boundaries also include but not limited to sidewalks, ADA improvements, parks, and lighting projects, whereas projects in the unincorporated pockets of Stanislaus County focus on health and safety related infrastructure improvements such as water and sewer systems.

Throughout the Stanislaus Urban County, there are neighborhoods and communities with minimal or non-existent public infrastructure. This round of Consolidated Planning process once again reaffirmed the community's desire for public infrastructure improvements especially in the low income communities. To this end, the Stanislaus Urban County has prioritized and will continue to set aside CDBG funds for needed infrastructure projects throughout these areas. Projects will include but are not limited to public sewer and water system installations as well as repairs, curb, gutter and sidewalk installation and repairs, improvements that provide greater accessibility, as well as other, CDBG eligible, non-housing community development infrastructure improvements.

Overall, funding for infrastructure improvements in the City of Turlock will be a medium-priority for the five-year period covered by the Con Plan. Infrastructure improvements have been an important goal in previous years, and the City of Turlock expects to continue its use of CDBG funds for improvements such as installation of curbs and sidewalks in target areas. Specific situations that demonstrate a need for such improvements will be considered on a case-by-case basis, as funding is available. Priority consideration will be given to areas where ADA issues exist and other funds can be leveraged as part of a project.

Infrastructure improvements are undertaken in older, lower-income areas. Activities identified under the public service category and targeted to special needs populations are offered on a Stanislaus Urban County and Turlock citywide basis, and/or where resources can be coordinated with existing facilities or services.

Other funding allocation priorities in Stanislaus Urban County and the City of Turlock include economic development, homeless services, and homeless prevention services.

Lack of sufficient funding continues to be the greatest obstacle in meeting the underserved needs. The Stanislaus Urban County and City of Turlock will continue to apply for funding and/or support applications by service providers to expand affordable housing opportunities as well as homeless assistance and supportive services consistent with the Con Plan.

SP-25 Priority Needs – 91.215(a)(2)

Priority Needs

Priority needs are those that will be addressed by the goals outlined in the Strategic Plan (discussed in greater detail in SP-45), according to the structure presented in the regulations at 24 CFR 91.215:

- ◆ Affordable Housing
 - Rental assistance
 - Production of new units
 - Rehabilitation of existing units
 - Acquisition of existing units

- ◆ Homelessness
 - Outreach
 - Emergency shelter and transitional housing
 - Rapid re-housing
 - Prevention
- ◆ Non-Housing Community Development
 - Public facilities
 - Public improvements and infrastructure
 - Public services
 - Economic development

Priority is assigned based on the level of need that is demonstrated by the data collected during the preparation of the Con Plan, specifically in the Needs Assessment and Market Analysis; the information gathered during the consultation and citizen participation process; and the availability of resources to address these needs. Based on all of these components, non-housing community development needs (including infrastructure, economic development, and public services), affordable housing, and homelessness are considered “high” priorities.

Table SP-1 Priority Needs Summary

1. Priority Need	Non-housing Community Development - Public Infrastructure Improvement	
Priority Level	High – Stanislaus Urban County; Medium – City of Turlock	
Population	X	Extremely low income
	X	Low income
		Moderate income
		Large families
		Families with children
		Elderly
		Chronic homelessness
		Individuals
		Mentally ill
		Chronic substance abuse
		Veterans
		Persons with HIV/AIDS
		Victims of domestic violence
		Unaccompanied youth
		Elderly
		Frail elderly
		Persons with mental disabilities
		Persons with physical disabilities

	Persons with developmental disabilities
	Persons with alcohol or other addictions
	Persons with HIV/AIDS and their families
Geographic Areas Affected	County: Stanislaus Urban County and Turlock City-wide
	Stanislaus Urban County: CDBG Eligible Block Groups
	City of Turlock: CDBG Eligible Block Groups
Associated Goals	Improve infrastructure in low income neighborhoods
	Secure leverage funding
Description	The Stanislaus Urban County and City of Turlock will continue addressing infrastructure improvement needs in low-income neighborhoods to create improved suitable living environments.
Basis for Relative Priority	Throughout the Stanislaus Urban County and City of Turlock, there are neighborhoods and communities with minimal or non-existent public infrastructure. This round of Consolidated Planning process once again reaffirmed the community's desire for public infrastructure improvements especially in the low income communities. Projects will include but are not limited to public sewer and water system installations (mainly in the unincorporated areas) as well as public sewer and water system repairs, curb, gutter and sidewalk installation and repairs, storm drain improvements, improvements that provide greater accessibility, as well as other, CDBG eligible, non-housing community development infrastructure improvements (mainly within the incorporated boundaries where public sewer and water systems already exist).
2. Priority Need	Affordable Housing
Priority Level	High
Population	X Extremely low income
	X Low income
	Moderate income
	X Large families
	Families with children
	X Elderly
	Chronic homelessness
	X Individuals
	Mentally ill
	Chronic substance abuse
	X Veterans
	Persons with HIV/AIDS
	Victims of domestic violence
	Unaccompanied youth
	Frail elderly
	Persons with mental disabilities

	X	Persons with physical disabilities
		Persons with developmental disabilities
		Persons with alcohol or other addictions
		Persons with HIV/AIDS and their families
Geographic Areas Affected		Stanislaus Urban County and Turlock City-wide
Associated Goals		Acquisition and Single-Multifamily Rehabilitation
		Affordable Senior Housing
		Improved Accessibility
		Temporary Relocation Services
		Rehabilitation of Existing Housing
		First-time Homebuyer Assistance
		Fair Housing and Tenant/Landlord Services
Description		The City of Turlock and/or Stanislaus Urban County intend to use a portion of their CDBG allocation and all of their HOME allocation to fund affordable housing activities. Leverage funding for these activities are described within the Anticipated Resources section of the Strategic Plan.
Basis for Relative Priority		According to data provided in the Needs Assessment and the housing Market Analysis completed as part of this Con Plan, high housing cost burden, overcrowding, and low vacancy rates create a high need for affordable housing, which will benefit both homeless and non-homeless special needs populations. Based on this data and the housing market analysis completed as part of this Con Plan, the Stanislaus Urban County and City of Turlock will pursue the creation of affordable housing (new unit production and conversion or preservation) as resources are available, which will benefit low-income households, homeless persons, households at-risk of homelessness and those with special needs. Home ownership will be increased for low and moderate households through the First-time Homebuyer program. Fair Housing and Tenant/Landlord Services will also be provided to improve the quality of rental housing.
3. Priority Need		Non-housing Community Development - Economic Development
Priority Level		High
Population		Extremely low income
	X	Low income
		Moderate income
		Large families
		Families with children
		Elderly
		Chronic homelessness
		Individuals
		Mentally ill
		Chronic substance abuse
		Veterans

	Persons with HIV/AIDS
	Victims of domestic violence
	Unaccompanied youth
Geographic Areas Affected	Stanislaus Urban County and Turlock City-Wide
Associated Goals	Technical Assistance for Small Businesses
Description	The Stanislaus Urban County and City of Turlock will provide technical assistance on facility accessibility requirements to eligible business and property owners by a California Certified Access Specialist and other qualified professionals, as well as technical assistance to small businesses to assist with capacity building, including strategic planning, operations, marketing, and finance assistance.
Basis for Relative Priority	The Market Analysis indicated that due to the economic downturn, between 2008 and 2010, 92,000 jobs were lost, some of which were the result of skilled workers who chose to commute to jobs located outside of the Valley. As a result, Stanislaus County has a great need for economic development. Small businesses in Stanislaus Urban County and City of Turlock have identified a need locally for assistance and education regarding compliance with accessibility requirements. Small start-up businesses who desire to expand, but lack the capacity to do so will receive assistance with financial reporting systems, developing a business strategy, designing a company website, and/or enhance marketing efforts.
4. Priority Need	Other Special Needs - Public Services
Priority Level	High
Population	X Extremely low income
	X Low income
	X Moderate income
	X Large families
	X At-Risk Youth
	X Elderly
	X Chronic homelessness
	X Individuals
	X Mentally ill
	X Chronic substance abuse
	X Veterans
	X Persons with HIV/AIDS
	X Victims of domestic violence
	X Unaccompanied youth
	X Frail elderly
	X Persons with mental disabilities
	X Persons with physical disabilities
	X Persons with developmental disabilities

	X	Persons with alcohol or other addictions
	X	Persons with HIV/AIDS and their families
Geographic Areas Affected		Stanislaus Urban County and Turlock City-wide
Associated Goals		Public Services
Description		The Stanislaus Urban County will utilize 10% of its annual award and the City of Turlock will utilize 15% of its annual award for the provision of public services. Public services include services targeted to extremely low, low, and moderate income families and individuals, as well as services targeted to special populations such as at-risk youth, persons over 62 years of age, or persons with disabilities.
Basis for Relative Priority		The needs assessment and Market Analysis indicated a great need for public services for extremely low- and low-income households, the elderly, persons with disabilities, and at-risk youth. Public service programs help these vulnerable populations meet their basic needs, such as food and shelter, and provide them with the resources and referrals for any additional needed services.
5. Priority Need		Homeless Services
Priority Level		High
Population	X	Extremely low income
		Low income
		Moderate income
	X	Large families
	X	At-Risk Youth
	X	Elderly
	X	Chronic homelessness
	X	Individuals
	X	Mentally ill
	X	Chronic substance abuse
	X	Veterans
	X	Persons with HIV/AIDS
	X	Victims of domestic violence
	X	Unaccompanied youth
	X	Frail elderly
	X	Persons with mental disabilities
	X	Persons with physical disabilities
	X	Persons with developmental disabilities
	X	Persons with alcohol or other addictions
	X	Persons with HIV/AIDS and their families
Geographic Areas Affected		Stanislaus Urban County and Turlock City-wide
Associated Goals		Shelter for Homeless Persons
		Rapid Re-Housing for Homeless Persons

	Homeless Prevention Assistance for the Extremely Low-income
	Capacity Building for Homeless Service Providers
	Homeless Services Data Collection
	Coordinated Assessment and Targeting of Services
	Outreach
Description	The Stanislaus Urban County and City of Turlock allocate up to 15% of each annual award for public services grants, some of which include programs that provide homeless services. Stanislaus Urban County utilizes 7.5% of its annual ESG award for Admin, 7.5% for HMIS Activities, 42.5% for emergency shelter activities, and 42.5% for Homeless Prevention and Rapid Re-Housing Activities. Admin funds will be utilized to work with the Stanislaus CoC on coordinated assessment, outreach, and data collection. Affordable housing activities, as described in Priority Need 2 – Affordable Housing, will also be a part of the regional approach to solving homelessness.
Basis for Relative Priority	As discussed in greater detail in the Needs Assessment, homeless individuals were counted as part of Stanislaus County’s 2014 point-in-time count, including those who were unsheltered. The data indicates a need to support programs that serve the homeless. Homelessness was also identified as a High priority in the community input received. Homelessness is also identified as a high priority by the Stanislaus County Board of Supervisor’s Focus on Prevention 2014 effort and by the Federal Department of Housing and Urban Development. The Stanislaus Urban County and City of Turlock will focus CDBG, HOME, and ESG resources on shelter, rental assistance, and affordable housing, which is crucial to ending homelessness. Both entities will also work closely with the Stanislaus CoC to ensure that ESG programs are working in harmony with Stanislaus CoC Transitional and Permanent Supportive Housing programs.

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market characteristics that will influence the use of funds available for housing type
Tenant-Based Rental Assistance (TBRA)	While a need exists for tenant-based assistance, the Stanislaus Urban County and City of Turlock do not intend to use HOME funds for TBRA. If the Stanislaus Urban County and City of Turlock were to provide funding for tenant-based assistance, such as a Rapid Re-Housing program, the funds would likely be non-Federal.
TBRA for Non-Homeless Special Needs	While a need exists for tenant-based assistance, the Stanislaus Urban County and City of Turlock do not intend to use HOME funds for TBRA for non-homeless special needs. If the Stanislaus Urban County and City of Turlock were to provide funding for tenant-based assistance, such as a rapid re-housing program, the funds would likely be non-Federal.
New Unit Production	According to data provided in the Needs Assessment, a number of Stanislaus Urban County and City of Turlock households are overpaying for housing. Based on this data and the Market Analysis completed as part of this Con Plan, the Stanislaus Urban County and City of Turlock will prioritize the creation of affordable housing (new unit production and conversion or preservation), which will benefit low-income households, including those with special needs.
Rehabilitation	Based on the data provided for in the Needs Assessment and the housing Market Analysis completed as part of this Con Plan, housing needs are a priority including the preservation and/or conversion of affordable housing which frequently results in the rehabilitation of these units.
Acquisition, including preservation	According to data provided for in the Needs Assessment, a number of Stanislaus Urban County and City of Turlock households are overpaying for housing. Based on this data and the housing Market Analysis completed as part of this Con Plan, the City of Turlock will prioritize the creation of affordable housing (new unit production and conversion or preservation), which will benefit low-income households, including those with special needs.

SP-35 Anticipated Resources – 91.215(a)(4), 91.220(c)(1,2)

Introduction

During the five-year Con Plan period, the Stanislaus Urban County expects to receive approximately \$2,197,687 annually in CDBG funding, for a five-year total of \$10,988,435. During the five-year Con Plan period, the Stanislaus Urban County expects to receive approximately \$190,669 annually in ESG funding, for a five-year total of \$953,345. During the five-year Con Plan period, the City of Turlock expects to receive \$548,076 annually in CDBG funding, for a five-year total of \$2,740,380. The HOME Consortium also anticipates at least \$911,823 in annual HOME funds, for a five-year total of \$4,559,115. The City of Turlock expects to use \$1,700,000 in CalHome funding for housing activities and administrative costs over the five-year Con Plan period. The table below provides a breakdown of these anticipated resources, which are based on the Fiscal Year 2015-2016 allocations.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG Stanislaus Urban County	Public-Federal	Infrastructure, Economic Development, Public Services, Fair Housing, Administration	\$2,197,687	County \$128,383 Waterford \$162,665	\$140,000	\$2,628,735	\$8,790,748	Prior year resources are unknown, other than \$140,000 set aside for Economic Development Activities. This figure may be more than listed in this table.
ESG Stanislaus Urban County	Public-Federal	Homeless Programs, Data Management, Administration	\$190,669	N/A	N/A	\$190,669	\$762,676	Funds will be utilized for ESG program administration, emergency and transitional shelters, homeless management information systems data entry, and homeless prevention and rapid re-housing services.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME Consortium	Public-Federal	Affordable Housing, Down Payment Assistance, Housing Rehab, Administration	\$911,823	\$100,000	\$800,000	\$1,811,823	\$3,547,292	Funds will be utilized for affordable housing, rehab, and down-payment assistance for first-time homebuyers.
CalHome Stanislaus Urban County	Public-State	Housing Programs – Down Payment Assistance & Housing Rehab	N/A	N/A	\$500,000	\$500,000	Unknown	Balance remaining for the rest of the Consolidated Planning period depends on first year spend down.
CDBG City of Turlock	Public-Federal	Infrastructure, Housing Programs, Housing Rehab, Down Payment Assistance, Fair Housing Public Services, Administration	\$548,076	\$50,000	\$800,000	\$1,398,076	\$2,142,304	Funds will be utilized for affordable housing, temporary relocation assistance, infrastructure, Fair Housing, Public Services, and Administration.
CalHome City of Turlock	Public-State	Affordable Housing, Down Payment Assistance, Housing Rehab, Administration	N/A	N/A	\$1,700,000	\$1,700,000	\$800,000	These funds were awarded competitively through HCD. The grants call for the fund to be used for Down payment assistance in specific low income census tracts and DPA with a rehab component.

Explain how Federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The Stanislaus Urban County members will continue the use of State of California funds (as they become available) designed to fund affordable housing projects/programs. Stanislaus County is currently a recipient of CalHome funds to provide down payment assistance to first time home buyers and owner occupied housing rehabilitation assistance.

PROGRAM INCOME

CDBG, HOME, NSP, and CDBG-R Program Income (PI) funds will continue to be used by the Stanislaus Urban County to fund gaps in projects/programs.

URBAN COUNTY MEMBER STATE CDBG PROGRAM INCOME

Prior to joining the Stanislaus Urban County, several Stanislaus Urban County cities received CDBG funds directly from the State of California. Since joining the Stanislaus Urban County, some of these cities have been collecting program income derived from loans made from their State grants.

Use of the funds through the Stanislaus Urban County simplifies the process for cities, which would otherwise have to establish a reuse plan with the State Department of Housing and Community Development. As the lead entity for the Stanislaus Urban County, Stanislaus County ultimately assumes the reporting and monitoring liabilities for State PI reported and used through the Stanislaus Urban County. In order limit liability, the following criteria will need to be met in order for Stanislaus County to accept the oversight of State Program Income (PI):

- ◆ Adequate notice to Stanislaus County of the intent to use PI will need to be provided to allow for reporting via the Stanislaus Urban County's AAP.
- ◆ A re-use plan detailing a plan for the timely use of the PI, within the same AAP fiscal year, will need to be established by the City of Turlock and accepted by Stanislaus County.
- ◆ PI will need to be used towards a CDBG eligible activity reflected in an adopted AAP and approved for funding by HUD.

NSP PROGRAM INCOME

The Stanislaus Urban County will continue to use NSP Program Income to remove blighted properties via the Abandoned and Dangerous Building Program (ADB). The ADB is responsible for investigating requests from the public and public agencies regarding structures that pose a threat to the health and safety of unincorporated Stanislaus County communities. The ADB was integrated into the NSP program to effectively address issues of blight resulting from abandoned and dangerous buildings declared a nuisance in NSP target areas.

NSP GENERAL

Stanislaus County will continue its efforts at liquidating NSP inventory (six properties) by finding eligible first time homebuyers to purchase the properties. The six remaining properties are located in the Airport, Empire, Grayson, Parklawn, and Salida neighborhoods.

The City of Oakdale will be working on a multi-family affordable housing project over this next Consolidated Planning period in which NSP Program Income funds may be used. The project plans to serve families with extremely low to very low incomes (30 – 60% of the Area Median Income).

STATE HOME PROGRAM INCOME (PI) (TURLOCK)

City of Turlock will continue to use State HOME PI as an additional funding source for the first time home buyer program.

AMERICAN DREAM DOWNPAYMENT INITIATIVE (ADDI) PI (CITY OF TURLOCK)

Any ADDI PI received will be utilized as part of the HOME program.

CAL HOME

The City of Turlock and Stanislaus Urban County members will continue the use of State of California funds (as they become available) designed to fund affordable housing projects/programs. Stanislaus County and the City of Turlock are currently recipients of CalHome funds, which provide down payment assistance to first time home buyers and owner occupied housing rehabilitation assistance.

STATE WATER BOARD GRANT

Stanislaus County will continue pursuing California State Water Resources Control Board (Water Board) grant funds to assist in the completion of CDBG-funded infrastructure projects. With redevelopment agency funds no longer being a financial tool for capital improvement projects, Stanislaus County must now competitively apply for funds such as these to complete projects that are initiated with CDBG funds. In 2014, Stanislaus County was able to secure a five million dollar grant for the Parklawn Sewer Infrastructure Project, and is currently working on its second application for the Airport Sewer Infrastructure Project.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The Stanislaus Urban County maintains six Neighborhood Stabilization Program (NSP) properties in Grayson, Salida, Empire, and the Parklawn and Airport neighborhoods which will be sold to first-time homebuyers throughout the five-year Con Plan cycle.

The City of Turlock Redevelopment Agency owns a parcel with a small office building. The building is currently leased for \$1.00 per year to Haven Women's Center . The intent of the five-year lease has been to bring much needed anti-domestic violence services to City of Turlock and overcome the transportation barrier of clients and families traveling the 15 miles to Modesto to get to much needed services.

The City of Turlock has also recently purchased a four-plex in one of the lowest income census tracts. The City of Turlock will be rehabilitating the four-plex and then selling the property to We Care, a local nonprofit that provides emergency shelter, case management, and transitional housing services so that We Care can add four units to its transitional housing program.

SP-40 Institutional Delivery Structure – 91.215(k)

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Turlock	Government, HOME Consortium Lead, CDBG Entitlement	Non-homeless Special Needs, Affordable Housing, Housing Rehab, Infrastructure, Neighborhood Improvements, Public Facilities, Economic Development, Public Services	Ceres, Hughson, Newman, Oakdale, Patterson, Waterford & Turlock city limits (eligible areas), unincorporated Stanislaus County
Stanislaus County	Government, CDBG/ESG Entitlement (Urban County Lead), HOME Consortium Member	Non-homeless Special Needs, Housing Rehab, Infrastructure, Neighborhood Improvements, Economic Development, Public Services, Homeless Services, Homeless Prevention Services	Ceres, Hughson, Newman, Oakdale, Patterson, Waterford, unincorporated Stanislaus County
City of Ceres	Government, CDBG/ESG Entitlement (Urban County Member), HOME Consortium Member	Non-homeless Special Needs, Housing Rehab, Infrastructure, Neighborhood Improvements, Economic Development	Ceres city limits (eligible areas)
City of Hughson	Government, CDBG/ESG Entitlement (Urban County Member), HOME Consortium Member	Non-homeless Special Needs, Housing Rehab, Infrastructure, Neighborhood Improvements, Economic Development	Hughson city limits (eligible areas)
City of Newman	Government, CDBG/ESG Entitlement (Urban County Member), HOME Consortium Member	Non-homeless Special Needs, Housing Rehab, Infrastructure, Neighborhood Improvements, Economic Development	Newman city limits (eligible areas)
City of Oakdale	Government, CDBG/ESG Entitlement (Urban County Member), HOME Consortium Member	Non-homeless Special Needs, Housing Rehab, Infrastructure, Neighborhood Improvements, Economic Development	Oakdale city limits (eligible areas)

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Patterson	Government, CDBG/ESG Entitlement (Urban County Member), HOME Consortium Member	Non-homeless Special Needs, Housing Rehab, Infrastructure, Neighborhood Improvements, Economic Development	Patterson city limits (eligible areas)
City of Waterford	Government, CDBG/ESG Entitlement (Urban County Member), HOME Consortium Member	Non-homeless Special Needs, Housing Rehab, Infrastructure, Neighborhood Improvements, Economic Development	Waterford city limits (eligible areas)
Housing Authority of the County of Stanislaus	Nonprofit Public Corporation	Housing Rehab	County-wide
Nonprofits (Various)	Nonprofit Corporation	Public Services, Homeless Services, Homeless Prevention Services	Ceres, Hughson, Newman, Oakdale, Patterson, Turlock, Waterford, Unincorporated County

Assess of Strengths and Gaps in the Institutional Delivery System

Please refer to the detailed discussion of homeless needs in the Needs Assessment section of the Con Plan (NA-40) and homeless services and facilities in the Market Analysis section (MA-30).

Please note that Stanislaus County has a robust planning and coordination system that involves service providers and program operators at all levels. In general, the collaborative programming between Stanislaus County, cities, and nonprofits is identified as a key strength. Other strengths include capital improvements, HOME Investment Partnership Program (HOME) and Neighborhood Stabilization Program (NSP) units, some programs for the chronically homeless (including comprehensive case management with a transition period before housing placement, supportive housing, and programs emphasizing home visits), and nonprofit capital facilities (i.e., shelters and transitional housing).

In general, the primary weakness is funding that is inadequate to meet the level of need. Funding gaps are most common for extremely low-income households, chronically homeless, homeless youth, and those living in transitional shelters.

Although some programs for the chronically homeless have been successful, there are greater barriers and funding gaps to providing enough services to the chronically homeless. In particular housing homeless youth is challenging because they are often not ready or willing to live in permanent housing. Another homeless subgroup identified as having a great need is homeless families with children.

The lack of permanently affordable housing is a considerable gap in the system. With no place to move persons out of transitional housing or for those in housing crisis to move to, persons and families can become homeless. The demise of the redevelopment agencies, long waiting lists, lack of funding for case management, mental health issues, bad credit or rental history, projects not being able to pencil out for developers, and job development are some of the top barriers to permanently affordable housing.

Housing placement was also identified as a weakness with long waiting lists, drug and GED requirements for applicants, lack of employment, income documentation, timing considerations for the NSP program, and the lack of affordable housing units.

Challenges to the success of homeless prevention services included income targeting requirements that are too low and too difficult to meet, uninhabitable substandard housing stock, cost of utility bills, insufficient mental health services, participants terming out of programs, lack of financial literacy and life skills amongst participants, inability of participants to document homeless status, need for willing landlords and employers, and the need to educate those in substandard housing regarding available resources. Also, sufficient funding from a variety of funding programs for housing as part of homeless prevention programs was identified as a funding gap for homeless prevention.

Although a significant number of homeless persons are sheltered (see 2014 Point in Time Count), there remain those who are not sheltered. Among these are the chronically homeless, most of who are persons in households without children. The trend has been a reduction in the number of unsheltered homeless households with children and little change in the number of unsheltered households without children.

The percentage of the homeless population that is considered to be chronically homeless has remained relatively steady over time (10-15 percent). With the exception of 2014, the majority of the chronically homeless are unsheltered.

Looking at particular sub-populations of the homeless, many are experiencing severe mental illness and are suffering under chronic substance abuse. There is also a significant number who are Victims of Domestic Violence. The severely mentally ill, chronic substance abuse and veterans are all populations with more unsheltered persons than sheltered. Persons with HIV/AIDS are more likely to be sheltered as are Victims of Domestic Violence. Comparing homelessness by race, 46 percent of Black or African Americans were unsheltered as compared to 38 percent of Whites who were unsheltered. Additionally, 16 percent of the unsheltered homeless were female and 22 percent were male.

Although Stanislaus County's efforts to prevent homelessness, shelter homeless persons and families, and transition persons to supportive and permanent housing are well-coordinated "wrap-around" services, there still remains a core of chronically homeless individuals who are largely unsheltered or who become housed but then transition back into homelessness. This population is marked by severe mental illness and chronic substance abuse. Men and black/African American persons are overrepresented among the homeless.

It can be concluded by both the trends in the homeless population, and a review of the types services offered and facilities available that efforts to serve and house households with children and prevention services aimed at that same population have been effective. To some degree, efforts to house the chronically homeless and move them along the continuum to permanent housing have also been successful, with significant resources being brought to bear in a multi-faceted approach to the problem. Who remain unsheltered and/or chronically homeless are the severely mentally ill and those afflicted by chronic substance abuse.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	
Legal Assistance	X		
Mortgage Assistance			
Rental Assistance	X	X	X
Utilities Assistance	X	X	
Street Outreach Services			
Law Enforcement		X	
Mobile Clinics	X		
Other Street Outreach Services		X	
Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X		
Education	X		
Employment and Employment Training	X		
Healthcare	X	X	
HIV/AIDS			
Life Skills	X	X	
Mental Health Counseling	X	X	
Transportation	X	X	
Other			
Other			

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

Please see the section above which partly answers this question as well as section NA-40 of the Needs Assessment and section MA-30 of the Market Analysis.

Stanislaus County has a variety of services focused on the needs of the homeless, including not just shelter but also preventative services and services directed at this population's social and health needs. These "wrap-around" services are targeted to the homeless population generally but also targeted to specific populations such as youth and foster youth, and families with children.

As previously mentioned, although Stanislaus County has a well-rounded and comprehensive approach to the problem of homelessness certain populations remain hard to house, namely the chronically homeless who are severely mentally ill and those afflicted by chronic substance abuse.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

Please see the sections above which partly answer this question as well section NA-40 of the Needs Assessment and section MA-30 of the Market Analysis.

Many services and facilities provided serve the general population of homeless persons but there are also a number of programs that are targeted to meet the needs of special needs homeless such as persons with HIV/AIDS, veterans, youth, aging-out foster youth, women and children, and the mentally ill.

Although treatment for substance abuse is available in the community, there are limited opportunities for persons who are actively using to be housed other than an overnight emergency shelter. The same holds true for those who are severely mentally ill. Although there are services available and there is supportive housing (transitional and permanent), those with the most severe mental illness do not have housing that is coupled with the level of care required. Such populations are often housed temporarily through short-term confinement or institutionalization as the result of arrest by law enforcement, but struggle to find suitable permanent housing placements.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

Stanislaus County will continue to work collaboratively with service and shelter providers to identify and address gaps in the institutional structure and service delivery system. Stanislaus County generally has a well-developed institutional structure and service delivery system.

Although every attempt is made to address the needs of the complete continuum of homelessness from prevention to permanent supportive housing, there is a portion of the chronically homeless population that remains difficult to serve. Although many of these persons could stabilize and recover if placed in stable housing, the intensity of services required and the disruptive nature of mental illness and substance abuse often make housing such persons challenging. Pursuing a "housing first" strategy for chronically homeless persons who suffer from mental illness or substance abuse is one approach Stanislaus County will consider. (See The National Alliance to End Homelessness http://www.endhomelessness.org/pages/housing_first) One of the greatest challenges for this approach is the amount of funding and resources that must be brought to bear to have an impact.

Stanislaus County will continue to work to increase the resources devoted to permanently affordable housing to serve as a stabilizing force preventing homelessness.

Stanislaus County will focus increased resources on homeless prevention/crisis intervention, especially on homeless youth, aging-out foster youth, families with children, and persons being discharged from institutions.

Stanislaus County will continue to devote resources to address the needs of the chronically homeless including comprehensive case management, supportive housing, shelters and transitional housing.

Stanislaus County will target resources to the lowest income groups with the highest needs including the chronically homeless, homeless youth, homeless families with children, and those living in transitional shelters.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Improve Infrastructure in Low-income Neighborhoods	2015	2019	Non-Housing Community Development	Ceres, Hughson, Newman, Oakdale, Patterson, Turlock, Waterford, Unincorporated County	Public Infrastructure Improvements	CDBG (Urban County): \$7,331,725 Turlock: \$750,000	Stanislaus Urban County: Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 7,136 Persons assisted Turlock: Public facility and infrastructure activities will occur in the LMI census tracts as well as in strategies to connect Low income households to city water and sewer services in the Montana West area

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Acquisition and Single-Multifamily Rehabilitation	2016	2019	Affordable Housing	Ceres, Hughson, Newman, Oakdale, Patterson, Turlock, Waterford, Unincorporated County	Affordable Housing Availability. Develop a strategy to acquire and rehabilitate rental units exhibiting deferred maintenance or poor property management, especially duplexes, triplexes and four-plexes in areas where multiple parcels can be acquired. Where feasible units will be converted to owner occupancy. If the units are to be retained as rental units, the city will turn the units over to a nonprofit or other community-based organization to own and manage as transitional, permanent supportive or affordable rental units.	HOME & CDBG*: To be determined *Turlock Only	Acquisition and rehab of 10-20 single/multifamily units
3	Affordable Housing for Seniors	2015	2019	Affordable Housing	Waterford	Affordable Senior Housing	HOME Consortium (Waterford): \$400,000	New Affordable Senior Housing Units
4	Temporary Relocation Services	2015	2019	Housing	Turlock	Temporary Housing Relocation for Housing Rehab Recipients	CDBG (Turlock): \$15,000	Provide temporary relocation assistance to 5 target income homeowners

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Rehabilitate Existing Housing	2015	2019	Housing	Ceres, Hughson, Newman, Oakdale, Patterson, Turlock, Waterford, Unincorporated County	Housing Rehabilitation: Emergency and Minor Repairs Preserve Affordable Housing Stock	HOME (Consortium-wide): \$750,000 CalHOME(County): \$365,000	HOME Consortium: Provide housing rehabilitation services to 40 target income owners
6	First-time Homebuyer Assistance	2015	2019	Affordable Housing	Ceres, Hughson, Newman, Oakdale, Patterson, Turlock, Waterford, Unincorporated County	Affordable Housing Availability	HOME(Consortium-wide): \$800,000 CalHOME(Turlock): \$600,000 CalHOME(County): \$500,000	Turlock: Provide down-payment assistance to 50 First-time Homebuyers HOME Consortium: Provide down-payment assistance to 60 first-time homebuyers
7	Technical Assistance for Small Businesses	2016	2019	Non-Housing Community Development	Ceres, Hughson, Newman, Oakdale, Patterson, Waterford, Unincorporated County	Economic Development	CDBG (Urban County): \$140,000 (previous years funds)	Assist 20 small businesses to expand and/or receive education on Federal/State Accessibility requirements

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Improve Accessibility	2015	2019	Non-Housing Community Development	Ceres, Hughson, Newman, Oakdale, Patterson, Turlock, Waterford, Unincorporated County	Housing Improvements for persons with Disabilities and Economic Development for Small Businesses who needs assistance with meeting Fed/State Accessibility Requirements	CDBG (Urban County): \$100,000 (previous years funds) Non-CDBG Funds (Turlock): \$50,000	Assist 10 small businesses with education on Federal/State Accessibility requirements Turlock: Assist 10 small businesses with education on Federal/State Accessibility requirements
9	Fair Housing and Tenant/Landlord Services	2015	2019	Non-Homeless Community Development	Ceres, Hughson, Newman, Oakdale, Patterson, Turlock, Waterford, Unincorporated County	Fair Housing	CDBG (Urban County): \$125,000 CDBG (Turlock): \$250,000	1,150 Extremely low, very low, low, and moderate income individuals 300 Extremely low, very low, low and moderate income individuals
10	Access to public services for low income households and special populations	2015	2019	Non-Homeless Special Needs	Ceres, Hughson, Newman, Oakdale, Patterson, Turlock, Waterford, Unincorporated County	Public Services for extremely low, low, and moderate-income households/individuals and special populations	CDBG (Urban County): \$1,098,845 CDBG (Turlock): \$400,000	14,350 Extremely low, very low, low, and moderate income individuals 2,500 Extremely low, very low, low, and moderate income individuals

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
11	Shelter for Homeless Persons	2015	2019	Homeless	County-wide	Homelessness	ESG (Urban County): \$403,425	2,700 sheltered homeless individuals and families
12	Rapid Re-Housing for Homeless Persons	2015	2019	Homeless	County-wide	Homelessness	ESG (Urban County): \$201,713	Housing for chronically homeless, homeless families with children, homeless veterans, and homeless persons without children 140 individuals; made up of 40 households
13	Homeless Prevention for Extremely Low Income Households and Individuals	2015	2019	Homeless	County-wide	At-risk of Homelessness	ESG (Urban County): \$201,712	Prevention of homelessness for extremely low-income families with children, and at-risk individuals 175 Individuals, made up of 50 households

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
14	Capacity Building for Homeless Service Providers	2015	2019	Homeless Facilities, Permanent Supportive Housing	Turlock	City of Turlock will work with homeless service provider to acquire property for the purpose of capacity building with allowing the use of city owned facilities for the purpose of assisting homeless persons and families with the permanent supportive housing and with operation of a day center.	Turlock: \$500,000	Turlock Gospel Mission – Development and operation of a day center for homeless persons We Care of Turlock – Development of city-owned building for the purposes of operating a permanent supportive housing project for homeless persons.
15	Homeless Services Data Collection	2015	2019	Homeless	County-wide	Homeless Data Collection	ESG (HMIS Funds): \$74,996	Data collection 1 job maintained or created for Data Entry Assistance

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

The City of Turlock has received its Final and Conclusive Letter of Determination from the California Department of Finance to move ahead with the second phase of Avena Bella, the City of Turlock’s most recent affordable housing project with its nonprofit development partner, EAH, Inc. The second phase of the project calls for the construction of an additional 60 units that are primarily two-bedroom units. It is intended that during the period of the Con Plan that Low Income Housing Tax Credits (LIHTC) will be sought and awarded so that the construction phase will begin. This 60-unit phase is 20 percent extremely low, 25 percent very low, and 55 percent low income as per the guidelines of the tax credit financing.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

The Housing Authority of the County of Stanislaus (Housing Authority) is not under a Section 504 Voluntary Compliance Agreement.

Activities to Increase Resident Involvements

The Housing Authority provides homeownership resources to participants in the Housing Choice Voucher Program. The Family Self-Sufficiency (FSS) Program has established partnerships with a variety of community resources to refer participants for services including pre- and post-secondary education, health care, child care, employment development, supported employment, and small business development including micro-loans. The FSS Program also encourages families to participate in financial wellness programs including financial literacy and credit repair with an emphasis on long-term financial stability for the purposes of homeownership. Supportive services are provided through the Stanislaus County Assistance Project, the Stanislaus County Department of Mental Health, or Stanislaus County Integrated Services Agency.

The Housing Authority previously implemented a services and communication “quality control” system that provides the Housing Authority with immediate customer feedback and identifies areas that may need improvement.

The Housing Authority has also implemented a resident education program with regularly scheduled meetings and written communications on agency policy, rules, and leases.

Efforts to improve communications with residents and program participants include: on site resident training/informational meetings, regular newsletters and flyers.

The Housing Authority has implemented a “curb-side” appearance program. The focus of the program is the exterior of buildings, parking areas, play grounds and other areas of the complexes. Rodent and insect problems are addressed when residents report a problem and/or on Annual Inspections. In an effort to better educate residents concerning these problems, information is regularly provided through the Housing Authority’s newsletter.

These actions have assisted the Housing Authority in creating an atmosphere which emphasizes customer satisfaction and communication.

Is the public housing agency designated as troubled under 24 CFR part 902?

No.

Plan to remove the ‘troubled’ designation

N/A.

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

State law employs the term “constraints” to describe forces or efforts to restrain actions that would otherwise occur.

Environmental review, general planning, zoning, and related local land use regulations and development standards are all extensions of local government police powers to protect life and property, minimize nuisances, and achieve a desired quality of life as expressed through a participatory public process. Certain barriers to affordability are required by State Law (such as preparing and adopting a General Plan and conducting environmental review), adopted for safety or civil rights reasons (such as the imposition of seismic construction standards in quake-prone areas, or requiring compliance with accessibility or visit ability design standards), or enacted to remedy or prevent a specific local issue (such as requiring landscaping to deter graffiti). However, the term “barrier” should not be interpreted in the context that local development standards and development review procedures are inhibiting the provision of quality affordable housing that would otherwise be developed.

Potential constraints to housing development in the Stanislaus Urban County and City of Turlock vary by area, but generally include infrastructure, residential development fees, land use controls, development standards, development and building permit application processing times, and resource preservation. Barriers to housing also include personal barriers such as poor credit history, involvement with the law, limited knowledge about tenants’ rights and the complaints process.

An analysis of these potential barriers is detailed in the Stanislaus and City of Turlock Housing Elements. A summary of potential barriers identified in the Housing Elements is provided in the Market Analysis (MA-40) section of this Con Plan.

Additionally, the following impediments to fair housing choice are identified in the AI:

- ◆ Insufficient supply of affordable housing.
- ◆ Shortage of subsidies and strategies to promote affordable, accessible housing for low-, very low-, and extremely low-income households, including protected classes.
- ◆ Differential origination rates based on race, ethnicity, and location.
- ◆ Limited coordination with real estate industry.
- ◆ Limited knowledge of fair housing rights.
- ◆ Discrimination in rental housing.
- ◆ Local development standards and their implementation, e.g., zoning, building, or design standards, may constrain development of housing opportunities for minority and low-income households.
- ◆ Inadequate access to employment opportunities, transportation, and public and social services, and infrastructure to support increased housing opportunities for lower-income households.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The Stanislaus Urban County and City of Turlock strive to consistently implement all policies and procedures, to review local development standards and development review procedures in such a way as to ensure that such do not have unintended negative consequences, and to improve policies and procedures so as to increase the opportunities and feasibility of developing affordable housing, especially for special needs and very low- and low-income units).

Public policy can help mitigate barriers to affordable housing in two ways. First, resources can be put toward reducing housing development's carrying costs associated with housing development and construction. Another option is to directly subsidize rents, as with the Stanislaus Housing Authority Housing Choice Voucher Program. Taken together, these two options present the best opportunity to impact barriers to housing affordability for an individual household. Public and private resources need to be available in a manner which allows for the most effective and efficient use of resources at the local level.

With respect to program regulations, Federal and State funding programs are most often created and structured to serve specific populations, i.e., low or very low income families, the elderly, people with disabilities. Other times, the programs focus on a particular type of housing, such as narrowly defined cooperatives, congregate housing, or owner-occupied homes. During the underwriting process, additional layers of requirements apply that limit cost, size, design, return, and subsidies. Such constraints are well intentioned and designed to ensure the proper use of limited public resources. However, they also force developers (and ultimately the residents) to be driven by the requirements of the funding sources rather than the needs of the community or the residents who will live in the housing. These requirements often demand that housing be narrowly defined as "low-income" or "elderly" or "congregate" housing, resulting in concentration of assisted housing.

Residents who receive Social Security and other supplemental income benefits, and the vast majority of individuals who use publicly funded services, face extreme barriers to accessing housing. The past decade has seen a greater number of persons who must expend more than 50% of their income to secure housing. This has resulted in greater pressure on publicly funded social services to direct scant resources to address this critical housing need and from a system perspective this policy has increased pressure on housing subsidy programs. Effective service delivery/treatment is diminished if consumers lack the income to access housing. If this barrier is not addressed, there will continue to be a high incidence of homelessness among individuals who are disabled and poor.

In the context of infrastructure, land cannot be used for housing unless, at a minimum, it is accessible by roads and is able to meet other basic infrastructure needs such as wastewater management. Ideally, sites will have easy access to sewer, water and utility hook-ups, be on or near a transportation corridor, and have easy access to shopping and municipal services. These elements are particularly true for affordable housing developments, where tenants may not have their own modes of transportation. However, in rural communities that lack adequate infrastructure, the cost of bringing in utilities and roads can often render affordable housing impossible to development. In many communities, reconciling environmental concerns with housing needs is a challenge.

The strategy of the Stanislaus Urban County and City of Turlock will be to continue ongoing efforts to review all potential barriers to affordable housing that are within their authority to address; to continue to pursue and utilize available funding for mortgage assistance and housing rehabilitation; and to continue to work with and partner with housing nonprofit agencies, and housing developers from the nonprofit and for-profit sectors to promote the development of affordable and special-needs housing.

Stanislaus Urban County and City of Turlock goals and programs, which are developed to address the need, as well as the barriers, to affordable housing are noted in the previous section SP-45 Goals Summary – 91.215(a)(4)

Additionally, the following action items are identified in the AI to address fair housing impediments:

- 1.1 **Action:** Continue to provide assistance to preserve existing affordable housing and to create new affordable housing.
- 1.2 **Action:** Continue to offer regulatory relief and incentives for the development of affordable housing.
- 1.3 **Action:** Continue to ensure the availability of adequate sites for the development of affordable housing.
- 2.1. **Action:** Continue to pursue available and appropriate State and Federal funding sources to support efforts to construct housing meeting the needs of lower-income households.
- 2.2 **Action:** Continue to support the Stanislaus Housing Authority Section 8 Housing Choice Voucher (HCV) Rental Assistance Program, including distribution of program information at the public counters for the Stanislaus County Department of Planning and Community Development, City of Turlock Housing Services, and all Stanislaus Urban County member jurisdictions. Stanislaus County and the City of Turlock will hold periodic meetings with representatives of the Housing Authority of the County of Stanislaus to discuss actions Stanislaus County, the City of Turlock, and Stanislaus Urban County member jurisdictions can take to coordinate housing program implementation.
- 2.3 **Action:** Follow through on Housing Element policies and programs.
- 3.1 **Action:** When selecting lending institutions for contracts and participation in local programs, Stanislaus County, the City of Turlock, and Stanislaus Urban County member jurisdictions may prefer those with a Community Reinvestment Act (CRA) rating of “Outstanding” and may exclude those with a rating of “Needs to Improve” or “Substantial Noncompliance” according to the most recent examination period published by the Federal Financial Institutions Examination Council (FFIEC). In addition, the Stanislaus Urban County and the City of Turlock may review an individual institution’s most recent HMDA reporting as most recently published by the FFIEC.
- 3.2 **Action:** Strengthen partnerships with lenders to discuss lenders’ community reinvestment goals, including home mortgages, home improvement loans, and community development investments to be made in low- and moderate-income neighborhoods in the Stanislaus Urban County and in the City of Turlock.
- 4.1 **Action:** Work cooperatively with the real estate industry to develop ways for local agents to become more familiar with the Stanislaus Urban County and City of Turlock housing and rental assistance programs.
- 4.2 **Action:** Encourage Realtors to seek fair housing training.
- 5.1 **Action:** Conduct more outreach to educate tenants, and owners and agents of rental properties, regarding their fair housing rights and responsibilities.
- 5.2 **Action:** Provide educational literature in English, Spanish, and other appropriate languages.
- 6.1 **Action:** Support efforts to enforce fair housing rights and to provide redress to persons who have been discriminated against.

- 6.2 Action:** Support efforts to increase the awareness of discrimination against all Federal and State protected classes.
- 7.1 Action:** Review zoning and related regulations to determine the degree of adequate opportunity in the community for affordable housing to exist and to develop new affordable housing options.
- 8.1 Action:** Examine possible gaps in public infrastructure and services, especially for the needs of persons with disabilities, seniors, and low-income residents via a Disadvantaged Unincorporated Communities assessment. If significant gaps are found, explore methods to address the gaps and incorporate public improvements and services into local infrastructure and service plans.

SP-60 Homelessness Strategy – 91.215(d)

Introduction

As discussed earlier in this Con Plan, the Stanislaus Urban County and City of Turlock participate in the Stanislaus CoC to develop and implement regional goals and strategies (outlined in this section) to address and end homelessness.

To develop the Stanislaus Urban County's homeless funding priorities, the current condition of homelessness in the nation and Stanislaus County was examined by pulling from the Stanislaus County's 2014 Point-In-Time (PIT) Homeless Count, the Stanislaus CoC's 2014 Exhibit 1, the Stanislaus Urban County's Fiscal Years 2012-2015 Consolidated Plan (CP), and the United States Interagency Council on Homelessness's Report, "Opening Doors – Federal Strategic Plan to Prevent and End Homelessness" (2010). A recent Community Survey, conducted in preparation for the development of Stanislaus Urban County's Fiscal Years 2012–2015 CP, identified homeless services as a high priority and homeless prevention activities as a medium priority. Eligible activities allowed for under the homeless funds that the CDBG Stanislaus Urban County receives (ESG and CDBG Public Services) were then compared to existing services available to homeless and at-risk persons to develop the funding priorities described below. The ultimate goal of the CDBG Stanislaus Urban County Homeless Strategy is to increase housing stability and decrease incidents of homelessness in Stanislaus County by targeting funds to populations most in need, meeting both the immediate and long-term needs of the homeless, and avoiding the duplication of services by coordinating with service providers and the Stanislaus CoC.

The Federal Strategic Plan to Prevent and End Homelessness has the following four Goals:

- ◆ End Chronic Homelessness in five years
- ◆ Prevent and End Homelessness among Veterans in five years
- ◆ Prevent and End Homelessness for Families, Youth and Children in 10 years
- ◆ Set a Path to End all Homelessness

The Federal Strategic Plan focuses on solving homelessness for the chronic homeless, homeless veterans, homeless families with children, and homeless unaccompanied youth. The document discusses six strategies as paths to housing those target populations:

- ◆ Individualized Goal-Based Service Planning
- ◆ Ongoing Support Services Connected to Mainstream Resources
- ◆ Independent Living Skills Training

- ◆ Connections to Supportive and Trustworthy Adults and Support Networks
- ◆ Employment and Education
- ◆ Housing

Similarly, the current focus of the Stanislaus CoC funding has been to provide permanent supportive housing for the chronically homeless, homeless veterans, and for homeless youth out of foster care. The Emergency Solutions Grant (ESG) Program provides both emergency shelter and rental assistance to help stably house homeless households with and without children and long-term homeless adults. ESG sub-grantees will assess individual clients' needs and will evaluate their potential for success in the appropriate program (Emergency, Transitional, Permanent Supportive Housing or Rental Assistance). If they are not able to offer the needed service, then clients will be referred to the appropriate resource.

Drawing from these local data sources and Federal strategies, the Stanislaus Urban County has established the following Homeless Strategic Plan action items:

- ◆ Develop and operate coordinated entry for all households who are entering the homeless system or at risk for homelessness.
- ◆ Reach out to homeless households (especially unsheltered persons) and assess their individual needs with coordinated entry and a common assessment tool; collect information to determine the underlying issues and risk factors and develop a plan to address those issues.
- ◆ Reduce recidivism through system-wide implementation of evidenced-based practices known to effectively address homelessness, including incorporation of the Focus on Prevention 2014 strategies.
- ◆ Address the emergency shelter needs of people living outside through increased street outreach and assessment of their health needs.
- ◆ Significantly expand homeless rapid re-housing services to end homelessness as quickly as possible.
- ◆ Consider adoption of a "housing first" approach as a direct route to reducing homelessness.
- ◆ Help low-income households who are being discharged from publicly funded systems of care avoid becoming homeless by engaging those systems of care in identifying solutions to such households and planning to avoid new homelessness.
- ◆ Improve data collection and analysis, including better utilizing HMIS to track the transition of persons into and out of homelessness.
- ◆ Increase access to vocational training opportunities for homeless persons.
- ◆ Increase access to affordable housing and support services in areas related to life skills.
- ◆ Increase coordination with entities releasing persons into homelessness and with service providers and the Stanislaus CoC.

Please see Table 1a and the discussion provided under the Homeless Needs Assessment portion of this document for additional details on the needs of homeless in Stanislaus County.

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

In coordination with the Stanislaus CoC, programs that provide street outreach to unsheltered homeless persons and assess their individual needs include the following:

Stanislaus CoC Homeless Fair

The annual homeless fair, organized by Stanislaus CoC members, provides on-site needed health and resource needs assessments, as well as provides outreach regarding available shelter and social services to homeless persons who are both sheltered and unsheltered. Previous homeless fairs have also provided pet food and bike repair services to participants.

Telecare Corporation – Westside SHOP Stanislaus Homeless Outreach Program

Under contract with Stanislaus County Behavioral Health and Recovery Services, the Westside SHOP program uses a multidisciplinary team, which includes a psychiatrist, a nurse, a Master's prepared clinician, and personal service coordinators/case managers with experience in substance abuse recovery, housing, employment, and mental health support to adult residents with serious mental illness and a history of homelessness. The team works in partnership with each other as well as other agencies and service providers in the area to assist members with linkage to community resources.

Based on the well-researched Program of Assertive Community Treatment model, developed in Madison, Wisconsin, the program provides or assists members in obtaining a full range of services, including:

- ◆ Comprehensive assessment and treatment
- ◆ Crisis intervention and immediate support 24 hours/day, 7 days/week
- ◆ Outreach and engagement
- ◆ Psychiatric assessment and treatment
- ◆ Medication management, support, and education
- ◆ Risk focused assessment and intervention
- ◆ Physical health screening, care coordination, and referral
- ◆ Substance abuse intervention and counseling
- ◆ Focus on self-help and wellness
- ◆ A primary focus on peer support and family / significant other involvement, promoting community integration
- ◆ Vocational and educational services
- ◆ Engagement activities
- ◆ Case management
- ◆ Housing support

- ◆ Benefits and entitlements assistance
- ◆ Family support
- ◆ Education and life skill coaching, including money management
- ◆ Dual diagnosis assessment and intervention
- ◆ Providing information and learning opportunities as support for individuals in their recovery

Emergency Solutions Grant Program

ESG funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, nonfacility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. Any funding provided for such services through the ESG program would be subject to the competitive grant award process.

Addressing the emergency and transitional housing needs of homeless persons

Short-term strategies for addressing the emergency and transitional housing needs of homeless persons include but are not limited to the following:

- ◆ Expanding street outreach efforts to prioritize the needs of persons living outside, especially those whose health is compromised.
- ◆ Sustaining existing emergency shelter and transitional housing inventory and helping those in shelters exit to permanent housing through rental assistance combined with case management that assists clients in developing life skills and reduces barriers to obtaining and retaining housing.

Long-term strategies include but are not limited to the following:

- ◆ Expanding economic stability programming to help participants achieve long-term stability and reduce recidivism.
- ◆ Increasing inventory of permanent supportive housing for homeless households through the development of affordable housing.
- ◆ Aligning Stanislaus CoC strategies with the “Opening Doors” Federal Strategic Plan to Prevent and End Homelessness and HEARTH data-driven strategies to shorten lengths of stay, rapidly re-house as many homeless persons as possible, and prevent persons from becoming homeless.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

Key to stabilizing housing for these homeless populations is the provision of supportive services, tailored to fit the needs of the individual.

Permanent housing destinations generally include an apartment or house, permanent supportive housing, or living permanently with friends or family. A return to homelessness is indicated by a new entry in a homeless residential program (emergency shelter, transitional housing, rapid re-housing) in HMIS within 365 days after exiting to permanent housing.

The Stanislaus CoC strategies encourage providing homeless households with housing quickly and with supportive services that are of greatest need to support stable housing; other needs the households may have should be addressed through referrals to existing mainstream resources available in the community.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The state has policies in place that require health care facilities to participate in regional planning meetings and develop a specific document to identify best practices for the post-hospital transition of homeless patients, methods to establish and support effective communications between hospitals and stakeholders regarding this transition and the identification of resources. Local health care facilities have specific protocol in place requiring a safe discharge for all patients. In 2008, the Stanislaus County Public Health Agency reestablished the task force to review the current protocol in place and address any gaps in services necessary to ensure successful discharge planning services. The Public Health Agency has become actively involved in the Stanislaus CoC and working towards developing liaisons with housing services agencies within the Stanislaus CoC to update the existing discharge planning protocol. Currently in place there are discharge planning social workers on staff at the hospitals who work with service providers to locate appropriate housing and prevent the release of patients to the streets or to HUD McKinney-Vento funded emergency shelters, transitional or permanent housing units.

Representatives from Behavioral Health and Recovery Services (BHRS) and the Community Services Agency (CSA) regularly attend the monthly Stanislaus CoC meetings and are active participants in discharge coordination planning, in particular for homeless individuals, throughout Stanislaus County.

For adults recently released from custody, Stanislaus County addresses housing issues through the Day Reporting Center (DRC). The Sheriff's Department conducts Probation Orientation Meetings at the DRC in which several programs have participated in the past including Solidarity, Teen Challenge, and Gospel Mission. As a result of the Stanislaus CoC's coordination with the Probation Department, the Stanislaus County Sheriff's and Probation Departments also recently began a diversion program, where homeless individuals who would otherwise be jailed for minor crimes are able to stay at the Salvation Army shelter facility, where they receive shelter and case management services. Collaboration with public service providers and the Probation Department is ongoing.

Stanislaus County has transitional living procedures in place for juveniles exiting foster care to address youth in placement where the long term plan is emancipation. These procedures are required by both the State and Federal governments. Stanislaus County develops a 90 day transition plan that includes a housing component. Procedurally, a lead officer receives a list of those eligible minors from the case officers and he works with the case officer, minor, family, and any service providers to develop the plan prior to the minor's last status review (usually at 18 years old). A status review is a court hearing to review the minor's status in placement. The plans are submitted to the court and all involved parties, including the minor.

Through contracted services with BHRS, Telecare SHOP (Stanislaus County's primary agency for outreach to CH/mentally ill persons) provides treatment and discharge planning to adults with mental illness and/or chemical addiction. Extensive policies are in place to ensure that patients and mentally ill inmates are not discharged into settings such as shelters, the streets, hotel or motels. Discharge planning is multi-disciplinary and starts upon admission to a facility, with SHOP case managers working with a team including the patient, family, guardians and agencies to develop a plan for housing, medication, vocational, social and educational needs, follow-up, support services and life activities. Discharge planning includes supportive or protective housing if the patient is incapable of independent living. Agencies receive diagnosis, medication and other pertinent information to assist with follow up services. Appropriate discharge settings include nursing homes, basic care facilities, adult foster care, and independent living which are not funded through HUD McKinney-Vento resources. SHOP assists individuals in completing application for housing and mainstream resources such as Social Security prior to the patients discharge. This protocol has been accepted within the Stanislaus CoC and the general community and has proven to be highly successful in preventing homelessness from persons discharged from mental health facilities.

SP-65 Lead-Based Paint Hazards (LBP) – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

All housing related programs administered by the Stanislaus Urban County and the City of Turlock, including Rapid Re-Housing, NSP and HOME Consortia projects, require that all units constructed before 1978 be screened and inspected for lead-based paint hazards. HOME Consortia projects are generally inspected by the Housing Authority and ESG Rapid Re-Housing units are inspected by Stanislaus County Building Inspectors, unless the Housing Authority has already conducted a LBP inspection. The lead-based paint regulation that became effective April 22, 2010 added a requirement that requires contractors bidding on the rehabilitation of homes built prior to 1978 provide documentation of EPA Lead Renovation and Repair and Painting certification. If lead is found in any housing unit, a lead-based paint clearance test is conducted, after the work has been completed, by a licensed contractor with expertise in this type of work. Final payment is not released until the unit has passed the lead-based paint testing requirements. These requirements will assist Stanislaus County in its goal to eliminate the lead-based hazards.

How are the actions listed above related to the extent of lead poisoning and hazards?

Although lead was banned from residential paint in 1978, a significant number of pre-1978 housing units still exist within the Stanislaus Urban County jurisdiction. The presence of lead-based paint constitutes an active or latent problem that may now or in the future cause harm. The 2007-2011 ACS (Total Units) and 2007-2011 CHAS (units with children present) estimates that there are 24,498 owner-occupied housing units, of which 7,754 have children present, that were constructed prior to 1980 within the Stanislaus Urban County jurisdictions and 4,727 owner-occupied housing units, of which 1,885 have children present, in the City of Turlock. This same data also shows that there are 18,412 renter-occupied housing units, of which 5,065 have children present, that were constructed prior to 1980 within the Stanislaus Urban County jurisdictions and 1,245 renter-occupied housing units, of which 2,131 have children present, in the City of Turlock. This data shows that there is a much higher percentage of pre-1980 renter-occupied units with children present, than in owner-occupied units.

The Health Services Agency (HSA) of Stanislaus County serves as the lead agency for Stanislaus County in the identification, documentation and prevention of lead poisoning. The Childhood Lead Poisoning Prevention Program of Stanislaus County, administered through the HSA, becomes involved with childhood lead-based poisoning when notification of an elevated screening blood level is received either from the laboratory or physician. If the blood level is 10ug/dL (micrograms per deciliter), notification is made to the family. Once a child meets the case definition, an environmental investigation is performed by a Registered Environmental Health Specialist to determine, if possible, the source of lead exposure.

The Stanislaus County HSA in partnership with the Department of Environmental Resources conducts the investigation of residences where children with elevated levels of lead reside.

The Stanislaus Urban County partnered with the Childhood Lead Poisoning Prevention Program to distribute information in the unincorporated areas of Stanislaus County and PJs. If the source of lead exposure is related to the residential physical environment (e.g., peeling paint that indicates the presence of lead) then the Housing Rehabilitation Program may participate in source eradication.

How are the actions listed above integrated into housing policies and procedures?

All housing-related programs administered by the Stanislaus Urban County, including Rapid Re-Housing and HOME Consortia project who collaborate with the Housing Authority, have policies in place which require that all units constructed before 1978 be screened for LBP hazards.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The City of Turlock, Turlock HOME Consortium, and Stanislaus Urban County have a multipronged approach to addressing the issue of reducing poverty through ensuring an adequate, affordable, quality housing supply, improving low-income neighborhoods, strengthening the employment skills of the community and ensuring access to basic needs such as food and shelter. The City of Turlock is particularly focused on ensuring quality housing options to low-income individuals through the production of new low-income units as well, the rehabilitation of existing low-income units and combating rental discrimination against minorities.

The City of Turlock realizes that it cannot combat poverty alone, and it is a top priority of the City of Turlock to coordinate with other entities where needed. The City of Turlock is particularly committed to coordinating with the County of Stanislaus, which is responsible for many housing and social service programs. The City of Turlock also coordinates with other entities such as the Stanislaus CoC and various community-oriented nonprofit groups that have a stake in the community. It is a top goal of the City of Turlock to ensure that it accesses all available grant money to assist the community.

The City of Turlock is committed to removing all impediments to eliminating poverty that are within its control. The City of Turlock regularly reviews its zoning, codes, permit process and fees to ensure that it is as accommodating as possible to those who wish to create jobs by opening or expanding businesses in the City of Turlock. The City of Turlock is committed to ensuring an adequate law enforcement presence so that businesses feel safe operating in the city and providing the quality infrastructure needed to support a vibrant economy. The City of Turlock is also taking the lead in increasing coordination with nonprofits to provide a unified plan.

See **Appendix 3** for map of low- and moderate income households within Stanislaus County.

FOCUS ON PREVENTION 2015

On October 28, 2014 the Board of Supervisors adopted a plan called Focus on Prevention 2015, which is a strategy for community transformation in four areas critical to the quality of life in Stanislaus County, including:

- ◆ Homelessness
- ◆ Strengthening Families
- ◆ Youth Early Intervention
- ◆ Reducing Recidivism

The goal of Focus on Prevention 2015 is to bring all sectors of the community together to provide an opportunity for cross-sector development of community-wide prevention strategies. A community convening will be held centering on each of the four categories listed above, where a plan for the development of the next phase will be outlined by the participants. This effort recognizes that although good programs exist throughout the County, multiple sectors of the community often stay within their established networks causing gaps in the network of care for the County's at-risk populations. As a result the outcomes and overall impact of these programs is falling short and the County is experiencing both funding gaps and funding redundancies. While the County will act as the facilitator of the Convenings, this effort centers on the platform that government is not the answer and that champions from the community must be the mobilizers of change. The effort focuses on coordination between the following sectors of the community:

- ◆ Education
- ◆ Faith-based
- ◆ Arts
- ◆ Media
- ◆ Government
- ◆ Nonprofits
- ◆ Business
- ◆ Entertainment and Sports
- ◆ Neighborhoods

Upon completion of the Convenings and the next step will be development of community-led prevention strategies. The County will be offering mini-grants for implementation plans which incorporate all sectors of the community. The focus on prevention is intended to become a new norm in which programs and services with a prevention focus and with meaningful prevention performance measures guide future resource decisions.

Stanislaus County through its CDBG/ESG program is committed to implementation of the Focus on Prevention 2015 platform and will integrate the work that comes out of this effort into future funding decisions. As a first step to incorporate the Board of Supervisor's Focus on Prevention 2015 effort into the Community Development Block Grant and Emergency Solutions Grant programs, this year planning staff will be setting aside one \$40,000 grant for prevention focused applications. CDBG and ESG funds will be incorporating more Focus on Prevention 2015 strategies as the process unfolds.

Homeless Services

All local nonprofit agencies serving the homeless offer some level of supportive services to program participants, ranging from family counseling to job skill development, all of which are intended to promote self-sufficiency and exiting poverty and homelessness.

The Emergency Food and Shelter Grant Program (EFSG), administered by the Federal Emergency Management Agency (FEMA), provides funding to supplement and expand ongoing efforts to provide shelter, food, and supportive services for the nation's hungry, homeless, and people in economic crisis.

Homeless Prevention and Transitional Housing

Homeless prevention activities are designed to keep low-income people who are at the highest risk of homelessness from entering homeless services. Prevention programs have been retooling to stabilize individuals and families that are at risk of becoming homeless and to improve their stability to avoid future housing crises. Prevention programs are funded through Balance of State ESG funds, HOPWA funds, Supportive Services for Homeless Veterans funds, and local private funding.

As the Stanislaus CoC begins a system-wide shift to a housing first approach, the Stanislaus CoC has encouraged the conversion of transitional facilities to permanent supportive housing. The remaining transitional housing programs are shortening their length of stay to more rapidly exit homeless persons to permanent housing, or they are seeking funding from other systems of care for intensive services for homeless persons facing severe barriers to housing. This reflects a new understanding of the purpose of transitional housing rather than continuing to fund it as a routing component of Stanislaus County's homeless housing system.

Vulnerability Index Survey

HOMELESS RISK FACTORS

Although we have no exact count as to the number of persons who lose their housing and become homeless each year, we do know what risk factors play into causing homelessness.

Persons who are homeless or at-risk of homelessness include individuals or families that are experiencing one or more risk factors. When evaluating these risk factors within the context of Stanislaus County a rise in persons at-risk of homelessness is anticipated. Some risk factors for homelessness include the following:

- ◆ Sudden and significant increase in utility costs
- ◆ Mental health and substance abuse issues
- ◆ Physical disabilities and other chronic health issues, including HIV/AIDS
- ◆ Severe housing cost burden (greater than 50 percent of income for housing costs)
- ◆ Homeless in last 12 months
- ◆ Young head of household (under 25 with children or pregnant)
- ◆ Current or past involvement with child welfare, including foster care
- ◆ Pending foreclosure of housing (rental or homeownership)
- ◆ Extremely low income (less than 30 percent of Area Median Income)
- ◆ Past institutional care (prison, treatment facility, hospital)
- ◆ Recent traumatic life event, such as death of a spouse or primary care provider, abandonment of spouse or primary care provider, or recent health crisis that prevented the household from meeting its financial responsibilities
- ◆ Credit problems that preclude obtaining of housing

- ◆ Significant amount of medical debt.
- ◆ Eviction within 2 weeks from a private dwelling (including housing provided by family or friends)
- ◆ Discharge within 2 weeks from an institution in which the person has been a resident for more than 180 days (including prisons, mental health institutions, hospitals)
- ◆ Residency in housing that has been condemned by housing officials and is no longer meant for human habitation
- ◆ Sudden and significant loss of income

MENTAL OR PHYSICAL DISABILITIES, SUBSTANCE ABUSE AND OTHER CHRONIC HEALTH ISSUES

Living with mental illness, physical disabilities, substance abuse or other chronic health issues can increase the risk of homelessness. The HSA's Stanislaus County Community Health Assessment Survey for 2008 found that Stanislaus County residents who needed help for emotional or mental health problems increased from 14.6 percent in 2001 to 20.5 percent in 2005. However, the number of persons who did not see health professionals who needed it for emotional or mental problems was at 43.3 percent. When asked why those not receiving help did not get it, 62.4 percent responded that it was due to a lack of insurance. Disabilities vary in type and severity and can have a significant impact on a household's housing needs and ability to pay for appropriate housing (2015–2023 Housing Element). According to the 2013 ACS 1-Year Estimates, 13.1 percent of the population in Stanislaus County and 11.8 percent in the City of Turlock reported a disability as compared to the State where 10.1 percent of the population reported a disability.

Stanislaus County rates for chronic health issues, such as diabetes, asthma, and obesity, are higher than averages for the State.

STANDARD CONDITION & SUBSTANDARD CONDITION BUT SUITABLE FOR REHABILITATION

Based on data from the 2007-2011 ACS, 48.2 percent (43,675 households) of both owner-occupied and renter-occupied households in the Stanislaus Planning Area have one or more of the following housing conditions: (1) lacks complete plumbing facilities; (2) lacks complete kitchen facilities; (3) more than one person per room; and (4) cost burden greater than 30 percent. Renter-occupied households have the highest rate of housing conditions at 58 percent, while 43 percent of owner-occupied households have none of the housing conditions. With regard to the age and condition of the housing stock, the majority of the Stanislaus Planning Area's housing units were built between 1950 and 1979 (34 percent), followed by between 1980 and 1999 (32 percent), 2000 or later (20 percent), and before 1950 (14 percent). Older units are generally in greater need of repair, including possible lead-based paint remediation: 48 percent of both owner-occupied and renter-occupied units were built before 1980. Approximately 30 percent of units built before 1980 have children present. These units pose the greatest risk of lead poisoning.

In the City of Turlock, 44.8 percent (10,747 households) of both owner-occupied and renter-occupied households have one or more of the following housing conditions: (1) lacks complete plumbing facilities; (2) lacks complete kitchen facilities; (3) more than one person per room; and (4) cost burden greater than 30 percent. Renter-occupied households have the highest rate of housing conditions at 58 percent, while 43 percent of owner-occupied households have none of the housing conditions. With regard to the age and condition of the housing stock, the majority of housing units were built between 1980 and 1999 (36 percent), followed by between 1950 and 1979 (33 percent), 2000 or later (23 percent), and before 1950 (9 percent). Older units are generally in greater need of repair, including possible lead-based paint remediation: 44 percent of both owner-occupied and renter-occupied units were built before 1980. Approximately 33 percent of units built before 1980 have children present. These units pose the greatest risk of lead poisoning.

COST BURDEN AND SEVERE COST BURDEN

Cost is the primary reason many individuals are unable to obtain or maintain quality housing. Approximately 24,101 of the Stanislaus Planning Area lower-income households overpaid for housing. Of those lower-income households paying more than 30 percent or more on housing, 54.9 percent were from the City of Ceres. The City of Turlock had approximately 22,780 lower-income households that were paying over 30 percent of their income on housing.

UNEMPLOYMENT AND UNDEREMPLOYMENT

According to the California Employment Development Department, the unemployment rate in Stanislaus County was 11.1 percent in January 2015, up from a revised 10.4 percent in December 2014, and below the year-ago estimate of 13.0 percent. This compares with an unadjusted unemployment rate of 7.3 percent for California and 6.1 percent for the nation during the same period. According to the 2009-2013 ACS, 9.6 percent were unemployed in the City of Turlock.

OVERCROWDING

The Census defines an overcrowded unit as one occupied by 1.01 persons or more per room (excluding bathrooms and kitchens). Units with more than 1.5 persons per room are considered severely overcrowded. Overcrowding increases health and safety concerns and stresses the condition of the housing stock and infrastructure. Overcrowding is strongly related to household size, particularly for large households and especially very large households and the availability of suitably sized housing. Overcrowding impacts both owners and renters; however, renters are generally more significantly impacted.

While family size and tenure are critical determinants in overcrowding, household income also plays a strong role in the incidence of overcrowding. As a general rule, overcrowding levels tend to decrease as income rises, especially for renters (particularly for small and large families). The rate of overcrowding for very low-income households is generally nearly three times greater than households over 95 percent of the area median income. As with renters, owner households with higher incomes have lower rates of overcrowding.

According to the 2009-2013 ACS, 7.1 percent of households in Stanislaus County and 6.7 percent of households in the City of Turlock were overcrowded, compared to 8.2 percent in California.

HOMELESS NEEDS

Persons experiencing homelessness and households at-risk of homelessness need access to the following services:

- ◆ Job training;
- ◆ Sustainable paying jobs;
- ◆ Stable and affordable housing;
- ◆ Supplemental food supplies;
- ◆ Life-skills training;
- ◆ Basic coping skills, financial planning, food shopping, spending;
- ◆ Safe, affordable child care;

- ◆ Accessible and reliable public transportation;
- ◆ Case management services or supportive housing after leaving a shelter;
- ◆ Coordinated case management for those involved with a variety of public entities, such as the courts and parole;
- ◆ A safe environment that is drug and gang free;
- ◆ Recreational programs for adults;
- ◆ Chore services, including yard maintenance for the elderly;
- ◆ Medication administration assistance for the elderly; and,
- ◆ Access to health care
- ◆ Access to vocational training opportunities; and
- ◆ Access to substance abuse treatment programs

Other Programs and Services

CONTINUUM OF CARE (STANISLAUS COC)

Stanislaus County and City of Turlock staff consults and collaborates with the Stanislaus CoC's committee in multiple ways. The Stanislaus CoC is made up of representatives from the City of Modesto, the City of Turlock, the Housing Authority, Stanislaus County Behavioral Health and Recovery Services, Stanislaus County Child Support Services, housing service providers, social service providers, fair housing service providers, health service providers and homeless service providers. Announcements for all funding opportunities through the County are routinely advertised at the Stanislaus CoC meetings. A representative from the Stanislaus CoC participates on the panel which scores applications for the competitive CDBG Public Service and ESG grants. Additionally, draft ESG and CDBG Public Services funding recommendations will be presented to the Stanislaus CoC during their April 2015 meeting for comment.

The Stanislaus Urban County and City of Turlock will maintain its membership and active involvement in the Stanislaus CoC, a multi-agency collaborative which focuses on the community's housing and social service needs, to continue outreach and information sharing with other Stanislaus County agencies serving similar clientele.

The Stanislaus CoC has developed two working committees to evaluate the best method for implementing a coordinated client intake and assessment process. As it is required to participate in HMIS as an ESG sub-recipient, a common data entry form was developed in this sub-committee to assist with uniform data collection to be input into the Stanislaus CoC's HMIS database. The sub-committee will continue to work together to develop a coordinated assessment process. The sub-committee is leaning toward a coordinated, rather than centralized, assessment system due to the limitations on the number of HMIS licenses and computers available to service providers.

INSTITUTIONS THAT MAY DISCHARGE PERSONS INTO HOMELESSNESS

Representatives from Behavioral Health and Recovery Services (BHRS) and the Community Services Agency (CSA) regularly attend the monthly Stanislaus CoC meetings and are active participants in program planning for homeless fund utilization throughout Stanislaus County. The HSA has been contacted in regard to recent and upcoming health care reform legislation, some of which encourages incorporating rental assistance and case management into discharge planning. Because Stanislaus County does not have a public hospital, private hospitals will ultimately need to be consulted in the future as to which health care reform measures they will be implementing. On October 1, 2011 California passed a corrections realignment plan, which shifts responsibility from the state to counties for the custody, treatment, and supervision of individuals convicted of specified nonviolent, non-serious, non-sex crimes.

As a result of this process, the Stanislaus County Sherriff's and Probation Departments refer recently discharged paroles to the Salvation Army shelter facility, where they receive shelter and case management services. Collaboration with public service providers and the Probation Department is ongoing.

SERVICE PROVIDERS

Consultation with public and private agencies that provide assisted housing, health services, and social services to determine what resources are available to address the needs of any persons that are chronically homeless was addressed via coordination with the local Stanislaus CoC.

How is the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

By continuing to fund the acquisition, development, and/or rehabilitation of affordable housing units when funding resources are available, the Stanislaus Urban County and City of Turlock will be providing individuals and families in poverty with a decent, affordable place to live, which will allow them to focus their efforts on overcoming poverty.

Providing financial assistance to first-time homebuyers can help them in making the transition to homeowner status and build up equity in their own home. Similarly, assisting a low-income family which already owns in home to rehabilitate or improve that home increases its value, and thus increases the value of that family's home in the long run.

Increased equity in the form of home ownership can, when properly nurtured, provide economic resources that can permit a low-income homeowner to increase their income, which can assist in the financing of higher education for household members (leading to increased income), or wealth which can assist in obtaining investment capital to start a business.

While the ability to access home equity is limited for extended periods of time under most housing assistance programs, a valuable credit history can be created which increases a family's access to borrowed money. In addition, the eventual termination of restrictions permits direct access to accumulated equity at some point in the future.

Funding for homeless-related programs will also provide a support system for individuals and families who are struggling with poverty.

All of these can have the effect of lifting families out of poverty.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Stanislaus County, as the lead agency for CDBG and ESG funds, monitors all sub-recipients on a regular basis (at least once per quarter). Monitoring is conducted to ensure statutory, regulatory, and programmatic requirements are being met and that information submitted to Stanislaus County is accurate and complete.

An agreement is executed with every sub-recipient which clearly states all contractual requirements including but not limited to the project scope of work, performance measurement standards, reporting requirements, draw-down requirements, and applicable Federal requirements. The monitoring process emphasizes on-site field visits, desk audits, technical assistance, and assistance to sub-recipients to ensure a good data collection and reporting system is in place.

Specifically, the objectives of Stanislaus County's monitoring program are to:

- ◆ Ensure that sub-recipient implements its program and its individual activities, as described in the application and the sub-recipient Agreement.
- ◆ Ensure that sub-recipient conducts its activities in a timely manner, and in accordance with the schedule included in the Agreement.
- ◆ Ensure that sub-recipient charges costs to the project, which are eligible under applicable laws and CDBG regulations, and reasonable in light of the services or products delivered.
- ◆ Ensure that sub-recipient conducts activities with adequate control over program and financial performance, and reasonable in light of the services or products delivered.
- ◆ Ensure that sub-recipient has continuing capacity to carry out the approved project, as well as other grants for which it may apply.
- ◆ Identify potential problem areas and assist the sub-recipient with applicable laws and regulations compliance.
- ◆ Assist sub-recipients in resolving compliance problems through discussion, negotiation, and the provision of technical assistance and training.
- ◆ Provide adequate follow-up measures to ensure that performance and compliance deficiencies are corrected and not repeated.
- ◆ Comply with the Federal monitoring requirements of 24 CFR 570.501(b) and 24 CFR 85.40.
- ◆ Determine if any conflicts of interest exist in the operation of the CDBG program per 24 CFR 570.611.
- ◆ Ensure that required records are maintained to demonstrate compliance with applicable regulations.
- ◆ Verify that the outputs and outcomes are realized in a timely manner.
- ◆ Track grantee's progress in fulfilling its goals and objectives set forth in the Con Plan measured with established guidelines to assure that the program remains on task. Additionally, with data collected by the grantee during monitoring visits and ultimately entered into the IDIS system, this program is capable of presenting the data to defend its progression towards accomplishment of its goals and objectives set forth in the Con Plan. On a semi-annual basis this information is compiled and compared with the goals and objectives in the Con Plan. If this information reflects the accomplishments set forth in the Con Plan, the programs will proceed as planned. If this information falls short of the goals set forth, appropriate adjustments will be made and notification sent to the respective sub-recipients to be cognizant of their need to meet certain milestones and timeliness requirements to assure receipt of expected funds for their respective programs.

PROGRAM AND PLANNING REQUIREMENTS

A coordinated monitoring process has been established to verify and confirm that grant funds have been used in an eligible and appropriate manner for each of the following programs:

COMMUNITY DEVELOPMENT BLOCK GRANT STANISLAUS URBAN COUNTY

Stanislaus County staff reviews quarterly project progress reports, requests for funds reports and budget printouts, which identify the total funds used by all jurisdictions during a given month. Stanislaus County staff verifies and cross-references the information on the quarterly budget activity reports. Monitoring visits are also scheduled quarterly by Stanislaus County staff for each jurisdiction to ensure appropriate expenditure of funds. Finally, Stanislaus County tracks the timeliness of draw-downs within the IDIS system to assure that the program meets or exceeds the threshold requirements established by HUD.

CDBG PUBLIC SERVICE GRANT PROGRAM (PSG)

Stanislaus County staff reviews quarterly PSG statistics tables, narratives, request for funds forms and budget printouts, which identify the total funds used/requested by each grantee during that reporting period. Stanislaus County staff verifies and cross-references the information on the quarterly budget activity reports. Monitoring visits are also scheduled quarterly by Stanislaus County staff for each grantee to ensure appropriate expenditure of funds and recommendations are provided to the grantee within 30 days of the monitoring visit.

EMERGENCY SOLUTIONS GRANT (ESG) PROGRAM

Stanislaus County staff reviews quarterly ESG statistical tables, narratives, Request for Funds forms and budget printouts, which identify the total funds used/requested by each grantee during that reporting period. Stanislaus County staff verifies and cross-references the information on the quarterly budget activity reports. Monitoring visits are also scheduled quarterly by Stanislaus County staff for each grantee to ensure appropriate expenditure of funds (including match requirements). Monitoring will include on-site visits, review of records such as client files, financial records, and interviews with staff and project participants. On-site monitoring will include formal and advance notification of the visit; pre-visit preparation based on review of existing information, and clear conclusions and recommendations provided to the grantee following the monitoring visit. As part of the ESG monitoring process invoices and accompanying receipts are reviewed for reimbursement eligibility. Once eligibility is confirmed, fifty percent (50%) of the costs related to the project are reimbursed. The sub-recipient in turn commits their dollar-to-dollar match by paying the remainder of the expenses from non-Federal sources.

DOWN PAYMENT ASSISTANCE PROGRAM

HOME Consortia members meet on a quarterly basis to update them on the progress of our Down Payment Assistance Program applicants and loans. Monitoring is the responsibility of the HOME Consortium lead agency (City of Turlock). Many applicants have credit challenges and are encouraged to reapply following the mitigation of all deficiencies. Monthly updates are also given on the funding availability for the program. When possible, applicants with credit problems are actively referred to nonprofit credit counseling services to address such concerns.

HOME REPAIR (REHABILITATION) PROGRAM

Stanislaus County successfully collaborates with the Housing Authority and use a combination of funds, including but not limited to HOME Consortia contributions that allow us to address the needs of both major and minor home rehabilitation programs. The Housing Authority local presence has offered a more effective program.

In addition, there are monitoring procedures tailored to the above-mentioned programs, which include but are not limited to compliance with housing codes through on-site inspections and clearance to ensure eligibility for the project's release of funds. Stanislaus County staff is continually working to improve program oversight by attending training on compliance topics, amendments to regulations and/or OMB circulars, and developing written procedures and forms.

TURLOCK HOME AND CDBG PROGRAM MONITORING

Monitoring of the Con Plan will be the responsibility of the City of Turlock's Housing Program Services Division. Monitoring will include the HUD-funded activities administered by the City of Turlock as described in the Con Plan. This will ensure that all statutory and regulatory requirements are being met and that performance reports and all other information submitted to HUD is correct and complete. The goal of the City of Turlock and the Consortium is to have no significant monitoring comments or audit findings.

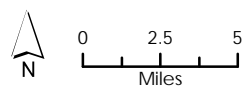
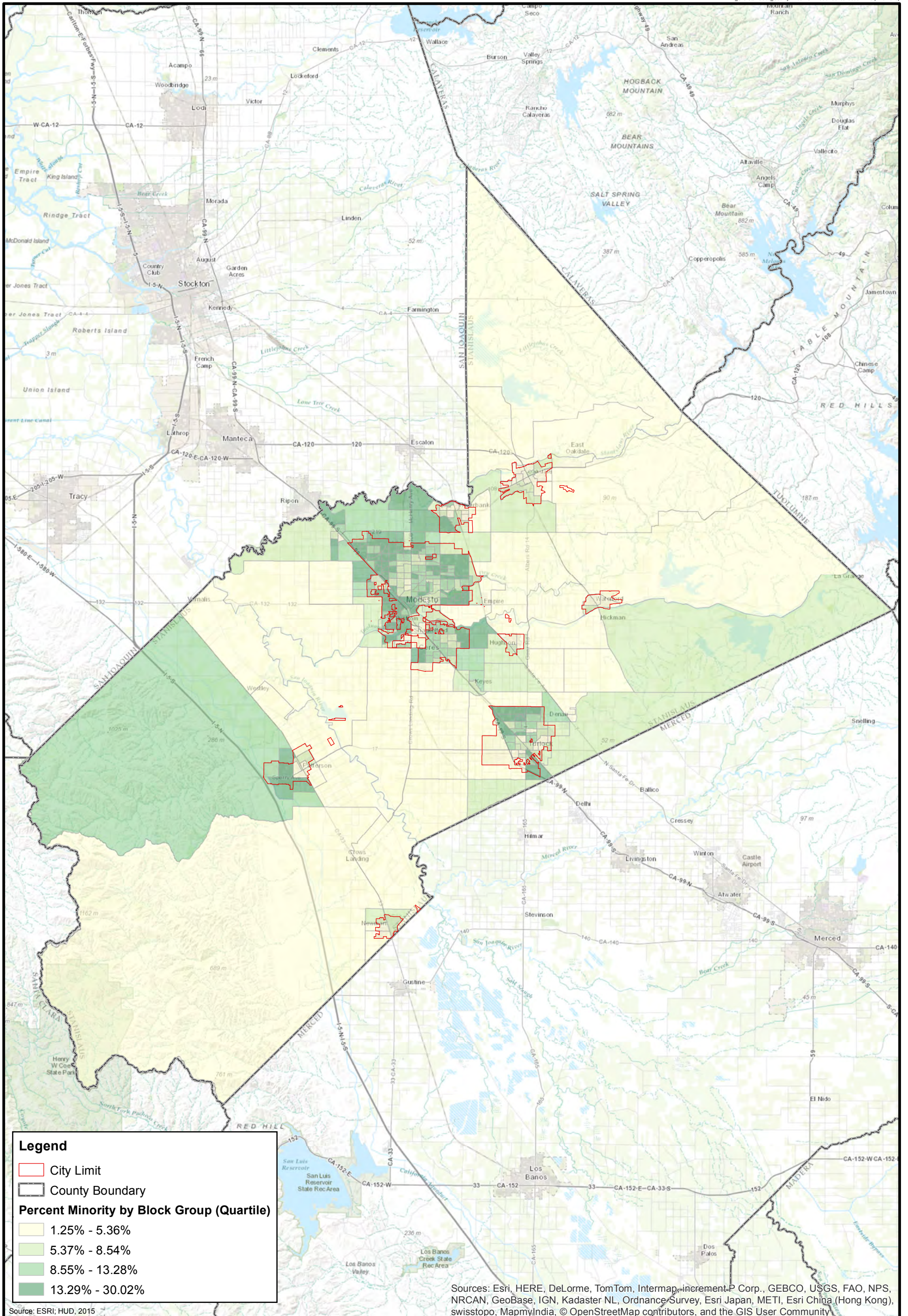
Specific monitoring functions will include the following:

- ◆ Review potential activities to ensure compliance with eligibility, national objectives and overall benefit.
- ◆ Review projects, prior to, during and at completion of their implementation to ensure compliance with all statutory and regulatory requirements.
- ◆ Conduct a single audit on a yearly basis to ensure compliance with the income requirements.
- ◆ Supervise and train employees with an emphasis on HUD statutory and regulatory requirements and hold periodic City of Turlock staff and Consortium member meetings to monitor activities.
- ◆ Prepare for and cooperate with the auditor conducting the annual audit of Federal funds received by the Consortium.
- ◆ Review all reports and other documentation submitted to HUD to ensure correctness and completeness.

Turlock tracks and reports on its progress toward meeting its housing and community development goals and report these on an annual basis in the Consolidated Annual Performance Report (CAPER). At a minimum, a yearly on-site review will be conducted to ensure compliance with specific long-term monitoring requirements of the programs involved including minority business outreach and comprehensive planning requirements. Quarterly reports prior to draw requests will be required to ensure compliance and eligibility, as well as the timeliness of expenditures by all of the City of Turlock's CDBG-funded nonprofits.

Appendices

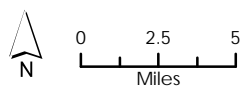
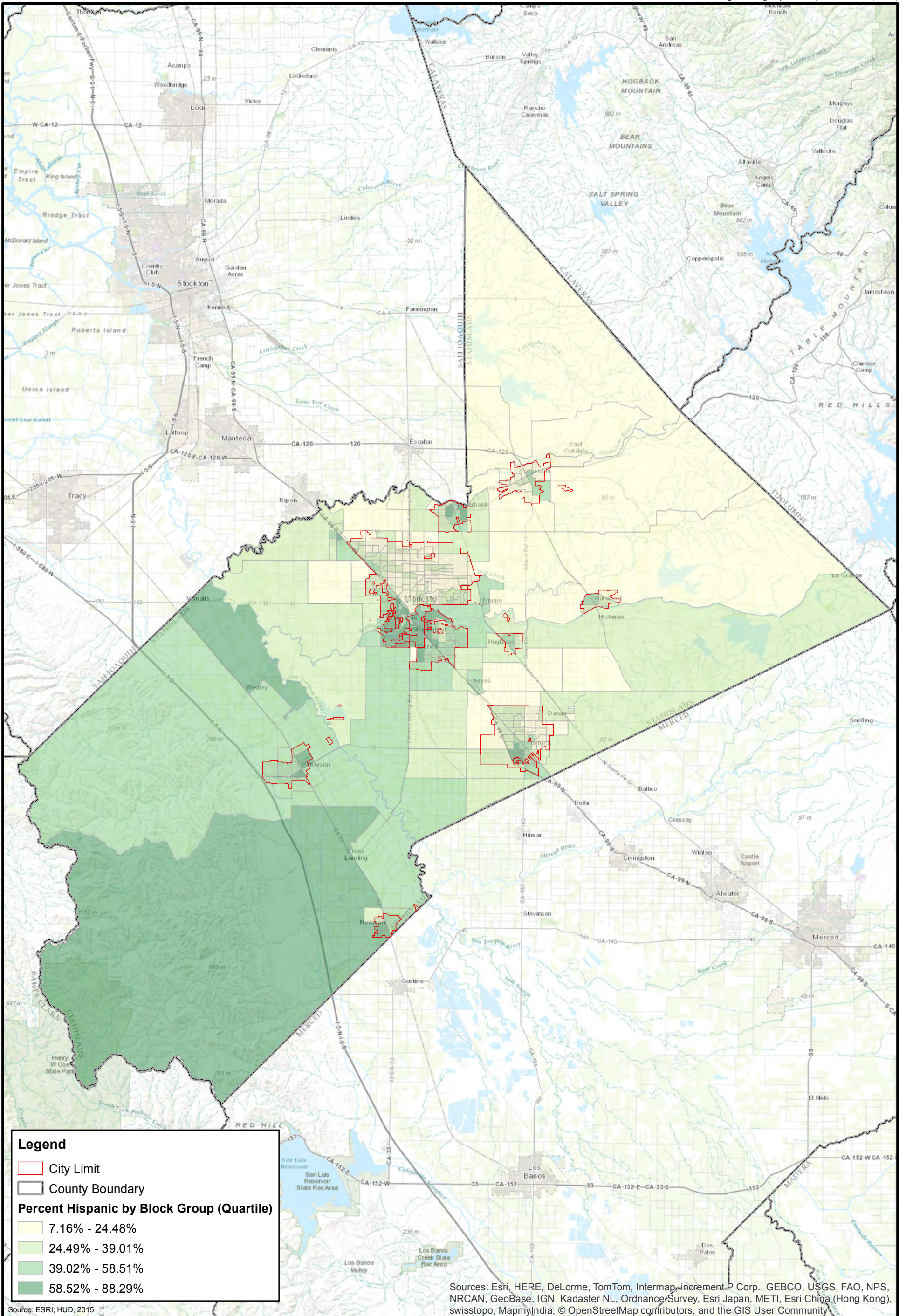
APPENDIX 1.
AREAS OF MINORITY
CONCENTRATION



Map 1
Racial Minority Concentration in Stanislaus County

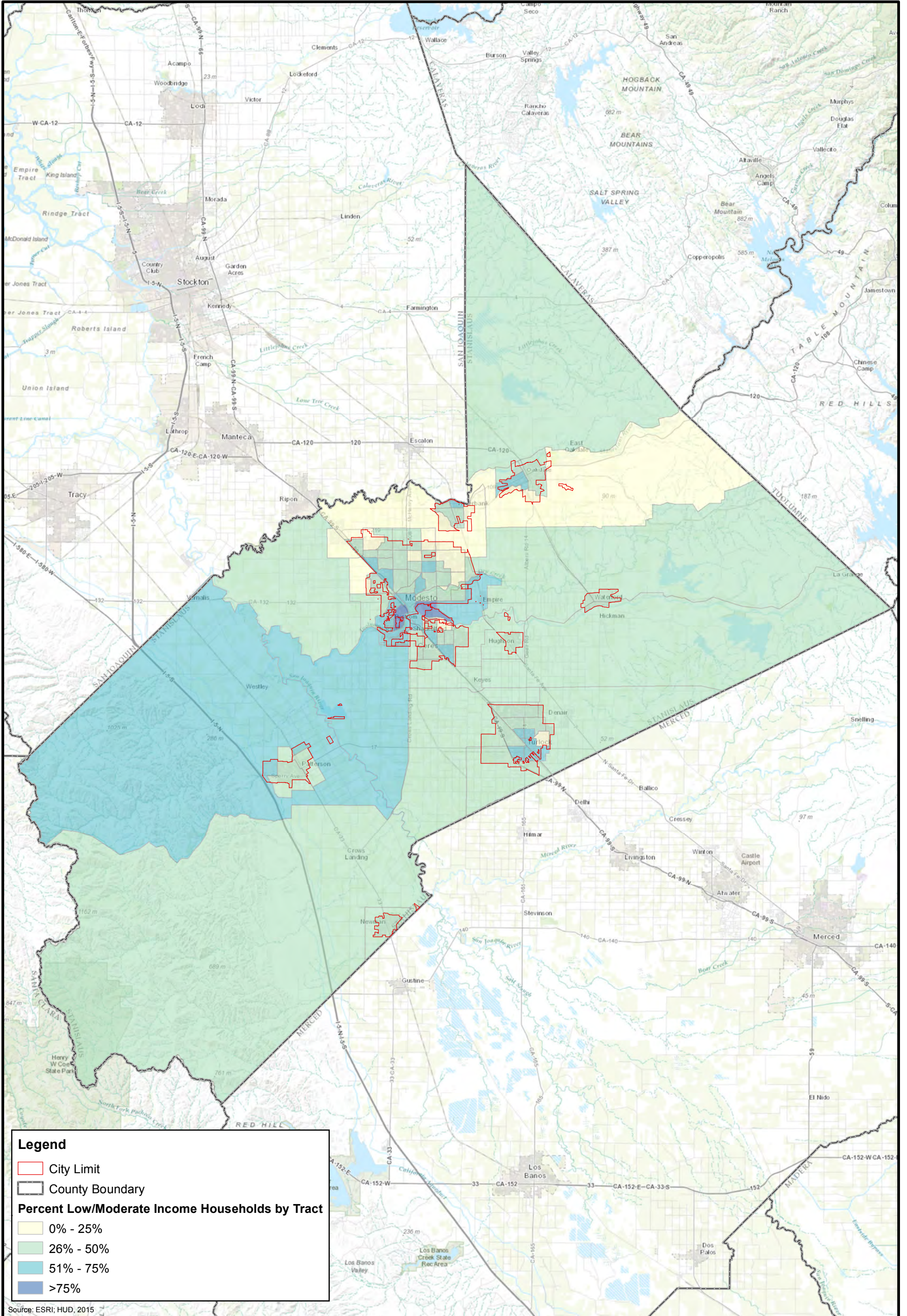


APPENDIX 2.
AREAS OF HISPANIC
CONCENTRATION

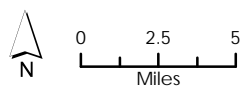


Map 2
Hispanic Concentration in Stanislaus County

APPENDIX 3.
AREAS OF LOW-INCOME AND VERY
LOW-INCOME CONCENTRATION

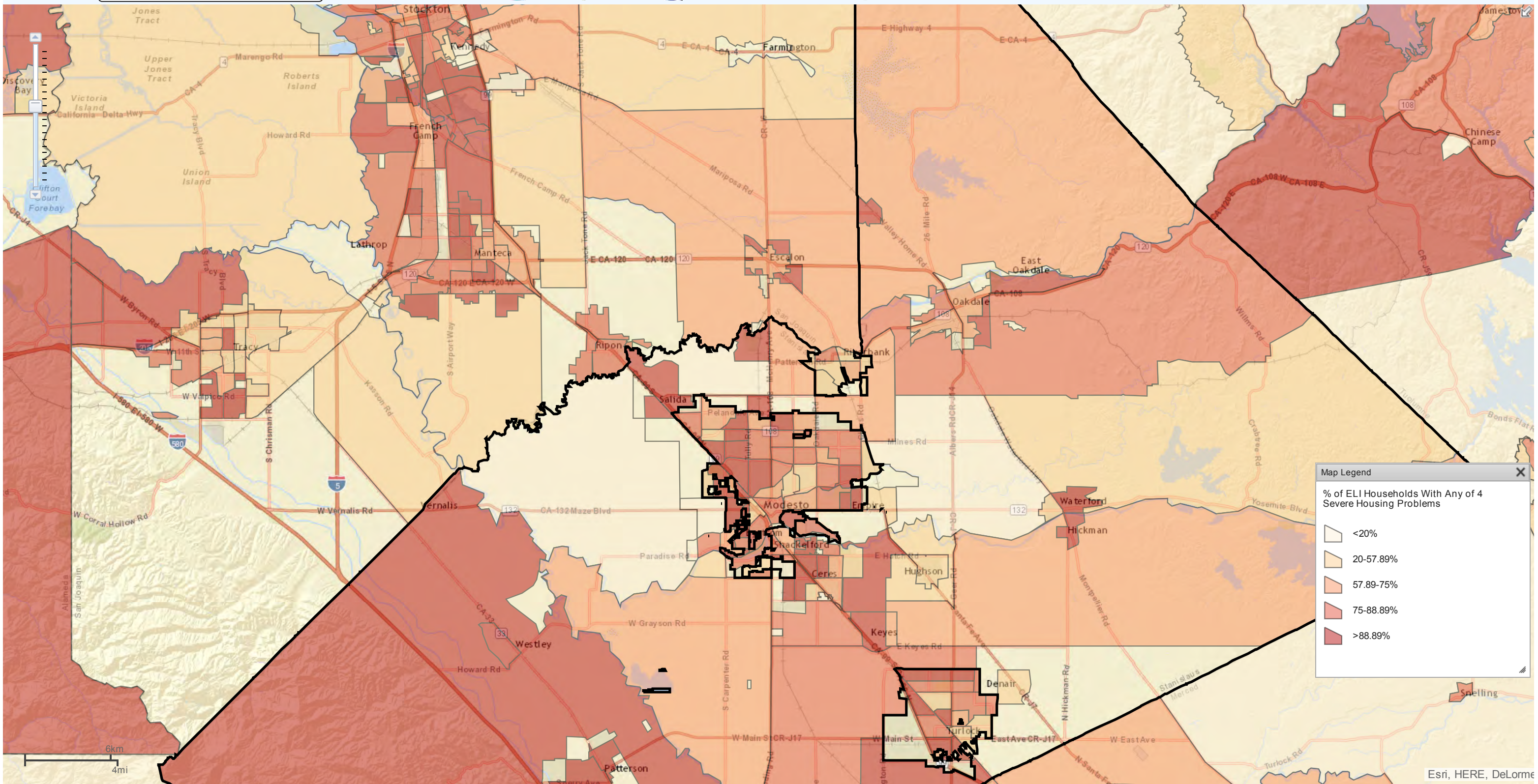


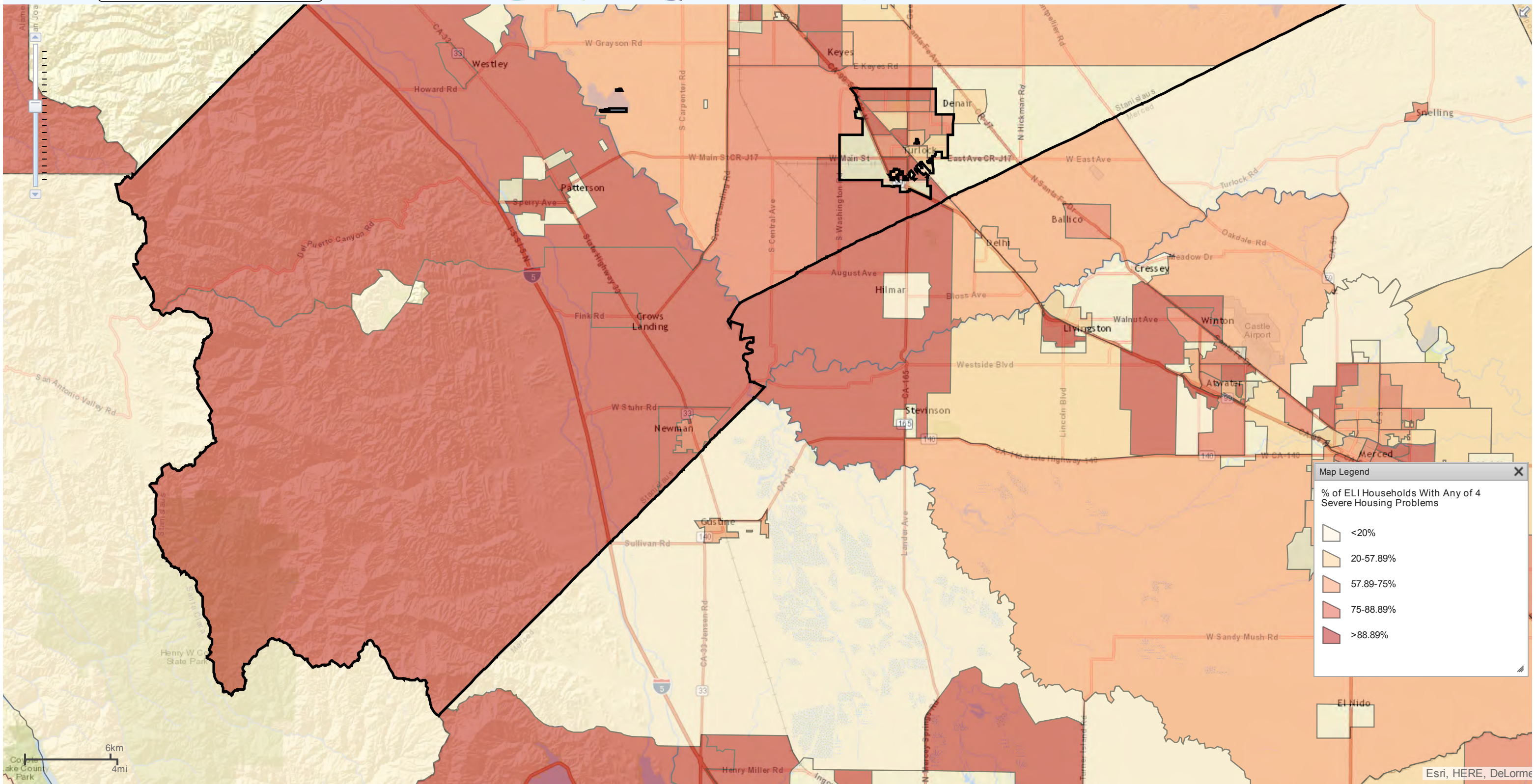
Source: ESRI; HUD, 2015



Map 3
Percentage of Low/Moderate Income Households in Stanislaus County

Appendix 4 – Severe Housing Problems Maps

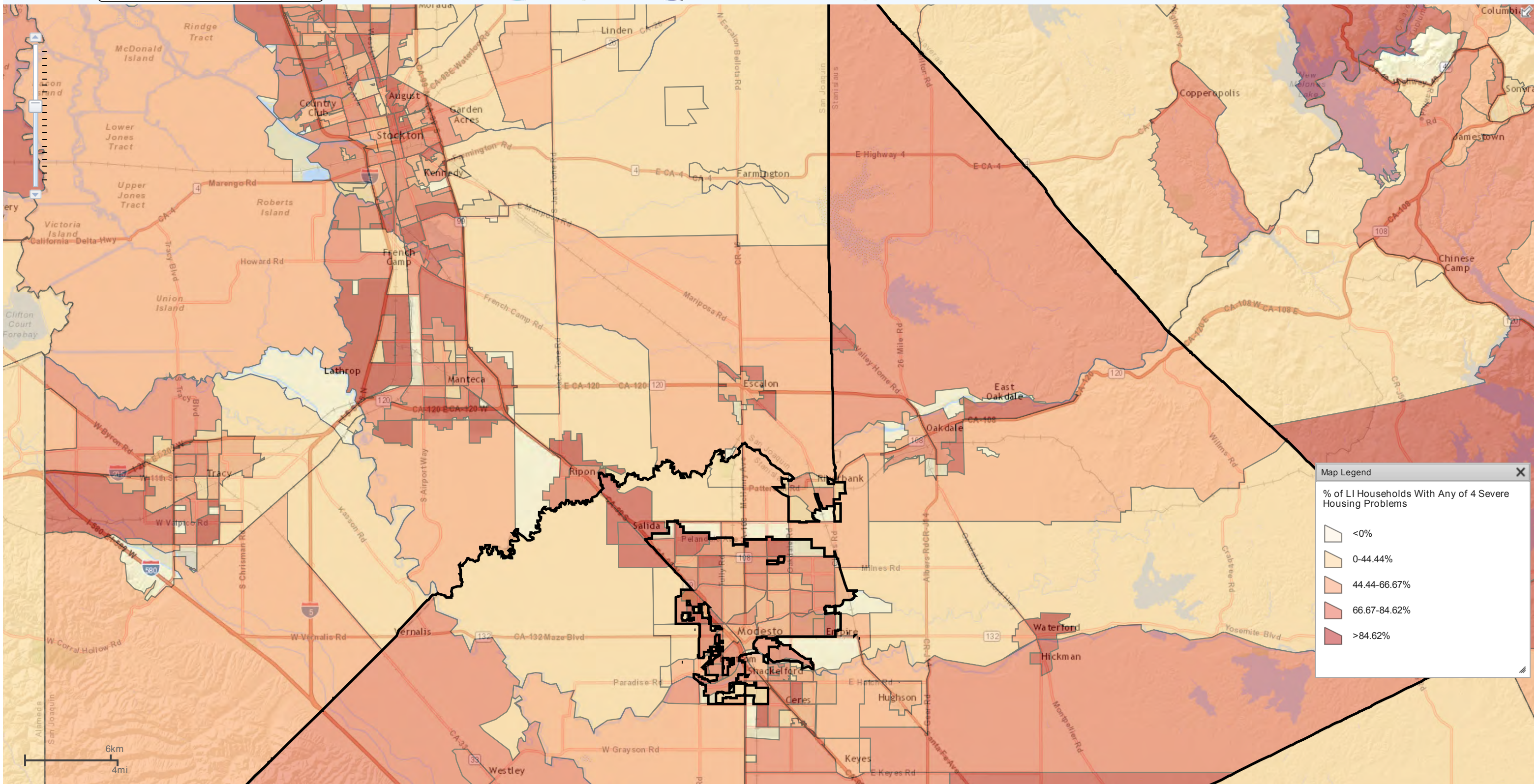


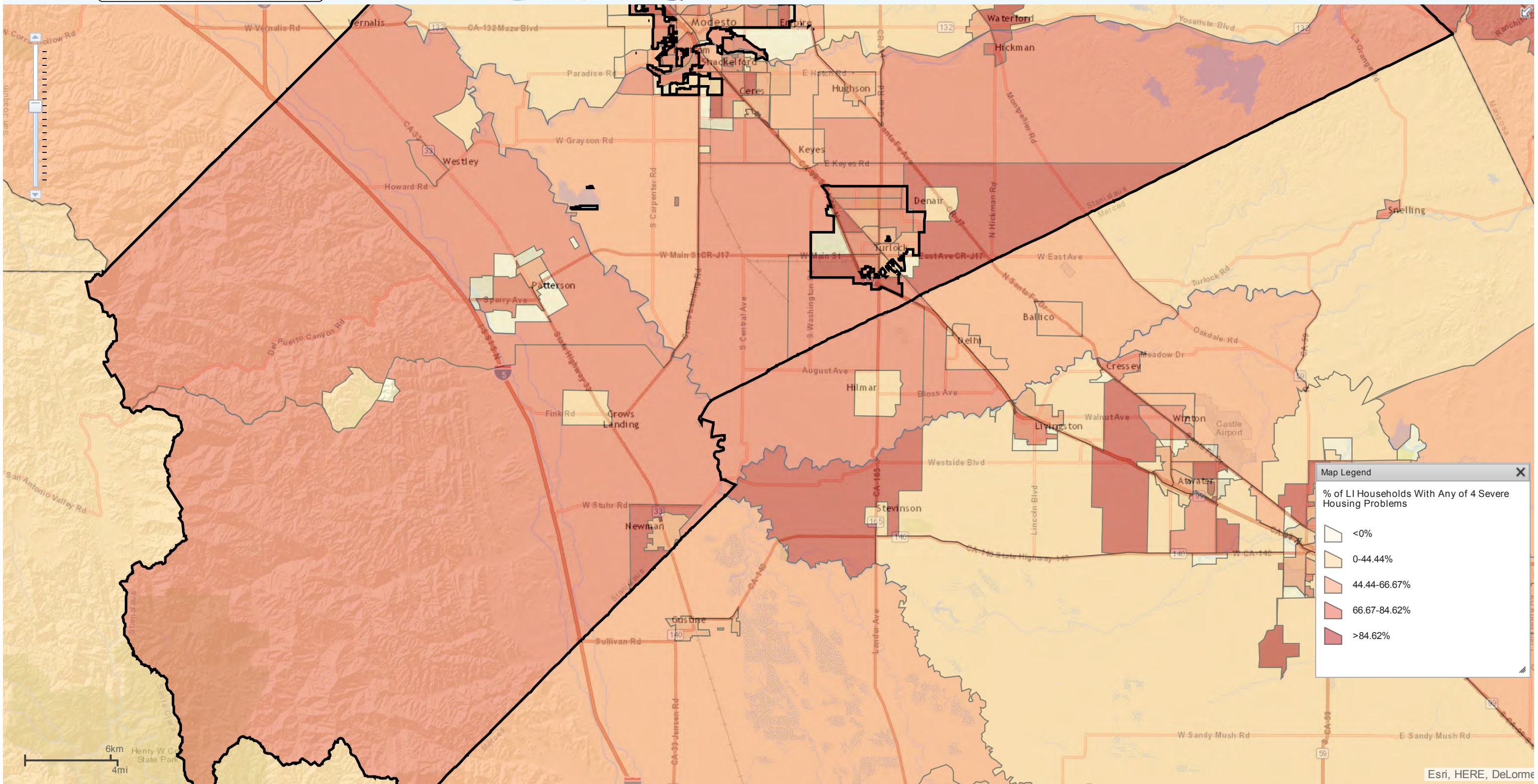


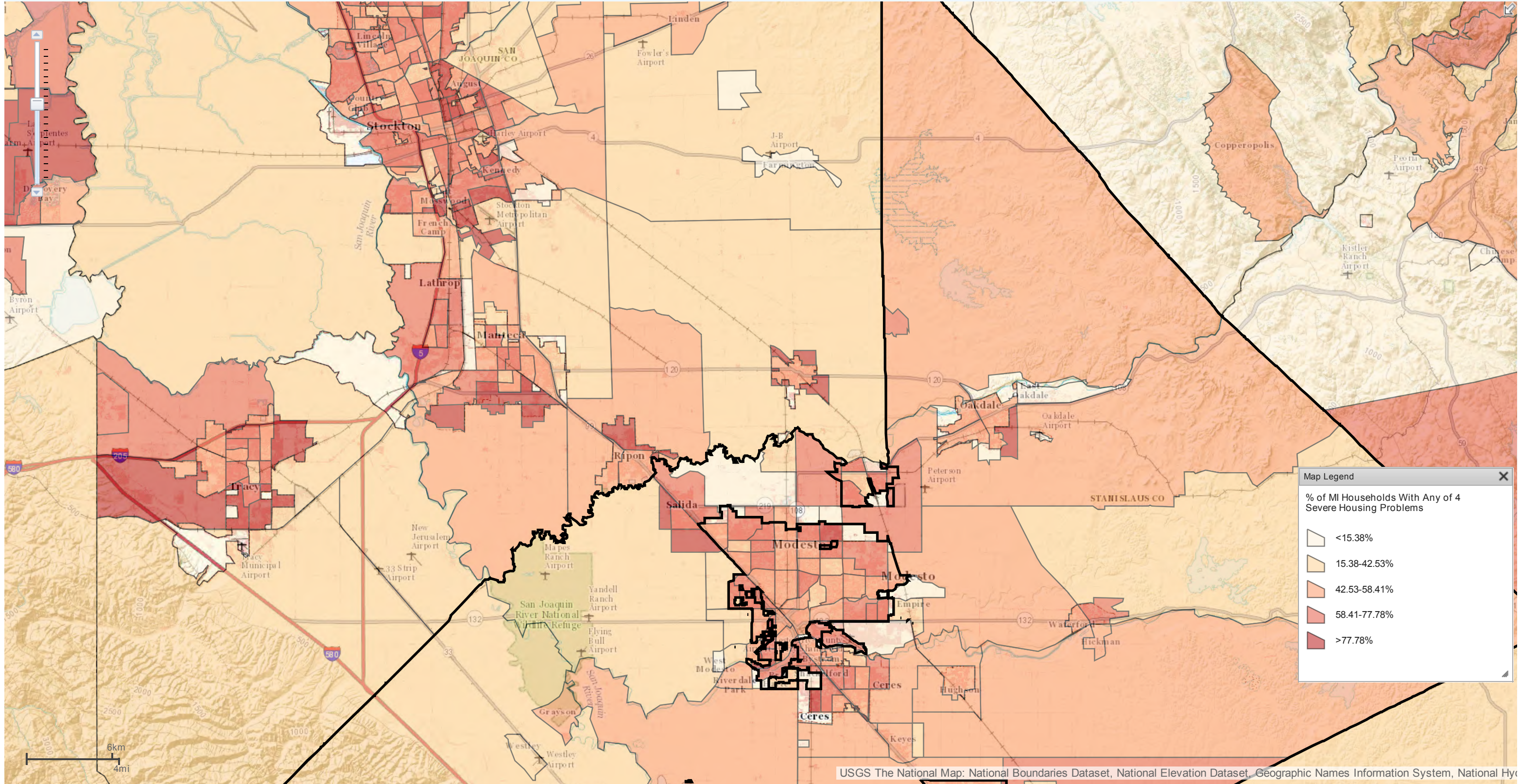
Map Legend

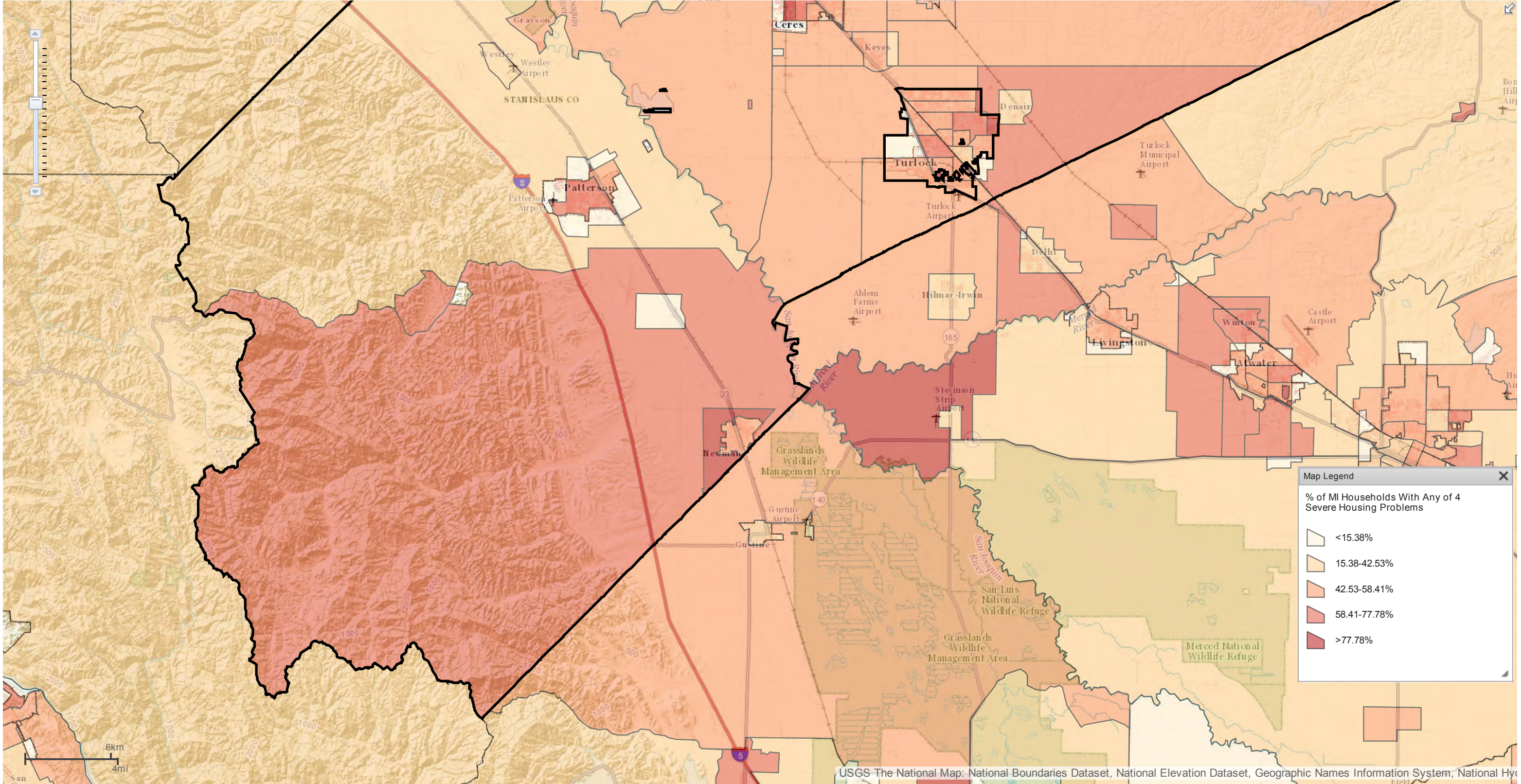
% of ELI Households With Any of 4 Severe Housing Problems

- <20%
- 20-57.89%
- 57.89-75%
- 75-88.89%
- >88.89%









Appendix 5 – Outreach Summary

COMMUNITY PARTICIPATION SUMMARY

INTRODUCTION

The community outreach process included four community workshops, one stakeholder meeting, a print and online survey, and agency phone and email consultations. Overall, more than 600 people provided their feedback on the Fiscal Year 2015-2020 Stanislaus Urban County/City of Turlock Regional Consolidated Plan (Con Plan) and Fiscal Year 2015–2023 Stanislaus County Housing Element. The following is a summary of the responses received during each portion of the outreach process. Overall trends and themes identified are located in the Community Themes section at the end of this summary. The Community Themes section takes into account results and feedback from all input events and methods. Complete meeting notes, sign-in sheets, survey data, and agency consultations are provided following this summary.

COMMUNITY WORKSHOPS

The workshops each began with a presentation; then, workshop participants were invited to provide their feedback at four activity stations set up around the room. The stations included posters where participants were asked to place dots (stickers) on the posters to prioritize issues and needed services and funding. The full dot voting results for all workshops are included at the end of this appendix.

COMMUNITY WORKSHOP 1 – CITY OF CERES (OCTOBER 15, 2014)

The following feedback was provided at the four activity stations set up around the room:

Station 1 – Consolidated Plan: Housing

Generally participants felt that unsafe neighborhood conditions and homelessness were very common and important to address. Emergency shelters, transitional housing, new affordable housing units, and improvements to the existing rental housing stock were all seen as very important to fund.

Station 2 – Consolidated Plan: Public Service and Facilities

Participants felt that funding for homeless prevention assistance, services for at-risk youth, and employment skills training were important to fund. Curbs and gutters as well as lighting improvements were also identified as very important to fund.

Station 3 – Consolidated Plan: Fair Housing

Participants felt that the greatest barrier to accessible housing was cost. Race and ethnicity was seen as the most common form of discrimination.

Station 4 – Housing Element

Building code enforcement and conserving and improving the existing housing stock were seen as important goals in the Housing Element.

Complete workshop materials, notes, and sign-in sheets are provided following this summary.

COMMUNITY WORKSHOP 2 – CITY OF TURLOCK (OCTOBER 20, 2014)

The following feedback was provided at the four activity stations set up around the room:

Station 1 – Consolidated Plan: Housing

Participants at Workshop 2 felt that new affordable rental housing and transitional housing for the homeless should be a priority for the next five years. Funding priorities were housing for lower-income households, mentally ill persons, and seniors. Services for homeless families with children and youth were also seen as very important to fund by workshop participants.

Station 2 – Consolidated Plan: Public Service and Facilities

In the public services category, participants felt services for low-income households, at-risk youth, and a job creation and retention program were very important to fund. Improvements including neighborhood facilities and street improvements were also categorized as very important to workshop participants.

Station 3 – Consolidated Plan: Fair Housing

Cost, accessibility, and supply were all identified as common barriers to finding housing. Discrimination based on race and ethnicity was identified as the most common form of discrimination. In addition, workshop participants felt that consumers were not aware of their rights under fair housing law.

Station 4 – Housing Element

Workshop participants identified first-time homebuyers programs, energy conservation, assistance for special needs housing, and conserving and improving existing housing as important goals for the Housing Element update.

Complete workshop materials, notes, and sign-in sheets are provided following this summary.

COMMUNITY WORKSHOP 3 – CITY OF OAKDALE (OCTOBER 22, 2014)

No participants attended this workshop.

COMMUNITY WORKSHOP 4 – CITY OF PATTERSON (OCTOBER 29, 2014)

The following feedback was provided at the four activity stations set up around the room:

Station 1 – Consolidated Plan: Housing

Rental housing affordability and overcrowding were identified as the most common housing concerns. Services for homeless families with children as well as individuals without children were very important to fund over the next five years.

Station 2 – Consolidated Plan: Public Service and Facilities

Participants identified facilities serving youth, child care facilities, street improvements, and improving the water supply as important to fund. Programs including homeless services, parent education, and financial literacy were also important to fund. Economic development funds should focus on technical assistance for businesses and employment skills training.

Station 3 – Consolidated Plan: Fair Housing

The most common barriers to housing were identified as cost, accessibility, and type of housing. Participants felt that reasons for discrimination include that consumers are not aware of their rights and landlords/owners are not aware of the law.

Station 4 – Housing Element

Workshop participants identified energy conservation, assistance for special needs housing, development of second units, conservation and improvement of existing housing, encouraging mixed-use development, and working with Habitat for Humanity and other agencies as very important for the Housing Element.

STAKEHOLDERS MEETING – STANISLAUS HOUSING AND SUPPORT SERVICES COLLABORATIVE COMMITTEE (STANISLAUS COC) (OCTOBER 16, 2014)

Generally participants felt that the collaborative programming between the County, cities, and nonprofits contributed to the success of Con Plan programs. Other things identified as working well included capital improvements, HOME Investment Partnership Program (HOME) and Neighborhood Stabilization Program (NSP) units, some programs for the chronically homeless (including comprehensive case management with a transition period before housing placement, supportive housing, and programs emphasizing home visits), and nonprofit capital facilities (i.e., shelters and transitional housing).

Participants identified that funding gaps were most common for extremely low-income households, chronically homeless, homeless youth, and those living in transitional shelters because they are not considered homeless by HUD.

Although some programs for the chronically homeless were noted amongst the successes, more participants felt there were barriers and funding gaps to providing enough services to the chronically homeless. It was noted that housing homeless youth is challenging because they are often not ready or willing to live in permanent housing. More transitional or emergency housing for homeless youth would be helpful. Another homeless subgroup identified as having a great need is homeless families with children.

Another question was regarding the top barriers to sustaining permanent housing. The group identified the demise of the redevelopment agencies, long waiting lists, lack of funding for case management, mental health issues, bad credit or rental history, projects not being able to pencil out for developers, and job development as some of the top barriers. Some of the top obstacles to housing placement were long waiting lists, drug and GED requirements for applicants, lack of employment, income documentation, timing considerations for the NSP program, and the lack of affordable housing units. Sheltered employment or employment that provides on-the-job training is needed.

Other comments included a discussion on economic development, NSP, coordination and referrals, and homeless prevention services.

Challenges to the success of homeless prevention services included income targeting requirements that are too low and too difficult to meet, uninhabitable substandard housing stock, cost of utility bills, insufficient mental health services, participants terming out of programs, lack of financial literacy and life skills amongst participants, inability of participants to document homeless status, need for willing landlords and employers, and the need to educate those in

substandard housing regarding available resources. Also, sufficient funding from a variety of funding programs for housing as part of homeless prevention programs was identified as a funding gap for homeless prevention. Prevention truly needs to be the focus for homeless prevention programs.

An overall greater level of funding for services and programs was mentioned repeatedly. Staffing the Stanislaus CoC was one suggestion related to funding. Funding for people to afford housing was mentioned repeatedly and lack of funding and overcrowding of emergency shelters was mentioned by several respondents.

The discussion questions, complete workshop notes, feedback forms, and attendance information are provided following this summary.

PRINT AND ONLINE SURVEY

An online survey was provided on the Stanislaus County website from October 20, 2014, to December 1, 2014. The option was also available to complete a written hard copy survey during this same time period. A total of 587 completed surveys were received: 585 English surveys and 2 Spanish surveys. The following survey results section includes results from both the online and print surveys completed.

Of those who indicated their affiliation or role when completing the survey, many worked for the government or a nonprofit organization. Others roles included agriculture, education, and concerned citizens.

SURVEY RESULTS BY QUESTION

Demographics

The first set of questions in the survey was regarding demographics. The majority of survey respondents identified themselves as homeowners (54%), followed by interested resident (41%) and public service provider (21%). Please note that respondents were able to select more than one category.

I am completing this survey as a(n)...		
Answer Options	Response Percent	Response Count
Interested resident	40.7%	239
Homeowner	54.2%	318
Renter	14.8%	87
Public/subsidized housing consumer	0.3%	2
Homeless individual	0.5%	3
Business owner	3.7%	22
Subsidized housing provider	0.7%	4
Landlord	5.1%	30
Public service provider	21.1%	124
Homeless service provider	4.3%	25
Housing advocate	2.6%	15
Health service provider	8.3%	49
Educator	7.2%	42
Municipal employee	10.1%	59
Other (please specify)	7.7%	45
Total	100%	587

Survey responses came from incorporated cities and unincorporated County, as well as outside of the County. The largest number of responses came from Modesto (34%), followed by Turlock (17%) and Salida (11%). Note that survey respondents that indicated that they are from Modesto may be from unincorporated areas of the County.

Parks and Community Centers

A majority of survey respondents felt it was important to fund facilities serving youth/after school programs (82%), facilities serving seniors (71%), improvements to parks (55%), and improvements to accessibility for seniors and disabled persons (61%). Respondents felt that neighborhood facilities and improvements to technology were maybe OK to fund. Other suggestions included facilities for the homeless and community service centers.

Please indicate the importance of investing funds in parks and community centers in your community.				
Answer Options	Yes, Important to fund	Maybe, OK to fund	No, Do not fund	Response Count
Facilities serving youth/after school programs	456	90	9	555
Facilities serving seniors	392	147	11	550
Neighborhood facilities	231	264	41	536
Facilities for child care	258	203	76	537
Improvements to parks	299	211	34	544
Improvements to accessibility for seniors and disabled persons	333	181	28	542
Improvements to technology	187	267	81	535
Other	45	14	29	88

Streets, Sewers, and Storm Drains

A majority of survey respondents felt it was important to fund street improvements (72%), install or repair curb and gutter (54%), install or improve sewer (59%) and storm drainage (62%), improve water supply (73%), install or repair sidewalks (57%), and install or improve street lighting (73%).

Please indicate the importance of investing funds for streets, sewer, and storm drainage related improvements in low-income communities throughout Stanislaus County.				
Answer Options	Yes, Important to fund	Maybe, OK to fund	No, Do not fund	Response Count
Street improvements	392	131	18	541
Install or repair curb and gutter	286	209	37	532
Install or improve sewer	314	191	28	533
Install or improve storm drainage	332	180	23	535
Improve water supply	388	127	16	531
Install or repair sidewalks	304	191	36	531
Install or improve street lighting	394	123	22	539
Other	29	8	21	58

Public Services Programs

Survey participants were asked to rank the importance of providing grant funds to programs that provide public services to low-income persons in their community. Respondents felt that the highest priority should be given to services for at-risk children/youth, seniors, and physically/mentally disabled persons. Lowest priority was to persons recently incarcerated or on parole, persons with substance abuse problems, and for financial literacy.

Economic Development and Business Assistance

Survey participants felt it was important to fund job creation/retention (79%), employment skills training (66%), start-up business assistance (five or fewer employees) (46%), and small business lending (45%). Participants felt it was maybe OK to fund commercial rehabilitation/facade improvement, commercial infrastructure, technical assistance for business expansion/improvement, and economic development studies, specific plans, and program development.

Top Concerns

Participants were asked to rank 21 potential areas or issues to prioritize in terms of housing choices and affordability, cost of living, special needs groups (seniors, those with disabilities, large families, homeless), energy conservation, housing conditions and safety, and infrastructure. Only one of the print surveys was filled in for this question and all issues were ranked equally. The three concerns receiving the largest percentage of the vote on the online survey were (in order of ranking):

1. Providing shelters and transitional housing for the homeless, along with services, to help move persons into permanent housing.
2. Establishing special needs housing for seniors.
3. Ensuring that children who grew up in Stanislaus County can afford to live in Stanislaus County.

Please indicate the importance of investing funds in the following economic development activities in your community.				
Answer Options	Yes, Important to fund	Maybe, OK to fund	No, Do not fund	Response Count
Commercial rehabilitation/facade improvement	98	275	122	495
Commercial infrastructure	119	274	104	497
Small business lending	225	215	55	495
Technical assistance for business expansion/improvement	133	266	92	491
Start-up business assistance (5 or fewer employees)	227	213	55	495
Employment skills training	332	138	31	501
Job creation/retention	394	89	15	498
Economic development studies, specific plans, and program development	156	258	79	493
Other	18	6	21	45

Homeless Needs

Survey participants were asked to rank the importance of meeting the needs of certain subpopulations of homeless persons in their community. Households with children was ranked as the highest priority followed by homeless veterans and then unaccompanied youth.

Participants were then asked to identify the greatest needs of certain homeless subpopulations in their community. For households with children, the greatest need was housing followed by case management and temporary rental assistance. For households/individuals without children, the greatest need identified was transitional housing followed by emergency shelter. Mental health services were identified as the highest priority for the chronically homeless. Case management was considered to be most important for unaccompanied youth. Permanent supportive housing was identified as being the most important for homeless veterans. Families and individuals at risk of becoming homeless were in greatest need of temporary rental assistance.

Housing Assistance Needs

Survey participants were asked to identify which housing assistance needs were important to fund. Health- and safety-related home repair (53%), energy efficiency improvements (50%), low-income housing acquisition (45%), and first-time homebuyer assistance (45%) were identified by participants as important to fund. Rehabilitation of public housing, lead-based paint abatement, homeownership/credit counseling, and fair housing/tenant landlord mediation were identified as maybe OK to fund.

In addition, 67 percent of survey respondents felt that providing shelters and transitional housing for the homeless, along with services to help move persons into permanent housing, was very important to fund. Other concerns that were very important included ensuring that children who grew up in Stanislaus County can afford to live in Stanislaus County when they become adults (66%) and establishing special needs housing for seniors (66%).

Please indicate the importance of investing funds for the following housing-related activities in your community.				
Answer Options	Yes, Important to Fund	Maybe, OK to Fund	No, Do Not Fund	Response Count
Rehabilitation of public housing	205	225	46	476
Energy efficiency improvements	237	179	62	478
Lead-based paint abatement	167	201	107	475
Low-income housing acquisition	215	181	78	474
Health- and safety-related home repair	256	176	47	479
First-time homebuyer assistance	216	178	83	477
Homeownership/credit counseling	187	198	88	473
Fair housing/tenant landlord mediation	186	219	68	473
Other	13	3	11	27

Housing Types

Participants were asked to identify housing types that were important to fund during 2015–2020. Participants identified emergency shelters (68%), permanent housing for special needs (57%), and transitional housing for the homeless (57%) as the highest priorities.

Please indicate the importance of investing funds in the following housing-related activities in your community.				
Answer Options	Yes, Important to fund	Maybe, OK to fund	No, Do not fund	Response Count
Emergency shelter	304	126	16	446
Transitional housing for the homeless	254	164	31	449
Permanent housing for special needs	257	162	29	448
Affordable rental housing	226	154	62	442
Affordable for-sale housing	189	154	100	443
Improvements to existing rental housing	136	205	99	440
Improvements to existing ownership housing	134	196	113	443
Other	8	4	12	24

Housing Populations

Participants were asked to identify which housing populations grant funds should be invested in. Survey respondents identified housing for senior persons (70%), housing for disabled persons (69%), and housing for aging-out foster youth (59%) as the highest priority.

Please indicate the importance of investing funds in housing for the following populations in your community.				
Answer Options	Yes, Important to fund	Maybe, OK to fund	No, Do not fund	Response Count
Housing for senior persons	310	113	18	441
Housing for disabled persons	305	124	11	440
Housing for homeless persons	224	166	45	435
Housing for large families (5 or more)	105	183	151	439
Housing for very low-income persons	202	173	61	436
Housing for aging-out foster youth	261	141	37	439
Housing for mentally ill persons	240	166	32	438
Housing for persons recently in jail or on parole	76	206	156	438
Other	7	2	12	21

Barriers to Equal Access to Housing

Cost was identified as the number one barrier to equal access to housing with 70 percent of respondents indicating that this is very common. Participants also felt that accessibility (for seniors and disabled persons) was also a barrier with 59 percent of the votes.

Please indicate how common and important it is to address the following barriers to equal housing in your community.				
Answer Options	Very Common, Important to Address	Somewhat Important to Address	Rare, Not Important to Address	Response Count
Cost	304	88	40	432
Accessibility (seniors and disabled persons)	260	146	35	441
Supply (new housing)	140	186	115	441
Proper size/type of housing	136	189	116	441
Other	8	8	9	25

Fair Housing

The next group of questions was regarding fair housing in Stanislaus County. Participants identified that discrimination was common and should be addressed in rental housing and mortgage lending. Discrimination was most common in regard to race/ethnicity and disability. The most common types of discrimination included deception regarding availability or price of housing and variation in price, rent, fees, or deposit information. Lack of enforcement, lack of reporting, consumers not being aware of their rights, and sellers/landlords not being aware of the law were all seen as reasons for unfair housing practices. Education was identified as the best method to combat housing discrimination.

Please indicate how common and important it is to address the following areas of housing discrimination in your community.				
Answer Options	Very Common, Important to Address	Somewhat Important to Address	Rare, Not Important to Address	Response Count
Rental housing	197	157	82	436
Housing for sale	154	169	111	434
Mortgage lending	171	152	110	433
Other	6	7	9	22

Please indicate how common and important it is to address the following areas of housing discrimination in your community.				
Answer Options	Very Common, Important to Address	Somewhat Important to Address	Rare, Not Important to Address	Response Count
Race/ethnicity	154	127	148	429
Language	141	141	146	428
National origin	107	156	165	428
Gender	91	142	192	425
Disability	193	134	102	429
Familial/marital status	99	149	180	428
Sexual orientation	97	133	198	428
Other	7	8	17	32

Please indicate how common and important it is to address the following areas of housing discrimination in your community.				
Answer Options	Very Common, Important to Address	Somewhat Important to Address	Rare, Not Important to Address	Response Count
Refusal to rent/sell	120	144	158	422
Refusal to show	90	145	184	419
Deception regarding availability or price	169	126	123	418
Different price, rent, fees or deposit	184	113	121	418
Other	5	5	15	25

Please indicate why housing discrimination might still happen in your community.				
Answer Options	Yes, This is One Reason	Maybe, Might be the Reason	No, Not the Reason	Response Count
Lack of enforcement	188	155	71	414
Lack of reporting	221	136	57	414
Consumers are not aware of rights	227	136	52	415
Sellers/landlords are not aware of the law	167	153	95	415
Other	13	3	10	26

Please indicate which are effective ways to combat housing discrimination in your community.				
Answer Options	Yes, This is Effective	Maybe, Might be Effective	No, Would Not be Effective	Response Count
Education	304	101	26	431
Enforcement	283	115	31	429
Reporting	277	124	27	428
Other	8	1	9	18

SURVEY RESULTS BY JURISDICTION

Survey results were further broken down based on location of the participant. The following is a summary of the responses received for Ceres, Hughson, Newman, Oakdale, Patterson, Turlock, and Waterford, as well as other areas of the county including Salida and Modesto.

Ceres

There were a total of 68 survey participants responding from Ceres. Participants from Ceres felt that the following programs and services are most important to fund:

- Job creation/retention
- Facilities serving youth/after school programs
- Housing for senior persons
- Facilities serving seniors
- Install or improve street lighting

Hughson

Thirteen survey participants indicated that they were from Hughson. The following programs and services were most important to fund for Hughson participants:

- Improve water supply
- Ensuring that children who grew up in Stanislaus County can afford to live in Stanislaus County
- Job creation/retention

Newman

A total of seven survey participants were from Newman. Participants indicated the following were most important to fund:

- Facilities serving youth/after school programs
- Facilities for child care
- First-time homebuyer assistance
- Job creation/retention
- Housing for senior persons and disabled persons

Oakdale

There were a total of 18 survey participants responding from Oakdale. Participants from Oakdale felt that the following programs and services are most important to fund:

- Facilities serving youth/after school programs
- Job creation/retention
- Providing shelters and transitional housing for the homeless, along with services, to help move persons into permanent housing
- Emergency shelter
- Housing for senior persons and disabled persons

Patterson

Of the survey participants, 30 were from Patterson. Participants from Patterson felt that the following programs and services are most important to fund:

- Street improvements
- Install or improve street lighting
- Job creation/retention
- Improve water supply
- Facilities serving youth/after school programs

Turlock

A total of 99 survey participants indicated they were from Turlock. Participants from Turlock felt that the following programs and services are most important to fund:

- Facilities serving youth/after school programs
- Job creation/retention
- Improve water supply
- Employment skills training
- Facilities serving seniors

Waterford

A total of 28 participants indicated that they were from Waterford. Results of the survey show that the program and services that are most important to fund are:

- Facilities serving youth/after school programs
- Establishing special needs housing for seniors
- Improve water supply

Other Areas

The remaining 329 survey participants were from Modesto, Salida, Riverbank, the unincorporated county, and a few were from other counties.

Salida

A total of 72 participants indicated that they were from Salida. Results of the survey in Salida show that the program and services that are most important to fund are:

- Install or improve street lighting
- Street improvements

Modesto and Surrounding Area

Of the survey participants, 203 indicated that they were from Modesto or unincorporated areas of the County adjacent to Modesto. Participants from this area felt that the following programs and services are most important to fund:

- Facilities serving youth/after school programs
- Street improvements
- Facilities serving seniors
- Improve water supply
- Job creation/retention

CONSULTATIONS

The primary trends in the input received during the consultations included:

- Need for more mental health services.
- As the economy recovers the people most likely in need will be those with fewer skills and less education.
- Shortage of experienced staff and lack of funding to employ experienced staff persons continues to be a problem.

COMMUNITY THEMES

The outreach effort for the Fiscal Year 2015-2020 Stanislaus Urban County/City of Turlock Regional Consolidated Plan and Fiscal Year 2015–2023 Stanislaus County Housing Element reached more than 600 interested participants and more than 40 local agencies. Overall, some general themes emerged throughout the process that will help guide the development of the Consolidated Plan and Housing Element. The themes can be broken down into the following six topic areas.

HOUSING FOR SENIORS, DISABLED PERSONS, AND YOUTH/FAMILIES

Housings for seniors, disabled persons, and youth/families were seen as a priority to both participants at the workshops and survey participants. Many participants agreed that homelessness was a priority to address in the next five years. Participants identified providing shelters and transitional housing for the homeless as important to fund.

PUBLIC SERVICES AND FACILITIES FOR YOUTH, SENIORS, AND DISABLED PERSONS

Respondents felt that the highest priority should be given to services for at-risk children/youth, seniors, and physically/mentally disabled persons. Facilities serving youth/after school programs were also identified as very important to many of the county's jurisdictions and was identified as a top priority overall.

HOMELESS SERVICES

Homeless services and needs were emphasized in the various forums. It was a focus of input from the Stanislaus CoC and was the top concern of the 21 issues ranked in the online survey. Homeless issues were identified as concerns and priorities at all three of the workshops where input was received. Eight percent of the "fill in the blank" comments on the survey in addition to the multiple choice responses were on the subject of homelessness.

HOUSING FOR HOMELESS HOUSEHOLDS WITH CHILDREN

Participants felt that homeless households with children were in the greatest need for support. Many felt that permanent supportive housing and temporary rental assistance was in great need for this subpopulation.

JOB CREATION AND RETENTION

The recession hit a lot of people in Stanislaus County at all educational and skill levels. Participants felt that job creation and retention was very important to fund over the next five years in almost all of the jurisdictions.

FAIR HOUSING

Cost and accessibility were generally identified as the most common barriers to finding housing. Discrimination based on race and ethnicity was identified as the most common form of discrimination.

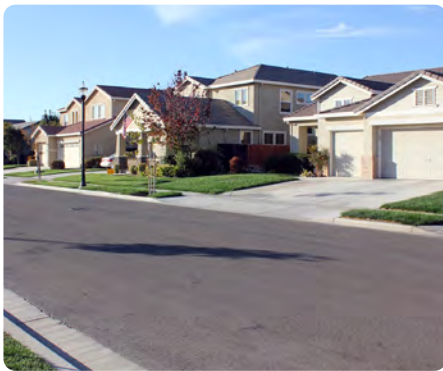
MAY 2015



STANISLAUS URBAN COUNTY

ANNUAL ACTION PLAN
FISCAL YEAR 2015–2016

MAY 2015



STANISLAUS URBAN COUNTY



*Prepared by PMC for Stanislaus County
1010 10th Street, Suite 3400
Modesto, CA 95354
209.525.6330*

ANNUAL ACTION PLAN FISCAL YEAR 2015-2016

MAY 2015

Stanislaus County
1010 10th Street
Suite 6700
Modesto, CA 95354



City of Ceres
2720 2nd Street
Ceres, CA 95307



City of Hughson
7018 Pine Street
Hughson, CA 95326



City of Newman
938 Fresno Street
Newman, CA 95360



City of Oakdale
280 N 3rd Avenue
Oakdale, CA 95361



City of Patterson
1 Plaza
Patterson, CA 95363



City of Waterford
312 E Street
Waterford, CA 95386



Table of Contents

Expected Resources	1
AP-15 Expected Resources - 91.220(c)(1,2)	1
Annual Goals and Objectives.....	5
AP-35 Projects - 91.220(d).....	7
AP-38 Project Summary.....	12
AP-50 Geographic Distribution - 91.220(f).....	17
Affordable Housing.....	19
AP-55 Affordable Housing - 91.220(g).....	19
AP-60 Public Housing - 91.220(h)	20
AP-65 Homeless and Other Special Needs Activities - 91.220(i).....	21
AP-75 Action Plan Barriers to Affordable Housing - 91.220(j)	28
AP-85 Other Actions - 91.220(k).....	31
Program Specific Requirements	38
AP-90 Program Specific Requirements - 91.220(l)(1,2,4)	38
Rapid Re-Housing and Homeless Prevention Assistance	43
Evaluating Outcomes	51
Record Keeping	52
Coordination among Homeless Service Providers	54
Other	54

List of Tables

Table 1 - Expected Resources – Priority Table	2
Table 2 – Goals Summary	5
Table 3 – Project Information	7
Table 4 - Geographic Distribution	18
Table 5 - One Year Goals for Affordable Housing by Support Requirement.....	19

Expected Resources

AP-15 Expected Resources - 91.220(c)(1,2)

Introduction

During Fiscal Year 2015-2016, Stanislaus Urban County expects to receive \$2,197,687 in Community Development Block Grant (CDBG) program funding and \$190,669 in Emergency Grant Solutions (ESG) funding. CDBG program income consists of approximately \$291,048, which will be spent down prior to Fiscal Year 2015-2016 program funds. The exact amount of prior year funds are still unknown. However, Economic Development activities, to be used on a Stanislaus Urban County-wide basis, will be funded with \$140,000 of prior year funds, with approximately \$28,000 estimated to be spent down during the Fiscal Year 2015-2016. Stanislaus County also currently has a balance of \$865,000 in CalHome funding, of which \$100,000 is anticipated to be utilized during the Fiscal Year 2015-2016 on down payment assistance activities and \$200,000 on housing rehabilitation activities.

Anticipated Resources

Table 1 - Expected Resources – Priority Table

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG Stanislaus Urban County	Public-Federal	Planning Administration Economic Development, Public Infrastructure Improvements, Fair Housing Services, and Public Services	\$2,197,687	County \$128,383 Waterford \$162,665	\$140,000	\$2,628,735	\$8,790,748	Majority of funds will be utilized for infrastructure projects. 10% will be set aside for public services. 20% for Admin. Prior year resources are unknown, other than \$140,000 set aside for Economic Development activities. This figure may be more than listed in this table.
ESG Stanislaus Urban County	Public - Federal	Homeless Programs, Data Management, and Administration	\$190,669	N/A	N/A	\$190,669	\$762,676	Funds will be utilized for ESG program administration, emergency and transitional shelters, homeless management information systems data entry, and homeless prevention and rapid re-housing services.
CalHome Stanislaus County (Unincorporated County only)	Public-State	First-time homebuyers and/or Owner Occupied Housing Rehabilitation and Admin	N/A	N/A	\$100,000 – DPA \$200,000 – Rehab	\$100,000 – DPA \$200,000 – Rehab	\$400,000 – DPA \$292,000 – Rehab	Funds will be used for first-time homebuyers and/or Owner-Occupied Housing Rehabilitation and Admin.

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The Stanislaus Urban County members will continue the use of State of California funds (as they become available) designed to fund affordable housing projects/programs. Stanislaus County is currently a recipient of CalHome funds to provide down payment assistance to first-time homebuyers and owner-occupied housing rehabilitation assistance.

Program Income (PI)

CDBG, HOME Investment Partnerships Program (HOME), Neighborhood Stabilization Program (NSP), and CDBG-R Program Income funds will continue to be used by the Stanislaus Urban County to fill funding gaps for affordable housing projects/programs as needed to help leverage other funds when possible.

URBAN COUNTY MEMBER STATE CDBG PROGRAM INCOME

Prior to joining the Stanislaus Urban County, several Stanislaus Urban County cities received CDBG funds directly from the State of California. Since joining the Stanislaus Urban County, some of these cities have been collecting program income derived from loans made from their State grants.

Use of the funds through the Stanislaus Urban County simplifies the process for cities, which would otherwise have to establish a re-use plan with the State Department of Housing and Community Development. As the lead entity for the Stanislaus Urban County, Stanislaus County ultimately assumes the reporting and monitoring liabilities for State PI reported and used through the Urban County. In order to limit liability, the following criteria will need to be met in order for Stanislaus County to accept the oversight of State Program Income (PI):

- ◆ Adequate notice to Stanislaus County of the intent to use PI will need to be provided to allow for reporting via the Fiscal Year 2015-2016 Stanislaus Urban County Annual Action Plan (AAP).
- ◆ A re-use plan detailing a plan for the timely use of the PI, within the same Annual Action Plan fiscal year, will need to be established by the city and accepted by Stanislaus County.
- ◆ PI will need to be used towards a CDBG eligible activity reflected in an adopted Annual Action Plan and approved for funding by U.S. Department of Housing and Urban Development (HUD).

Neighborhood Stabilization Program (NSP) 1 and 3 Program Income

The Stanislaus Urban County will continue to use NSP 1 and 3 Program Income to remove blighted properties via the Abandoned and Dangerous Building (ADB) Program. The ADB is responsible for investigating requests from the public and public agencies regarding structures that pose a threat to the health and safety of unincorporated Stanislaus County communities. The ADB was integrated into the NSP program to effectively address issues of blight resulting from abandoned and dangerous buildings declared a nuisance in NSP target areas.

NSP General

Stanislaus County will continue its efforts at liquidating NSP inventory (six properties) by finding eligible first-time homebuyers to purchase the properties. The six remaining properties are located in the Airport, Empire, Grayson, Parklawn, and Salida neighborhoods.

The City of Oakdale will be working on a multi-family affordable housing project over this next Consolidated Planning period in which NSP Program Income funds may be used. The project plans to serve families with extremely low to very low incomes (30–60% of the area median income, or AMI).

CALHOME

Stanislaus Urban County members will continue the use of State of California funds (as they become available) designed to fund affordable housing projects/programs. Stanislaus County is currently a recipient of CalHome funds, which provide down payment assistance to first-time homebuyers and owner-occupied housing rehabilitation assistance.

State Water Board Grant

Stanislaus County will continue pursuing California State Water Resources Control Board (Water Board) grant funds to assist in the completion of CDBG-funded infrastructure projects. With redevelopment agency funds no longer being a financial tool for capital improvement projects, Stanislaus County must now competitively apply for funds such as these to complete projects that are initiated with CDBG funds. In 2014, Stanislaus County was able to secure a \$5 million grant for the Parklawn Sewer Infrastructure Project, and is currently working on its second application for the Airport Sewer Infrastructure Project.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The Stanislaus Urban County maintains four NSP properties in Grayson, Salida, Empire, and the Airport neighborhood which will be sold to first-time homebuyers throughout the 5-year consolidated plan cycle. The City of Oakdale also intends to use a 3-acre NSP acquired property to develop a multi-family affordable housing complex over the consolidated plan period.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.220(c)(3)&(e)Goals Summary Information

Table 2 – Goals Summary

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Improve Infrastructure in Low-income Neighborhoods	2015	2020	Non-Housing Community Development	Ceres, Hughson, Newman, Oakdale, Patterson, Waterford, Unincorporated County	Public Infrastructure Improvements	CDBG (Urban County): \$1,667,035 in current year funds. (Prior fiscal year funds will also be used)	Public facility or infrastructure activities other than low/moderate income housing benefit: 2,400 persons assisted (cities only; Empire/Airport not counted)
2	Economic Development	2015	2020	Non-Housing Community Development	Ceres, Hughson, Newman, Oakdale, Patterson, Waterford, Unincorporated County	Economic Development	CDBG (Urban County): \$140,000 in prior year funds	Assist four to ten small businesses to expand and/or receive education on Federal/State accessibility requirements, business expansion, or to do façade improvements.
3	Fair Housing and Tenant/Landlord Services	2015	2016	Non-Homeless Community Development	Ceres, Hughson, Newman, Oakdale, Patterson, Waterford, Unincorporated County	Fair Housing	CDBG (Urban County): \$25,000	230 extremely low-, very low-, low-, and moderate-income individuals

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Access to public services for low- income households and special populations	2015	2016	Non-Homeless Special Needs	Ceres, Hughson, Newman, Oakdale, Patterson, Waterford, Unincorporated County	Public Services for Extremely Low-, Low-, and Moderate-Income Households/Individuals and Special Populations	CDBG (Urban County): \$219,768	2,870 extremely low-, very low-, low-, and moderate-income individuals
5	Shelter for Homeless Persons	2015	2017	Homeless	Countywide	Homelessness	ESG (Urban County): \$80,685	540 sheltered homeless individuals and families
6	Rapid Re-Housing for Homeless Persons	2015	2017	Homeless	Countywide	Homelessness	ESG (Urban County): \$40,343	Housing for chronically homeless, homeless families with children, homeless veterans, and homeless persons without children 28 individuals; made up of 8 households
7	Homeless Prevention for Extremely Low Income Households and Individuals	2015	2017	Homeless	Countywide	At Risk of Homelessness	ESG (Urban County): \$40,342	Prevention of homelessness for extremely low-income families with children, and at-risk individuals; 35 individuals, made up of 10 households
8	Homeless Services Data Collection	2015	2016	Homeless	Countywide	Homeless Data Collection	ESG (HMIS Funds): \$14,999	Data collection 1 job maintained or created for data entry assistance

AP-35 Projects - 91.220(d)

Introduction

As shown in the previous section, AP 20 Annual Goals and Objectives, the Stanislaus Urban County has identified goals to address housing and community development needs between Fiscal Years 2015 and 2020. On an annual basis, the Stanislaus Urban County will try to achieve as many of these goals as feasible. Below are the proposed Fiscal Year 2015-2016 projects (also known as programs or activities). Wherever possible, the Stanislaus Urban County has identified specific projects.

Table 3 – Project Information

#	Project Name
1	Stanislaus County Empire Storm Drain Infrastructure Project
2	Stanislaus County Airport Neighborhood Sewer Project
3	Economic Development Program – ADA Technical Assistance/Business Development Technical Assistance/Façade Improvements
4	Fair Housing and Tenant/Landlord Services – Project Sentinel
5	City of Ceres Nadine Avenue and Evans Road Infrastructure Infill
6	City of Hughson - 2nd Street Infrastructure Project (Part 1)
7	City of Newman - Inyo Avenue Infrastructure Project Phase II
8	City of Oakdale - Davitt Phase II
9	City of Patterson - 4th Street Infrastructure Project Phase II and 5th Street Alley Infrastructure Project
10	City of Waterford - La Gallina Avenue Infrastructure Project Phase II
11	CASA of Stanislaus County – Direct Service Project
12	Center for Human Services – Westside Family Resource Center
13	Center for Human Services – Oakdale Family Resource Center
14	Center for Human Services – Ceres Partnership for Healthy Children
15	Children’s Crisis Center – Children’s Guardian Project
16	Salvation Army Red Shield – Tutoring and Computer Program
17	Second Harvest Food Bank – Food Assistance Program
18	Second Harvest Food Bank – Food 4 Thought Program
19	We Care Program – Turlock – Emergency Cold Weather Shelter
20	Central Valley Youth for Christ - Family Counseling Concern Strength thru Guidance
21	Children’s Crisis Center – Marsha’s High Risk Infant/Toddler Shelter
22	Children’s Crisis Center – Verda’s Children Shelter
23	Community Housing and Shelter Services – HPRP Program
24	Community Housing and Shelter Services – HMIS Data Entry
25	Family Promise - New Beginnings – Shelter to Solutions
26	We Care – Emergency Cold Weather Shelter
27	We Care – Rapid Re-Housing Program

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

There are three specific goals for the CDBG/ESG programs. They are:

- ◆ Provide decent housing;
- ◆ Provide a suitable living environment; and,
- ◆ Expand economic opportunities

The Fiscal Year 2015-2020 Stanislaus Urban County / City of Turlock Regional Consolidated Plan (Con Plan) was designed to address the above program goals by outlining the Urban County's needs and priorities for the plan period. CDBG program funds are designed to serve those at or below 80% of the AMI. The current 100% AMI in Stanislaus County for one (1) person is \$39,900 and a family of four (4) is \$56,900. If a project benefits a specific neighborhood or community, at least 51% of the population within that geographic boundary must be within this targeted income group (this is known as an "area benefit activity").

As stated above, CDBG area benefit activities must address the needs of low and moderate income persons residing in an area where at least 51% of the residents are of low-income. This is recognized by United States Department of Housing and Urban Development (HUD) as a Low/Moderate Area (LMA). With HUD's release of 2010 Census data in 2014, a number of areas that previously qualified as LMA are no longer eligible. Two Stanislaus Urban County partner members (Newman and Patterson) no longer contain any LMA areas according to the new Census data. The northeast portion of the Empire community (north of Yosemite Boulevard and east of Santa Fe Avenue) is also no longer eligible according to the new data.

There is reason to believe that HUD-provided data does not reflect the actual majority income levels of several Stanislaus Urban County neighborhoods based on the visible physical conditions of the project areas and local knowledge and information of the community's demographics. In cases where Stanislaus Urban County members would like to undertake area benefit activities that are not identified as eligible areas by HUD, Stanislaus County and those Stanislaus Urban County members will conduct door-to-door income surveys of the project areas to ensure that they meet the required LMA standards.

Further, priority is assigned based on the level of need that is demonstrated by the data collected during the preparation of the Con Plan, specifically in the Needs Assessment and Market Analysis; the information gathered during the consultation and citizen participation process; and the availability of resources to address these needs.

During this consolidated planning period, members of the Stanislaus Urban County will have the opportunity to "shift" their fiscal year allocations for other member(s) of the Stanislaus Urban County's future year allocation to address the need for larger sums of funding to complete infrastructure projects of larger scale.

Aside from the City of Ceres, most Stanislaus Urban County's city allocations range from \$120,000 to \$153,000 for infrastructure activities. Because redevelopment funds are no longer an option for leverage funding, their annual CDBG allocation alone may not be enough to complete a larger scale project.

Any Stanislaus Urban County member that would like to shift their allocation with another member's future year allocation must enter into an independent agreement. Cities entering into agreement to shift funds, will be responsible for working out repayment terms amongst themselves if future allocations decline.

The yearly allocation for the HOME program includes Stanislaus County and its urban members. The allocation is also based on Census data population and poverty percentages amongst jurisdictions. The City of Turlock is the lead entity with responsibility for implementing and administering HOME funds for the HOME Consortium. Please refer to the City of Turlock's Fiscal Year 2015-2016 AAP for specific HOME activities.

In addition, the members of the HOME Consortium and Stanislaus Urban County use various methods to establish health and safety project priority criteria based on unique community needs.

For Stanislaus County, the County Board of Supervisors adopted on August 23, 2011 a Residential Neighborhood Infrastructure Project Ranking Criteria to be used in determining the priority of future infrastructure spending projects beyond those already having been programmed and reflected in past Annual Action Plans and Implementation Plans of the County's former redevelopment agency.

The ranking criteria focus on the following factors:

- a. Health and safety needs of the program/project and how those needs compare with the needs of other programs/projects. (i.e., high per capita septic system failures).
- b. The willingness and ability of the local community to assess themselves for purposes of contributing towards project costs and costs of ongoing maintenance and operation of improvements, inclusive of support of the program/project by the area's Municipal Advisory Council (MAC) or an organized community group (if no MAC exists to represent the area).
- c. Identified and available funding sources for the specific program/project (the ability to leverage local agency dollars with outside funding sources are critical to ensuring a successful program/project).
- d. A projects geographical and fiscal equity in terms of equitable distribution throughout the various communicates, service to income qualified residents, and, when needed, proximity to needed infrastructure connects.

On October 28, 2014 the Board of Supervisors adopted a plan called Focus on Prevention 2015, which is a strategy for community transformation in four areas critical to the quality of life in Stanislaus County (homelessness, strengthening families, youth early intervention, and reducing recidivism). The goal of Focus on Prevention 2015 is to bring all sectors of the community together to provide an opportunity for cross-sector development of community-wide prevention strategies

Stanislaus County through its CDBG/ESG program is committed to implementation of the Focus on Prevention 2015 platform and will integrate the work that comes out of this effort into future funding decisions. As a first step to incorporate the Board of Supervisor's Focus on Prevention 2015 effort into the Community Development Block Grant and Emergency Solutions Grant programs, this year planning staff set aside one \$40,000 grant for prevention focused applications. CDBG and ESG funds will be incorporating more Focus on Prevention 2015 strategies as the process unfolds.

For Fiscal Year 2015-2016 , Public Service funds were allocated based on a competitive grant cycle to which public service providers can apply for grants up to \$20,000. Applicants were restricted to submitting three (3) applications per agency for public services, provided each application is a request for a different program or office. One \$40,000 Focus on Prevention Grant was made available which had an agency limit of one (1) application per agency. All applicants were required to attend a technical workshop prior to submission of an application. A panel made up of representation from each Stanislaus Urban County members, the Stanislaus County Chief Executive Office, and the CoC, reviewed each written application submission and oral presentation and scored them individually.

Community outreach was conducted to prioritize the targeting of public service funds within the community. A community surveys identified the following public service priorities:

High Priorities

- ◆ Services for At-risk Children/Youth
- ◆ Senior Services
- ◆ Services for Physically/Mentally Disabled Persons
- ◆ Homeless Services

Medium Priorities

- ◆ Services for Victims of Domestic Violence
- ◆ Homeless Prevention Services
- ◆ Emergency Food Assistance
- ◆ Parent Education

Low Priorities

- ◆ Utility Assistance
- ◆ Financial Literacy
- ◆ Services for Persons Recently Incarcerated or on Parole
- ◆ Service for Persons with Substance Abuse Problems
- ◆ Other General Low/Mod Income Services

Based on the survey results, each public service applicant receives a score between 0-5 representing the priority, as identified by the community surveys, of the primary population they serve. Additional criteria for public service providers scoring during the competitive grant application process include:

Capacity & Experience

- ◆ Agency & Staff Experience with Proposed Program
- ◆ Agency Experience with the Implementation of Grants (Federal, State or Private)
- ◆ Site Control for Activity Location
- ◆ Program Sustainability

Need/Extent Of The Problem

- ◆ Low-Income Populations Served
- ◆ Focus on Eligible Urban County Areas

- ◆ Meeting an Important Community Need
- ◆ Consolidated Plan Priority

Soundness of Approach

- ◆ Multi-sector Partnerships
- ◆ Project Innovation

Methodology

- ◆ Eligible & Reasonable Budget
- ◆ Standardized Client Intake and Eligibility Process

Accomplishments

- ◆ Measurable, Verifiable and Effective Accomplishments
- ◆ Long-term Accomplishments
- ◆ Activity Results

Funding Resources

Leveraging Sources (Private, Fed, State, Local, In-kind)

Achieving Results & Program Evaluation (only applies to programs funded within the last 12 months)

- ◆ Monitoring Results & Timeliness
- ◆ Continuum of Care Partner

Grant Submittal

- ◆ Application Accuracy, Completeness, and Quality

As discussed earlier within the Consultation Process section of this document, the results of the competitive process were presented to the CoC, and the ESG/SHP/HMIS Sub-committee for input on April 16, 2015.

The greatest single obstacle to meeting underserved needs, in addition to constraints and restrictions of the funding programs' requirements, is the limited funding available to address underserved needs.

AP-38 Project Summary

Project Summary Information

PUBLIC SERVICES PROGRAMS –URBAN COUNTY*

CASA of Stanislaus County Direct Service Project \$20,000

Court Appointment Special Advocates (CASA) connects youth in foster care with case managers who advocate for them throughout their time in the foster care system. At-risk youth in the foster care system are referred to CASA by the Stanislaus County Superior Court to provide advocacy services for children in dependency. The advocate works with everyone involved and makes independent, informed recommendations on the child's behalf directly to the Judge who makes all orders regarding the case. The dedication of CASA volunteers allows judges to ensure successful outcomes for children. For many abused children, their CASA volunteer will be the one constant adult presence in their lives. Independent research has demonstrated that children with a CASA volunteer are substantially less likely to spend time in long-term foster care and less likely to reenter care.

Center for Human Services Ceres Partnership for Healthy Children- Concrete Support in Times of Need \$20,000

CHS in partnership with Ceres Partnership for Healthy Children (CPHC) will provide emergency assistance (food, clothing, utility assistance, baby supplies, transportation vouchers, hygiene needs) to low-income families from the Ceres area through their Concrete Support in Times of Need Program. CPHC's Family Resource Center provides case management services to families referred from Ceres Unified School District, Ceres Public Safety, Community Services Agency, local businesses, or self-referred. Families will receive a Family Development Assessment to determine need and to help with future family goal planning. Families that are in need of emergency assistance would work with a Family Advocate to access other programs such as housing assistance, Cal Fresh, Temporary Assistance for Needy Families, WIC and other community programs.

Center for Human Services Oakdale Family Resource Center Crisis Support Program \$20,000

CHS will assist residents and families from Oakdale, Valley Home and Knights Ferry who need assistance with utility bills, food, clothing, temporary shelter and mental health or alcohol and drug counseling services through their Crisis Support program at the Oakdale Family Resource Center (FRC). A Family Advocate will provide strength-based assessments, an empowerment plan with goals, resource and referrals and other needed services. The goal is to increase each resident's capacity to become a healthy and productive member of the Eastside community by providing concrete support for basic and emergency needs.

Center for Human Services Westside Family Resource Center \$20,000

The Patterson and Newman Family Resource Centers will provide brief case management and crisis intervention, utility assistance, emergency food, and resource and referral services for low-income families in need residing on the Westside of the County. Families and individuals that are in need of utility assistance must work with a case manager to complete a three session Budget and Financial Planning Training in order to receive the utility assistances. Families and individuals in need of emergency food can receive a one-time emergency food bag and would be referred to our nutrition classes to help address any future emergency food needs. CHS will work with community partners on the Westside to maximize the number and depth of resources provided to the homeless or low income residents seeking services and support.

**Children's Crisis Center
Children's Guardian Project \$20,000**

This project will provide emergency child care, meals, crisis intervention and support services to a disadvantaged population of high-risk infants, toddlers and school-age children living in Oakdale, Valley Home, Hughson, Empire, Hickman and Waterford. This project will deliver specialized care to an impoverished population of children growing up within families experiencing generational abuse, domestic violence, familial abuse and/or homelessness. These children will be members of families living in very low to moderate low income households (below 80% of AMI), enduring various social and economic challenges. They will have undergone traumas stemming from exposure to domestic violence, substance abuse, extreme poverty, mental illness or homelessness. They are likely to be frightened, suffering poor hygiene, lacking trust and delayed in their development. Without intervention, they face increased risk for further abuse, advanced neglect, chronic illness, developmental delays, emotional disturbance, mental illness, academic failures and delinquency.

Nurturing staff, specializing in child development, crisis counseling and crisis management will tend to the physical, emotional, therapeutic, educational and nutritional needs of each child. Caregivers will be qualified with education and advanced training in child development, school-age instruction, disaster preparedness, food service and crisis intervention. This project will shield vulnerable children from family situations that threaten their well-being and will help families overcome anxieties related to poverty, homelessness, unemployment and evictions.

**Salvation Army Red Shield
Tutoring and Computer Program \$19,812**

The agency will be operating a tutoring program to help children in south Modesto and surrounding areas with their educational needs. Children will be divided into 3 groups due to grade level with an additional group for Spanish Speakers. There is a tutor assigned to each grade level group, and he/she sits in the center of the circular table to assist each student. In the case where no homework is given, the children will work on level appropriate packets of work that have been prepared by the tutoring coordinator. A computer program is also available after tutoring that allows each child to learn typing skills and informational literacy. They are also given a small snack prior to the tutoring and a meal after computer program is complete.

**Second Harvest Food Bank
Food Assistance Program \$20,000**

Second Harvest Food Bank provides assistance to those who are food insecure. Second Harvest's Food Assistance Program interacts with non-profit charities that have a food pantry program of their own. The agency is currently serving 18 non-profit organizations in the cities of Ceres, Oakdale, Hickman, Keyes, Empire, Patterson, Waterford, and Newman which include the unincorporated areas of Stanislaus County. The non-profit charities visit the Food Bank as often as once per week to select packaged groceries, canned fruit and vegetables, grains, dairy products, meats, fresh fruits and vegetables. The charities then distribute the food through their food pantries to individuals in need. The strength of the program is the ability to pick up large-scale donations from retail stores and distribution centers, which far exceeds the pickup and storage capabilities of small non-profit charities. By centralizing the collection, storage, and distribution of product through the Food Bank, more individuals in need are served through the food pantries.

Second Harvest Food Bank is requesting funding to purchase food that will be used to supplement our distribution efforts in the grant service areas. The funds will be used to purchase additional nutritional groceries that are not frequently donated to Second Harvest Food Bank. These funds will provide for additional nutritional food being made available to the low-income residents residing within the Stanislaus County CDBG funding area.

**Second Harvest Food Bank
Food 4 Thought Program \$20,000**

The Food 4 Thought program is an innovative approach that addresses the nutritional needs of hungry school children and offers them the incentive to improve academically and physically. The program reaches out to children through existing tutorial programs at schools and youth sites. Children that participate in the required four hours per week in tutoring and four hours in physical activities are provided a bag of 15-18 pounds of supplemental groceries, including 7-9 pounds of fresh fruits and vegetables. The after-school programs incorporate tutoring, enrichment, and fitness goals to promote healthy outcomes while building self-esteem.

**We Care Program-Turlock
Emergency Cold Weather Shelter \$20,000**

The We Care Program (WCP) Emergency Cold Weather Shelter serves homeless men over the age of 18. The WCP's Cold Weather Shelter has the capacity to shelter 48 homeless individuals a night during the most inhospitable winter months. The shelter provides a warm, safe environment for individuals who would otherwise be sleeping on the street or in places not meant for human habitation. The shelter will operate from November 8, 2015 to April 15, 2016, seven days a week from 6:30pm to 8:00am. Nutritious meals are provided nightly by various local churches, civic organizations, local businesses and individual families. Mealtime provides community members with the opportunity to bring immediate assistance to those in need while serving to break down the stereotypes of homelessness. We Care provides onsite services including, but not limited to, computer access for employment searches, resume development, Rapid Re-Housing and Supportive Housing Programs, case management provided by a licensed clinician, notary public services, a clothes closet, transportation vouchers, and financial assistance to obtain identification documents.

Focus on Prevention Project (Part of Public Services Set Aside) – Urban County*

**Central Valley Youth for Christ
Family Counseling Concern Strength thru Guidance \$39,539**

CVYFC will provide follow-up counseling services to youth and families identified primarily through CVYFC's Point Break workshops conducted at schools in the Ceres Unified School District. Point Break is an intervention strategy designed to develop resiliency skills, break down educational and social barriers among youth, and teach the value of conflict resolution and respect for others. Following Point Break workshops, CVYFC Family Concern Counselors will provide counseling to low- and moderate-income, high-risk students and their families identified by school counselors, teachers, and administrators. CDBG funding will allow Marriage and Family Therapist internists (qualified by education and obtaining experience and hours for full licensure) to provide at least six weekly, one-hour counseling sessions per youth/family. Spanish language counseling will be provided by bilingual-bicultural personnel, as needed. Counseling and case management are supervised by a licensed MFT on the CVYFC staff. Anticipated results are improved academic achievement and behavior and strengthened family and peer relationships.

* The sum of all amounts awarded to the ten public service grant programs, is \$417 less the \$219,768 (10%) set aside for Public Services as two applicants did not request maximum grant amounts. To address this, the \$417 will be spread equally amongst all ten grantees as part of the final contract awards.

Infrastructure Projects – Urban County

Stanislaus County

Stanislaus County-CDBG Program Administration: \$323,013

Stanislaus County will provide management and administration services to the Stanislaus Urban County program member. The funds will cover the costs of salary, publications, public notices, and other eligible costs directly related to the program. These funds will also cover administration costs incurred from administering the ESG program (costs incurred in excess of ESG administration funds).

Fair Housing Program: \$25,000

Stanislaus County will contract with Project Sentinel, a HUD certified fair housing agency, to carry out Fair Housing Program services. Funds will be used to provide fair housing information, housing counseling and tenant/landlord mediation services to residents of the Stanislaus Urban County. Project Sentinel provides housing advocacy to the Stanislaus Urban County's members through community forums, town-hall meetings, and housing fairs.

Airport Neighborhood Sewer Infrastructure Project: \$305,927

Stanislaus County will seek State Water Board funds to finance the remaining phases of the sanitary sewer system in the Airport Neighborhood. CDBG funding will remain allocated to the project until sufficient funding is secured to complete the project.

Empire Storm Drain Infrastructure Project: \$305,927

Stanislaus County will continue seeking viable alternatives for addressing storm drainage within the community, including sidewalks to help facilitate a safer path of travel in storm water impacted areas. On September 9, 2014, the Board of Supervisors approved the Empire Community Storm Drainage Report detailing an alternative, low impact design, swale system and the initiation of a Proposition 218 vote for the funding of the project; however, initial feedback from the community has not indicated support for the alternative swale system. In response to the feedback, the County will be working with the community to identify alternative targeted storm drain solutions that may include sidewalks. CDBG funds will remain allocated to the project for design and construction of the project.

City of Ceres

City of Ceres CDBG Administration: \$15,209

This expenditure includes costs associated management, oversight, and coordination of the related CDBG funded projects.

Nadine Avenue and Evans Road Infrastructure Infill: \$244,987

The project will provide curb, gutter, and sidewalk, matching AC and storm drainage. The project area is located along Nadine Avenue between Weber Avenue and Richland Avenue.

- ◆ Estimated cost: \$200,000
- ◆ Estimated number of people served: 75

City of Hughson

City of Hughson CDBG Administration: \$15,209

This expenditure includes costs associated management, oversight, and coordination of the related CDBG funded projects.

2nd Street Infrastructure Project (Part 1): \$122,532

The project is part of a multi-year effort to complete sidewalk infill projects to improve connectivity, mobility and access for non-motorized users of the City. The project will include the installation of curb,

gutter and sidewalk and pedestrian and ADA improvements. The project area is located along 2nd Street between Walker Land and Fox Road.

- ◆ Estimated cost: \$150,000
- ◆ Estimated number of people served: 50

City of Newman

City of Newman CDBG Administration: \$15,209

This expenditure includes costs associated management, oversight, and coordination of the related CDBG funded projects.

Inyo Avenue Infrastructure Project: \$139,147

The project is to install/replace curb, gutter and sidewalk and street repair and overlay (due to infrastructure repairs) on the north side of Inyo Avenue from R to Merced Streets.

- ◆ Estimated cost: \$100,000
- ◆ Number of People to Be Served:
 - Approximately 2,800 drivers/trips per day (refer to GP EIR Traffic report).
 - 598 Households reside within the project area (1/4 mile) and will benefit from the improvements.
 - 13 Households are adjacent to the project site.
 - If narrowed down to a service radius, one can estimate the local service area as:
 - 598 households within a ¼ mile radius
 - 832 additional households when extending to a ½ mile radius
 - For a total of 1,430 households within a ½ mile radius

City of Oakdale

City of Oakdale CDBG Administration: \$15,209

This expenditure includes costs associated management, oversight, and coordination of the related CDBG funded projects.

Davitt Phase II: \$153,530

The project will install new water/sewer mains and service connections, and provide pavement rehabilitation. The project area is located on Davitt Avenue between West J Street to a southern dead end.

- ◆ Estimated cost: \$200,000
- ◆ Estimated number of people served: 100

City of Patterson

City of Patterson CDBG Administration: \$15,209

This expenditure includes costs associated management, oversight, and coordination of the related CDBG funded projects.

4th Street Infrastructure Project Phase II and 5th Street Alley Infrastructure Project: \$138,993

The project will be phased over the next 5 fiscal years and will include 2,158 linear feet of water main replacement along 4th Street and 2,825 linear feet of water main replacement along the 5th Street alley. The location is along 4th Street and the 5th Street alley between C and D Streets.

- ◆ Estimated cost: \$312,375 and \$398,305
- ◆ Estimated number of people served: 147

City of Waterford

City of Waterford CDBG Administration: \$15,209

This expenditure includes costs associated management, oversight, and coordination of the related CDBG funded projects.

La Gallina Infrastructure Project Phase II: \$127,609

The City of Waterford will be entering into an “allocation trading agreement” with the City of Hughson to allow Waterford the use of Hughson’s Fiscal Year 2015-2016 CDBG allocation. The City of Waterford will use its CDBG allocation in addition to Hughson’s allocation to complete the La Gallina Infrastructure Project in Fiscal Year 2015-2016. The project will include installation of curb, gutter, sidewalk, ADA accessible ramps, and storm drain, infrastructure improvements along La Gallina Avenue from F Street on the West to C Street on the east.

- ◆ Estimated cost: \$600,000
- ◆ Estimated number of people served: 224

AP-50 Geographic Distribution - 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Unincorporated Stanislaus County, along with the cities of Ceres, Hughson, Newman, Oakdale, Patterson, and Waterford, form what is known as the “Stanislaus Urban County”. The Stanislaus Urban County, as an Entitlement Jurisdiction, receives Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG) entitlement funds from HUD on an annual basis based on a formula allocation. Stanislaus County is recognized as the “lead entity” under these entitlement programs.

A requirement of the CDBG program is to benefit those members of the population that meet the definition of Targeted Income. A Targeted Income person is one who earns 80% or less of the AMI for CDBG funds, and 30% or less than the AMI for ESG grant funds. Additionally, if a project benefits a specific neighborhood or community, at least 51% of the population within that geographic boundary must be within the Targeted Income Group (TIG).

Geographic Distribution

Table 4 - Geographic Distribution

Target Area	Percentage of Funds
Urban County CDBG Block Groups	100%

The main objective of the CDBG program is to develop viable communities by providing decent housing and a suitable living environment and by expanding opportunities for persons of low and moderate-income.

Approximately 10% of the Stanislaus Urban County's CDBG entitlement allocation is designated under the "Public Service" program. The Public Service program provides funds to non-profit organizations, through a competitive application process, to provide essential public service programs throughout the participating Stanislaus Urban County members.

The remaining funds are distributed among the Stanislaus Urban County members, via a formula that represents poverty and population census data, to address community infrastructure needs. These needs may include, but are not limited to, sewer infrastructure and storm drainage to sidewalk infill projects. CDBG funds are used to address infrastructure improvement needs, which in turn improve the quality of life by promoting safe and healthy communities.

Rationale for the priorities for allocating investments geographically

For the development of the AAP, the participating jurisdictions used population information derived from the U.S. Census regarding median household income. The target areas of the Stanislaus Urban County members are the very low and low-income areas of the jurisdictions. Although funds are used for all residents of the Stanislaus Urban County's members, priority is given to programs and projects in the target areas.

CDBG funds allocated to the Stanislaus Urban County will be utilized for various programs including infrastructure improvements, economic development, public services, and fair housing. Some programs are funded collectively for the benefit of the entire Stanislaus Urban County, such as homeless and public services. Other programs are specific to individual members of the Stanislaus Urban County. Each member of the Stanislaus Urban County identifies the specific needs within its respective communities as a means to determine use of its specific allocations.

Affordable Housing

AP-55 Affordable Housing - 91.220(g)

Introduction

The tables in this section provide estimates on the number of homeless, non-homeless, and special needs households to be provided affordable housing during the program year and the number of affordable units that will be provided by program type, including rental assistance, production of new units, rehabilitation of existing units, or acquisition of existing units.

Table 5 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households to be Supported	
Homeless	252
Non-Homeless	34
Special-Needs	190
Total	286

Note: Total does not add up due to number of clients being served being represented in more than one category.

Table 6 - One Year Goals for Affordable Housing by Support Type

One Year Goals for the Number of Households Supported Through	
Rental Assistance	44
The Production of New Units	15
Rehab of Existing Units	7
Acquisition of Existing Units	0
Total	66

Discussion

One of the goals identified in the Con Plan and this AAP is to increase the supply of affordable rental housing for the city's lowest-income households.

Housing assistance and programs were also identified as a community need via the consolidated plan process. In Fiscal Year 2015-2016, Stanislaus Urban County members will continue to use any funds available including State CalHome housing funds (not all Stanislaus Urban County members are recipients of CalHome funds) and their HOME funds to address the variety of housing needs within the jurisdiction. Although the Stanislaus Urban County has identified housing assistance and housing programs as one of the top three priorities, the Stanislaus Urban County members' ability to considerably contribute toward the provision and development of affordable housing programs/projects has been drastically limited both by the State of California's elimination of Redevelopment Agencies (which was the most significant tool for the provision of affordable housing, economic development, job creation and elimination of blight), as well as by the continued reduction of HOME funds in recent years.

Emergency shelter and rental assistance, for homeless households and households at-risk of becoming homeless, will also be provided through the Emergency Solutions Grant program.

AP-60 Public Housing - 91.220(h)

Introduction

The Stanislaus Urban County and the Housing Authority of Stanislaus County (Housing Authority) continue to have a close working relationship and meet on an as needed basis to discuss concerns relevant to public housing and other housing matters. The Stanislaus Urban County will continue to work with the Housing Authority and other public and private housing and social service agencies to foster public housing improvements and resident initiatives.

Actions planned during the next year to address the needs to public housing

The Housing Authority's mission is committed to addressing the unmet housing needs of residents and communities in the county consistent with federal, state, and local law. The Housing Authority owns and operates public housing units in addition to operating the Housing Choice Voucher Program (Section 8). Based on the data supplied by HUD, the Housing Authority has 3,930 Housing Choice Vouchers in use. As of October 2014, The Housing Authority has a waiting list of 3,514 families in the Stanislaus Urban County and 752 in the City of Turlock. (Source: 2014 PHA Plan)

The Housing Authority operates 647 conventional public housing units throughout Stanislaus County in five Asset Management Properties (AMP). AMP 1 contains a total of 149 units located in Oakdale, Turlock, Ceres, and Hughson. AMP 2 contains a total of 66 units located in Newman, Patterson and Westley. The remaining 432 units are located in AMP's 3, 4 & 5 in the City of Modesto.

The Housing Authority operates several affordable housing programs in addition to Public Housing, including year round Farm Labor Housing, Seasonal Migrant Farm Worker Housing and several smaller affordable housing properties including units funded under the Neighborhood Stabilization Program and the Housing Choice Voucher Program (Section 8).

Currently, there is no other funding or authorization from HUD to increase the number of Public Housing units, however, the Housing Authority is always working to increase the stock of affordable housing in Stanislaus County through other available resources, programs, and partnerships as opportunities arise.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

The Housing Authority provides homeownership resources to participants in the Housing Choice Voucher Program. The Family Self-Sufficiency (FSS) Program has established partnerships with a variety of community resources to refer participants for services including pre- and post-secondary education, health care, child care, employment development, supported employment, and small business development including micro-loans. The FSS Program also encourages families to participate in financial wellness programs including financial literacy and credit repair with an emphasis on long-term financial stability for the purposes of homeownership. Supportive services are provided through Community Impact Central Valley (CICV), the Stanislaus County Behavioral Health and Recovery Services (BHRS), or Stanislaus County Integrated Services Agency.

The Housing Authority previously implemented a services and communication "quality control" system that provides the Housing Authority with immediate customer feedback and identifies areas that may need improvement.

The Housing Authority has also implemented a resident education program with regularly scheduled meetings and written communications on agency policy, rules, and leases.

Efforts to improve communications with residents and program participants include: on site resident training/informational meetings, regular newsletters and flyers.

The Housing Authority has implemented a “curb-side” appearance program. The focus of the program is the exterior of buildings, parking areas, play grounds and other areas of the complexes. Rodent and insect problems are addressed when residents report a problem and/or on Annual Inspections. In an effort to better educate residents concerning these problems, information is regularly provided through the Housing Authority’s newsletter.

These actions have assisted the Housing Authority in creating an atmosphere which emphasizes customer satisfaction and communication.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

N/A. The Housing Authority is not designated as troubled.

AP-65 Homeless and Other Special Needs Activities - 91.220(i)

Introduction

As discussed earlier in this AAP, the Stanislaus Urban County and City of Turlock participate in the Stanislaus County Continuum of Care (CoC) to develop and implement regional goals and strategies (outlined in this section) to address and end homelessness.

To develop the Stanislaus Urban County’s homeless funding priorities, the current condition of homelessness in the Nation and Stanislaus County was examined by pulling from the 2014 Point-in-Time (PIT) count, the CoC’s 2014 Exhibit 1, the Stanislaus Urban County’s Fiscal Year 2012-2015 Consolidated Plan (Fiscal Year 2012-2015 Con Plan), and the United States Interagency Council on Homelessness’s Report, “Opening Doors – Federal Strategic Plan to Prevent and End Homelessness” (2010). A recent Community Survey, conducted in preparation for the development of the Fiscal Year 2012-2015 Con Plan, identified homeless services as a high priority and homeless prevention activities as a medium priority. Eligible activities allowed for under the homeless funds that the CDBG Stanislaus Urban County receives (ESG and CDBG Public Services) were then compared to existing services available to homeless and at-risk persons to develop the funding priorities described below. The ultimate goal of the Stanislaus Urban County Homeless Strategy is to increase housing stability and decrease incidents of homelessness in Stanislaus County by targeting funds to populations most in need, meeting both the immediate and long-term needs of the homeless, and avoiding the duplication of services by coordinating with service providers and the Stanislaus CoC.

The Federal Strategic Plan to Prevent and End Homelessness has the following 4 Goals:

- ◆ End Chronic Homelessness in five years
- ◆ Prevent and End Homelessness among Veterans in 5 years
- ◆ Prevent and End Homelessness for Families, Youth and Children in 10 years
- ◆ Set a Path to End all Homelessness

The Federal Strategic Plan focuses on solving homelessness for the chronic homeless, homeless veterans, homeless families with children, and homeless unaccompanied youth. Within the document six strategies are discussed as paths to housing those target populations:

- ◆ Individualized Goal-Based Service Planning
- ◆ On-Going Support Services Connected to Mainstream Resources
- ◆ Independent Living Skills Training
- ◆ Connections to Supportive and Trustworthy Adults and Support Networks
- ◆ Employment and Education
- ◆ Housing

Similarly, the current focus of the Stanislaus County CoC funding has been to provide permanent supportive housing (PSH) for the chronically homeless, homeless veterans and for homeless youth out of foster care. The Emergency Solutions Grant (ESG) Program provides both emergency shelter and rental assistance to help stably house homeless households with and without children and long-term homeless adults. ESG sub-grantees will assess individual clients' needs and will evaluate their potential for success in the appropriate program (Emergency, Transitional, Permanent Supportive Housing or Rental Assistance). If they are not able to offer the needed service, then clients will be referred to the appropriate resource.

Drawing from these local data sources and federal strategies, the Stanislaus Urban County has established the following Homeless Strategic Plan action items:

- ◆ Develop and operate coordinated entry for all households who are entering the homeless system or at risk for homelessness.
- ◆ Reach out to homeless households (especially unsheltered persons) and assess their individual needs with coordinated entry and a common assessment tool; collect information to determine the underlying issues and risk factors and develop a plan to address those issues.
- ◆ Reduce recidivism through system-wide implementation of evidenced-based practices known to effectively address homelessness, including incorporation of the Focus on Prevention 2014 strategies.
- ◆ Address the emergency shelter needs of people living outside through increased street outreach and assessment of their health needs.
- ◆ Significantly expand homeless rapid re-housing services to end homelessness as quickly as possible.
- ◆ Consider adoption of a "housing first" approach as a direct route to reducing homelessness.
- ◆ Help low-income households who are being discharged from publicly funded systems of care avoid becoming homeless by engaging those systems of care in identifying solutions to such households and planning to avoid new homelessness.
- ◆ Improve data collection and analysis, including better utilizing HMIS to track the transition of persons into and out of homelessness.

- ◆ Increase access to vocational training opportunities for homeless persons.
- ◆ Increase access to affordable housing & support services in areas related to life skills.
- ◆ Increase coordination with entities releasing persons into homelessness and with service providers and the Stanislaus CoC.

Please see Table 1a and the discussion provided under the Homeless Needs Assessment portion of the Con Plan for additional details on the needs of homeless in Stanislaus County.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The Emergency Solutions Grant Program

The primary source of homeless funds in the Stanislaus Urban County is Emergency Solution Grant (ESG) funds. The ESG program, formally the Emergency Shelter Grant program, is intended to supplement state, local and private efforts to improve the quality and number of emergency shelters and transitional facilities for homeless people as well as to provide case management and financial assistance to prevent homelessness and to permanently re-house homeless persons. HUD issued an interim rule for the ESG Program on December 5, 2011. This rule amended the McKinney-Vento Homeless Assistance Act in accordance with the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act), enacted into law on May 20, 2009. The interim rule established a list of eligible activities, and allows the local grantee, Stanislaus Urban County, to select activities in accordance with its own community development objectives.

Designed as a first step in a CoC plan of assistance, the ESG program strives to address the immediate needs of persons residing on the street and needing emergency shelter and transitional housing, as well as assisting their movement to independent living. While flexible in terms of serving all homeless subpopulations and preventing persons from becoming homeless, ESG program legislation and implementing regulations do limit the types of activities and amounts of funds that can be spent on different activities. The following categories of eligible activities and applicable limitations are discussed in the Emergency Solutions Grant Guidelines on page 40.

- ◆ Street Outreach Activities (funding capped)
- ◆ Emergency Shelter Activities (funding capped)
- ◆ Homeless Prevention Activities
- ◆ Rapid Re-Housing Activities
- ◆ Homeless Management Information System (HMIS) Activities

To be eligible for ESG assistance, a public service project must serve homeless persons or very low income households who are at-risk of homelessness (at or below 30% of AMI).

HUD's proposed allocation for Fiscal Year 2015-2016 ESG funds is in the amount of \$190,669. The interim rule eliminated the previous program caps and replaced them with a 60% maximum (or Hold Harmless Need "HHN" maximum) of grant funds to be spent on shelter and street outreach activities. Administration funds are capped at 7.5% of the total grant allocation. Locally, approximately \$10-15,000 per year is set aside for HMIS data entry assistance, to assist non-HUD funded shelters and homeless service providers in entering their client service data into the HMIS system. After the HMIS award and

Administration are subtracted from the overall award amount, 50% of the remaining award is awarded to shelter programs and the remaining 50% of the funds are awarded to programs that provide homeless prevention and rapid re-housing services.

The following includes a list of homeless service and prevention programs to be funded by the Stanislaus Urban County with Emergency Solutions Grant funds throughout the Fiscal Year 2015-2016:

EMERGENCY SOLUTIONS GRANT PROGRAMS – URBAN COUNTY

The Children’s Crisis Center Marsha’s High-Risk Infant/Toddler Shelter \$16,129

This project will provide shelter, emergency care, meals, crisis intervention and homeless support services to an impoverished population of high-risk infants and toddlers ages birth - 3 years living in Ceres, Empire, Grayson, Patterson, Salida, Westley and unincorporated Modesto. This project will deliver specialized shelter to this highly vulnerable population of children growing up within families experiencing poverty, domestic violence, familial abuse and/or homelessness. Nurturing staff, specializing in infant/toddler care, child development, crisis counseling and crisis management will tend to the physical, emotional, therapeutic, educational and nutritional needs of each child. Caregivers will be qualified with education and advanced training in child development, preschool instruction, disaster preparedness, food service and crisis intervention. This project will shield disadvantaged children from family situations that threaten their well-being and will offer support to help families overcome anxieties related to poverty, homelessness, unemployment and evictions.

The Children’s Crisis Center Verda’s Children Shelter \$22,200

This program represents a new project that would provide shelter, emergency care, meals, crisis intervention and homeless support services to an impoverished population of high-risk infants, toddlers and school-age children ages birth to 17, living in unincorporated Turlock, Newman, Patterson, Hughson, Hickman and Waterford. This project will deliver specialized shelter to this disadvantaged population of children growing up within families experiencing poverty, domestic violence, familial abuse and/or homelessness. Nurturing staff, specializing in child development, crisis counseling and crisis management will tend to the physical, emotional, therapeutic, educational and nutritional needs of each child. Caregivers will be qualified with education and advanced training in child development, school-age instruction, disaster preparedness, food service and crisis intervention. This project will shield vulnerable children from homelessness and family situations that threaten their well-being. It will offer support to help families overcome anxieties related to poverty, homelessness, unemployment and evictions.

Community Housing and Shelter Services Homeless Prevention and Rapid Re-Housing Program \$24,777

The goal of this project is to assist 20 Households, or about 50 individual with Homeless Prevention Rapid Re-Housing funding. The Homeless Prevention funding will be utilized to provide rental assistance to prevent eviction for households who have received a 3-day notice and have written verifiable documentation of an emergency that has caused them to enter into default on their rent. The Rapid Re-Housing funding will be utilized to provide short-term rental assistance via first month’s rent and deposit assistance to households who are homeless and are unable to pay for their full move-in fees. All households served will receive on-going Case Management Services and complete an individualized action plan to address their immediate and long-term goals to ensure permanent housing sustainability.

Community Housing and Shelter Services- CHSS HMIS Project \$14,999

Data entered into the HMIS system for all homeless service providers, not just HUD funded, provides a better representation of the homeless population needs within the community. Complete quality data entry also makes it more likely for our community to receive a representative funding amount for homeless services, reducing the burden on our limited public safety dollars. This funding will allow a staff person that has training via a Section 3, Workforce Alliance project established in 2012 to remain employed. The staff person successfully graduated from the program and maintained full-time employment from that date within our Agency. Her services have enabled enter essential missing data from the largest homeless shelter provider within Stanislaus County, as they are not able to apply for government funding to provide these types of services per their mission statement. The partnership allows the non-HUD funded homeless service agency to enter the data (over 50% of the homeless population) and better represent to funders the numbers of actual number of needy individuals that are present within the community as a whole.

Family Promise

New Beginnings- Shelter to Solutions \$41,344

With “*New Beginnings – Shelter to Solutions*” Family Promise continues to provide a comprehensive approach to ending family homelessness. The emergency shelter program strengthens families by providing a safe place where homeless children and their families can stay together during crisis. Through the Interfaith Hospitality Network, volunteers from local congregations provide overnight lodging and meals in their existing facilities. The Family Promise Day Center operates as home base for the families during the day with showers, laundry facilities and resources for job and housing search. Participation in case management is required and focused to address each family’s unique needs and goals. Case management includes resources for education, employment assistance, life skills training and our newest program, *New Beginnings*, a financial literacy program tailored specifically to low-income or homeless families. Transportation is provided to and from our overnight shelter sites.

Rapid Re-Housing rental assistance helps remove financial barriers and enable families to make the transition to housing stability. Families utilizing the rental assistance program receive housing search and placement assistance, housing stability case management and landlord mediation. Short-term rental assistance provides a resource for families to make their New Beginning and encourages them to work toward independence. Follow up financial education and counseling continues to be available for six months after program completion to help families navigate challenges and reduce recidivism.

We Care Program of Turlock

We Care Emergency Cold Weather Shelter \$27,500

The We Care Program (WCP) Emergency Cold Weather Shelter serves homeless men over the age of 18. The WCP’s Cold Weather Shelter has the capacity to shelter 48 homeless individuals a night during the most inhospitable winter months. The shelter provides a warm, safe environment for individuals who would otherwise be sleeping on the street or in places not meant for human habitation. The shelter will operate from November 8, 2015 to April 15, 2016, seven days a week from 6:30pm to 8:00am. Nutritious meals are provided nightly by various local churches, civic organizations, local businesses and individual families. Mealtime provides community members with the opportunity to bring immediate assistance to those in need while serving to break down the stereotypes of homelessness. We Care provides onsite services including, but not limited to, computer access for employment searches, resume development, Rapid Re-Housing and Supportive Housing Programs, case management provided by a licensed clinician, notary public services, a clothes closet, transportation vouchers, and financial assistance to obtain identification documents.

We Care Program of Turlock

We Care Rapid Re-Housing Program \$29,420

The We Care Rapid Re-housing Program provides services for homeless individuals and families without children over the age of 18 who have income or income potential, or who can find housing in a subsidized housing program. This project will assist 6 homeless individuals and families with housing search and placement, rental application fees, rental and utility assistance, rental and utility deposits, case management, referrals, and support services. This is a case management based program with each participant having an individualized housing program with attainable goals that are monitored on a monthly basis. Participants who are unemployed or underemployed will be required to seek employment and utilize employment services. Participants with income will be responsible for creating budgets based on their current income and expenses. Budgeting and decision making skills are a focal point of case management and all clients are required to utilize all applicable mainstream resources that are available. The program provides the intense case management necessary to move people off of the streets and into permanent housing. Project participants receive a housing plan created specifically to meet their individual housing needs and goals. A case manager meets with program participants at least once a month in their home to see how things are going and to assess their housing plan progress. The majority of the program participants will be individuals and families that are utilizing the We Care Emergency Cold Weather Shelter and the Turlock Gospel Mission. The goal is to move individuals and families that are homeless through transitional housing and into a permanent, sustainable, housing situation.

Addressing the emergency shelter and transitional housing needs of homeless persons

The path to obtaining and maintaining permanent housing has many steps. The first of these steps often involves providing for the immediate needs of persons experiencing homelessness, such as food and shelter. The CoC's Exhibit 1 describes that Stanislaus County experienced a loss of emergency and transitional shelter beds from Fiscal Year 2010-2011. These lower bed numbers occurred due to losses in non-profit funding and the paring down of non-profit services in an attempt to stay fiscally sound. In response to this trend, the Stanislaus Urban County's Homeless Strategy places a high priority on utilizing homeless funds to assist emergency and transitional shelters with covering their operational and essential service costs. Approximately 42% of the Fiscal Year 2015-2016 ESG award will go towards ESG programs that provide emergency (both seasonal and year-round) shelter.

Short-term strategies for addressing the emergency and transitional housing needs of homeless persons include but are not limited to the following:

- ◆ Expanding street outreach efforts to prioritize the needs of persons living outside, especially those whose health is compromised.
- ◆ Sustaining existing emergency shelter and transitional housing inventory and helping those in shelter exit to permanent housing through rental assistance combined with case management that assists clients in developing life skills and reducing barriers to obtaining and retaining housing.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The Stanislaus Urban County Homeless Strategy also places a high priority on providing rental assistance and housing relocation and stabilization services to persons and households experiencing homelessness. Approximately 42% of the Fiscal Year 2015-2016 ESG award will go towards ESG programs that provide rental assistance, utility assistance, payment of rental and utility arrears, or rental or utility deposits in combination with case management which works with clients on an individual basis to sustain permanent housing. Modeled after the 2009 Recovery Act Homeless Prevention and Rapid Re-housing (HPRP) Recovery program, which concluded in August 2012, the program utilizes housing search and placement services, intensive case management, and rental assistance to remove barriers to permanent housing for homeless persons and persons 30% or under the AMI who are at-risk of losing their housing.

The Continuum of Care strategies encourage providing homeless households with housing quickly and with supportive services that are of greatest need to support stable housing; other needs the households may have should be addressed through referrals to existing mainstream resources available in the community.

Permanent housing destinations generally include an apartment or house, permanent supportive housing, or living permanently with friends or family. A return to homelessness is indicated by a new entry in a homeless residential program (emergency shelter, transitional housing, rapid re-housing) in HMIS within 365 days after exiting to permanent housing.

Ending the cycle of homelessness requires a combination of rental assistance, homeless prevention, re-housing, and permanent supportive housing programs along with long-range homeless reduction strategies. Long-term strategies include but are not limited to the following:

- ◆ Expanding economic stability programming to help participants achieve long-term stability and reduce recidivism.
- ◆ Increasing inventory of permanent supportive housing for homeless households through the development of affordable housing.
- ◆ Aligning Stanislaus CoC strategies with the “Opening Doors” Federal Strategic Plan to Prevent and End Homelessness and HEARTH data-driven strategies to shorten lengths of stay, rapidly re-house as many homeless persons as possible, and prevent persons from becoming homeless.
- ◆ Aligning CoC strategies with the Stanislaus County Focus on Prevention efforts, specifically their effort to reduce the incidents of homelessness through cross-sector community collaboration.
- ◆ Improvements in data collection and coordinated assessment between service providers to assist in targeting funding to services proved to be most effective in moving individuals and households out of homelessness.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The State has policies in place that require health care facilities to participate in regional planning meetings and develop a specific document to identify best practices for the post-hospital transition of homeless patients, methods to establish and support effective communications between hospitals and stakeholders regarding this transition and the identification of resources. Local health care facilities have specific protocol in place requiring a safe discharge for all patients. In 2008, the Stanislaus County Public

Health Agency reestablished the task force to review the current protocol in place and address any gaps in services necessary to ensure successful discharge planning services. The Public Health Agency has become actively involved in the Stanislaus CoC and working towards developing liaisons with housing services agencies within the Stanislaus CoC to update the existing discharge planning protocol. Currently in place there are discharge planning social workers on staff at the hospitals who work with service providers to locate appropriate housing and prevent the release of patients to the streets or to HUD McKinney-Vento funded emergency shelters, transitional or permanent housing units.

Representatives from Behavioral Health and Recovery Services (BHRS) and the Community Services Agency (CSA) regularly attend the monthly Stanislaus CoC meetings and are active participants in discharge coordination planning, in particular for homeless individuals, throughout Stanislaus County.

For adults recently released from custody, Stanislaus County addresses housing issues through the Day Reporting Center (DRC). The Sheriff's Department conducts Probation Orientation Meetings at the DRC in which several programs have participated in the past including Solidarity, Teen Challenge, and Gospel Mission. As a result of the CoC's coordination with the Probation Department, the Stanislaus County Sheriff's and Probation Departments also recently began a diversion program, where homeless individuals who would otherwise be jailed for minor crimes are able to stay at the Salvation Army shelter facility, where they receive shelter and case management services. Collaboration with public service providers and the Probation Department is on-going.

Stanislaus County has transitional living procedures in place for juveniles exiting foster care to address youth in placement where the long term plan is emancipation. These procedures are required by both the State and Federal governments. Stanislaus County develops a 90 day transition plan that includes a housing component. Procedurally, a lead officer receives a list of those eligible minors from the case officers and he works with the case officer, minor, family, and any service providers to develop the plan prior to the minor's last status review (usually at 18 years old). A status review is a court hearing to review the minor's status in placement. The plans are submitted to the court and all involved parties, including the minor.

Through contracted services with BHRS, Telecare SHOP (Stanislaus County's primary agency for outreach to Chronically Homeless/mentally ill persons) provides treatment and discharge planning to adults with mental illness and/or chemical addiction. Extensive policies are in place to ensure that patients and mentally ill inmates are not discharged into settings such as shelters, the streets, hotel or motels. Discharge planning is multi-disciplinary and starts upon admission to a facility, with SHOP case managers working with a team including the patient, family, guardians and agencies to develop a plan for housing, medication, vocational, social and educational needs, follow-up, support services and life activities. Discharge planning includes supportive or protective housing if the patient is incapable of independent living. Agencies receive diagnosis, medication and other pertinent information to assist with follow up services. Appropriate discharge settings include nursing homes, basic care facilities, adult foster care, and independent living which are not funded through HUD McKinney-Vento resources. SHOP assists individuals in completing application for housing and mainstream resources such as Social Security prior to the patients discharge. This protocol has been accepted within the Stanislaus CoC and the general community and has proven to be highly successful in preventing homelessness form persons discharged from mental health facilities.

AP-75 Action Plan Barriers to Affordable Housing - 91.220(j)

Introduction

Actions or policies of governmental agencies, whether involved directly or indirectly in the housing market, can impact the ability of the development community to provide adequate housing to meet consumer demands. For example, the impact of federal monetary policies and the budgeting and funding policies of a variety of departments can either stimulate or depress various aspects of the housing

industry. Local or state government compliance or the enactment of sanctions (i.e., sewer connection or growth moratoriums for noncompliance with the federal Clean Air Act and Clean Water Act) can impact all types of development.

State agencies and local government compliance with state statutes can complicate the development of housing. Statutes such as the California Environmental Quality Act and sections of the Government Code relating to rezoning and general plan amendment procedures can also act to prolong the review and approval of development proposals by local governments. In many instances, compliance with these mandates establishes time constraints that cannot be altered by local governments.

Local governments exercise a number of regulatory and approval powers that directly impact residential development within their respective jurisdictional boundaries. These powers establish the location, intensity, and type of units that may or may not be developed. The County's General Plan, zoning regulations, project review and approval procedures, development and processing fees, utility infrastructure, public service capabilities, and development attitudes all play important roles in determining the cost and availability of housing opportunities.

Environmental review, general planning, zoning, and related local land use regulations and development standards are all extensions of local government police powers to protect life and property, minimize nuisances, and achieve a desired quality of life as expressed through a participatory public process. Certain barriers to affordability are required by State Law (such as preparing and adopting a General Plan and conducting environmental review), adopted for safety or civil rights reasons (such as the imposition of seismic construction standards in quake-prone areas, or requiring compliance with accessibility or visit ability design standards), or enacted to remedy or prevent a specific local issue (such as requiring landscaping to deter graffiti). However, the term "barrier" should not be interpreted in the context that local development standards and development review procedures are inhibiting the provision of quality affordable housing that would otherwise be developed.

Potential constraints to housing development in the Stanislaus Urban County vary by area, but generally include infrastructure, residential development fees, land use controls, development standards, development and building permit application processing times, and resource preservation. Barriers to housing also include personal barriers such as poor credit history, involvement with the law, limited knowledge about tenants' rights and the complaints process.

An analysis of these potential barriers is detailed in the Stanislaus Housing Element and the Fiscal Year 2015-2020 Regional Analysis of Impediments to Fair Housing Choice (AI). A summary of potential barriers identified in the Housing Element and the AI is provided in the Market Analysis (MA-40) section of the Con Plan.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

Environmental review, general planning, zoning, and related local land use regulations and development standards are all extensions of local government police powers to protect life and property, minimize nuisances, and achieve a desired quality of life as expressed through a participatory public process. Certain barriers to affordability are required by State Law (such as preparing and adopting a General Plan and conducting environmental review), adopted for safety or civil rights reasons (such as the imposition of seismic construction standards in quake-prone areas, or requiring compliance with accessibility or visit ability design standards), or enacted to remedy or prevent a specific local issue (such as requiring landscaping to deter graffiti). However, the term "barrier" should not be interpreted in the context that local development standards and development review procedures are inhibiting the provision of quality affordable housing that would otherwise be developed.

Potential constraints to housing development in the Stanislaus Urban County vary by area, but generally include infrastructure, residential development fees, land use controls, development standards, development and building permit application processing times, and resource preservation. Barriers to housing also include personal barriers such as poor credit history, involvement with the law, limited knowledge about tenants' rights and the complaints process.

An analysis of these potential barriers is detailed in the Stanislaus Housing Element. A summary of potential barriers identified in the Housing Element is also provided in the Market Analysis (MA-40) section of this Con Plan and in the Fiscal Year 2015-2020 Regional Analysis of Impediments to Fair Housing Choice (AI).

Actions, planned and ongoing, by Stanislaus Urban County to remove or ameliorate barriers to housing, consist of the following:

Development Process: To expedite project facilitation and provide internal support to project applicants, the Stanislaus Urban County will continue to undertake efforts to build relationships between the Stanislaus Urban County and the development community to provide input into delivery of development services, cost of services, construction standards, development impact fees, and other development service policy areas.

Fee Structure: The Stanislaus Urban County will continue to review its fee systems as a means of reducing the cost of housing development. The Stanislaus Urban County and its city members recognize that fees can affect the cost of construction and of affordable housing in the community.

Subdivision Improvement Standards and Zoning Ordinance: The Stanislaus Urban County and its city members will review and provide input to modify Subdivision Improvement Standards, where reasonable and appropriate, to provide cost savings in the development of residential units while continuing to ensure the public health, safety, and welfare of residents.

Affordable Housing: The Stanislaus Urban County will assign priority to educating the citizens of Stanislaus County and member cities regarding the importance of providing affordable housing to support job growth. This will be done through public education, public participation, and fair housing information.

Rental Housing: The Stanislaus Urban County will analyze implementation of incentive programs such as a Mortgage Revenue Bond Program or other program for both owner-occupied and rental properties.

Land Costs, Construction, and Financing: Land, construction, and financing costs represent a significant constraint to residential development; developers of affordable housing face challenges in securing financing. Due to the limited possible return from rents or sales prices of affordable units, many private lenders are concerned with the financial returns for these types of projects; as a result, additional financing and subsidy from state and federal funding sources for affordable projects are necessary. The Stanislaus Urban County and its city members will pursue, where appropriate, state and federal funding and/or subsidies to address land and construction costs.

Non-Governmental Constraints: Housing purchase prices, financing costs, cost of land and improvements, construction costs, property taxes, profit, and rent rates continue to be the biggest constraints to housing access for households with lower and moderate incomes. The Stanislaus Urban County and its member cities will continue to monitor these non-governmental constraints and where possible, undertake efforts that can address these constraints and their effect on the provision of affordable housing.

In addition to the above barriers, the following impediments to fair housing choice are identified in the AI:

- ◆ Insufficient supply of affordable housing.
- ◆ Shortage of subsidies and strategies to promote affordable, accessible housing for low-, very low-, and extremely low-income households, including protected classes.
- ◆ Differential origination rates based on race, ethnicity, and location.
- ◆ Limited coordination with real estate industry.
- ◆ Limited knowledge of fair housing rights.
- ◆ Discrimination in rental housing.
- ◆ Local development standards and their implementation, e.g., zoning, building, or design standards, may constrain development of housing opportunities for minority and low-income households.
- ◆ Inadequate access to employment opportunities, transportation, and public and social services, and infrastructure to support increased housing opportunities for lower-income households.

The Stanislaus Urban County has also allocated annual funding in the amount of \$25,000 to Project Sentinel to actively engage the community regarding issues of barriers to affordable housing.

AP-85 Other Actions - 91.220(k)

Introduction

Stanislaus Urban County, through the Con Plan, targets federal funds to residents that have traditionally not been served, or are underserved, by previous programs. Project activities funded through the Con Plan are carefully designed to provide appropriate and needed services, particularly to those that may not be eligible for assistance from other sources, or are geographically isolated by lack of transportation, or that lack basic amenities, particularly medical care, in their neighborhoods.

Actions planned to address obstacles to meeting underserved needs

For seniors and homebound frail elderly, the physically and developmentally disabled, victims of domestic violence, and infants and youth, funds provided through the Con Plan often make the difference between independent living and institutionalization.

Homeless households are also commonly identified as having underserved needs. These households include individuals and families who cannot secure or maintain affordable and safe shelter and lack a fixed regular residence or reside at nighttime in an emergency shelter or institution. Numerous homeless populations like veterans, youths, seniors, and disabled individuals have specific needs that require more intense specialized attention to resolve their homelessness.

One of the ongoing challenges in meeting the needs of the underserved is the lack of sufficient funding for services provided by local governments, non-profit organizations, and other agencies. Service providers faced with this challenge are expected to provide more and more services with the same, if not smaller, budget every year.

To address this obstacle, Stanislaus Urban County will continue to seek funding opportunities through different sources, encourage projects or programs that leverage funds, and ensure that projects and programs are operated as effectively and efficiently as possible.

Stanislaus County, in partnership with the Housing Authority, continues to support the Family Self Sufficiency program to assist eligible low income persons become homeowners. Stanislaus County also continues to partner with Habitat for Humanity, when feasible, in the acquisition of lots for the construction or rehabilitation of affordable housing units to be made available to low income households.

Further, Stanislaus County also administers State of California CalHome funds to supplement federal HOME funds for the provision of the Stanislaus County First Time Homebuyer and Housing Rehabilitation Programs. Stanislaus County's Housing Rehabilitation Program assists owner-occupied households address health and safety related repairs in their homes. These funds will continue to be used to leverage other resources and maximize the number of households to be assisted thereby addressing underserved needs.

Stanislaus County will continue its partnership with the Stanislaus CoC, a multi-agency collaborative which focuses on the community's housing and social service needs, also allows for the distribution of much needed SuperNOFA funds to affordable housing developers within Stanislaus County. The Stanislaus Urban County will continue partnering with SHSSC to address the needs of the community and addressing obstacles to meeting underserved needs.

Actions planned to foster and maintain affordable housing

As stated throughout the Con Plan, housing is considered a high priority. Accordingly, the Stanislaus Urban County prioritizes the use of, HOME, or CalHome funding it receives for the development and rehabilitation of affordable housing (including preservation and conservation) that serves low-income households and to address homelessness.

The following is a summary of the programs and projects to be carried out by the current Stanislaus Urban County members in an effort to provide affordable and decent housing:

HOME

Stanislaus Urban County will use HOME funds, available through the HOME Consortium, for First-time Homebuyer and Owner Occupied Rehabilitation programs. Specific information regarding activities in the Stanislaus Urban County are contained in the Fiscal Year 2015-2016 City of Turlock Annual Action Plan (City of Turlock AAP), as Turlock is the lead entity for the HOME Consortium, of which Stanislaus Urban County is a member.

Neighborhood Stabilization Program (NSP)

Stanislaus County will continue its efforts at liquidating NSP inventory (six properties) by finding eligible first time homebuyers to purchase the properties. The six remaining properties are located in the Airport, Empire, Grayson, Parklawn and Salida neighborhoods. These units will provide affordable housing opportunities to low and moderate income families.

The City of Oakdale will also work on the development of a vacant NSP property for a multi-family affordable housing project, or other eligible development or liquidation.

Emergency Solutions Grant Program

Through the ESG Program, Stanislaus Urban County residents facing short-term financial crisis are able to seek assistance through agencies such as Community Housing and Shelter Services, Family Promise, and We Care, who provide rental assistance in combination with intensive case management to homeless persons and families or to prevent people in jeopardy of becoming homeless. Case managers work with ESG participants to overcome barriers to permanent housing by providing financial management training, job and housing search assistance, and service referrals. These resources ease the financial burden of the homeless and assist in the facilitation of achieving permanent housing.

Actions planned to reduce lead-based paint hazards

The Housing Authority serves as the lead agency for Stanislaus County in the identification, documentation and prevention of lead poisoning. The Childhood Lead Poisoning Prevention Program of Stanislaus County, administered through the Housing Authority, becomes involved with childhood lead-based poisoning when notification of an elevated screening blood level is received either from the laboratory or physician. If the blood level is 10ug/dL (micrograms per deciliter), notification is made to the family. Once a child meets the case definition, an environmental investigation is performed by a Registered Environmental Health Specialist to determine, if possible, the source of lead exposure. The Housing Authority, in partnership with the Department of Environmental Resources, conducts the investigation of residences where children with elevated levels of lead reside.

The Stanislaus Urban County partners with the Childhood Lead Poisoning Prevention Program to distribute information in the unincorporated areas of Stanislaus County and members of the HOME Consortium. If the source of lead exposure is related to the residential physical environment (e.g. peeling paint that indicates the presence of lead) then the Housing Rehabilitation Program may participate in source eradication.

The Housing Authority has addressed the issue of lead-based paint hazards by providing notices to landlords and tenants who participate in the Housing Choice Voucher Program, borrowers/occupants of the Stanislaus Urban County Owner-Occupied Housing Rehabilitation Loan Program, and homebuyers who use HOME and CDBG funds, warning them of the hazards of lead-based paint. Additionally, all units that are rehabilitated with CDBG and HOME funds are subject to lead-based paint compliance requirements. Through the creation of new affordable housing units, low-income households are able to reside in new housing units that are free of lead-based paint hazards.

Actions planned to reduce the number of poverty-level families

Stanislaus Urban County has a multipronged approach to addressing the issue of reducing poverty through ensuring an adequate, affordable, quality housing supply, improving low-income neighborhoods, strengthening the employment skills of the community and ensuring access to basic needs such as food and shelter.

Stanislaus Urban County works to reduce the number of poverty-level individuals and families by targeting CDBG, HOME, and/or other funds to projects that will provide affordable housing units and related services to foster self-sufficiency. The Urban County does not have the resources or the capacity to increase the incomes of poverty-level persons; however, other agency programs, such as the Housing Authority, act to reduce the housing costs for these individuals with the Housing Choice Voucher Program and public housing units, all of which serve low-income residents.

Focus on Prevention 2015

On October 28, 2014 the Board of Supervisors adopted a plan called Focus on Prevention 2015, which is a strategy for community transformation in four areas critical to the quality of life in Stanislaus County, including:

- ◆ Homelessness
- ◆ Strengthening Families
- ◆ Youth Early Intervention
- ◆ Reducing Recidivism

The goal of Focus on Prevention 2015 is to bring all sectors of the community together to provide an opportunity for cross-sector development of community-wide prevention strategies. A community convening will be held centering on each of the four categories listed above, where a plan for the development of the next phase will be outlined by the participants. This effort recognizes that although good programs exist throughout Stanislaus County, multiple sectors of the community often stay within their established networks causing gaps in the network of care for Stanislaus County's at-risk populations. As a result the outcomes and overall impact of these programs is falling short and the County is experiencing both funding gaps and funding redundancies. While the County will act as the facilitator of the Convenings, this effort centers on the platform that government is not the answer and that champions from the community must be the mobilizers of change. The effort focuses on coordination between the following sectors of the community:

- ◆ Education
- ◆ Faith-based
- ◆ Arts
- ◆ Media
- ◆ Government
- ◆ Nonprofits
- ◆ Business
- ◆ Entertainment and Sports
- ◆ Neighborhoods

Upon completion of the Convenings and the next step will be development of community-led prevention strategies. Stanislaus County will be offering mini-grants for implementation plans which incorporate all sectors of the community. The focus on prevention is intended to become a new norm in which programs and services with a prevention focus and with meaningful prevention performance measures guide future resource decisions.

Stanislaus County through its CDBG/ESG program is committed to implementation of the Focus on Prevention 2015 platform and will integrate the work that comes out of this effort into future funding decisions. As a first step to incorporate the Board of Supervisor's Focus on Prevention 2015 effort into

the Community Development Block Grant and Emergency Solutions Grant programs, this year planning staff will be setting aside one \$40,000 grant for prevention focused applications. CDBG and ESG funds will be incorporating more Focus on Prevention 2015 strategies as the process unfolds.

Homeless Services

All local nonprofit agencies serving the homeless offer some level of supportive services to program participants, ranging from family counseling to job skill development, all of which are intended to promote self-sufficiency and exiting poverty and homelessness.

The Emergency Food and Shelter Grant Program (EFSG), administered by the Federal Emergency Management Agency (FEMA), provides funding to supplement and expand ongoing efforts to provide shelter, food, and supportive services for the nation's hungry, homeless, and people in economic crisis.

Homeless Prevention and Transitional Housing

Homeless prevention activities are designed to keep low-income people who are at the highest risk of homelessness from entering homeless services. Prevention programs have been retooling to stabilize individuals and families that are at risk of becoming homeless and to improve their stability to avoid future housing crises. Prevention programs are funded through Balance of State ESG funds, HOPWA funds, Supportive Services for Homeless Veterans funds, and local private funding.

As the Stanislaus CoC begins a system-wide shift to a housing first approach, the Stanislaus CoC has encouraged the conversion of transitional facilities to permanent supportive housing. The remaining transitional housing programs are shortening their length of stay to more rapidly exit homeless persons to permanent housing, or they are seeking funding from other systems of care for intensive services for homeless persons facing severe barriers to housing. This reflects a new understanding of the purpose of transitional housing rather than continuing to fund it as a routing component of Stanislaus County's homeless housing system.

The majority of programs and activities described within this document will have a minor impact on moving a family out of poverty. Most do not increase earning power or give a family a substantially higher income. The few notable exceptions are the programs that address barriers to independence, including employment, along with housing, such as the Family Self-Sufficiency Program and the McKinney-Vento Homeless Assistance Programs. The Stanislaus Urban County, along with the CoC and other organizations, will aggressively pursue increasing the availability of these and similarly designed programs as the opportunity arises.

Other Programs

The Stanislaus County Alliance WorkNet, The Community Services Agency's (CSA) CalWorks Program, and the California Employment Development Department (EDD) are all resources available to persons seeking employment.

Alliance Worknet

In addition, Stanislaus County, through its economic development efforts, strives to promote activities that will ultimately have major impacts on the community, thus reducing poverty.

The Alliance partners with Stanislaus County and its cities in fulfilling the following objectives:

- ◆ Promotion of Stanislaus County and its nine incorporated cities as a desirable location for new and expanding businesses.
- ◆ To work with public agencies and local businesses to promote cooperation in the economic development process.
- ◆ To assist in business retention and expansion efforts by offering programs for technical and financial assistance.

The Alliance offers these programs: Technical Assistance, Training and Education, and Loan Programs. This organization also offers confidential, one-on-one counseling to businesses needing assistance in a variety of areas, and a small business center that offers a wide variety of training seminars and conferences for the business community throughout the year.

The Alliance maintains a small revolving loan fund for gap financing. Typically, the Alliance will provide up to half the business financing needs while a bank provides the other half. The Alliance revolving loans are for terms of up to 7 years and are at competitive interest rates.

Stanislaus County will continue to work with the public and private sectors seeking mutual opportunities that will provide jobs to greatly improve employment opportunities for those in need throughout the County.

Actions planned to develop institutional structure

The Stanislaus Urban County relies on private, nonprofit organizations as well as for-profit developers to build new affordable units and to rehabilitate existing housing units. Stanislaus Urban County staff will continue to work closely with these entities to ensure that as many new affordable units are produced as possible each year. The Stanislaus Urban County also relies on the nonprofit service sector to provide emergency shelter, transitional and special needs housing, and services to the homeless population. The Stanislaus Urban County will continue to support these organizations and their activities to the fullest extent possible.

To the extent that a gap exists in the institutional structure, a strategy of this AAP is to take action to close that gap. Programs such as the Probation Day Center which connects ex-prisoners to services such as housing and employment, and other agencies promoting the development and well-being of children 0-5 years of age, through the Children and Families Commission, will continue to be partners in identifying opportunities for improved institutional structure.

The Stanislaus CoC continues to work together to improve services provided, including data collection quality through the HMIS system, to ensure that participants receiving services do not experience any gaps as they strive to reach their goal of independence from the need of public services within the community.

The Focus on Prevention effort is an attempt to develop, through multi-sector community collaboration, programs that transcend emergency services and work to improve quality of life for program participants.

Actions planned to enhance coordination between public and private housing and social service agencies

The Stanislaus Urban County relies on private nonprofit organizations and for-profit developers to build and acquire, develop, and rehabilitate affordable units. The City of Turlock and the Stanislaus Urban County will continue to work closely with these entities to ensure that each year as many new affordable units are produced, or are available, as possible.

The Stanislaus Urban County also relies on the nonprofit service sector to provide emergency shelter and transitional and special needs housing. The Stanislaus Urban County will continue to support these organizations and their activities.

Stanislaus County, as administrator of the Stanislaus Urban County, coordinates and consults with other program providers, local, state and federal government entities, non-profit and for-profit organizations and business, professional organizations, interest groups, and other parties interested in the implementation of federal programs.

Specifically, they are: Housing Authority of the County of Stanislaus, Stanislaus County Health Services Agency, Stanislaus County Community Services Agency, Stanislaus County Behavioral Health and Recovery Services; California Department of Housing and Community Development; U.S. Department of Agriculture/Rural Development, U.S. Economic Development Administration, U.S. Department of Housing and Urban Development (HUD); California Coalition for Affordable Housing; Habitat for Humanity, Stanislaus County Affordable Housing Corporation (STANCO), California Rural Legal Assistance (CRLA), and Self-Help Enterprises. This will assure that the activities outlined in the AAP are given the fullest attention for design and implementation or construction.

Stanislaus County will continue to participate in regularly scheduled meetings with the cities of Modesto and Turlock to coordinate any CDBG, HOME and ESG funded activity that may be of benefit to each of the separate entitlement communities within Stanislaus County. Further, quarterly meetings will be held between the participating jurisdictions of the Stanislaus Urban County. This will assure that the activities outlined in the AAP are given the fullest attention for design and implementation or construction.

The Stanislaus Urban County will maintain its membership and active involvement in the Stanislaus County Continuum of Care (CoC), a multi-agency collaborative which focuses on the community's housing and social service needs, to continue outreach and information sharing with other Stanislaus County agencies serving similar clientele.

Program Specific Requirements

AP-90 Program Specific Requirements - 91.220(I)(1,2,4)

Introduction

There are three specific goals of the Federal CDBG/ESG and HOME programs. They are:

1. Provide decent housing;
2. Provide a suitable living environment; and,
3. Expand economic opportunities

This AAP has been developed to assist the Stanislaus Urban County in achieving these three goals. The overriding consideration that is required of the CDBG program is to benefit those members of the population that meet the definition of Targeted Income. A Targeted Income person is one who earns 80% or less of the AMI for CDBG funds, and 30% or less than the AMI for ESG grant funds. Additionally, if a project benefits a specific neighborhood or community, at least 51% of the population within that geographic boundary must be within the Targeted Income Group (TIG).

As identified by the Consolidated Plan for Fiscal Years 2015-2020, priority will be given to projects in the following areas: Infrastructure, Economic Development, Housing Assistance, Housing Programs, and Public Services.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed

In Fiscal Year 2015-2016, the Stanislaus Urban County anticipates receiving approximately \$128,383 in Program Income, all of which will be receipted into IDIS and committed to activities.

The City of Waterford also anticipates receiving 162,665 in State CDBG Program Income which will be receipted into IDIS and committed to activities.

2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan

The Stanislaus Urban County does not currently have an open Section 108 project.

3. The amount of surplus funds from urban renewal settlements

Not applicable. The Stanislaus Urban County does not have urban renewal settlements.

4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.

Not applicable. The Stanislaus Urban County has not returned any funds as a result of ineligible activities, excessive draws, or ineligible expenditures.

5. The amount of income from float-funded activities

Not applicable. The Stanislaus Urban County does not have float-funded activities.

Total Program Income – See response to Question 1 above.

Other CDBG Requirements

1. The amount of urgent need activities

The Stanislaus Urban County has not identified any urgent needs as part of the Consolidated Planning process or for this AAP.

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

N/A Home Consortium Programs are included in the City of Turlock's AAP, who is the lead entity for HOME funds.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

N/A Home Consortium Programs are included in the City of Turlock's AAP, who is the lead entity for HOME funds.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

N/A Home Consortium Programs are included in the City of Turlock's AAP, who is the lead entity for HOME funds.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

N/A Home Consortium Programs are included in the City of Turlock's AAP, who is the lead entity for HOME funds.

Emergency Solutions Grant (ESG)

Reference 91.220(I)(4)

1. Include written standards for providing ESG assistance (may include as attachment)

Stanislaus County's written standards include:

- a. Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under ESG.
- b. Policies and procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers.
- c. Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance.
- d. Standards for determining the share of rent and utilities costs that each program participant must pay, if any, while receiving homelessness prevention or rapid rehousing assistance.
- e. Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time.
- f. Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participants receives assistance; or the maximum number of times the program participants may receive assistance.

Evaluating Eligibility for Assistance under ESG

1. **Initial Evaluations.** The recipient or its sub-recipient must conduct an initial evaluation to determine the eligibility of each individual or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing, in accordance with the centralized or coordinated assessment requirements set forth under 24 CFR §576.400(d) and the written standards established under 24 CFR §576.400(e).

Determining Program Participant Eligibility. The following criteria shall be used to determine program participant eligibility for assistance under ESG:

- a. Income shall be annualized and calculated based on the standards for the Housing Choice Voucher Program (Section 8 Eligibility Standards). Program participants must be 30% and under the AMI to be determined to be eligible.
- b. A client cannot be determined to be ineligible for the program due to a lack of income.
- c. Additional criteria, established by the CoC's ESG Sub-committee shall be followed.
- d. Rapid Re-housing assistance, specifically for the target populations listed below, shall be prioritized over Homeless Prevention assistance:

- i. Chronically Homeless
- ii. Homeless Veterans
- iii. Homeless Families with Children
- iv. Homeless Unaccompanied Youth

Annual income. For each program participant who receives homelessness prevention assistance, or who receives rapid re-housing assistance longer than one year, the following documentation of annual income must be maintained:

- a. Income evaluation form containing the minimum requirements specified by HUD and completed by the recipient or sub-recipient; and
- b. Source documents for the assets held by the program participant and income received over the most recent period for which representative data is available before the date of the evaluation (e.g., wage statement, unemployment compensation statement, public benefits statement, bank statement);
- c. To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., employer, government benefits administrator) or the written certification by the recipient's or sub-recipient's intake staff of the oral verification by the relevant third party of the income the program participant received over the most recent period for which representative data is available; or
- d. To the extent that source documents and third party verification are unobtainable, the written certification by the program participant of the amount of income the program participant received for the most recent period representative of the income that the program participant is reasonably expected to receive over the 3-month period following the evaluation.

Determinations of ineligibility. For each individual and family determined ineligible to receive ESG assistance, the record must include documentation of the reason for that determination.

Re-evaluations for homelessness prevention and rapid re-housing assistance. The recipient or sub-recipient must re-evaluate the program participant's eligibility and the types and amounts of assistance the program participant needs not less than once every three (3) months for program participants receiving homelessness prevention assistance, and not less than once annually for program participants receiving rapid re-housing assistance. At a minimum, each reevaluation of eligibility must establish that:

- a. The program participant does not have an annual income that exceeds 30 percent of median family income for the area, as determined by HUD; and
- b. The program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance.
- c. The recipient or sub-recipient may require each program participant receiving homelessness prevention or rapid re-housing assistance to notify the recipient or sub-recipient regarding changes in the program participant's income or other circumstances (e.g., changes in household composition) that affect the program participant's need for assistance under ESG. When notified of a relevant change, the recipient or sub-recipient must re-evaluate the program participant's eligibility and the amount and types of assistance the program participant needs.

- d. Annual income. When determining the annual income of an individual or family, the recipient or sub-recipient must use the standard for calculating annual income under 24 CFR 5.609.
- e. Connecting program participants to mainstream and other resources. The recipient and its sub-recipients must assist each program participant, as needed, to obtain:
- f. Appropriate supportive services, including assistance in obtaining permanent housing, medical health treatment, mental health treatment, counseling, supervision, and other services essential for achieving independent living; and
- g. Other Federal, State, local, and private assistance available to assist the program participant in obtaining housing stability, including:
 - i. Medicaid (42 CFR chapter IV, subchapter C);
 - ii. Supplemental Nutrition Assistance Program (7 CFR parts 271-283);
 - iii. Women, Infants and Children (WIC) (7 CFR part 246);
 - iv. Federal-State Unemployment Insurance Program (20 CFR parts 601-603, 606, 609, 614-617, 625, 640, 650);
 - v. Social Security Disability Insurance (SSDI) (20 CFR part 404);
 - vi. Supplemental Security Income (SSI) (20 CFR part 416);
 - vii. Child and Adult Care Food Program (42 U.S.C. 1766(t) (7 CFR part 226));
 - viii. Other assistance available under the programs listed in 24 CFR § 576.400(c).

Eligibility for Rental Units. The rental unit identified to receive financial assistance must meet the following minimum qualifications. This applies to both rental units receiving Rapid Re-housing and Homeless Prevention assistance:

- a. Unit must pass habitability inspections, which includes an assessment for lead-based paint hazards. Inspections shall be requested on a standard form and will be conducted by Stanislaus County Building Permits Division staff.
- b. Rental assistance cannot be provided unless the rent does not exceed the Fair Market Rent established by HUD, as provided under 24 CFR part 888.111-888.115, and complies with HUD's standard of rent reasonableness, as established under 24 CFR 982.507. (1) For purposes of calculating rent under this section, the rent shall equal the sum of the total monthly rent for the unit, any fees required for occupancy under the lease (other than late fees and pet fees) and, if the tenant pays separately for utilities, the monthly allowance for utilities (excluding telephone) established by the Housing Authority for the area in which the housing is located.
- c. Best efforts must be made to ensure that units receiving ESG assistance are legal dwellings and are not in the process of foreclosure.
- d. Units receiving assistance, or the client's last known residence, must be located within the areas covered by the Stanislaus Urban County. These areas include the Cities of Ceres, Hughson, Newman, Oakdale, Patterson, Waterford and the unincorporated areas of

Stanislaus County. This limitation does not apply if the client has been homeless for one (1) year or more.

Terminating assistance. In general, if a program participant violates program requirements, the recipient or sub-recipient may terminate the assistance in accordance with a formal process established by the CoC that recognizes the rights of individuals affected. The recipient or sub-recipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases.

- a. To terminate rental assistance or housing relocation and stabilization services to a program participant, the required formal process, at a minimum, must consist of:
 - i. Written notice to the program participant containing a clear statement of the reasons for termination;
 - ii. A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
 - iii. Prompt written notice of the final decision to the program participant.
- b. Ability to provide further assistance. Termination under this section does not bar the recipient or sub-recipient from providing further assistance at a later date to the same family or individual.

Rapid Re-Housing and Homeless Prevention Assistance

1. **Rapid Re-Housing Assistance.** If a program participant can document that they meet the following criteria, then they shall be considered to meet the definition of "homeless" and may qualify for Rapid Re-Housing assistance, provided that all other eligibility criteria can also be met:
 - a. An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - i. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
 - ii. An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
 - iii. An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;
 - b. An individual or family who will imminently lose their primary nighttime residence should be classified as Homeless Prevention
 - c. Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

- i. Are defined as homeless under the Runaway and Homeless Youth, Head Start, Violence Against Women, Public Health Services, Food and Nutrition, or Child Nutrition Acts;
 - ii. Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
 - iii. Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
 - iv. Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addition, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or
- d. Any individual or family who:
- i. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual or family's primary nighttime residence or has made the individual or family afraid to return to their nighttime residence;
 - ii. Has no other residence; and
 - iii. Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.
2. **Homeless Prevention Assistance.** If a program participant can document that they meet the following criteria, then they shall be considered to meet the definition of "At-risk of Homelessness" and may qualify for Homeless Prevention assistance, provided that all other eligibility criteria can also be met:
- a. An individual or family who:
- i. Has an annual income below 30 percent of area median family income;
 - ii. Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in the homeless definition; and
 - iii. Meets one of the following conditions:
 - 1) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - 2) Is living in the home of another because of economic hardship;
 - 3) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;

- 4) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, state, or local government programs for low-income individuals;
 - 5) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than two (2) (1.5 people per room, as defined by the U.S. Census Bureau);
 - 6) Is exiting a publicly funded institution, or system of care, e.g., health-care facility, mental health facility, foster care, or other youth facility, or correction program or institution; or
 - 7) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the Stanislaus Urban County approved Fiscal Year 2012-2015 Con Plan;
- b. A child or youth who does not qualify as homeless under the HEARTH Act but qualifies as homeless under the Runaway and Homeless Youth, Head Start, Violence Against Women, Public Health Services, Food and Nutrition, or Child Nutrition Acts; or
 - c. A child or youth who does qualify as homeless under the HEARTH Act but qualifies as homeless under the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) of that child or youth if living with her or him.
3. **Short-term Rental Assistance.** (Medium priority as referenced in the Fiscal Year 2012-2015 Con Plan survey results priority list) Short-term rental assistance is defined as rental assistance provided for up to 3 months.
 4. **Medium-term Rental Assistance.** (High priority as referenced in the Fiscal Year 2012-2015 Con Plan survey results priority list) Medium-term rental assistance is defined as rental assistance provided for more than 3 months but not more than 24 months of rent, within a 3 year period.
 5. **Rental Arrears.** (Medium priority as referenced in the Fiscal Year 2012-2015 Con Plan survey results priority list) Payment of rental arrears consists of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.
 6. **Tenant-based rental assistance.** Includes providing rental assistance to program participants who pay rent for a unit that is under a lease. The following standards apply to this type of rental assistance:
 - a. A program participant who receives tenant-based rental assistance may select a housing unit in which to live and may move to another unit or building and continue to receive rental assistance, as long as the program participant continues to meet the program requirements.
 - b. The recipient may require that all program participants live within a particular area for the period in which the rental assistance is provided.
 - c. The rental assistance agreement with the owner must terminate and no further rental assistance payments under that agreement may be made if:
 - i. The program participant moves out of the housing unit for which the program participant has a lease;
 - ii. The lease terminates and is not renewed; or

- iii. The program participant becomes ineligible to receive ESG rental assistance.
7. **Project-based rental assistance.** Project-based rental assistance is an eligible ESG activity. However, any ESG funded project-based rental assistance program must work with Stanislaus County staff to ensure the program complies with 24 CFR § 576.106 (i).
 8. **Use with other subsidies.** Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance, or living in a housing unit receiving project-based rental assistance or operating assistance, through other public sources. Rental assistance may not be provided to a program participant who has been provided with replacement housing payments under the URA during the period of time covered by the URA payments.
 9. **Maximum Amounts and Periods of Assistance.** Each program participant may receive up to 12 months of rental assistance and housing relocation and stabilization services. This assistance may be extended if the program participant's housing plan has been followed and the case manager determines that additional months of assistance are required for the participant to overcome additional barriers to housing. In no case can HPRP assistance exceed 24 months during any 3-year period.
 10. **Prioritizing Assistance Type.** Standards for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance.
 - a. Rapid Re-housing assistance, particularly for chronically homeless, for veterans, for unaccompanied youth, and for families with children, shall be prioritized over other financial assistance types.
 - b. When developing a client's housing plan, the following eligible activities should be considered a high priority:
 - i. Employment Assistance and job training
 - ii. Benefit enrollment
 - iii. Resource and referral services
 - iv. Medium-term rental assistance
 - v. Housing search and placement
 - vi. Housing stability case management
 - vii. Life skills training
 - c. When developing a client's housing plan, the following eligible activities should be considered a medium priority:
 - i. Short-term rental assistance
 - ii. Utility assistance
 - iii. Utility deposits

- iv. Security deposits
 - v. Rental arrears
 - vi. Rental application fees
 - vii. Child care
 - viii. Education services
 - ix. Transportation
- d. When developing a client's housing plan, the following eligible activities should be considered a low priority:
- i. Legal services
 - ii. Mental health services
 - iii. Last's month rental payments
 - iv. Moving costs
 - v. Mediation
 - vi. Credit repair
 - vii. Outpatient health services
 - viii. Mental health services
 - ix. Substance abuse treatment services
 - x. Services for special populations
- e. If a client enters the program as Rapid Re-housing, then exits and re-enters, they will be reclassified as Homeless Prevention. The length of Rapid Re-housing and Homeless Prevention assistance will be counted towards the maximum number of months to receive assistance together.

11. **Program Participant Responsibilities.** Standards for determining the share of rent and utilities costs that each program participant is responsible to pay, if any, while receiving homelessness prevention or rapid rehousing assistance is as follows:

- a. If at intake a client is determined to have cash-income or benefits, their rental assistance shall decrease by 10% every month. If a case manager determines that barriers exist that would make this requirement an obstacle to stable permanent housing at program exit, then this requirement may be waived. Barriers shall be documented in client file and must be consistent with CoC established barriers.
- b. Debt to income ratio limits include: 35% income to housing ratio; and a 45% total monthly debt to income ratio. If a case manager creates a housing plan that includes a plan for getting a program participant's debt to income ratio to these levels, then this requirement may be waived. This shall be documented in the client's Housing Plan and signed by the client.

12. **Rental assistance agreement.** The recipient or sub-recipient may make rental assistance payments only to an owner with whom the recipient or sub-recipient has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided, including the requirements that apply under this section. The rental assistance agreement must provide that, during the term of the agreement, the owner must give the recipient or sub-recipient a copy of any notice to the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program participant.
13. **Late payments.** The recipient or sub-recipient must make timely payments to each owner in accordance with the rental assistance agreement. The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease. The recipient or sub-recipient is solely responsible for paying late payment penalties that it incurs with non-ESG funds.
14. **Lease.** Each program participant receiving rental assistance must have a legally binding, written lease for the rental unit, unless the assistance is solely for rental arrears. The lease must be between the owner and the program participant. Where the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease, if the agreement gives the program participant an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented by the owner's financial records, rent ledgers, or canceled checks. For program participants living in housing with project-based rental assistance under paragraph (i) of this section, the lease must have an initial term of one year.
15. **Housing Relocation and Stabilization Services. 24 CFR § 576.105.** Any rapid re-housing or homeless prevention rental assistance must be provided in accordance with the housing relocation and stabilization services, in particular monthly case management. Program staff salary related costs cannot exceed 20% of the total grant award. Staff time will be reimbursed based on the number of hours spent providing housing relocation and stabilization services for Stanislaus Urban County clients plus up to 20% benefits, excluding overhead costs. Paid time off (PTO) is not an eligible expense.
16. **Financial assistance costs.** Financial assistance costs are eligible activities under Housing Relocation and Stabilization Services. Subject to the general conditions under 24 CFR § 576.103 and 24 CFR §576.104, ESG funds may be used to pay housing owners, utility companies, and other third parties for the following costs in order of funding priority:
 - a. Rental application fees. ESG funds may pay for the rental housing application fee that is charged by the owner to all applicants.
 - b. Security deposits. ESG funds may pay for a security deposit that is equal to no more than 2 months' rent.
 - c. Last month's rent. If necessary to obtain housing for a program participant, the last month's rent may be paid from ESG funds to the owner of that housing at the time the owner is paid the security deposit and the first month's rent. This assistance must not exceed one month's rent and must be included in calculating the program participant's total rental assistance, which cannot exceed 24 months during any 3-year period.
 - d. Utility deposits. ESG funds may pay for a standard utility deposit required by the utility company for all customers for the utilities listed in paragraph (v) of this section.

- e. Utility payments. ESG funds may pay for up to 24 months of utility payments per program participant, per service, including up to 6 months of utility payments in arrears, per service. A partial payment of a utility bill counts as one month. This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments. Eligible utility services are gas, electric, water, and sewage. No program participant shall receive more than 24 months of utility assistance within any 3-year period.
 - f. Moving costs. ESG funds may pay for moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance under paragraph (b) of this section and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.
17. **Housing search and placement.** Housing Search and Placement is an eligible activity under Housing Relocation and Stabilization Services. This includes activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing, as follows:
- a. Assessment of housing barriers, needs, and preferences;
 - b. Development of an action plan for locating housing;
 - c. Housing search;
 - d. Outreach to and negotiation with owners;
 - e. Assistance with submitting rental applications and understanding leases;
 - f. Assessment of housing for compliance with ESG requirements for habitability, lead-based paint, and rent reasonableness;
 - g. Assistance with obtaining utilities and making moving arrangements; and
 - h. Referral for tenant counseling, to local fair housing provider.
18. **Housing Stability Case Management.** Housing Stability Case Management is an eligible activity under Housing Relocation and Stabilization Services. Each program participant receiving homelessness prevention or rapid rehousing assistance must meet regularly with a case manager and the assistance provider must develop an individualized housing plan to help that program participant retain permanent housing after the ESG assistance ends. These requirements are intended to help ensure that the ESG-funded emergency, short-term or medium-term assistance will be effective in helping program participants regain long-term housing stability and avoid relapses into homelessness. ESG funds may be used to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing. This assistance cannot exceed 30 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing. Component services and activities consist of:
- a. Using the centralized or coordinated assessment system as required under 24 CFR §576.400(d), to evaluate individuals and families applying for or receiving homelessness prevention or rapid re-housing assistance;

- b. Conducting the initial evaluation required under 24 CFR § 576.401(a), including verifying and documenting eligibility, for individuals and families applying for homelessness prevention or rapid re-housing assistance;
 - c. Counseling;
 - d. Developing, securing, and coordinating services and obtaining Federal, State, and local benefits;
 - e. Monitoring and evaluating program participant progress;
 - f. Providing information and referrals to other providers;
 - g. Developing an individualized housing and service plan, including planning a path to permanent housing stability; and
 - h. Conducting re-evaluations required under 24 CFR § 576.401(b).
18. **Mediation.** Mediation is an eligible activity under Housing Relocation and Stabilization Services. ESG funds may pay for mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the program participant from losing permanent housing in which the program participant currently resides.
19. **Legal services.** Providing legal services is an eligible activity under Housing Relocation and Stabilization Services. ESG funds may pay for legal services, as set forth in 24 CFR § 576.102(a)(1)(vi), except that the eligible subject matters also include landlord/tenant matters, and the services must be necessary to resolve a legal problem that prohibits the program participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which the program participant currently resides.
20. **Credit repair.** Assisting with credit repair is an eligible activity under Housing Relocation and Stabilization Services. ESG funds may pay for credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.
21. **24 CFR § 576.107 HMIS component.** Provided funding from another local source is not already available for the HMIS related costs below, the recipient or sub-recipient may use ESG funds to pay the costs of contributing data to the HMIS designated by the CoC for the area. Activities funded under this section must comply with HUD's standards on participation, data collection, and reporting under a local HMIS. Eligible activities under this category include:
- a. Purchasing or leasing computer hardware;
 - b. Purchasing software or software licenses;
 - c. Purchasing or leasing equipment, including telephones, fax machines, and furniture;
 - d. Obtaining technical support;
 - e. Leasing office space;

- f. Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS;
- g. Paying salaries for operating HMIS including, completing data entry, monitoring and reviewing data quality, completing data analysis, reporting to the HMIS Lead, training staff on using the HMIS or comparable database, and implementing and complying with HMIS requirements;
- h. Paying costs of staff to travel to and attend HUD-sponsored and HUD-approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act;
- i. Paying staff travel costs to conduct intake;
- j. Paying participation fees charged by the HMIS Lead, if the recipient or sub-recipient is not the HMIS Lead. The HMIS Lead is the entity designated by the CoC to operate the area's HMIS; and
- k. If the sub-recipient is a victim services provider or a legal services provider, it may use ESG funds to establish and operate a comparable database that collects client-level data over time (i.e., longitudinal data) and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must not be entered directly into or provided to an HMIS.

Evaluating Outcomes

1. **Defining Stably Housed.** For the purposes of evaluating outcomes of Rapid Re-housing and Homeless Prevention assistance, a program participant is considered to be stably housed, if their residence at time of exit includes one of the following:
 - a. Permanent Supportive Housing
 - b. Rental by client no housing subsidy
 - c. Rental by client, VASH housing subsidy
 - d. Rental by client, other (non-VASH) housing subsidy
 - e. Staying or living with family, permanent tenure
 - f. Staying for living with friends, permanent tenure
2. **Additional Outcomes.** Additional outcomes to be tracked include the following:
 - a. Changes in employment
 - b. Changes in cash benefits
 - c. Changes in non-cash benefits
 - d. Supportive services received
 - e. Job or life skills training received

Record Keeping

1. **Homeless status.** Documentation of homeless status must occur at intake. Lack of third-party documentation must not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider. Records contained in an HMIS or comparable database used by victim service or legal service providers are acceptable evidence of third-party documentation and intake worker observations if the HMIS retains an auditable history of all entries, including the person who entered the data, the date of entry, and the change made; and if the HMIS prevents overrides or changes of the dates on which entries are made. Priority for obtaining evidence is as follows:
 - a. Third Party Written
 - b. Third Party Oral
 - c. Documents provided by program participant
 - d. Self-declaration
2. **Documenting Homelessness.** For each individual or family who receives ESG homelessness assistance, the records must include the evidence relied upon to establish and verify the individual or family's "homelessness" status. This evidence must include an intake and certification form that meets HUD specifications and is completed by the sub-recipient. Required documentation includes the following:
 - a. If the individual or family is lacking a fixed nighttime residence and is staying in either a place not meant for habitation or a shelter, acceptable evidence includes:
 - i. A written observation by an outreach worker of the conditions where the individual or family was living,
 - ii. A written referral by another housing or service provider, or
 - iii. A certification by the individual or head of household seeking assistance.
 - b. If the individual or family is exiting a public institution where their stay was 90 days or less, and where they stayed either in a place not meant for habitation or a shelter prior to entry, acceptable evidence includes 2a.i-iii above and:
 - i. Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution. All oral statements must be recorded by the intake worker; or
 - ii. Where the evidence in paragraph (b)(2)(i) of this section is not obtainable, a written record of the intake worker's due diligence in attempting to obtain the evidence described in paragraph (b)(2)(i) and a certification by the individual seeking assistance that states he or she is exiting or has just exited an institution where he or she resided for 90 days or less.
 - c. For any other circumstances where an individual or family qualifies as homeless under 24 CFR §576.2 of the Federal Code, the evidence must comply with 24 CFR §576.500(b) of the Federal Code.

3. **Documenting At risk of homelessness status.** For each individual or family who receives ESG homelessness prevention assistance, the records must include the evidence relied upon to establish and verify the individual or family's "at risk of homelessness" status. This evidence must include an intake and certification form that meets HUD specifications and is completed by the recipient or sub-recipient. The evidence must also include:
 - a. Determination of annual income
 - b. The program participant's certification on a form specified by HUD that the program participant has insufficient financial resources and support networks (e.g., family, friends, faith-based or other social networks, immediately available to attain housing stability and meets one or more of the conditions described of the definition of "at risk of homelessness" in 24 CFR §576.2)
 - c. The most reliable evidence available to show that the program participant does not have sufficient resources or support networks. Acceptable evidence includes:
 - i. Source documents (e.g., eviction notice, notice of termination from employment, unemployment compensation statement, bank statement, health-care bill showing arrears, utility bill showing arrears);
 - ii. To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., former employer, public administrator, relative) or the written certification by the recipient's or sub-recipient's intake staff of the oral verification by the relevant third party that the applicant meets one or both of the criteria under paragraph (1)(ii) of the definition of "at risk of homelessness" in 24 CFR § 576.2; or
 - iii. To the extent that source documents and third-party verification are unobtainable, a written statement by the recipient's or sub-recipient's intake staff describing the efforts taken to obtain the required evidence; and a statement that the intake staff that the staff person has visited the applicant's residence and determined that the applicant meets one or more of the criteria under paragraph (1)(iii) of the definition or, if a visit is not practicable or relevant to the determination, a written statement by the recipient's or sub-recipient's intake staff describing the efforts taken to obtain the required evidence
4. **Rental assistance agreements and payments.** The records must include copies of all leases and rental assistance agreements for the provision of rental assistance, documentation of payments made to owners for the provision of rental assistance, and supporting documentation for these payments, including dates of occupancy by program participants.
5. **Utility allowance.** The records must document the monthly allowance for utilities (excluding telephone) used to determine compliance with the rent restriction.
6. **Services and assistance provided.** The recipient must keep records of the types of essential services, rental assistance, and housing stabilization and relocation services provided under the recipient's program and the amounts spent on these services and assistance. The recipient and its sub-recipients that are units of general purpose local government must keep records to demonstrate compliance with the maintenance of effort requirement, including records of the unit of the general purpose local government's annual budgets and sources of funding for street outreach and emergency shelter services.
7. **Program participant records.** In addition to evidence of homeless status or "at risk of homelessness" status, as applicable, records must be kept for each program participant that document:

- a. The services and assistance provided to that program participant, including, as applicable, the security deposit, rental assistance, and utility payments made on behalf of the program participant;
- b. Compliance with the applicable requirements for providing services and assistance to that program participant under the program components and eligible activities provisions at 24 CFR § 576.101 through 24 CFR § 576.106, the provision on determining eligibility and amount and type of assistance at 24 CFR §576.401(a) and (b), and the provision on using appropriate assistance and services at 24 CFR §576.401(d) and (e); and
- c. Where applicable, compliance with the termination of assistance requirement in 24 CFR § 576.402.

Coordination Among Homeless Service Providers

1. **Centralized or coordinated assessment systems and procedures.** The recipient and its sub-recipients must keep documentation evidencing the use of, and written intake procedures for, the centralized or coordinated assessment system(s) developed by the Continuum(s) of Care (CoC(s) in accordance with the requirements established by HUD.
2. **Provider Coordination.** The ESG Sub-committee will meet once a month, after the general CoC meeting. ESG recipients must attend this sub-committee meeting bi-monthly to ensure standardized coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers.
3. **Coordination with CoC(s) and other programs.** The recipient and its sub-recipients must document their compliance with the requirements of 24 CFR § 576.400 for consulting with the Continuum(s) of Care and coordinating and integrating ESG assistance with programs targeted toward homeless people and mainstream service and assistance programs. *HMIS*. The recipient must keep records of the participation in HMIS or a comparable database by all projects of the recipient and its sub-recipients.

Other

1. **Match Funding.** The recipient must keep records of the source and use of contributions made to satisfy the matching requirement in 24 CFR § 576.201. The records must indicate the particular fiscal year grant for which each matching contribution is counted. The records must show how the value placed on third-party, Non-cash contributions was derived. To the extent feasible, volunteer services must be supported by the same methods that the organization uses to support the allocation of regular personnel costs.
2. **Program income.** Program income shall have the meaning provided in 24 CFR 85.25. Program income includes any amount of a security or utility deposit returned to the recipient or sub-recipient.
3. **Conflicts of interest.** The recipient and its sub-recipients must keep records to show compliance with the organizational conflicts-of- interest requirements in 24 CFR § 576.404(a)

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The CoC has developed a working sub-committees to evaluate the best method for implementing a coordinated client intake and assessment process. As it is required to participate in HMIS as an ESG sub-recipient, a common set of data is currently being collected through entry of client information into the HMIS. Through the HMIS Sub-committee, universal entry and assessment forms have been developed and are in use by each agency required to enter into the HMIS system. The Sub-committee also implemented a common release form for client permission to be entered into HMIS. Throughout the 2015-2016 Fiscal Year, the Sub-committee will continue to work together to further develop the CoC's coordinated assessment process.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

ESG funds were allocated based on a competitive grant cycle to which homeless and homeless prevention service providers can apply. Applicants are restricted to submitting two (2) applications per agency, provided each application is a request for a different program or office. All applicants are required to attend a technical workshop prior to submission of an application. A panel made up of representation from each Stanislaus Urban County members, the Stanislaus County Chief Executive Office, and the CoC, reviewed each written application submission and oral presentation and scored them individually. Scoring for ESG grants consists of the following categories:

Capacity & Experience

- ◆ Agency & Staff Experience with Proposed Program
- ◆ Agency Experience with the Implementation of Grants (Federal, State or Private)
- ◆ Site Control for Activity Location
- ◆ Program Sustainability

Need/Extent of The Problem

- ◆ Extremely Low-Income (30% and below AMI) Population Served
- ◆ Focus on Eligible Urban County Areas
- ◆ Meeting an Important Community Need
- ◆ Homeless Prevention/Rapid Re-Housing Component

Soundness of Approach

- ◆ Multi-sector Partnerships
- ◆ Project Innovation

Methodology

- ◆ Eligible & Reasonable Budget
- ◆ Standardized Client Intake and Eligibility Process

Accomplishments

- ◆ Measurable, Verifiable and Effective Accomplishments
- ◆ Long-term Accomplishments
- ◆ Activity Results

Funding Resources

- ◆ Leveraging Sources (Private, Fed, State, Local, In-kind)

Achieving Results & Program Evaluation (only applies to programs funded within the last 12 months)

- ◆ Monitoring Results & Timeliness
- ◆ Continuum of Care Partner

Grant Submittal

- ◆ Application Accuracy, Completeness, and Quality

As discussed earlier within the Consultation Process section of this document, the results of the competitive process will be presented to the CoC, and the ESG/SHP/HMIS Sub-committee for input in April 2015.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The Stanislaus CoC has one formerly homeless person currently actively participating in meetings. The Stanislaus CoC will continue to work to gain input from homeless individuals and advocacy groups for all Stanislaus CoC projects. A Street Relief resources fair for the homeless, which connected homeless persons to medical screenings, enrollment assistance, documentation replacements, emergency food and clothing, as well as for general resource and referral services, is coordinated by Stanislaus CoC members annually. The 2015 sheltered homeless count was conducted on Wednesday evening, January 28, 2015 and the unsheltered homeless count was conducted on Thursday, January 29, 2015. Surveys conducted included comments from homeless persons on what services they needed most.

5. Describe performance standards for evaluating ESG.

Discussion

For the purposes of evaluating outcomes of Rapid Re-housing and Homeless Prevention assistance, a program participant is considered to be stably housed, if their residence at time of exit includes one of the following:

- ◆ Permanent Supportive Housing
- ◆ Rental by client no housing subsidy
- ◆ Rental by client, VASH housing subsidy

- ◆ Rental by client, other (non-VASH) housing subsidy
- ◆ Staying or living with family, permanent tenure
- ◆ Staying for living with friends, permanent tenure

Additionally, sub-grantees will be required to document each program participant's barriers to obtaining and maintaining stable housing at program entry, re-certification, and at program exit. In particular, sub-grantees must keep detailed records for each program participant in the following categories:

- ◆ Changes in employment
- ◆ Changes in cash benefits
- ◆ Changes in non-cash benefits
- ◆ Supportive services received
- ◆ Job or life skills training received

In general, ESG program participants whose residence at program exit is considered to be "stably housed" and who experiences a decrease in the number of barriers from program exit to program entry, will be considered to be a program success.

MAY 2015



STANISLAUS URBAN COUNTY AND CITY OF TURLOCK

REGIONAL ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

FISCAL YEARS 2015–2020

MAY 2015



STANISLAUS URBAN COUNTY/ CITY OF TURLOCK



*Prepared by PMC for Stanislaus County
1010 10th Street, Suite 3400
Modesto, CA 95354
209.525.6330*

REGIONAL ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FISCAL YEARS 2015 – 2020

MAY 2015

Stanislaus County
1010 10th Street
Suite 6700
Modesto, CA 95354



City of Ceres
2720 2nd Street
Ceres, CA 95307



City of Hughson
7018 Pine Street
Hughson, CA 95326



City of Newman
938 Fresno Street
Newman, CA 95360



City of Oakdale
280 N 3rd Avenue
Oakdale, CA 95361



City of Patterson
1 Plaza
Patterson, CA 95363



City of Turlock
156 S Broadway
Turlock, CA 95380



City of Waterford
312 E Street
Waterford, CA 95386



Table of Contents

Executive Summary	1
Purpose and Intent	1
Preparation of the AI	1
Geographic Terms	2
Impediments Identified.....	2
Affordable Housing	3
Private Practice and Mortgage Lending	3
Fair Housing Education and Enforcement.....	4
Government Barriers	4
Introduction	5
Geography	5
What Is Fair Housing?	5
What Is an Impediment to Fair Housing Choice?	6
Purpose of the Analysis of Impediments	6
Stanislaus Urban County/City of Turlock Consolidated Plan	7
Background	8
Population	8
Population by Age.....	9
Areas of Minority Concentration	10
Income	11
Areas of Low- and Very Low-Income Concentration	13
Poverty.....	13
Education	14
Employment.....	14
Households.....	16
Special Needs Populations – Non-Homeless.....	18
Elderly	18
Persons with Disabilities	18
Large Households.....	20
Female-Headed Households	20
Housing Characteristics	21
Housing Growth	21
Tenure.....	22
Housing Type.....	23
Vacancy Rate	23
Age of Housing Stock	24
Housing Cost	26

Housing Affordability by Tenure and Household Type	27
Overcrowding	29
Foreclosures	29
Private Sector Practices	31
Real Estate Sales Practices	31
Real Estate Profession – Self-Regulated	32
Real Estate Law Violations	32
Professional Code of Ethics Breach	33
Outreach and Education	34
RENTAL AND PROPERTY MANAGEMENT	34
Rental and Property Management – Self-Regulated.....	35
Financial Institutions and Mortgage Lending	36
Advertisement	37
Use of Restrictive Covenants	37
Summary of Private Sector Practices	37
Mortgage Lending (HMDA Data)	38
Community Reinvestment Act	38
Home Mortgage Disclosure Act.....	38
Lending Action Volume by Race and Ethnicity.....	38
Lending Action Rates by Race and Ethnicity.....	41
American Indian or Alaska Native	41
Hawaiian or Pacific Islander	43
Black or African American	44
Other or No Information	45
Asian	46
White.....	47
Hispanic	48
Mortgage Lending by Area	50
Minority Concentration	50
Hispanic Concentration.....	50
Low/Moderate-Income Concentration	51
Geographic Distribution of High Priced Loans.....	51
Summary of Findings	52
Claims and Enforcement	53
Fair Housing Complaints and Enforcement.....	53
U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity .	54
California Department of Fair Housing and Employment (DFEH).....	55
Stanislaus County and City of Turlock.....	55
Nonprofit Fair Housing Organizations	56

Department of Justice	60
Advocacy Organizations	60
Outreach and Education	60
Summary of Complaints and Enforcement Activity	62
Government Barriers to Fair Housing.....	63
Housing Element Law and Compliance.....	63
Procedural Requirements	64
Housing for Persons with Special Needs	64
Housing for the Homeless	66
Building Code	69
Resources and Incentives for Affordable Housing	70
Identification of Impediments and Actions to Address	72
Affordable Housing	72
Private Practices and Mortgage Lending.....	76
Fair Housing Education and Enforcement.....	77
GOVERNMENT BARRIERS.....	78

Appendices

- Appendix 1. - Areas of Minority Concentration Maps
- Appendix 2. - Areas of Hispanic Concentration Maps
- Appendix 3. - Areas of Low-Income and Very Low-Income Concentration Maps
- Appendix 4. - Mortgage Lending Patterns Maps
- Appendix 5. - Census Tract 26.02 Maps
- Appendix 6. - Outreach Summary

List of Tables

Table 1 Current and Projected Population	8
Table 2 Rate of Change in Current and Projected Population	9
Table 3 Population by Age.....	9
Table 4 Race as a Percentage of Total Population	10
Table 5 Hispanic Origin as a Percentage of Total Population.....	11
Table 6 Income Categories.....	11
Table 7 Income Characteristics for Incorporated Jurisdictions.....	12
Table 8 Income Characteristics for Unincorporated Areas.....	12
Table 9 Share of Population Below Poverty	13
Table 10 Educational Attainment for Persons Aged 25 Years and Older Under the Poverty Level.....	14
Table 11 Major Manufacturing Employers – Stanislaus County.....	14
Table 12 Major Non-Manufacturing Employers – Stanislaus County.....	15
Table 13 Employment by Industry – Stanislaus County	15
Table 14 Wages and Employment – Stanislaus County	16

Table 15 Household Composition, 2010.....	17
Table 16 Family Household Composition	17
Table 17 Senior Households	18
Table 18 Disability Status and Types	19
Table 19 Large Households.....	20
Table 20 Female-Headed Households	21
Table 21 Housing Units, 2000–2014	22
Table 22 Housing Tenure	22
Table 23 Units in Structure	23
Table 24 Vacancy Status, 2010.....	24
Table 25 Age of Housing by Tenure	25
Table 26 Median Home Sale Prices	26
Table 27 Median Rental Listings	26
Table 28 Fair Market Rents, 2014	27
Table 29 Cost Burden Summary, Renters.....	28
Table 30 Cost Burden Summary, Owners.....	28
Table 31 Persons per Room.....	29
Table 32 Foreclosure Activity January 2015	30
Table 33 2013 Lending Action by Race, Stanislaus County	39
Table 34 2013 Lending Action by Ethnicity, Stanislaus County	39
Table 35 2013 Lending Actions for American Indian or Alaska Native by Area, Stanislaus County.....	42
Table 36 2013 Lending Actions for Hawaiian or Pacific Islander by Area, Stanislaus County.....	43
Table 37 2013 Lending Actions for Black or African American by Area, Stanislaus County.....	44
Table 38 2013 Lending Actions for Other or No Information by Area, Stanislaus County	45
Table 39 2013 Lending Actions for Asian by Area, Stanislaus County	46
Table 40 2013 Lending Actions for White by Area, Stanislaus County	47
Table 41 2013 Lending Actions for Hispanic by Area, Stanislaus County	49
Table 42 2013 Lending Actions for Census Tracts with Less than 50 Percent Origination Rate, Stanislaus County.....	51
Table 43 2013 High Priced Loans for Consortium Jurisdictions, Stanislaus County	52
Table 44 Fair Housing Cases per Agency*, Approximately 2012 to 2014**	57
Table 44.1 Fair Housing Cases per Agency in City of Turlock, Approximately 2012 to 2014*	57
Table 45 Fair Housing Cases by Basis, * Approximately 2012 to 2014**	58
Table 45.1 Fair Housing Cases by Basis in City of Turlock*, Approximately 2012 to 2014**	58
Table 46 Fair Housing Complaints by Resolution in Stanislaus Urban County* for HUD and DFEH, 2012 to 2014**	59
Table 46.1 Fair Housing Complaints by Resolution in Stanislaus Urban County* for Project Sentinel, 2012 to 2014**	59
Table 46.2 Fair Housing Complaints by Resolution in City of Turlock*, 2012 to 2014**	59
Table 47 Project Sentinel's fair housing program, number of individuals served.....	61

List of Figures

Figure 1 2013 Loan Applications by Race, Stanislaus County.....	40
Figure 2 2013 Population by Race, Stanislaus County	40
Figure 3 2013 All Loan Applications, Stanislaus County	41
Figure 4 2013 Lending Actions for American Indian or Alaska Native	42
Figure 5 2013 Lending Actions for Hawaiian or Pacific Islander	43
Figure 6 2013 Lending Actions for Black or African American	44
Figure 7 2013 Lending Actions for Other or No Information.....	45
Figure 8 2013 Lending Actions for Asian.....	46
Figure 9 2013 Lending Actions for White.....	47
Figure 10 2013 Loan Actions for Hispanic.....	48
Figure 11 2013 Loan Actions for Non-Hispanic.....	48
Figure 12 2013 Loan Actions for Ethnicity No Information Provided.....	49

Executive Summary

Purpose and Intent

An Analysis of Impediments to Fair Housing Choice, or “AI,” is a requirement imposed on recipients of certain Federal grants from the U.S. Department of Housing and Urban Development (HUD). The Stanislaus Urban County and City of Turlock receive an annual entitlement of Community Development Block Grant (CDBG) funds from HUD. The regulations that govern these grants (Title 24 Code of Federal Regulations, Part 91) require that each HUD grantee certify as a condition of its grant that the grantee is “affirmatively furthering fair housing.” This includes (1) conducting an analysis of impediments to fair housing choice; (2) taking appropriate actions to overcome the effects of impediments identified through that analysis; and (3) maintaining records reflecting the analysis and actions.

This document is the Stanislaus Urban County and City of Turlock’s first regional AI. This AI adheres to the recommended scope of analysis and format in the *Fair Housing Planning Guide* developed by HUD (1996).

HUD defines the AI as “a comprehensive review of a state’s or entitlement jurisdiction’s laws, regulations and administrative policies, procedures and practices. The AI involves an assessment of how these laws, regulations, policies and procedures affect the location, availability, and accessibility of housing, and how conditions, both private and public, affect fair housing choice.”¹

This review and assessment is used to identify actions that jurisdictions will take to improve fair housing. The format of the AI is such that each action is associated with a concern or issue. These are described as “impediments.” HUD formally defines an impediment to fair housing as “any action, omission, or decision that is intended to or has the effect of restricting a person’s choice of housing on the basis of race, color, religion, sex, disability, familial status, or national origin.”²

The framework of impediments and actions is to be used by the jurisdiction to plan its annual actions and to report on actions taken to improve fair housing. This work is accomplished in the Annual Action Plan and in the Consolidated Annual Performance and Evaluation Report (CAPER), respectively.

Although the AI is not required as part of the annual submission to HUD, HUD recommends that each jurisdiction regularly update its AI. HUD has suggested that the AI be conducted at least as often as the Consolidated Plan, which is required every five years. The Stanislaus Urban County and City of Turlock’s current Consolidated Plans are valid through June 2015.

Preparation of the AI

Stanislaus County commissioned PMC to conduct and draft this regional AI through a competitive process for the preparation of the Fiscal Year 2015-2020 Stanislaus Urban County / City of Turlock Regional Consolidated Plan. PMC is a private consulting firm and has successfully prepared various other city and county AIs and Consolidated Plans.

The research, analysis, and consultations required to complete the AI commenced in August 2014. The project was substantially complete by the end of March 2015.

¹ HUD Memorandum, “Analysis of Impediments to Fair Housing Choice Reissuance,” September 8, 2004.

² U.S. Department of Housing and Urban Development, *Fair Housing Planning Guide*, March 1996.

During October 2014, Stanislaus County held public workshops to discuss the AI process and to gather public comment on the state of fair housing and possible impediments. The workshop public notice and notes from the workshop are provided as an attachment to the AI.

On March 31, 2015, Stanislaus County and City of Turlock published the draft AI for public review and comment.

On April 28, 2015, the Turlock City Council held a public hearing to consider adoption of the final AI.

On May 5, 2015, the Stanislaus County Board of Supervisors held a public hearing to consider adoption of the final AI.

All public comments received and responses to those comments are provided as an attachment to the AI.

Geographic Terms

Throughout this document, the following geographic terms may be used. To assist the reader, an explanation of each is provided below.

- ◆ **Stanislaus County (countywide):** Includes all cities in Stanislaus County as well as the unincorporated area of the County.
- ◆ **Stanislaus Urban County:** Includes the cities of Ceres, Hughson, Newman, Oakdale, Patterson, and Waterford and the unincorporated balance area of the County (the unincorporated area less the CDBG entitlement cities of Modesto and Turlock and the non-entitlement city of Riverbank). Stanislaus County is the lead entity for the Stanislaus Urban County.
- ◆ **Unincorporated County:** Includes the entire unincorporated area of Stanislaus County (this area is not a part of any municipality).
- ◆ **Entitlement Cities:** The CDBG entitlement cities in Stanislaus County are Modesto and Turlock.
- ◆ **HOME Consortium:** The members of the HOME Consortium are the Stanislaus Urban County and the City of Turlock. The City of Turlock is the lead entity for the HOME Consortium.

Impediments Identified

The AI identified the impediments listed below. The last section of the AI, "Identification of Impediments and Actions to Address," provides detail regarding the impediments identified and describes the planned actions to address those impediments

It is important to note that the identification of an impediment does not necessarily identify a deficiency. By identifying the presence of an impediment, this analysis is stating the nature of a problem that the actions will serve to mitigate. These may be affirmative actions as much as responses to current conditions.

In addition, State law requires local jurisdictions in California to assess barriers to affordable housing as part of the General Plan's Housing Element. Programs to address impediments to fair housing may be addressed through the implementation of the Housing Element.

Affordable Housing

1. **Impediment: Insufficient supply of affordable housing.**
 - 1.1 **Action:** Continue to provide assistance to preserve existing affordable housing and to create new affordable housing.
 - 1.2 **Action:** Continue to offer regulatory relief and incentives for the development of affordable housing.
 - 1.3 **Action:** Continue to ensure the availability of adequate sites for the development of affordable housing.
2. **Impediment: Shortage of subsidies and strategies to promote affordable, accessible housing for low-, very low-, and extremely low-income households, including protected classes.**
 - 2.1 **Action:** Continue to pursue available and appropriate State and Federal funding sources to support efforts to construct housing meeting the needs of lower-income households.
 - 2.2 **Action:** Continue to support the Stanislaus Housing Authority Section 8 Housing Choice Voucher (HCV) Rental Assistance Program, including distribution of program information at the public counters for the Stanislaus County Department of Planning and Community Development, City of Turlock Housing Services, and all Stanislaus Urban County member jurisdictions. Stanislaus County and the City of Turlock will hold periodic meetings with representatives of the Housing Authority of the County of Stanislaus to discuss actions Stanislaus County, the City of Turlock, and Stanislaus Urban County member jurisdictions can take to coordinate housing program implementation.
 - 2.3 **Action:** Follow through on Housing Element policies and programs.

Private Practice and Mortgage Lending

3. **Impediment: Differential origination rates based on race, ethnicity, and location.**
 - 3.1 **Action:** When selecting lending institutions for contracts and participation in local programs, Stanislaus County, the City of Turlock, and Stanislaus Urban County member jurisdictions may prefer those with a Community Reinvestment Act (CRA) rating of “Outstanding” and may exclude those with a rating of “Needs to Improve” or “Substantial Noncompliance” according to the most recent examination period published by the Federal Financial Institutions Examination Council (FFIEC). In addition, the Stanislaus Urban County and the City of Turlock may review an individual institution’s most recent HMDA reporting as most recently published by the FFIEC.
 - 3.2 **Action:** Strengthen partnerships with lenders to discuss lenders’ community reinvestment goals, including home mortgages, home improvement loans, and community development investments to be made in low- and moderate-income neighborhoods in the Stanislaus Urban County and in the City of Turlock.
4. **Impediment: Limited coordination with real estate industry.**
 - 4.1 **Action:** Work cooperatively with the real estate industry to develop ways for local agents to become more familiar with the Stanislaus Urban County and City of Turlock housing and rental assistance programs.

- 4.2 **Action:** Encourage Realtors to seek fair housing training.

Fair Housing Education and Enforcement

5. Impediment: Limited knowledge of fair housing rights.

- 5.1 **Action:** Conduct more outreach to educate tenants, and owners and agents of rental properties, regarding their fair housing rights and responsibilities.

- 5.2 **Action:** Provide educational literature in English, Spanish, and other appropriate languages.

6. Impediment: Discrimination in rental housing.

- 6.1 **Action:** Support efforts to enforce fair housing rights and to provide redress to persons who have been discriminated against.

- 6.2 **Action:** Support efforts to increase the awareness of discrimination against all Federal and State protected classes.

Government Barriers

7. Impediment: Local development standards and their implementation, e.g., zoning, building, or design standards, may constrain development of housing opportunities for minority and low-income households.

- 7.1 **Action:** Review zoning and related regulations to determine the degree of adequate opportunity in the community for affordable housing to exist and to develop new affordable housing options.

8. Impediment: Inadequate access to employment opportunities, transportation, and public and social services, and infrastructure to support increased housing opportunities for lower-income households.

- 8.1 **Action:** Examine possible gaps in public infrastructure and services, especially for the needs of persons with disabilities, seniors, and low-income residents via a Disadvantaged Unincorporated Communities assessment. If significant gaps are found, explore methods to address the gaps and incorporate public improvements and services into local infrastructure and service plans.

Introduction

As recipients of funds from the U.S. Department of Housing and Urban Development (HUD), the Stanislaus Urban County and City of Turlock are required to conduct an Analysis of Impediments to Fair Housing Choice (AI) and to periodically review that analysis and update it as necessary. This AI was completed in concert with the Fiscal Year 2015-2020 Stanislaus Urban County/ City of Turlock Regional Consolidated Plan (Con Plan). The AI will be reassessed and reevaluated with each Consolidated Plan.

The Stanislaus Urban County and City of Turlock developed an established five-year Consolidated Plan yet each has a distinct process to request funding and to evaluate requests for funds. The joint collaboration maximizes the impact of available resources and ensures a more efficient distribution of funds. This is most notable in the provision of countywide services and the ability to fund large housing projects that might be beyond the capacity of any single jurisdiction.

This AI is one of several ways in which Stanislaus Urban County and the City of Turlock are fulfilling their obligation to affirmatively further fair housing. This AI includes an analysis of local factors that may impact fair housing choice, the identification of specific impediments to fair housing choice, and a plan to address those impediments. The Stanislaus Urban County and City of Turlock must also ensure equal access to the services and programs it provides or assists.

The Stanislaus Urban County and City of Turlock each prepare its own Consolidated Annual Performance Evaluation Report (CAPER). These CAPERs include a description of the efforts made each year to affirmatively further fair housing. These documents may be consulted for an evaluation of actions taken by the Stanislaus Urban County and City of Turlock.

Geography

Stanislaus County, along with the cities of Ceres, Hughson, Newman, Oakdale, Patterson, and Waterford, form what is known as the Stanislaus Urban County. The Stanislaus Urban County is an entitlement jurisdiction and receives Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG) entitlement funds from HUD on an annual basis based on a formula allocation. Similarly, the City of Turlock is an entitlement jurisdiction of its own and receives HOME Investment Partnerships (HOME) Program funds on behalf of the HOME Consortium (which includes the Stanislaus Urban County members) as well as its own CDBG formula allocation. The City of Turlock is not a recipient of ESG entitlement funds.

Stanislaus County is recognized as the lead entity for the County CDBG and ESG funds and the City of Turlock is recognized as the lead entity for HOME funds and manages its own CDBG funds. The Stanislaus Urban County will be entering its fourteenth year as an entitlement jurisdiction for CDBG and its twelfth year as a recipient of ESG funds. The City of Turlock will be entering its thirty-first year as a CDBG entitlement jurisdiction and its fifteenth year as the lead agency for the City of Turlock/Stanislaus County HOME Consortium.

What Is Fair Housing?

Federal law prohibits discrimination in the provision of housing or access to housing based on membership in certain protected classes of persons or personal status. These protections apply to race, color, national origin or ancestry, sex, religion, familial status, and mental and physical handicap (disability).

California State law codifies the Federal protections and adds sexual orientation, marital status, use of language, source of income, HIV/AIDS, and medical condition. State law also prohibits discrimination based on any arbitrary status (the Unruh Act).

Equal access to housing is fundamental to each person in meeting essential needs and pursuing personal, education, employment, or other goals. Federal and State fair housing laws prohibit discrimination in the sale, rental, lease, or negotiation for real property based on a person's protected status.

Fair housing is a condition in which individuals of similar income levels in the same housing market have a like range of choice available to them, regardless of personal status.

What Is an Impediment to Fair Housing Choice?

As defined by the HUD *Fair Housing Planning Guide* (1996), impediments to fair housing choice are:

- ◆ Any actions, omissions, or decisions taken because of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, or any other arbitrary factor which restrict housing choices or the availability of housing choices; or
- ◆ Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, or any other arbitrary factor.

To affirmatively further fair housing, a community must work to remove impediments to fair housing choice.

Purpose of the Analysis of Impediments

The purpose of an AI is to review conditions in the jurisdiction that may impact the ability of households to freely choose housing and to be treated without regard to race, ethnicity, religion, gender, national origin, source of income, age, disability, or other protected status. The AI reviews the general state of fair housing, the enforcement of fair housing law, efforts to promote fair housing, access to credit for the purpose of housing, and general constraints to the availability of a full range of housing types.

An AI examines the affordability of housing in the jurisdiction, with an emphasis on housing affordable to households with annual incomes classified as low income and less. (Low income is defined as equal to or less than 80 percent of the adjusted area median income as most recently published by HUD.)

The document has three major goals:

- ◆ To provide an overview of the Stanislaus Urban County and the City of Turlock and current conditions as they impact fair housing choice.
- ◆ To review the policies and practices of the Stanislaus Urban County and the City of Turlock as they impact fair housing choice and the provision of housing, specifically affordable housing and housing for special needs households.
- ◆ To identify impediments to fair housing choice and actions the Stanislaus Urban County and the City of Turlock will take to remove those impediments or to mitigate the impact those impediments have on fair housing choice.

Fulfilling these goals includes the following:

- ◆ A review of the laws, regulations, and administrative policies, procedures, and practices of the HOME Consortium.
- ◆ An assessment of how those laws affect the location, availability, and accessibility of housing.
- ◆ An assessment of conditions, both public and private, affecting fair housing choice.

Fiscal Year 2015-2020 Stanislaus Urban County/ City of Turlock Regional Consolidated Plan (Con Plan)

This AI has been prepared in coordination with Con Plan for the Stanislaus Urban County and the City of Turlock. The Con Plan outlines the Stanislaus Urban County and City of Turlock's priority housing and community development needs, as well as the objectives and strategies for meeting those needs. The Con Plan is a requirement of recipients of housing and community development funds from HUD.

One of the major focuses of the Con Plan is the provision of affordable housing opportunities for lower-income households and persons with special needs, many of whom may be victims of housing discrimination. As part of the Con Plan, the Stanislaus Urban County and the City of Turlock must certify that they are affirmatively furthering fair housing choice for all residents by:

- ◆ Conducting an analysis to identify impediments to fair housing choice;
- ◆ Taking appropriate actions to overcome the effects of any impediments identified through the analysis; and
- ◆ Maintaining records reflecting the analysis and actions taken.

This AI constitutes the Stanislaus Urban County and the City of Turlock's efforts to identify impediments to fair housing and actions to overcome the effects of the identified impediments. Through the annual planning process, both jurisdictions will incorporate specific actions to be undertaken to remove impediments and to further fair housing choice.

Background

This section presents a summary of the demographic profile, economic, income distribution, and housing characteristics for the Stanislaus Urban County and the City of Turlock.

Population

Tables 1 and 2 demonstrate a few notable growth trends in the Stanislaus Urban County and the City of Turlock. The actual annual percentage growth rate from 2000 to 2010 increased with respect to the actual annual growth percentage rate from 1990 to 2000 for the Stanislaus Urban County.

As related to the population from 2000 to 2010, the actual growth percentage rate in the City of Turlock (28.2 percent), Ceres (37.9 percent), Hughson (83.7 percent), Newman (60.1 percent), Oakdale (38.3 percent), Patterson (86.3 percent), and Waterford (24.8 percent) exceeds the percentage growth for the Stanislaus Urban County (21.8 percent) as a whole, with the exception of the Unincorporated County (3.3 percent).

The Stanislaus Council of Governments (StanCOG) projected that the population in the Stanislaus Urban County would reach 239,883 by 2015 and increase to 260,225 by 2020. Between 2010 and 2015, Stanislaus Urban County's population was estimated to grow by 8.3 percent. The year 2000 population data source in Table 1 is the Department of Finance. The data in the Con Plan Needs Assessment Table NA-1 comes from the 2007-2011 CHAS which is different than the AI data in Table 1. The Con Plan data is from the IDIS data download. Table 1 below also includes projections. All of the population data works together in the table. The source cannot be changed to match the source in Con Plan Table NA-1, nor vice versa.

**Table 1
Current and Projected Population**

Jurisdiction	1990	2000	2010	2015	2020
Stanislaus Urban County					
Ceres	26,314	32,928	45,417	50,069	55,379
Hughson	3,259	3,615	6,640	7,012	7,437
Newman	4,151	6,385	10,224	11,648	13,274
Oakdale	11,961	14,952	20,675	22,908	25,457
Patterson	8,626	10,959	20,413	25,065	30,375
Waterford	4,771	6,776	8,456	9,409	10,496
Unincorporated Area of Stanislaus County	95,756	106,741	110,236	113,772	117,807
Entitlement Jurisdictions					
Turlock	42,198	53,481	68,549	74,983	82,328
Stanislaus Urban County Total	154,838	182,356	222,061	239,883	260,225

Source: Department of Finance 1990, 2000; StanCOG RTP 2010, 2015, 2020

Table 2
Rate of Change in Current and Projected Population

Jurisdiction	1990 to 2000		2000 to 2010		2010 to 2015	
	Annual Growth	Total Growth	Annual Growth	Total Growth	Annual Growth	Total Growth
Stanislaus Urban County						
Ceres	2.5%	25.1%	3.8%	37.9%	1.0%	10.2%
Hughson	1.1%	10.9%	8.4%	83.7%	0.6%	5.6%
Newman	5.4%	53.8%	6.0%	60.1%	1.4%	13.9%
Oakdale	2.5%	25.0%	3.8%	38.3%	1.1%	10.8%
Patterson	2.7%	27.0%	8.6%	86.3%	2.3%	22.8%
Waterford	4.2%	42.0%	2.5%	24.8%	1.1%	11.3%
Unincorporated Area of Stanislaus County	1.1%	11.5%	0.3%	3.3%	0.3%	3.2%
Entitlement Jurisdictions						
Turlock	2.7%	26.7%	2.8%	28.2%	0.9%	9.4%
Stanislaus Urban County Total	1.8%	17.8%	2.2%	21.8%	0.8%	8.0%

Source: Department of Finance 1990, 2000; StanCOG RTP 2010, 2015, 2020

Population by Age

Table 3 shows population by age group. Of the jurisdictions in the Stanislaus Urban County, Oakdale had the largest share of persons over 65 (12.4 percent), followed by the City of Turlock (11.7 percent) and Hughson (10.8 percent). Patterson had the largest percentage of persons under the age of 19 (37.3 percent), followed by Waterford (36.6 percent). The Unincorporated Area of Stanislaus County had the largest share of persons between 19 and 64 (61.9 percent).

Table 3
Population by Age

Jurisdiction	Percentage of Persons Under 19	Percentage of Persons Over 19	Percentage of Persons Age 19–64	Percentage of Persons Over 65
Stanislaus Urban County				
Ceres	35.8%	64.2%	56.4%	7.8%
Hughson	34.1%	66.0%	55.2%	10.8%
Newman	35.5%	64.6%	56.0%	8.6%
Oakdale	30.6%	69.5%	57.1%	12.4%
Patterson	37.3%	62.9%	56.6%	6.3%
Waterford	36.6%	63.6%	56.2%	7.4%
Unincorporated Area of Stanislaus County	32.1%	72.7%	61.9%	10.8%
Entitlement City				
Turlock	30.9%	69.1%	57.4%	11.7%

Source: 2010 U.S. Census

Note: Due to rounding, total percentage of persons for individual jurisdictions may not equal 100.

Although the Stanislaus Urban County is generally diverse, the particular racial and ethnic composition varies by community. Please see **Tables 4** and **5**.³ Of the six cities in the Stanislaus Urban County, Oakdale is the only one with a White population of over 80 percent (80.1), and none have a racial minority⁴ population near or greater than 50 percent.

It can also be noted that three communities have a Hispanic population (all races) over 50 percent (Ceres, Newman, and Patterson).

Areas of Minority Concentration

Data on race and ethnicity were examined at the block group level to determine areas of minority and ethnic concentration (2010 U.S. Decennial Census, Summary File 3). Minority population is defined as the total population less those who responded “White alone” to the U.S. Census. Census tract areas where the percentage of total minority population exceeds the group’s countywide total percentage by at least one percentage point are considered to be areas of “minority concentration.” Areas that have a minority population at least 1.5 times the countywide total percentage are considered to be areas of “high minority concentration.” Please see **Map 2** in **Appendix 1**.

Areas showing an overall minority concentration include unincorporated areas north of Modesto, which includes Salida, unincorporated areas east of Ceres, northwestern and southern portions of the City of Turlock, western portions of Patterson, and unincorporated areas south of Patterson.

Since the U.S. Census enumerates Hispanic as a distinct ethnic category, this characteristic was examined separately. Census tract areas where the percentage of total Hispanic population exceeds the countywide percentage by at least one percentage point are considered to be areas of Hispanic concentration. Areas that have a Hispanic population at least 1.5 times the countywide percentage are considered to be areas of high Hispanic concentration. Please see **Map 2** in **Appendix 2**. Areas of high minority concentration include portions of the western unincorporated Stanislaus County and portions of Patterson, Bystrom, and Ceres.

Table 4
Race as a Percentage of Total Population

Jurisdiction	White	Black or African American	American Indian or Alaskan Native	Asian	Native Hawaiian and Other Pacific Islander	Some Other Race	Two or More Races
Stanislaus Urban County							
Ceres	57.7%	2.6%	1.3%	6.8%	0.8%	25.2%	5.5%
Hughson	77.2%	0.8%	1.5%	1.5%	0.2%	14.8%	4.4%
Newman	66.6%	2.3%	1.0%	1.9%	0.4%	22.4%	5.4%
Oakdale	80.1%	0.8%	1.0%	2.2%	0.2%	11.5%	4.1%
Patterson	49.6%	6.3%	1.1%	5.2%	1.4%	30.5%	5.9%
Waterford	71.0%	0.9%	1.3%	1.5%	0.1%	20.6%	4.6%
Entitlement City							
Turlock	69.8%	1.7%	0.9%	5.6%	0.5%	16.5%	5.0%

Source: 2010 U.S. Census

³ Race is shown for persons who reported being of that race alone. Persons reporting more than one race are included in “two or more races.” Persons who indicated they were of only one race but did not report a race in one of the five categories shown are included in “some other race.”

⁴ The racial minority population includes all persons reporting a race other than White.

Table 5
Hispanic Origin as a Percentage of Total Population

Jurisdiction	Hispanic or Latino (all races)	Not Hispanic or Latino (all races)
Stanislaus Urban County		
Ceres	56.0%	44.0%
Hughson	43.2%	56.8%
Newman	61.6%	38.4%
Oakdale	26.1%	73.9%
Patterson	58.6%	41.4%
Waterford	42.3%	57.7%
Entitlement City		
Turlock	36.4%	63.6%

Source: 2010 U.S. Census

Income

In this AI, income will be discussed using the income categories as defined in **Table 6**. These categories correspond to the income limits published annually by HUD. HUD bases these income categories on the Decennial Census with adjustment factors applied using the annual American Community Survey (ACS). Income categories take family size into consideration. The income limit for a family of four is shown for illustration.

Table 6
Income Categories

Term	Percentage of AMI¹	2015 Income Limit, Family of 4²
Stanislaus County		
Extremely low income	30%	\$24,250
Very low income	50%	\$28,450
Low income	80%	\$45,500
Moderate income ³	120%	\$68,280

1. AMI = area median family income

2. Based on the Modesto, CA, Metropolitan Statistical Area (MSA) 2015 AMI of \$53,500

3. HUD does not publish a "moderate income" limit. It is calculated as 2.4 times the published very low-income limit.

Table 7 provides a summary of income statistics as reported by the 2011 ACS for all jurisdictions within the Stanislaus Urban County except the unincorporated area of the County. The 2011 ACS provides data for a Census-designated place (CDP). A CDP comprises a densely settled concentration of population that is not within an incorporated place but is locally identified by a name. The Stanislaus Urban County has 22 different CDPs. To get a better idea of the incomes for the unincorporated area, **Table 8** provides data on the CDPs in the unincorporated parts of Stanislaus County.

The communities of the Stanislaus Urban County have a significant disparity of household income between them. Median incomes range from \$18,779 in the Airport CDP to \$107,250 in the East Oakdale CDP.

Table 7
Income Characteristics for Incorporated Jurisdictions

Jurisdiction	Median Household Income	Per Capita Income
Stanislaus Urban County		
Ceres	\$50,124	\$17,688
Hughson	\$49,997	\$19,985
Newman	\$47,416	\$18,134
Oakdale	\$59,842	\$25,238
Patterson	\$54,187	\$20,649
Waterford	\$54,413	\$17,228
Entitlement City		
Turlock	\$50,862	\$22,289

Source: 2007–2011 ACS

Table 8
Income Characteristics for Unincorporated Areas

Census-Designated Place	Median Household Income	Per Capita Income
Unincorporated Areas		
Airport	\$18,779	\$9,706
Bret Harte	\$30,833	\$10,300
Bystrom	\$22,227	\$10,543
Cowan	\$33,594	\$11,544
Crows Landing	\$70,357	\$12,860
Del Rio	\$107,171	\$77,510
Denair	\$64,136	\$23,537
Diablo Grande	\$88,393	\$40,719
East Oakdale	\$107,250	\$46,810
Empire	\$31,570	\$12,729
Grayson	\$41,250	\$12,381
Hickman	\$60,150	\$19,337
Keyes	\$34,423	\$12,996
Monterey Park Tract	\$85,256	\$13,865
Parklawn	\$38,519	\$12,647
Riverdale Park	\$34,353	\$14,726
Rouse	\$18,895	\$9,476
Shackelford	\$23,870	\$7,829
Valley Home	\$38,250	\$18,402
Westley	\$38,798	\$8,714
West Modesto	\$31,110	\$12,751

Source: 2007–2011 ACS

Areas of Low- and Very Low-Income Concentration

Data on income was examined at the block group level to determine areas of low- and very low-income concentration (2015 HUD Low and Moderate Income Summary Data).

Low-income areas are those that have 51 percent or more low-income persons.⁵ Please see **Map 3** in **Appendix 3**. Areas with 50 percent or more low- and moderate-income households include unincorporated portions of the County surrounding Patterson, Empire, and Bystrom and portions of Ceres, Turlock, and Oakdale.

Poverty

In addition to reporting income, the ACS reports the number of persons and families that have incomes that fall below the Federal poverty level.⁶ The poverty level is adjusted for family size and composition, making it a more relative measure than household income. Persons and families that are below the poverty level are in general very poor. Please see **Table 9** for data on persons, families, and children who fall below the poverty line.

Waterford, Newman, and Hughson each have a level of poverty above 20 percent. These jurisdictions also have a notably high level of children in poverty.

Table 9
Share of Population Below Poverty

Jurisdiction	Persons	Persons Under 18 Years of Age	Families
Stanislaus Urban County			
Ceres	19.9%	25.8%	15.9%
Hughson	20.6%	31.7%	13.6%
Newman	21.5%	27.6%	14.5%
Oakdale	15.6%	19.3%	12.7%
Patterson	16.0%	20.9%	10.9%
Waterford	23.3%	27.0%	13.6%
Entitlement Jurisdictions			
Turlock	17.2%	21.4%	10.9%
Stanislaus Urban County Total	20.3%	28.4%	16.4%

Source: 2008–2012 ACS (HCD data packet)

⁵ Using the LOWMODPCT variable, which is defined as “the percentage of persons who are of low/moderate income; calculated by LOWMOD/LOWMODUNIV times 100.”

⁶ The “poverty level” is a measure of poverty used by the U.S. Census Bureau based on a set of money income thresholds that vary by family size and composition. If the total income for a family or unrelated individual falls below the applicable poverty threshold, that family or person is classified as being below the poverty level.

Education

Education level plays a critical role in determining the income level of a household. **Table 10** provides a summary of educational attainment for persons aged 25 years and older for the share of the population in each jurisdiction under the poverty level. For the share of persons having a college degree, only two of the six jurisdictions in the Stanislaus Urban County were below the State percentage (4.8 percent).

Table 10
Educational Attainment for Persons Aged 25 Years and Older Under the Poverty Level

Jurisdiction	Percentage Less Than High School Graduate	Percentage High School Graduate and Equivalent	Percentage Some College (no degree)	Percentage College Degree
Stanislaus Urban County				
Ceres	23.5%	15.3%	13.3%	4.6%
Hughson	28.3%	14.3%	5.3%	10.8%
Newman	33.0%	13.6%	12.8%	9.0%
Oakdale	29.8%	14.1%	6.7%	8.6%
Patterson	23.8%	13.9%	4.5%	8.0%
Waterford	35.4%	18.7%	9.6%	4.2%
Entitlement City				
Turlock	21.2%	15.7%	12.4%	5.1%

Source: 2008–2012 ACS

Employment

This section provides an overview of employment trends in Stanislaus County. The manufacturing industry continues to be an important employer in Stanislaus County. The top 12 employers in the manufacturing industry in 2014 are listed in **Table 11**.

Table 11
Major Manufacturing Employers – Stanislaus County

Employer	Description	Number of Employees
Zabaco Winery	Winery	1,000–4,999
Foster Farms	Poultry Processing Plant	1,000–4,999
Fairbanks Cellars	Winery	1,000–4,999
Ecco Domani Winery	Winery	1,000–4,999
E & J Gallo Winery	Winery	1,000–4,999
Del Monte Foods	Canning	1,000–4,999
Con Agra Foods Inc	Canning	1,000–4,999
Bartles & Jaymes Company	Winery	1,000–4,999
Andre Champagne Cellars	Winery	1,000–4,999
Carlo Rossi Winery	Winery	1,000–4,999
CVS Caremark Distribution Center	Distribution Center	500–999
Modesto Bee	Newspaper	500–999

Source: California EDD 2014

Some of Stanislaus County's largest employers are also in the non-manufacturing field. The top 13 non-manufacturing employers for 2014 are listed in **Table 12**.

Table 12
Major Non-Manufacturing Employers – Stanislaus County

Employer	Description	Number of Employees
Stanislaus County Community Services	Government Office	1,000–4,999
Memorial Medical Center	Hospital	1,000–4,999
Doctors Medical Center	Hospital	1,000–4,999
Emanuel Medical Center	Hospital	1,000–4,999
Hornsby's Pub Draft Cider Ltd.	Beverages	1,000–4,999
Oak Valley Hospital	Hospital	500–999
Frito-Lay Inc.	Potato Chips/Snack Foods	500–999
California State University	Schools – Universities & Colleges Academic	500–999
Alliance Worknet	County Government – Social/Human Resources	500–999
Stanislaus County Community	Government Offices	500–999
Stanislaus County Welfare Dept	County Government	500–999
Women Infants Child Program – WIC	Social Service & Welfare Organization	500–999
Turlock Irrigation District	Electric Company	250–499

Source: California EDD 2014

Table 13 shows the number of persons employed in Stanislaus County by industry type in 2012. The top three industries are educational, health and social services; manufacturing; and retail trade.

Table 13
Employment by Industry – Stanislaus County

Industry Type	Number	Percentage
Agriculture, forestry, fishing, hunting, and mining	11,004	5.4%
Construction	15,185	7.4%
Manufacturing	26,026	12.8%
Wholesale trade	8,532	4.2%
Retail Trade	26,074	12.8%
Transportation, warehousing, and utilities	10,768	5.3%
Information	2,741	1.3%
Finance, insurance, real estate, rental and leasing	7,939	3.9%
Professional, scientific, management, administration	16,803	8.2%
Educational, health and social services	44,568	21.8%
Arts, entertainment, recreation, and services	16,107	7.9%
Other services	10,428	5.1%
Public administration	10,428	3.9%
TOTAL	204,032	100.0% ¹

Source: 2008–2012 ACS (HCD data packet)

Notes: 1. Percentages may not equal 100 due to rounding.

Table 14 indicates the average annual wages earned in the private sector by industry type in 2012. The highest overall wages were in education and health services, followed by the manufacturing industry.

**Table 14
Wages and Employment – Stanislaus County**

Industry Type	Employment	Percentage of Total	Annual Wages per Employee
Total private	139,111	100.0% ¹	\$39,174
Goods-producing	40,187	28.9%	\$43,971
Natural resources and mining ²	13,371	9.6%	\$27,871
Construction	6,205	4.5%	\$46,156
Manufacturing	20,610	14.8%	\$53,759
Service-providing	98,924	71.1%	\$37,000
Trade, transportation, and utilities	33,237	23.9%	\$35,000
Information	971	0.7%	\$48,000
Financial activities	5,426	3.9%	\$46,000
Professional and business services	12,878	9.3%	\$37,000
Education and health services	23,631	17.0%	\$56,000
Leisure and hospitality	14,891	10.7%	\$14,000
Other services	7,531	5.4%	\$19,000
Unclassified	360	0.3%	\$34,000

Source: 2012 Bureau of Labor Statistics Quarterly Census of Employment and Wages

Notes: 1) Percentages may not equal 100 due to rounding.

2) Includes agriculture, forestry, fishing, and hunting workers.

Households

The type, size, and composition of a household can affect the type of housing and services that are needed. The following section provides an analysis of the household profiles for all jurisdictions in the Stanislaus Urban County and the City of Turlock.

Table 15 presents household size, percentage of persons living alone, and percentage of households with persons age 65 and older. Patterson had the largest average household size (3.63 persons) of all the jurisdictions, with the second largest household size (3.55 persons) reported in Ceres. Based on the 2010 U.S. Census, Oakdale had the largest share of persons living alone (21.6 percent) and Hughson reported the largest percentage of households with persons over the age of 65 (26.0 percent).

Table 15
Household Composition, 2010

Jurisdiction	Average Household Size (persons)	Percentage of Single Persons Living Alone	Percentage of Households with Person 65 and Older
Stanislaus Urban County			
Ceres	3.55	12.5%	20.8%
Hughson	3.20	17.7%	26.0%
Newman	3.38	15.5%	20.3%
Oakdale	2.81	21.6%	25.4%
Patterson	3.63	12.7%	17.6%
Waterford	3.43	12.4%	18.5%
Unincorporated Area of Stanislaus County	N/A	15.9%	29.7%
Entitlement City			
Turlock	2.96	20.9%	25.0%

Source: 2010 U.S. Census

Table 16 presents the number of family households and the share of family households that are married, are single parents, and have children under 18 years of age for all jurisdictions in the Stanislaus Urban County and the City of Turlock.

Patterson (49.2 percent) had the largest share of families with children under 18, Waterford (61.0 percent) had the largest share of married couples, and Ceres (14.6 percent) had the largest share of single parents.

Table 16
Family Household Composition

Jurisdiction	Number of Family Households	Percentage of Total Households Married	Percentage of Total Households with Children Under 18	Percentage of Total Households with Single Parents
Stanislaus Urban County				
Ceres	10,575	57.6%	46.8%	14.6%
Hughson	1,628	60.8%	42.8%	10.0%
Newman	2,432	60.5%	46.3%	12.5%
Oakdale	5,298	52.9%	36.6%	11.2%
Patterson	4,647	60.4%	49.2%	12.7%
Waterford	2,047	61.0%	46.5%	12.5%
Unincorporated Area of Stanislaus County	26,461	58.2%	37.8%	13.0%
Entitlement Jurisdictions				
Turlock	16,669	52.9%	36.7%	10.9%
Stanislaus Urban County Total	53,088	58.0%	41.2%	14.5%

Source: 2010 U.S. Census

Special Needs Populations – Non-Homeless

Certain groups may have more difficulty finding housing and may require specialized services or assistance. Owing to their special circumstances, they are more likely to have extremely low, very low, low, or moderate incomes. These groups include the elderly, the frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addiction, victims of domestic violence, large households, and single parent-headed households.

Elderly

The three jurisdictions with the largest share of senior households were Hughson (26.1 percent), Oakdale (21.4 percent), and City of Turlock (20.5 percent). Please see **Table 17**.

Of all member jurisdictions in the Stanislaus Urban County, only Hughson (46.7 percent) had less than 50 percent of senior households reporting that they owned their homes.

Table 17
Senior Households

Jurisdiction	Percentage of Senior Households	Percentage of Owner Households	Percentage of Renter Households
Stanislaus Urban County			
Ceres	16.4%	79.7%	20.3%
Hughson	26.1%	46.7%	53.3%
Newman	13.4%	61.3%	38.7%
Oakdale	21.4%	70.3%	29.7%
Patterson	13.3%	93.1%	6.9%
Waterford	15.7%	62.8%	37.2%
Unincorporated Area of Stanislaus County	19.2%	84.0%	16.0%
Entitlement Jurisdictions			
Turlock	20.5%	64.9%	35.1%
Stanislaus Urban County Total	18.8%	80.6%	19.4%

Source: 2008–2012 ACS (HCD data packet)

Persons with Disabilities

Table 18 presents data from the 2000 Census (data is not available in the 2010 Census) for persons with disabilities in all jurisdictions in the Stanislaus Urban County and the City of Turlock. Of the jurisdictions in the Stanislaus Urban County, Hughson (11.3 percent) had the greatest share of persons with a disability for all persons over 5 years of age, followed by Oakdale (11.1 percent). Patterson (5.8 percent) had the smallest share of persons with a disability, followed by Waterford (7.8 percent). Data for Ceres was unavailable from the 2000 U.S. Census.

**Table 18
Disability Status and Types**

Jurisdiction	Number of Disabled Persons	Percentage of Persons Disabled	Percentage of Disabled Population –Sensory	Percentage of Disabled Population –Physical	Percentage of Disabled Population –Mental	Percentage of Disabled Population –Self-Care	Percentage of Disabled Population –Go-Outside-Home	Percentage of Disabled Population – Employment Disability
Stanislaus Urban County								
Ceres	N/A	N/A	8.2%	23.1%	14.8%	6.0%	21.1%	26.9%
Hughson	432	11.3%	12.4%	28.6%	16.4%	9.0%	14.5%	19.2%
Newman	515	8.1%	11.9%	21.8%	16.3%	9.8%	20.2%	20.0%
Oakdale	1,586	11.1%	9.3%	24.6%	15.1%	8.7%	18.3%	24.0%
Patterson	613	5.8%	13.6%	20.7%	10.3%	5.8%	22.8%	26.8%
Waterford	491	7.8%	9.6%	20.8%	14.6%	7.9%	16.0%	31.1%
Unincorporated Area of Stanislaus County	12,461	9.7%	9.5%	23.9%	13.8%	6.7%	20.8%	25.2%
Entitlement City								
Turlock	4,484	8.8%	10.0%	23.2%	16.0%	7.4%	21.7%	21.6%

Source: 2000 U.S. Census (HCD data packet)

Large Households

Large family households are defined as households of five or more persons who are related. Large family households are considered a special needs group because there is a limited supply of adequately sized housing to accommodate their needs.

Table 19 provides data for large households for all jurisdictions in the Stanislaus Urban County and the City of Turlock. The jurisdictions with the greatest share of large households were Waterford (27.2 percent), Ceres (23.1 percent), and Patterson (21.8 percent). Oakdale had the smallest share of large households (13.3 percent).

Based on data from the 2007–2011 ACS, the supply of housing units with three or more bedrooms available for ownership and rental is in excess of the number of large owner and rental households. This suggests that there is not a numerical shortage of available housing units to meet the needs of large households. However, lower-income large households may be priced out of the larger housing units.

Table 19
Large Households

Jurisdiction	Large Households	Percentage of Large Households	Percentage of Total Owner-Occupied Households	Percentage of Total Renter-Occupied Households
Stanislaus Urban County				
Ceres	3,080	23.1%	29.9%	23.4%
Hughson	359	19.1%	12.6%	16.4%
Newman	696	21.2%	23.4%	22.1%
Oakdale	995	13.3%	15.1%	14.0%
Patterson	1,470	21.8%	36.3%	26.5%
Waterford	637	27.2%	27.4%	27.2%
Unincorporated Area of Stanislaus County	6,888	17.1%	25.0%	20.0%
Entitlement Jurisdictions				
Turlock	3,217	14.2%	13.6%	13.9%
Stanislaus Urban County Total	14,125	22.4%	18.9%	29.8%

Source: 2008–2012 ACS (HCD data packet)

Female-Headed Households

Families with female heads of households experience a high incidence of all jurisdictions in the Stanislaus Urban County and the City of Turlock. As shown in **Table 20**, the share of female-headed households in poverty ranges from 2.7 percent in unincorporated areas to 8.8 percent in Hughson.

**Table 20
Female-Headed Households**

Jurisdiction	Total Female-Headed Households	Percentage of Female-Headed Households with Children	Percentage of Female-Headed Households without Children	Percentage of Female-Headed Households in Poverty	Percentage of Total Families in Poverty
Stanislaus Urban County					
Ceres	2,389	14.5%	8.2%	7.2%	15.9%
Hughson	406	17.0%	9.0%	8.8%	13.6%
Newman	450	15.1%	3.0%	5.6%	14.5%
Oakdale	790	10.3%	4.6%	6.5%	12.7%
Patterson	551	8.4%	4.2%	5.2%	10.9%
Waterford	388	13.6%	6.8%	4.7%	13.6%
Unincorporated Area of Stanislaus County	4,418	12.6%	4.0%	2.7%	9.0%
Entitlement Jurisdictions					
Turlock	3,241	13.0%	6.8%	4.2%	10.9%
Stanislaus Urban County Total	9,392	12.1%	5.7%	6.4%	15.2%

Source: 2008–2010 ACS (HCD data packet)

Note: Percentages are based on total number of households.

Housing Characteristics

The most significant trend in the Stanislaus Urban County and the City of Turlock housing markets has been the decrease in single-family home sales prices and the corresponding decrease in the value of single-family housing. Combined with an environment of historically low interest rates, this has reduced the gap between the cost of buying a home and the price which households at the lower end of the range of incomes can afford. Although this “affordability gap” has been reduced when it comes to home purchase, the combination of instability in the job market, stagnating real wages, and the general tightening of credit has not necessarily made home purchase easier for lower-income households.

The rental market has seen continued low vacancy rates, and rents have been stable and trending upward.

The following discussion identifies housing characteristics, trends, and needs for Stanislaus County jurisdictions.

Housing Growth

Between 2000 and 2014, the number of housing units increased throughout Stanislaus Urban County member jurisdictions but declined in the unincorporated area of Stanislaus County by 5.1 percent. **Table 21** displays housing growth in all jurisdictions in the Stanislaus Urban County. Of all the jurisdictions in the Stanislaus Urban County, Hughson had the largest increase in housing units (5.2 percent). Second to that was Newman with an increase of 2.4 percent. The City of Turlock had an increase of 0.4 percent.

**Table 21
Housing Units, 2000–2014**

Jurisdiction	2000 Housing Units	2014 Housing Units	Percentage Change 2000–2014
Stanislaus Urban County			
Ceres	13,673	13,725	0.4%
Hughson	2,234	2,350	5.2%
Newman	3,357	3,437	2.4%
Oakdale	7,822	7,961	1.8%
Patterson	6,328	6,363	0.6%
Waterford	2,665	2,665	0.0%
Unincorporated Area of Stanislaus County	37,346	35,455	-5.1%
Entitlement Jurisdictions			
Turlock	24,627	24,727	0.4%
Stanislaus Urban County Total	73,425	71,956	-2.0%

Source: 2000 and 2014 DOF (HCD data packet)

Tenure

Housing tenure refers to whether a unit is owner-occupied or renter-occupied. **Table 22** provides a summary of housing tenure for all jurisdictions in the Stanislaus Urban County and the City of Turlock. As shown, Patterson had the greatest share of owner-occupied households (67.5 percent) and the City of Turlock had the greatest share of renter-occupied housing units (44.6 percent).

**Table 22
Housing Tenure**

Jurisdiction	Owner-Occupied	Renter-Occupied
Stanislaus Urban County		
Ceres	63.1%	36.9%
Hughson	67.1%	32.9%
Newman	66.6%	33.4%
Oakdale	61.1%	36.9%
Patterson	67.5%	32.5%
Waterford	66.2%	33.8%
Unincorporated Area of Stanislaus County	63.4%	36.6%
Entitlement Jurisdictions		
Turlock	55.4%	44.6%
Stanislaus Urban County Total	63.8%	36.2%

Source: 2010 U.S. Census (HCD data packet)

Housing Type

Table 23 exhibits the percentage of housing units as a share of total housing units by the number of units in the structure for all jurisdictions in the Stanislaus Urban County and the City of Turlock. Demand for owner-occupied housing is primarily met through the supply of single-family housing, while renter-occupied housing demand is primarily met through a combination of single-family housing and multi-family units.

Table 23
Units in Structure

Jurisdiction	Single-Family	Multi-Family (2–4 units)	Multi-Family (>5 units)	Mobile Homes, Boat, RV, Van, etc.
Stanislaus Urban County				
Ceres	80.93%	1.88%	10.34%	2.75%
Hughson	84.93%	1.88%	10.52%	2.75%
Newman	87.46%	4.85%	7.69%	0.00%
Oakdale	82.44%	5.70%	7.78%	4.09%
Patterson	91.18%	2.47%	4.26%	2.10%
Waterford	81.80%	4.16%	13.62%	0.42%
Entitlement Jurisdictions				
Turlock	73.27%	7.08%	15.85%	2.79%
Stanislaus Urban County Total	81%	5%	8%	6%

Source: 2007–2011 ACS

Vacancy Rate

Vacancy trends in housing are analyzed using a “vacancy rate,” which establishes the relationship between housing supply and demand. For example, if the demand for housing is greater than the available supply, the vacancy rate is low and the price of housing will most likely increase. Additionally, the vacancy rate indicates whether or not the community has an adequate housing supply to provide choice and mobility. HUD standards indicate that a vacancy rate of 5 percent is sufficient to provide choice and mobility.

Table 24 provides the total number of vacant housing units as well as the percentage of vacant housing units in 2010 for all jurisdictions in the Stanislaus Urban County and the City of Turlock. Please note that the California Department of Finance (DOF) estimate is for all housing unit types and does not exclude seasonal, recreational, or occasional use and all other vacant units. The DOF also does not provide vacancy by tenure. To provide vacancy by other reason for vacancy, 2000 Census data was used (see **Table 24**).

Overall, the 2010 data (**Table 24**) indicates that Stanislaus Urban County has vacancy rates ranging from 6.8 percent to 11.0 percent. Patterson had the highest vacancy rate (11.0 percent) and Oakdale had the lowest (6.8 percent). Overall Stanislaus Urban County had a vacancy rate of 8.3 percent in 2010.

**Table 24
Vacancy Status, 2010**

Jurisdiction	Total Vacant Housing Units	Percentage of Total Housing Units Vacant
Stanislaus Urban County		
Ceres	981	7.2%
Hughson	165	7.4%
Newman	355	10.5%
Oakdale	534	6.8%
Patterson	698	11.0%
Waterford	207	7.8%
Unincorporated Area of Stanislaus County	3,105	9.3%
Entitlement Jurisdictions		
Turlock	1,855	7.5%
Stanislaus Urban County Total	4,537	8.3%

Source: 2010 DOF Census (HCD data packet)

Age of Housing Stock

Table 25 displays the share of housing units constructed by age and tenure in all jurisdictions in the Stanislaus Urban County and the City of Turlock. With the exception of Stanislaus Urban County, City of Turlock, and Ceres, most housing in each jurisdiction was built after 1980.

**Table 25
Age of Housing by Tenure**

Jurisdiction	Before 1950			1950 to 1979			1980 to 1999			2000 or Later		
	Total	Renter	Owner	Total	Renter	Owner	Total	Renter	Owner	Total	Renter	Owner
Stanislaus Urban County												
Ceres	5%	8%	4%	35%	42%	32%	38%	36%	39%	21%	14%	24%
Hughson	18%	27%	13%	15%	20%	13%	23%	18%	26%	43%	35%	49%
Newman	18%	23%	16%	19%	19%	19%	30%	29%	30%	33%	29%	35%
Oakdale	10%	6%	12%	33%	24%	25%	37%	41%	35%	20%	7%	27%
Patterson	9%	10%	9%	15%	28%	9%	33%	31%	35%	42%	30%	48%
Waterford	15%	15%	14%	22%	24%	21%	38%	32%	40%	25%	29%	23%
Entitlement Jurisdictions												
Turlock	9%	10%	8%	33%	37%	29%	36%	38%	34%	23%	16%	28%
Stanislaus Urban County Total	14%	14%	13%	34%	40%	30%	32%	31%	33%	20%	15%	23%

Source: 2007–2011 ACS

Housing Cost

Table 26 provides a summary of home sales prices for all jurisdictions in the Stanislaus Urban County and the City of Turlock. Stanislaus County experienced a sharp increase in the median sales price for homes from 2012 to 2013. It is important to note that as a measure of central tendency, median sales price is sensitive to sales volume in market subsectors as much as it is to overall price trends. An increase in the volume of sales of higher-priced homes relative to overall sales volume can lead to an increase in median sales price even though overall prices remain low.

As shown, as of 2013, Waterford had the lowest median sales price (\$143,500) and Hughson the highest (\$250,000). Patterson and Hughson experienced the sharpest increases in the median sales price of homes from 2012 to 2013.

In 2015, a survey of local newspapers and online rental listings was conducted for both single-family homes and multi-family units for all jurisdictions in Stanislaus County. The results are presented in **Table 27**. According to the results of the survey, the median rental rate in Stanislaus Urban County is \$1,095 and in the City of Turlock is \$845.

HUD publishes annual Fair Market Rents, which include an estimated utility cost, and the annual income required to afford them. **Table 28** shows the Fair Market Rents for 2014 for the Stanislaus Urban County.

Table 26
Median Home Sale Prices

Jurisdiction	2011	Year-to-Year Change 2012		Year-to-Year Change 2013	
		Dollars	Percentage	Dollars	Percentage
Stanislaus Urban County					
Ceres	\$127,500	\$130,250	2.16%	\$160,000	22.84%
Hughson	\$170,000	\$185,000	8.82%	\$250,000	35.14%
Newman	\$110,000	\$116,750	6.14%	\$145,000	24.20%
Oakdale	\$168,000	\$175,000	4.17%	\$210,000	20.00%
Patterson	\$142,000	\$150,000	5.63%	\$210,000	40.00%
Waterford	\$110,000	\$113,000	2.73%	\$143,500	26.99%
Entitlement Jurisdictions					
Turlock	\$153,000	\$160,000	5.58%	\$195,000	22.19%

Source: 2011–2013 DataQuick

Table 27
Median Rental Listings

Place/Community	Type: Bedroom (BR)					Median Rent
	Studio	1 BR	2 BR	3 BR	4 BR	
Stanislaus Urban County						
Stanislaus Urban County	N/A	\$653	\$823	\$1,148	\$1,400	\$1,095
Entitlement Jurisdictions						
Turlock	N/A	\$690	\$885	\$950	\$1,795	\$845

Source: PMC rental survey, 2015

**Table 28
Fair Market Rents, 2014**

Unit Size	FMR
Studio	\$583
1-bedroom	\$720
2-bedroom	\$923
3-bedroom	\$1,360
4-bedroom	\$1,578

Source: U.S. Department of Housing and Urban Development, 2015 Fair Market Rent, Modesto, CA, MSA

Housing Affordability by Tenure and Household Type

The assessment of the Stanislaus Urban County's and the City of Turlock's housing needs relies on custom tabulations of U.S. Decennial Census data provided by HUD. These tabulations are referred to as the CHAS (Comprehensive Housing Affordability Strategy) tables obtained using HUD's State of the Cities Data System. This data is presented in two main tables, one presenting housing problems by households and the other presenting affordability mismatch by housing units. **Tables 29** and **30** provide a summary of cost burden. The needs of renter and owner households are examined separately.

The CHAS housing problems table presents the number of households paying more than 30 percent and 50 percent of gross income for housing by tenure, household type, and income category. This cost of housing as a percentage of gross income is referred to as the housing cost burden. According to HUD, a household which has a housing cost burden over 30 percent has a high housing cost burden. Those with a cost burden over 50 percent have a severe cost burden.

Overpayment is a concern for low-income households since they may be forced to live in overcrowded situations or cut other necessary expenditures, such as health care, in order to afford housing. The HUD definition of housing cost includes not only monthly rent and mortgage payments but an estimate of utilities.

Renter Households

Overall, renter households in Stanislaus County have a higher cost burden than owner households. Low-income renter households (>50 to ≤80 percent area median income [AMI]) experience a high cost burden at close to the same rate as do all renter households. Very low-income (>30 percent to ≤50 percent AMI) and extremely low-income renter households (≤30 percent AMI) experience cost burdens much higher than all renters.

Owner Households

Owner households in Stanislaus County have a lower percentage of cost burden than renter households. Ceres and Patterson have a severe cost burden of over 10 percent, while the remaining jurisdictions all have lower rates of severe cost burden among owner households.

Generally, lower-income owner households experience a high cost burden at a higher rate than do all owner households. Extremely low-income owner households (≤30 percent AMI) experience the highest levels of cost burden among all owner households.

**Table 29
Cost Burden Summary, Renters**

Jurisdiction	All Renters		Elderly		Large		Low-Income		Very Low-Income		Extremely Low-Income	
	High	Severe	High	Severe	High	Severe	High	Severe	High	Severe	High	Severe
Stanislaus Urban County												
Ceres	50.7%	33.2%	5.7%	3.1%	9.9%	7.3%	55.7%	14.1%	92.4%	58.1%	81.2%	73.5%
Hughson	48.2%	29.2%	26.3%	15.3%	9.5%	2.2%	100.0%	46.4%	68.4%	39.5%	100.0%	100.0%
Newman	55.0%	33.6%	4.3%	4.3%	16.6%	6.2%	85.5%	34.8%	66.7%	42.9%	76.3%	76.3%
Oakdale	34.3%	24.0%	11.8%	5.2%	1.7%	1.1%	54.4%	5.4%	91.5%	64.4%	75.7%	73.0%
Patterson	34.4%	23.2%	3.6%	2.5%	7.3%	3.9%	46.8%	24.1%	91.7%	55.0%	90.6%	90.6%
Waterford	49.3%	27.1%	13.9%	4.4%	12.4%	5.0%	52.3%	6.2%	95.2%	9.5%	71.7%	71.7%
Entitlement City												
Turlock	48.9%	28.1%	12.7%	6.4%	5.7%	1.7%	75.9%	17.7%	87.4%	55.8%	85.6%	77.7%

Source: 2011 CHAS data

**Table 30
Cost Burden Summary, Owners**

Jurisdiction	All Owners		Elderly		Large		Low-Income		Very Low-Income		Extremely Low-Income	
	High	Severe	High	Severe	High	Severe	High	Severe	High	Severe	High	Severe
Stanislaus Urban County												
Ceres	16.6%	11.0%	6.5%	2.5%	14.0%	5.5%	60.8%	31.5%	66.2%	52.8%	73.4%	60.9%
Hughson	13.1%	7.5%	3.7%	1.9%	9.7%	1.5%	66.7%	26.7%	80.0%	80.0%	25.0%	0.0%
Newman	12.1%	9.6%	5.1%	3.3%	8.6%	2.8%	43.7%	40.7%	74.3%	57.1%	76.9%	53.8%
Oakdale	12.9%	9.4%	9.3%	5.4%	4.9%	2.2%	56.7%	34.6%	64.7%	49.0%	72.4%	72.4%
Patterson	14.2%	10.8%	5.4%	4.5%	11.0%	2.0%	64.3%	40.0%	73.2%	53.7%	93.8%	93.8%
Waterford	16.0%	7.6%	7.5%	4.5%	12.6%	1.8%	65.2%	21.7%	100.0%	62.5%	77.8%	55.6%
Entitlement City												
Turlock	13.3%	8.4%	8.0%	3.6%	6.1%	1.7%	57.7%	32.5%	72.0%	49.9%	72.5%	46.4%

Source: 2011 CHAS data

Overcrowding

Table 31 illustrates the share of households by person per room for owners and renters for all jurisdictions in the Stanislaus Urban County and the City of Turlock. Households with more than 1 person per room are considered overcrowded. Households with more than 1.5 persons per room are considered severely overcrowded. As shown in **Table 31**, renter-occupied households have a higher incidence of overcrowding than owner-occupied households.

Table 31
Persons per Room

Jurisdiction	Owner Occupied			Renter Occupied		
	<1.0 persons	1.01 to 1.5 persons	>1.5 persons	<1.0 persons	1.01 to 1.5 persons	>1.5 persons
Stanislaus Urban County						
Ceres	60.2%	2.8%	0.2%	31.4%	4.2%	1.3%
Hughson	55.7%	2.6%	0.0%	37.9%	2.8%	1.0%
Newman	58.5%	2.2%	0.0%	34.8%	4.1%	0.4%
Oakdale	58.1%	0.1%	0.8%	37.1%	2.7%	1.3%
Patterson	65.2%	1.9%	0.2%	26.4%	3.6%	2.6%
Waterford	65.2%	2.7%	1.4%	26.4%	2.3%	2.0%
Unincorporated Area of Stanislaus County	59.8%	2.7%	0.7%	31.3%	4.2%	1.1%
Entitlement Jurisdictions						
Turlock	53.3%	1.1%	0.3%	41.1%	2.8%	1.3%
Stanislaus Urban County Total	60.2%	2.4%	0.5%	31.7%	3.9%	1.3%

Source: 2008–2012 ACS (HCD data packet)

Foreclosures

A foreclosure is a term used to describe the procedure followed in enforcing a creditor's rights when a debt secured by any lien on property is in default.

According to Realty Trac in February 2015, the number of properties that received a foreclosure filing in Stanislaus County (countywide) was 20 percent lower than the previous month and 33 percent lower than the same time last year.

Home sales countywide for January 2015 were down 19 percent compared with the previous month, and down 19 percent compared with a year ago. The median sales price of a non-distressed home was \$225,000. The median sales price of a foreclosure home was \$198,000, or 12 percent lower than non-distressed home sales.

- ◆ **Table 32** provides the number of homes in some stage of foreclosure (default, auction or bank owned) in January 2015.

**Table 32
Foreclosure Activity January 2015**

Top Cities/Areas	Total Sales (January 2015)	Median Sales Price	Number of Foreclosures (January 2015)
Turlock	57	\$245,000	129
Oakdale	31	\$300,000	63
Ceres	29	\$197,000	101
Patterson	23	\$269,500	85
Newman	12	\$207,000	20
Salida	10	\$220,000	44
Hughson	6	\$249,500	116
Waterford	6	\$198,000	27

Sources: Realty Trac Stanislaus County area data, February 2015.

Private Sector Practices

Private housing industry practices are central to making housing available for all people, from initial inquiries to approval. No single factor is more primary to providing equal and fair access to individuals, regardless of their race/ethnicity, color, national origin, gender, disability, family size, marital status, source of income, age, and sexual orientation, than availability of housing. That is, a real estate agent, broker, property manager, or private individual seller or renter has influence on accessibility when they tell a potential renter or buyer whether a house or apartment is vacant and available to them. Moreover, a financial institution's approval and terms for a new home loan is equally important for individuals to access housing absent discrimination. Secondary to this is the information that individuals receive regarding suitability such as cost, number of bedrooms, accessibility features, and more. Renters and buyers cannot uncover those important characteristics without the assistance of these professionals. In the final stage, accepting the offer of a potential renter or buyer is ultimately in the hands of housing professionals and financial institutions. Therefore, an individual and their family's search for housing, from beginning to end, relies heavily on the private housing industry.

The Fair Housing Act has two primary goals: to end housing discrimination and to promote more equitable and integrated communities. This second goal embodies the American values of fair access and equal opportunity for all. According to the San Joaquin Valley Fair Housing and Equity Assessment (2014), poverty and race have historically been connected due in part to economic factors, historical land use laws and practices, and ongoing housing discrimination. Hispanics and African Americans across the Central Valley region are more likely to live in neighborhoods with high concentrations of poverty compared to Whites. Individuals and families who live in these areas have less access to better jobs, schools, health care, transportation, and housing.⁷ This impacts the ability of individuals to improve themselves and for communities to become more vibrant and healthy places to live for all.

As the gatekeeper to housing opportunities, the housing industry will be analyzed for its contribution to further fair housing. This section of the AI reviews the policies and practices of real estate agents, property managers, small private individual sellers/renters, homeowners, insurance companies, and mortgage lenders in their efforts to offer fair housing choices in the Stanislaus Urban County and the City of Turlock.

Real Estate Sales Practices

Discriminatory practices in real estate (homeownership) are more difficult to detect than in rentals. When people want to buy a home, they often consult with a real estate agent or broker to assist in finding the right housing for their needs, or they could encounter an agent or broker representing the seller. A potential buyer is often unaware whether they are being steered into a different home because of discrimination. As a result, the individual will not report the incident to the professional associations or appropriate government authority. In turn, the professional association will not discipline the agent/broker to prevent further discrimination, nor will the buyer's transaction be remedied. Outreach and education to the association's professional members is key in preventing discriminatory practices. Additionally, outreach to individual buyers to educate them on their rights will be important, as well as investigating/testing real estate practices by Federal, State, and local agencies and nonprofit fair housing advocates, which is discussed further in the Outreach and Education sections below.

⁷ San Joaquin Valley Fair Housing and Equity Assessment (April 2014)

Real Estate Profession – Self-Regulated

In California, in order to engage in the business of real estate sales, a broker or salesperson must be licensed by the California Bureau of Real Estate (CalBRE). CalBRE also enforces violations of California real estate law. In Stanislaus County and the City of Turlock, any case of discrimination or other fair housing violation that is experienced by an individual from a real estate professional could be reported to the local representative association and/or to CalBRE.

The real estate industry in California is highly professionalized. Almost all real estate brokers and salespersons are affiliated with a real estate trade association. The two largest are the California Association of Realtors (CAR), associated with the National Association of Realtors (NAR), and the California Association of Real Estate Brokers (CAREB), associated with the National Association of Real Estate Brokers (NAREB). The use of the term “Realtor” is restricted by NAR as a registered trademark. Members of NAREB are licensed to use the professional designation “Realtist.”



Real Estate Law Violations

The California Bureau of Real Estate regulates and enforces the conduct of its licensed professionals to protect residents from discriminatory practices. Specifically, Title 10, Chapter 6 of the California Code of Regulations prohibits real estate licensed professionals from discriminatory conduct based on race, color, sex, religion, national origin, marital status, physical handicap, and ancestry. Missing or updated categories from California and Federal anti-discrimination laws include familial status, disability, source of income, sexual orientation, and other arbitrary factors; regardless, these are obligatory. CalBRE provides a long, non-exhaustive list of examples of illegal discriminatory conduct, which may be useful to licensed professionals while in the field. Examples include the following.

A real estate professional shall not:

- ◆ refuse to negotiate or making unavailable the sale, rental or financing of real property...
- ◆ refuse or failing to show, rent, sell or finance the purchase of real estate...
- ◆ discriminate in the terms, conditions or privileges of sale, rental or financing of the purpose of real property...
- ◆ discriminate when providing services or facilities connected with the sale, rental or financing of the purchase of real property...
- ◆ discriminate when processing an application more slowly.....
- ◆ based on race, color, sex, religion, national origin, marital status, physical handicap and ancestry.

Brokers and salesperson must pass an exam to become licensed. They are tested on ethics, including discriminatory practices. Every four years, real estate professionals are tested again on ethics when they renew their license.

A resident can take preventive measures to experiencing discrimination by looking up a real estate professional on CalBRE's website to find a violation. Once a resident files a claim with CalBRE and the licensed professional is found in violation, the violation will be noted in the professional's record. Brokers are responsible for familiarizing their salespersons with the requirements of Federal and State laws relating to discrimination. If the salesperson violates these laws, both the salesperson and the broker will have the violation referenced on their online record.

Residents can submit a claim to CalBRE by mail, in person, or online. Instructions for filing a complaint specifically reference what complaints CalBRE will handle. A few types of complaints are referenced, including real estate brokers or salespersons that mislead or defraud a consumer; however, there is no mention of discrimination based on any of the protected classes. It is reasonable to assume that the average person with a discrimination claim would believe that CalBRE is not the place to obtain assistance. Fair housing protection is absent on the claim form as well.

A review of CalBRE's website and current publications shows limited amounts of information related to housing choice discrimination, either for licensed professionals or residents. CalBRE has a dispute resolution web page with no mention of discrimination. It has online guides for tenants renting a home (avoiding fraud is the big concern), yet no mention of discrimination, such as a number to call if tenants believe they are being treated unfairly. CalBRE's web page issues consumer alerts, though none are about fair housing choice. However, a resident with discrimination concerns will get the best information by calling CalBRE, which will provide the caller with information about filling a claim and direct them appropriately.

Professional Code of Ethics Breach

Beyond CalBRE's requirements, real estate professionals are held to a code of ethics mandated by either CAR/NAR or CAREB/NAREB, depending on their membership and their local board of real estate professionals.

NAR has a professional code of conduct, which specifically prohibits unequal treatment in professional services or employment practices on the basis of "race, color, religion, sex, handicap, familial status, or national origin" (Article 10, NAR Code of Ethics). Both associations prohibit members from promulgating deed restrictions or covenants based on race.

Article 10 of the NAR Code of Ethics provides that "Realtors shall not deny equal professional services to any person for reasons of race, color, religion, sex, handicap, familial status, or national origin. Realtors shall not be a party to any plan or agreement to discriminate against any person or persons on the basis of race, color, religion, sex, handicap, familial status, or national origin."

A Realtor pledges to conduct business in keeping with the spirit and letter of the Code of Ethics. Article 10 imposes obligations on Realtors and is also a firm statement of support for equal opportunity in housing. A Realtor who suspects discrimination is instructed to call the local Board of Realtors. Local Boards of Realtors will accept complaints alleging violations of the Code of Ethics filed by a home seeker who alleges discriminatory treatment in the availability, purchase, or rental of housing. Local Boards of Realtors have a responsibility to enforce the Code of Ethics through professional standards, procedures, and corrective action in cases where a violation of the Code of Ethics is proven to have occurred.

CAR has many local associations throughout the state. Stanislaus County is served by the Central Valley Association of Realtors (CVAR). CVAR holds local real estate members to the professional code of ethics. A resident complaint will be reviewed by the Professional Standards Committee for validity and action.

Similarly, NAREB Realtists follow a strict code of ethics stating that "any Realtist shall not discriminate against any person because of race, color, religion, sex, national origin, disability, familial status, or sexual orientation" (Part I, Section 2, NAREB Code of Ethics) in the sale or rental of real property, in advertising the sale or rental of real property, in the financing of real property, or in the provision of professional services.

Part I, Section 2 of the NAREB Code of Ethics continues to state that any "Realtist shall not be instrumental in establishing, reinforcing, or extending any agreement or provision that restricts or limits the use or occupancy of real property to any person or group of persons on the basis of race, color, religion, sex, national origin, disability, familial status, or sexual orientation."

CAREB, NAREB's state chapter, has 13 local chapters across California. Stanislaus County has a local chapter in Modesto called the Central Valley Realist Association.

Outreach and Education

By reaching out to its members with educational opportunities, such as in fair housing law and best practices, the real estate field can have a significant impact on improving fair housing practices in Stanislaus County.

CVAR does not directly offer fair housing educational courses. CAR, however, offers continuous online courses dealing with fair housing requirements and issues. CAR's online license renewal program is available at a nominal fee to CAR members. As part of CAR's online license renewal program, CAR offers a suite of real estate courses. "Fair Housing" is CAR's course that educates Realtors on the history of fair housing as well as on current fair housing laws. According to the course description, the course will provide an overview of Federal fair housing laws and an in-depth discussion of individual laws and their application to the practice of real estate. The course also provides CAR members with a study of the State of California's fair housing laws and regulations. The course emphasizes anti-discriminatory conduct that all licensees should practice and concludes by discussing the voluntary affirmative action marketing program and why promoting fair housing laws is a positive force at work in California and throughout the nation.

NAREB was formed by African American real estate professionals out of a need to secure equal housing opportunities regardless of race, creed, or color. NAREB passes down its mission of "promoting democracy in housing" to its state and local chapters, and offers trainings and multiple conferences. NAREB's California Chapter offers statewide conferences to educate its members. The most recent conference was held in October 2014: State of Housing in Black California – The Stolen American Dream.



Stanislaus County, on behalf of the Stanislaus Urban County members, and the City of Turlock provide annual CDBG funds to a local fair housing nonprofit Project Sentinel to provide fair housing outreach and education to local real estate professionals.

RENTAL AND PROPERTY MANAGEMENT

Renters constitute a significant portion of the population in Stanislaus County. California is the nation's largest rental market, providing approximately 5.9 billion rental units and homes for 17 million residents.⁸ According to the U.S. Census, Stanislaus County's housing units consist of 40.9 percent rental units (approximately 68,000 units), which is a higher than the national average at 34 percent. California's overall rental rate is higher at 44 percent.⁹

According to the San Joaquin Valley Fair Housing and Equity Assessment, the valley "is home to a disproportionate number of economically and socially vulnerable populations, including farm workers, immigrants, renters, homeowners facing foreclosure, and people with disabilities." Additionally, non-Whites face more challenges in the housing market due to their "economic conditions, immigration status, linguistic isolation, and larger family size." Many of these vulnerable populations will be seeking to rent, putting great responsibility on property management companies and owners to use non-discriminatory practices.

When looking to rent their property, landlords and property management companies want to find responsible and reliable tenants while also following fair housing laws. An unclean or irresponsible tenant

⁸ California Apartment Association, www.caanet.org/industry (February 24, 2015).

⁹ American Community Survey, 2008–2012.

can cost the owner additional time and money. However, it is equally important for landlords to understand fair housing laws and implement fair housing practices.

Rental and Property Management – Self-Regulated

The California Apartment Association (CAA) is the country's largest statewide trade association for rental property owners and managers. CAA incorporated in 1941 to serve rental property owners and managers throughout California. CAA represents rental housing owners and professionals who together manage more than 1.5 million rental units. CAA has a local association that services Mariposa, Stanislaus, and Tuolumne counties called CAA-Central Valley. The Central Valley office is located in Modesto.

CAA supports the spirit and intent of all local, State, and Federal fair housing laws for all residents without regard to color, race, religion, sex, marital status, mental or physical disability, age, familial status, sexual orientation, or national origin. When signing up to become a member of the California Apartment Association, new members agree to abide by the following provisions of their Code of Ethics and Code of Equal Housing Opportunity. The Code of Equal Housing Opportunity reads as follows:

- ◆ We agree that in the rental, lease, sale, purchase, or exchange of real property, owners and their employees have the responsibility to offer housing accommodations to all persons on an equal basis;
- ◆ We agree to set and implement fair and reasonable rental housing rules and guidelines and will provide equal and consistent services throughout our resident's tenancy;
- ◆ We agree that we have no right or responsibility to volunteer information regarding the racial, creed, or ethnic composition of any neighborhood, and we do not engage in any behavior or action that would result in steering; and
- ◆ We agree not to print, display, or circulate any statement or advertisement that indicates any preference, limitations, or discrimination in the rental or sale of housing.

CAA provides members with tenant screening services, application forms, and other types of landlord-tenant forms, which if used by CAA members provide legal procedures for processing rental applications and resolving tenant issues. Further, should landlords stay within these guidelines, they will likely avoid committing housing violations.¹⁰ CAA offers a landlord helpline where landlords can call and speak to an attorney about their responsibilities. Lastly, all members receive a fair housing flyer to post on-site at their properties which states that it is illegal to discriminate based on the protected classes.

When CAA receives complaints about potential fair housing violations, the association provides tenants with information on their rights and then refers them to the California Department of Fair Employment and Housing to file a claim. The Executive Director of CAA's Central Valley branch stated that her experience has been that most tenant complaints are about non-CAA members. The director said that these non-CAA members are "mom and pop" shops with little training and are unaware of the laws. For this reason, CAA makes additional efforts to try to reach these smaller operations through outreach events and the landlord helpline.

¹⁰ Conversation with CAA Executive Director, Fresno branch, 2/26/15.

Local Property Management Companies

Some of the largest rental companies in Stanislaus County¹¹ include Liberty Property Management, Cornerstone Property Management, Matel Realtors, Marshall Perry, GreenGate Property Management, and Stanislaus Property Management. Half of these management companies are CAA members.

Outreach and Education

CAA offers a Certificate in Residential Management, which requires a course on fair housing law. In addition, the CAA website provides links to the Fair Housing Institute and Fair Housing Network. Members receive CAA Issue Insight, an online publication that provides in-depth discussion of fair housing or landlord-tenant issues. CAA offers training opportunities across the state and in Modesto. CAA has a landlord helpline open Monday through Friday where landlords can ask questions about landlord-tenant issues and property management. Questions can be submitted online or over the phone. CAA also provides free forms online to its members, such as rental applications and lease agreements. CAA provides fair housing information to renters at outreach events.

Small “Mom and Pop” Owners

It is important to analyze small mom and pop owners in the Stanislaus Urban County and the City of Turlock because they are most likely to unintentionally commit fair housing violations; however, they are the most difficult to reach and their relative size is unknown. These owners constitute an individual or a small group of individuals that rent one or a few units; they generally have less training and professional background. Renting property is a secondary business for them and often not their main profession. Further, they often form verbal contracts with tenants instead of written contracts, and they are unfamiliar with their rights and responsibilities.

CAA reports that the majority of mom and pop owners do not have ownership with CAA and are deterred by the time and cost to join, even though the actual benefits of joining outweigh the costs when they run into issues. CAA also finds that the majority of landlords who call the helpline are these mom and pop owners. CAA encourages them to attend training and to utilize services as members.

With less training, the typical means of housing associations to prevent fair housing violations is less effective. Until these owners seek more training, claims brought by individuals remain the primary means of educating and enforcing fair housing laws with these individuals. (See the Fair Housing Complaints and Enforcement section for more information). Educating potential tenants on their fair housing rights is key to enforcement in these circumstances. Increasing efforts to reach and train private owners would also be beneficial.

Stanislaus County, on behalf of the Stanislaus Urban County members, and the City of Turlock provide annual CDBG funds to a local fair housing nonprofit Project Sentinel to provide fair housing outreach and education to local Realtors and small mom and pop owners.

Financial Institutions and Mortgage Lending

See section on Mortgage Lending.

¹¹ According to Mark Gallvan, Case Manager, at Project Sentinel for fair housing and land-lord tenant issues.

Advertisement

In February 2015, a review of rental housing advertisements for all of Stanislaus County and City of Turlock was conducted to identify any fair housing impediments. Advertisements were examined for language that explicitly or implicitly indicated that housing would not be made available to persons based on membership in a protected class or that there would be preferences for or bias against persons belonging to a protected class. No advertisements were found that would indicate unfair housing practices.

Fifty rental advertisements were surveyed across 11 sources including property management companies, newspapers, and other online listings. The following sources were reviewed:

- ◆ Liberty Property Management
- ◆ Cornerstone Property Management
- ◆ Matel Realtors
- ◆ Marshall Perry Inc.
- ◆ GreenGate Property Management
- ◆ Stanislaus Property Management
- ◆ Rent.com
- ◆ Craigslist.org
- ◆ ApartmentGuide.com
- ◆ Ceres Courier
- ◆ Turlock Journal

Use of Restrictive Covenants

Covenants that restrict the ownership or use of real property based on membership in a protected class are prohibited under State and Federal law. Nonetheless, recorded documents with these terms persist.

Today, the California Department of Real Estate reviews Covenants, Conditions, and Restrictions (CC&Rs) for all subdivisions of five or more lots and for condominiums of five or more units. This review is authorized by the Subdivided Lands Act and mandated by the Business and Professions Code, Section 11000. The review includes a wide range of issues, including compliance with fair housing law.

Since 2000, California State law has required that any person or entity providing declarations, deeds, and other governing documents related to the use of real property must place a cover page over the document or a stamp on the first page of the document containing a statement that any restrictive covenants that may appear in the document are null and void and that any person with an interest in the property has the right to request that the language be removed.

Summary of Private Sector Practices

While the private industry sets standards and policies, there is no internal tracking as to whether members are following those policies and practices as related to fair housing. Providing more education and outreach may help improve practices. Given the data on complaints, there appears to be a lack of knowledge regarding the obligation of landlords and property managers to make reasonable accommodations for disabled persons and to rent to them without regard to disability.

Mortgage Lending (HMDA Data)

Lending practices in the private sector may impact a household's access to housing. A key aspect of fair housing choice is equal access to credit for the purchase of a home. In the past, financial institutions did not always employ fair lending practices. Credit market distortions and other activities such as redlining prevented some groups from having equal access to credit.¹² This section reviews the lending practices of financial institutions and the access to financing from all households, particularly minority households and those of very low and low incomes.

Community Reinvestment Act

The passage of the Community Reinvestment Act (CRA) in 1977 was designed to improve access to credit for all members of the community. CRA's purpose is to encourage regulated financial institutions to meet the credit needs of entire communities, including very low- and low-income persons and neighborhoods. It is codified under Title 12 Section 2901 of the United States Code (12 U.S.C. § 2901) and implemented by regulations under Title 12, Section 228 of the Code of Federal Regulations (12 C.F.R. § 228). Under CRA, a lending institution must disclose its lending activity by geographic area and type of lending. The Federal Financial Institutions Examination Council (FFIEC), a Federal interagency, coordinates among several Federal bodies to conduct an examination of the lending institution's activities. This examination results in a rating based on several factors. Those that have a poor rating may be required to improve community lending practices as a condition of regulatory agency approval for certain activities such as branch openings, acquisitions, and mergers. CRA has undergone several legislative changes since 1977 and was substantially revised in 2005.

Home Mortgage Disclosure Act

The Home Mortgage Disclosure Act (HMDA), enacted by Congress in 1975 (12 U.S.C. §2801) and implemented by the Consumer Financial Protection Bureau (CFPB) under Regulation C (12 C.F.R. § 1003), requires lending institutions to report public loan data. Analyzing this data can reveal patterns of lending by race and location that may indicate discriminatory practices in mortgage lending.

To prepare this analysis, 4,727 records of lender actions were pulled from the 2013 HMDA data set (for calendar year 2013) for Stanislaus County and the City of Turlock. These lender actions represent a lenders' response to a request from a consumer to obtain a new home loan to purchase a primary residence.

Lender actions related to home improvement loans, refinancing, and to purchase properties that will not be owner-occupied were excluded. Lender actions that did not show a loan type were also excluded, as were records of loan transactions between banks and "pre-approval" requests.¹³

Lending Action Volume by Race and Ethnicity

Tables 33 and **34** provide a summary of the results of home loan applications by race and ethnicity for Stanislaus County. Originations indicate loan applications that were approved. Denials indicate loan applications that were accepted as complete applications with the proper paperwork but were denied. Failures indicate applications that were not accepted as complete applications with the proper paperwork

¹² Redlining is a now illegal and discontinued practice where banks would not extend mortgage credit to purchase homes in certain areas. The banks would use maps wherein these areas were marked with red ink.

¹³ Please see the note at the end of this section for a technical discussion of how the raw HMDA data was filtered to create the data set analyzed.

because they were closed for incompleteness, withdrawn by the applicant, or approved but not accepted. Approved but not accepted means that customary loan-commitment or loan-closing conditions such as an acceptable property survey, an acceptable title insurance binder, clearing title requirements, or clearing a termite inspection were not met. As shown in **Table 33**, persons reporting White made up more than 75 percent of loan applications in Stanislaus County. As shown in **Table 34**, roughly 32 percent of loan applicants were persons reporting ethnicity as Hispanic or Latino.

Table 33
2013 Lending Action by Race, Stanislaus County

Race	Total Applications	Denials	Failures	Originations
American Indian or Alaska Native	100	15	17	68
Asian	342	58	70	214
Black or African American	82	15	10	57
Native American or Other Pacific Islander	58	9	9	40
White	3,732	451	616	2,665
Other or No Info Provided	413	79	92	242
Total	4,727	627	814	3,286

Source: Home Mortgage Disclosure Act, 2013 LAR and TS Raw Data

Note: White includes Hispanic or Latino persons.

Table 34
2013 Lending Action by Ethnicity, Stanislaus County

Ethnicity	Total Applications	Denials	Failures	Originations
Hispanic or Latino	1,504	218	269	1,017
Not Hispanic or Latino	2,854	341	460	2,053
Other or no info	369	68	85	216
Total	4,727	627	814	3,286

Source: Home Mortgage Disclosure Act, 2013 LAR and TS Raw Data

Figures 1 and 2 provide a visual comparison of the share of loan applications by race in 2013 (**Figure 1**) to the share of the whole population by race in 2013 (**Figure 2**). When compared to the general population of Stanislaus County (per the 2013 ACS), the data set is roughly representational. Persons reporting race as Black or African American were slightly underrepresented as loan applicants, while persons reporting race as Asian and White were slightly overrepresented as loan applicants.

Figure 1
2013 Loan Applications by Race, Stanislaus County

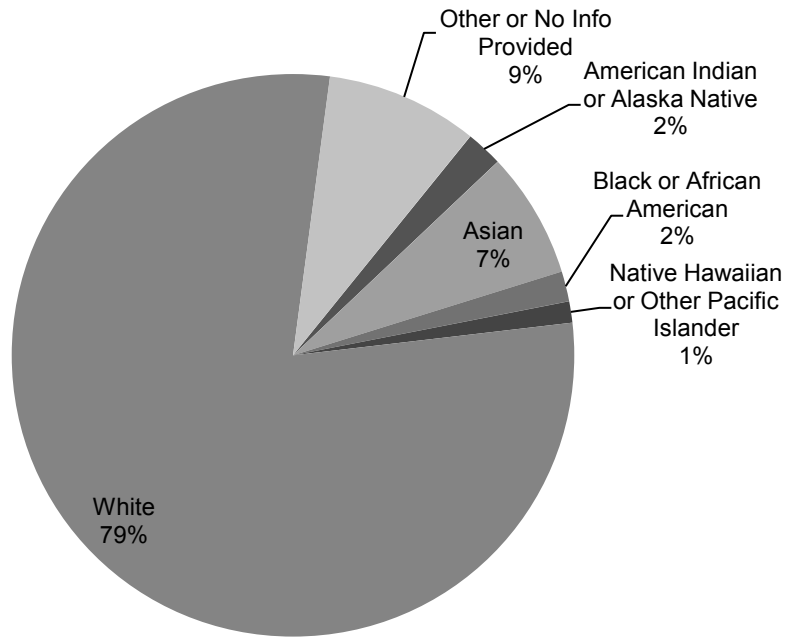
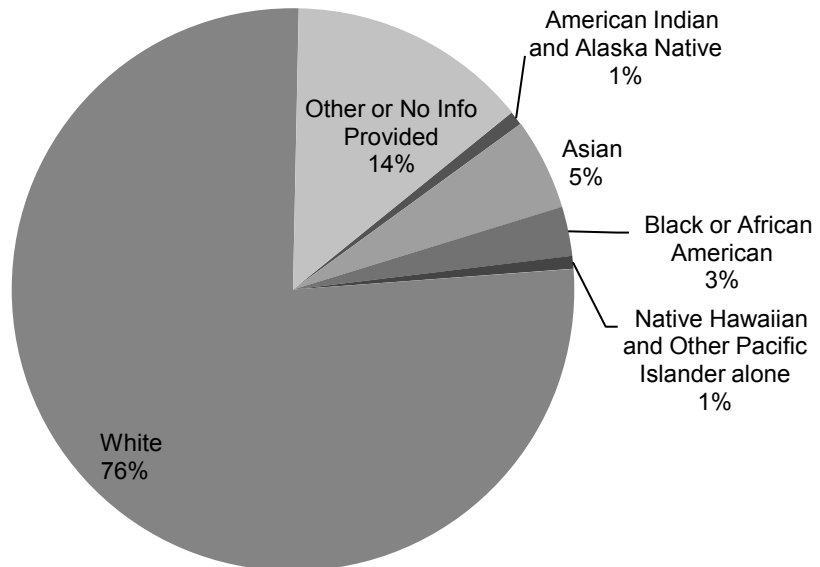


Figure 2
2013 Population by Race, Stanislaus County

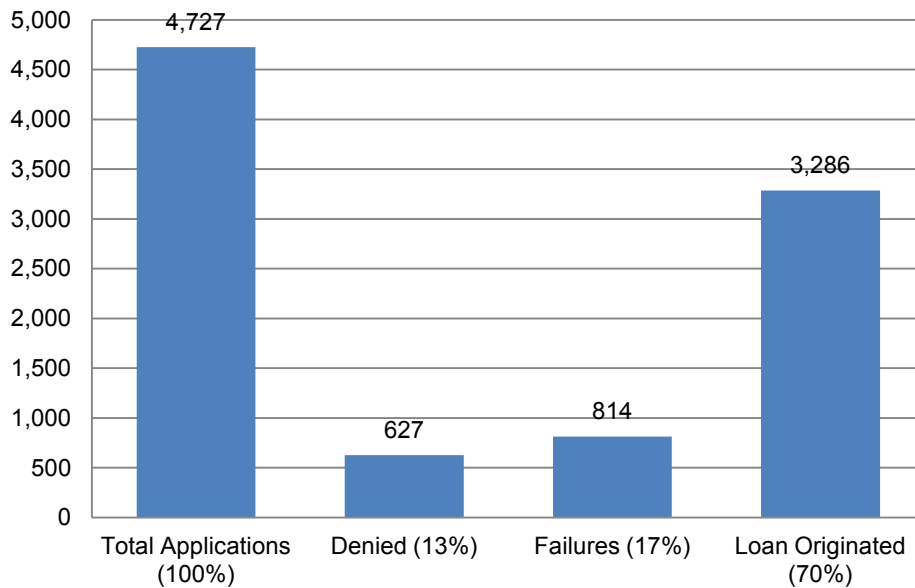


Lending Action Rates by Race and Ethnicity

To reveal differences in lending action rates by race and ethnicity, histograms were created to compare the rate of outcomes by race and ethnicity.¹⁴ The histograms are scaled to be roughly equal in size so that differences in lending volume are minimized.

In the overall data set (**Figure 3**), approximately 13 percent of all applications were denied and 17 percent resulted in failure. Seventy percent of all applications resulted in loan origination.

Figure 3
2013 All Loan Applications, Stanislaus County



American Indian or Alaska Native

For persons in the American Indian or Alaska Native racial category, the origination rate was slightly lower than for the overall population and the denial rate slightly higher. The denial rate was 15 percent and the loan origination rate was 68 percent.

As shown in **Table 35**, the Unincorporated County had the largest share of denied loan applications. However, these rates are essentially meaningless because only fifteen applications were denied for persons in the American Indian or Alaska Native racial category in 2013. There was one denial in the City of Turlock.

¹⁴ It should be noted that the variable used to segregate the data by race and ethnicity was “Applicant Race 1” and “Applicant Ethnicity.” Co-applicant information and other races reported by the applicant were not considered.

Figure 4
2013 Lending Actions for American Indian or Alaska Native

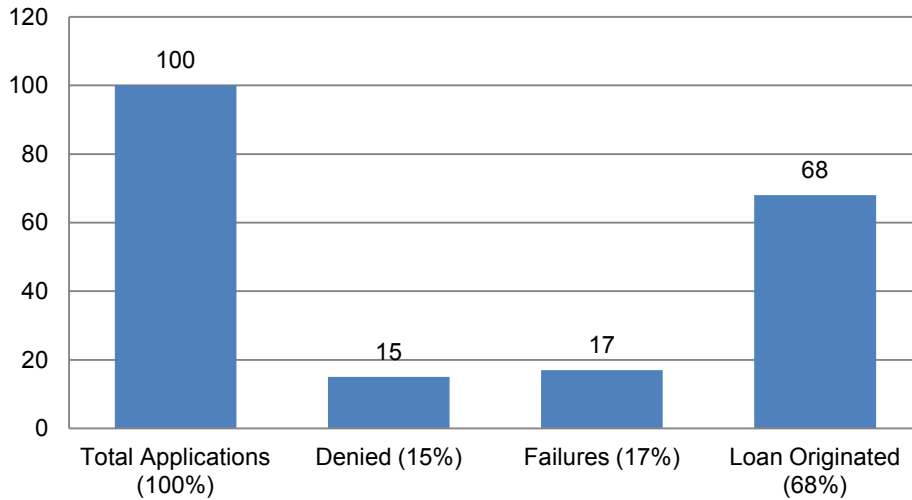


Table 35
2013 Lending Actions for American Indian or Alaska Native by Area, Stanislaus County

Jurisdiction	Total Applications	Denials		Failures		Originations	
		Number	Percentage	Number	Percentage	Number	Percentage
Stanislaus Urban County							
Ceres	13	0	0%	3	18%	10	15%
Hughson	2	0	0%	0	0%	2	3%
Newman	3	1	7%	0	0%	2	3%
Oakdale	4	1	7%	0	0%	3	4%
Patterson	4	1	7%	1	6%	2	3%
Waterford	3	1	7%	0	0%	2	3%
Unincorporated County	21	3	20%	5	30%	13	19%
Entitlement Jurisdictions							
Turlock	7	1	7%	1	6%	5	7%
Stanislaus County Total	100	15	100%	17	100%	68	100%

Source: Home Mortgage Disclosure Act, 2013 LAR and TS Raw Data

Note: Percentages do not add up to 100% because data for Modesto is included in the total but not called out in the table.

Note: HMDA reports data at the census tract level, making it difficult to distinguish loan action for tracts that share multiple jurisdictional boundaries. However, the data provided in the table describes general areas of Stanislaus County.

Hawaiian or Pacific Islander

For persons in the Hawaiian or Pacific Islander racial category, the origination rate and the failure rate were slightly lower and the denial rate slightly higher than for the overall population.

As shown in **Table 36**, Ceres had the largest share of loan applications resulting in denial. However, these rates are essentially meaningless because only nine applications were denied for persons in the Hawaiian or Pacific Islander racial category in 2013. There was one denial in the City of Turlock.

Figure 5
2013 Lending Actions for Hawaiian or Pacific Islander

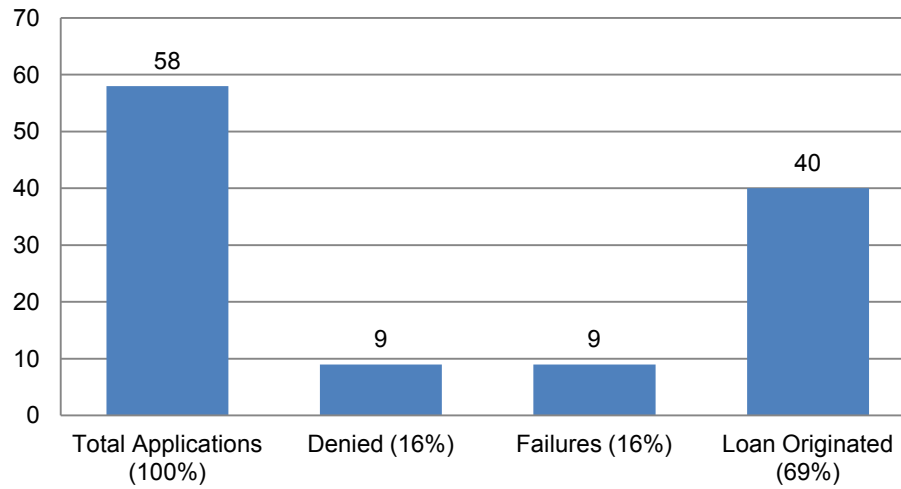


Table 36
2013 Lending Actions for Hawaiian or Pacific Islander by Area, Stanislaus County

Jurisdiction	Total Applications	Denials		Failures		Originations	
		Number	Percentage	Number	Percentage	Number	Percentage
Stanislaus Urban County							
Ceres	7	3	33%	1	11%	3	8%
Patterson	4	1	11%	0	0%	3	8%
Waterford	1	0	0%	0	0%	1	3%
Unincorporated County	4	1	11%	0	0%	3	8%
Entitlement Jurisdictions							
Turlock	4	1	11%	0	0%	3	8%
Stanislaus County Total	58	9	100%	9	100%	40	100%

Source: Home Mortgage Disclosure Act, 2013 LAR and TS Raw Data

Note: Percentages do not add up to 100% because data for Modesto is included in the total but not called out in the table.

Note: HMDA reports data at the census tract level, making it difficult to distinguish loan action for tracts that share multiple jurisdictional boundaries. However, the data provided in the table describes general areas of Stanislaus County.

Black or African American

For persons in the Black or African American racial category, the denial rate was lower than the overall population and the failure rate higher. The denial rate was also lower than for other racial categories. The origination rate was the same as for the overall population. Lenders denied almost one in five loan applications, and about one in eight applications resulted in failure.

As shown in **Table 37**, Patterson had the largest share of loan applications resulting in denial. Since there are few applications that resulted in denial, these rates are not very meaningful. There was one denial in the City of Turlock.

Figure 6
2013 Lending Actions for Black or African American

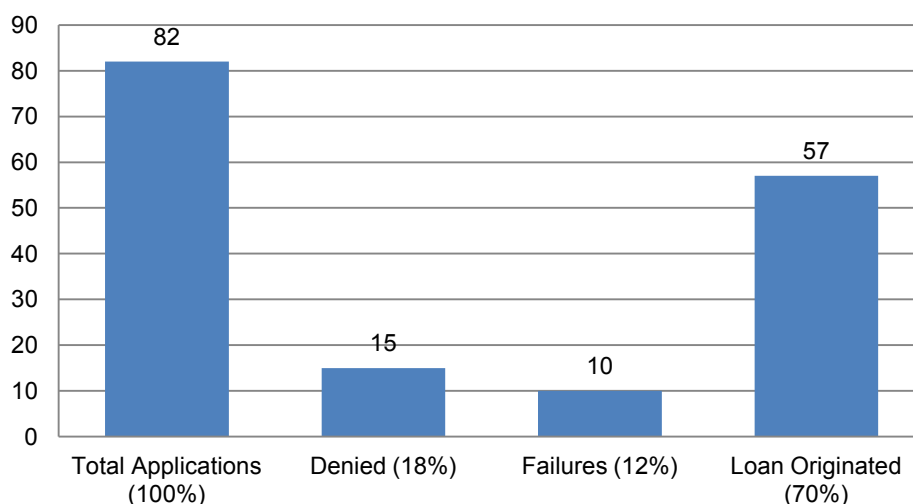


Table 37
2013 Lending Actions for Black or African American by Area, Stanislaus County

Jurisdiction	Total Applications	Denials		Failures		Originations	
		Number	Percentage	Number	Percentage	Number	Percentage
Stanislaus Urban County							
Ceres	4	2	13%	0	0%	2	4%
Hughson	1	0	0%	0	0%	1	2%
Newman	2	1	7%	0	0%	1	2%
Patterson	23	4	27%	5	50%	14	25%
Unincorporated County	10	0	0%	2	20%	8	15%
Entitlement Jurisdictions							
Turlock	2	1	7%	0	0%	1	2%
Stanislaus County Total	82	15	100%	10	100%	57	100%

Source: Home Mortgage Disclosure Act, 2013 LAR and TS Raw Data

Note: Percentages do not add up to 100% because data for Modesto is included in the total but not called out in the table.

Note: HMDA reports data at the census tract level, making it difficult to distinguish loan action for tracts that share multiple jurisdictional boundaries. However, the data provided in the table describes general areas of Stanislaus County.

Other or No Information

For persons in the Other or No Information racial category, the records that indicated a race of “other” or where no race information was provided had higher denial and failure rates than the overall population and the origination rate was lower. Twenty-two percent of loan applications resulted in failure and nineteen percent resulted in denial.

As shown in **Table 38**, the Unincorporated County had the largest share of loan applications resulting in denial, followed by Ceres and Patterson. There were six denials in the City of Turlock, consisting of 8 percent of denials in *Stanislaus County*.

Figure 7
2013 Lending Actions for Other or No Information

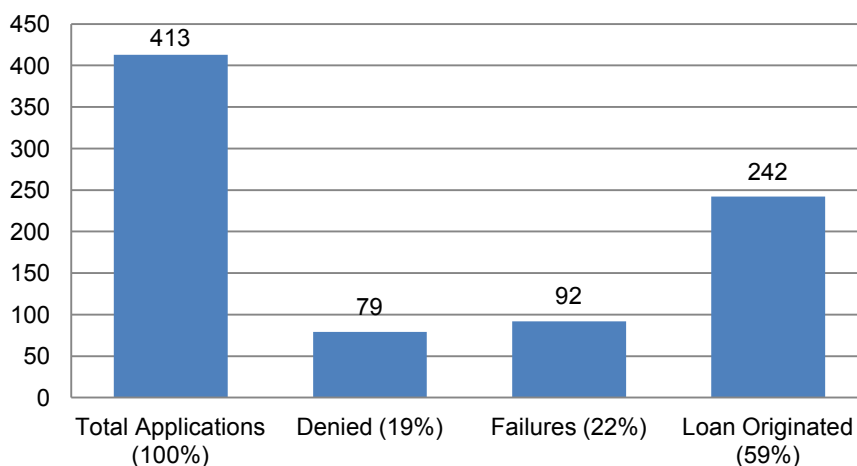


Table 38
2013 Lending Actions for Other or No Information by Area, Stanislaus County

Jurisdiction	Total Applications	Denials		Failures		Originations	
		Number	Percentage	Number	Percentage	Number	Percentage
Stanislaus Urban County							
Ceres	38	8	10%	12	13%	18	7%
Hughson	10	1	1%	3	3%	6	2%
Newman	8	1	1%	2	2%	5	2%
Oakdale	29	7	9%	5	5%	17	7%
Patterson	40	8	10%	12	13%	20	8%
Waterford	15	4	5%	3	3%	8	3%
Unincorporated County	87	19	24%	22	24%	46	19%
Entitlement Jurisdictions							
Turlock	60	6	8%	9	10%	45	19%
Stanislaus County Total	413	79	100%	92	100%	242	100%

Source: Home Mortgage Disclosure Act, 2013 LAR and TS Raw Data

Note: Percentages do not add up to 100% because data for Modesto is included in the total but not called out in the table.

Note: HMDA reports data at the census tract level, making it difficult to distinguish loan action for tracts that share multiple jurisdictional boundaries. However, the data provided in the table describes general areas of Stanislaus County.

Asian

Persons in the Asian racial category had higher denial and failure rates than the overall population and the origination rate was lower. About 1 in 6 applications were denied and another 1 in 5 applications resulted in failure.

As shown in **Table 39**, the Unincorporated County had the largest share of denied loan applications, followed by Ceres. There were seven denials in the City of Turlock, consisting of 12 percent of denials in Stanislaus County.

Figure 8
2013 Lending Actions for Asian

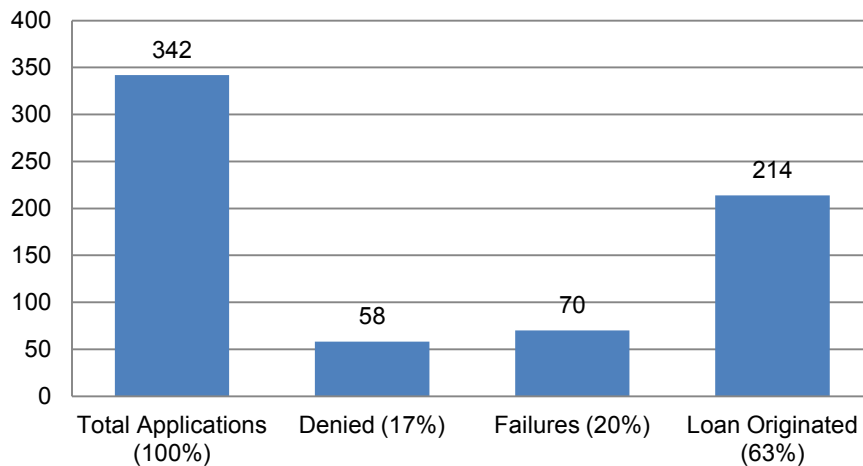


Table 39
2013 Lending Actions for Asian by Area, Stanislaus County

Jurisdiction	Total Applications	Denials		Failures		Originations	
		Number	Percentage	Number	Percentage	Number	Percentage
Stanislaus Urban County							
Ceres	52	9	16%	12	17%	31	14%
Oakdale	8	1	2%	1	1%	6	3%
Patterson	33	5	9%	8	11%	20	9%
Waterford	2	0	0%	1	1%	1	0%
Unincorporated County	56	21	37%	7	10%	26	12%
Entitlement Jurisdictions							
Turlock	47	7	12%	6	9%	34	16%
Stanislaus County Total	342	58	100%	70	100%	214	100%

Source: Home Mortgage Disclosure Act, 2013 LAR and TS Raw Data

Note: Percentages do not add up to 100% because data for Modesto is included in the total but not called out in the table.

Note: HMDA reports data at the census tract level, making it difficult to distinguish loan action for tracts that share multiple jurisdictional boundaries. However, the data provided in the table describes general areas of Stanislaus County.

White

For persons in the White racial category, the origination rate was slightly higher than the overall population and higher than all other subgroups, with denials lower than the aggregate and other subgroups. It is more likely that a loan was originated for an applicant reporting race as White. Hispanic or Latino persons are included in the White racial category.

As shown in **Table 40**, the Unincorporated County had the largest share of loan applications resulting in denial, followed by the City of Turlock and Ceres. There were forty-nine denials in the City of Turlock, consisting of 11 percent of denials in Stanislaus County.

Figure 9
2013 Lending Actions for White

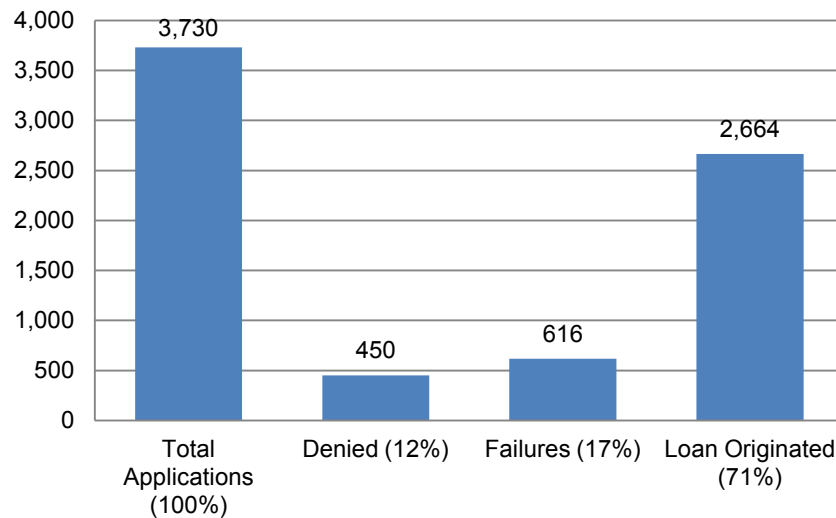


Table 40
2013 Lending Actions for White by Area, Stanislaus County

Jurisdiction	Total Applications	Denials		Failures		Originations	
		Number	Percentage	Number	Percentage	Number	Percentage
Stanislaus Urban County							
Ceres	329	43	10%	64	10%	222	8%
Hughson	103	6	1%	16	3%	81	3%
Newman	81	17	4%	11	2%	53	2%
Oakdale	255	30	7%	36	6%	189	7%
Patterson	173	26	6%	31	5%	116	4%
Waterford	101	14	3%	19	3%	68	3%
Unincorporated County	744	102	23%	111	18%	531	20%
Entitlement Jurisdictions							
Turlock	486	49	11%	74	12%	363	14%
Stanislaus County Total	3,730	450	100%	616	100%	2,664	100%

Source: Home Mortgage Disclosure Act, 2013 LAR and TS Raw Data

Note: Percentages do not add up to 100% because data for Modesto is included in the total but not called out in the table.

Note: HMDA reports data at the census tract level, making it difficult to distinguish loan action for tracts that share multiple jurisdictional boundaries. However, the data provided in the table describes general areas of Stanislaus County.

Hispanic

When the data is grouped by applicants that responded as Hispanic, Not Hispanic, and No information provided for Hispanic ethnicity, denial, failure, and origination rates varied from the aggregate. Applicants who reported Hispanic showed a slightly greater share of denials and failures and a slightly lower share of approvals when compared to the aggregate.

As shown in **Table 41**, the Unincorporated County had the largest share of denied loan applications, followed by Ceres and Patterson. There were nineteen denials in the City of Turlock, consisting of 9 percent of denials in Stanislaus County.

Figure 10
2013 Loan Actions for Hispanic

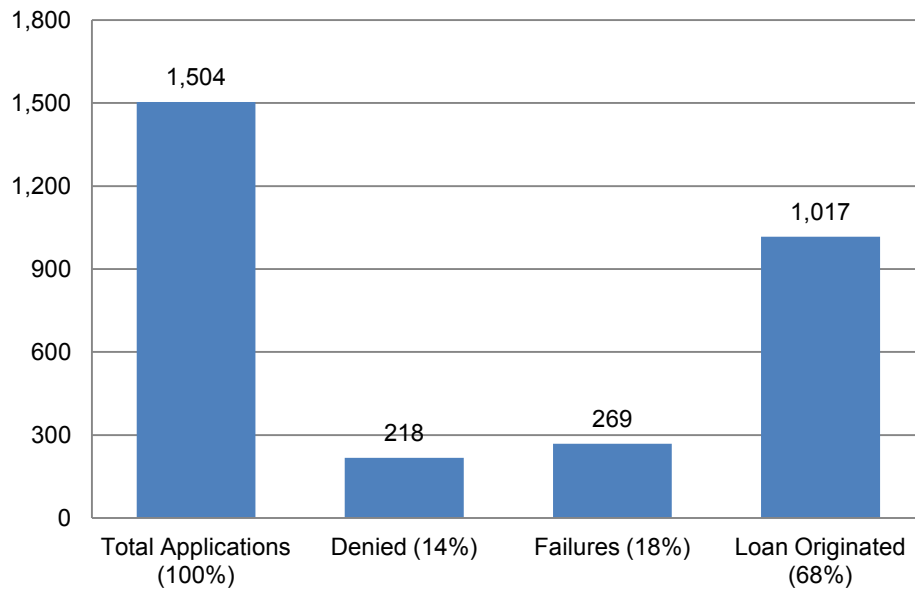


Figure 11
2013 Loan Actions for Non-Hispanic

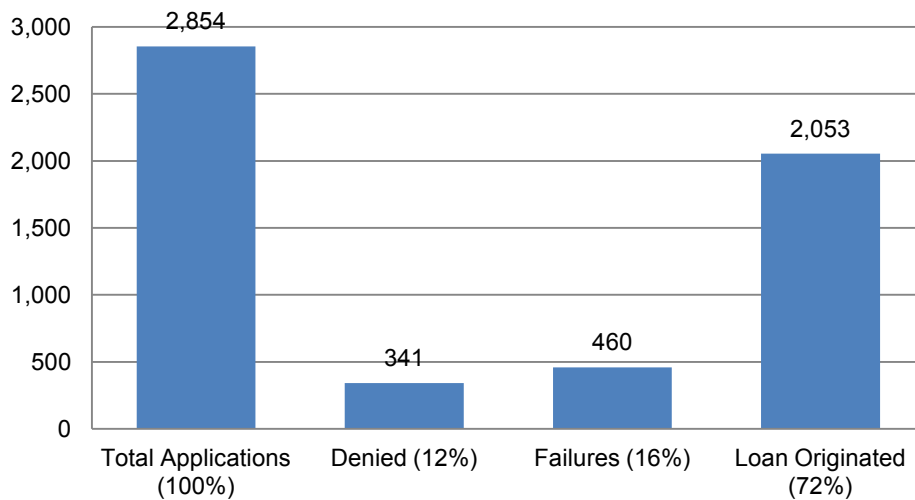


Figure 12
2013 Loan Actions for Ethnicity No Information Provided

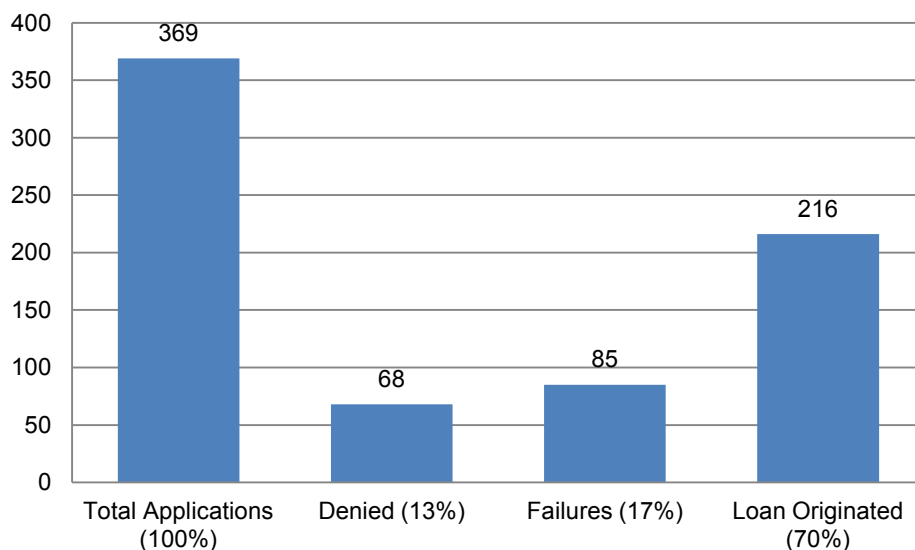


Table 41
2013 Lending Actions for Hispanic by Area, Stanislaus County

Jurisdiction	Total Applications	Denials		Failures		Originations	
		Number	Percentage	Number	Percentage	Number	Percentage
Stanislaus Urban County							
Ceres	233	32	15%	47	17%	154	15%
Hughson	33	3	1%	6	2%	24	2%
Newman	55	13	6%	8	3%	34	3%
Oakdale	48	5	2%	8	3%	35	3%
Patterson	121	21	10%	18	7%	82	8%
Waterford	41	6	3%	10	4%	25	2%
Unincorporated County	254	38	18%	37	14%	179	17%
Entitlement Jurisdictions							
Turlock	159	19	9%	23	9%	117	12%
Stanislaus County Total	1,502	217	100%	269	100%	1,016	100%

Source: Home Mortgage Disclosure Act, 2013 LAR and TS Raw Data

Note: Percentages do not add up to 100% because data for Modesto is included in the total but not called out in the table.

Note: HMDA reports data at the census tract level, making it difficult to distinguish loan action for tracts that share multiple jurisdictional boundaries. However, the data provided in the table describes general areas of Stanislaus County.

Mortgage Lending by Area

The same data set used to analyze mortgage lending by race and ethnicity was used to analyze mortgage lending by area. The HMDA data reports loans by the census tract of the home being purchased. The goal of this analysis is to detect whether there are geographic patterns of mortgage credit availability, and specifically whether there are any correlations between availability of home loans with geographic race, ethnicity, or income characteristics.

Loan applications were analyzed by census tract and mapped. All areas in Stanislaus County were mapped by quartile and show the volume and rate of each lending action: origination, denial, and failure. Lending action maps are located in **Appendix 4**.

HMDA data is organized into the 89 countywide census tracts (2000 census tract boundaries). Seventy percent of loan applications across all census tracts in Stanislaus County resulted in origination, 17 percent resulted in failure, and 13 percent resulted in denial. The lending action data indicates that origination is more likely than failure for Stanislaus County as a whole; however at the census tract level, some areas in Stanislaus County have much smaller shares of loan origination.

As shown in the origination rate map, found in **Appendix 4** (mapped rates of origination by countywide quartiles), the areas that fall within the highest quartile (74.9 percent to 86.7 loan origination rates) are located in and around the cities of Turlock, Hughson, Modesto, and Oakdale.

Areas that fall within the mid-range quartiles for rates of origination (62.6 percent to 74.8 percent) consist of a majority of Stanislaus County and include unincorporated areas in the southwestern and eastern portions of Stanislaus County, including Patterson and Newman.

The lowest quartile for rates of origination is made up of census tracts with 62.5 percent or less of actions resulting in loan origination. The areas making up the lowest quartile rate of origination include portions in the center of Stanislaus County in and around Modesto and Ceres and south of the City of Turlock.

Of those census tracts that fall within the lower quartile, three have a share of less than 50 percent origination, meaning it is more likely for loan applications to result in failure than origination. **Table 42** displays census tracts with less than 50 percent loan origination. The census tracts shown in **Table 42** with significantly low rates of origination are 16.04 (42 percent), 22 (41 percent), and 26.02 (47 percent).

Two of these census tracts have so few application records that the resulting rates are meaningless (16.04 and 22). The remaining census tract (26.02) is located in Ceres. It is important to put this census tract with a low origination rate into context with the characteristics of the census tract. These characteristics include minority concentration, Hispanic concentration, and low/moderate-income concentration.

Minority Concentration

Census tract 26.02 has a concentration of minorities that is similar to that of Stanislaus County as a whole. This census tract has a minority population share that is in the range of 8.55 to 13.28 percent (see **Map 11** in **Appendix 5**).

Hispanic Concentration

Census tract 26.02 has a highly concentrated population of Hispanic individuals. The concentration of Hispanic persons in the census tract is 52 percent (see **Map 12** in **Appendix 5**).

Low/Moderate-Income Concentration

As described in the Con Plan, areas with a low/moderate-income population greater than 51 percent of total households are considered to be target areas. Census tract 26.02 is located in a low/moderate-income area with a low/moderate-income population share that ranges between 51 and 75 percent (see **Map 13** in **Appendix 5**).

Table 42
2013 Lending Actions for Census Tracts with
Less than 50 Percent Origination Rate, Stanislaus County

Census Tract	Location	Total Applications	Denials	Failures	Originations
16.04	Modesto	19	26%	32%	42%
22	Modesto	22	27%	32%	41%
26.02	Ceres	38	18%	34%	47%

Source: Home Mortgage Disclosure Act, 2013 LAR and TS Raw Data

Geographic Distribution of High Priced Loans

Under Regulation C of the Home Mortgage Disclosure Act, lenders are required to report the difference between the annual percentage rate (APR) of originated loans and the average prime offer rate. The prime rate is the rate that prime borrowers can expect to receive. Subprime borrowers receive higher APRs than prime borrowers, meaning that subprime borrowers pay more for mortgage financing.

The HMDA data set reports the rate spread for all originated loans. The rate spread represents the difference between the APR and the prime rate at the time of loan purchase. Essentially, the rate spread reports the rate that borrowers pay in excess of the prime rate. For first-lien loans, lenders are required to report the rate in excess of 1.5 percent of the prime rate. For subordinate-lien loans, lenders are required to report the rate in excess of 3.5 percent. For example, if a borrower secures a first-lien mortgage with an 8 percent APR when the prime rate is 5 percent, the rate spread reported in the HMDA data set is 1.5 percent $[8 - (1.5 \times 5) = 1.5]$. Loans with a reported rate spread are considered high cost or subprime loans.

Table 43 reports the share of high priced loans originated for owner-occupied home purchases in all jurisdictions in the Stanislaus Urban County and the City of Turlock. Because HMDA data is reported by census tract, there may be some overlap of reporting between jurisdictions; however, no duplicated loan records are reported. As shown, 14.4 percent of originated loans in Stanislaus County are high priced loans. Of the cities, Newman (29.5 percent) and Ceres (19.6 percent) have the largest share of high cost loans and Hughson (7.8 percent) the lowest. The City of Turlock had forty-five high priced loans, consisting of 10 percent of the high priced loans in Stanislaus County.

Table 43
2013 High Priced Loans for Consortium Jurisdictions,
Stanislaus County

Jurisdiction	Total Loan Originations	First-Lien High Cost Loans	Subordinate-Lien High Cost Loans	Total High Cost Loans	Percentage High Cost Loans
Stanislaus Urban County					
Ceres	286	56	0	56	19.6%
Hughson	90	7	0	7	7.8%
Newman	61	14	4	18	29.5%
Oakdale	215	17	2	19	8.8%
Patterson	175	22	0	22	12.6%
Waterford	80	13	0	13	16.3%
Unincorporated County	449	52	2	54	25.3%
Entitlement Jurisdictions					
Turlock	451	45	0	45	10.0%
Stanislaus County Total	3,285	461	12	473	14.4%

Source: Home Mortgage Disclosure Act, 2013 LAR and TS Raw Data

Note: Percentages do not add up to 100% because data for Modesto is included in the total but not called out in the table.

Note: HMDA reports data at the census tract level, making it difficult to distinguish loan action for tracts that share multiple jurisdictional boundaries. However, the data provided in the table describes general areas of Stanislaus County.

Summary of Findings

It is difficult to determine to what extent an applicant's race, ethnicity, or income characteristics influence whether a loan application is originated, denied, or fails. A complete picture is not available of the reasons why a loan application is denied or fails and whether an applicant's race, ethnicity, or income had any influence on the denial or failure of an application. However, a general description can be provided of whether any correlations exist between race, ethnicity, and income characteristics with the ultimate origination, denial, or failure of an application.

In general, it is more likely that loan application requests result in origination, meaning that a greater share of loan applications originate than fail. Loan applications for each race do not vary greatly from the aggregate results of lending actions in Stanislaus County. However, denial and failure rates of applications for racial and ethnic minorities tend to be slightly higher than the aggregate.

Applicants reporting their racial category as Asian experience lower rates of origination than all other subgroups. Sixty-three percent of all loan applications for Asian persons originated. Of the 37 percent of applications that failed to originate, 17 percent were a result of denial and 20 percent were a result of failure to be accepted, being withdrawn, or closed for incompleteness.

The higher than expected rate of denied loan applications for Asian persons signifies an opportunity to direct policies toward making homeownership opportunities more available, through pre-purchase counseling, financial literacy, nontraditional credit building, credit counseling, and alternative credit rating.

Areas of low origination rates tend to be in the central portion of Stanislaus County, particularly in and around Modesto and Ceres and south of the City of Turlock. These areas also have high concentrations of Hispanic persons and low- and moderate-income households.

Claims and Enforcement

Fair Housing Complaints and Enforcement

Patterns of complaints and enforcement are useful to assess the nature and level of potentially unfair or discriminatory housing practices in the private sector. When enforcement practices are consistent and well known, housing industry professionals are incentivized to be aware of and practice fair housing laws. The fair housing associations, similarly, encourage its members to stay better informed and well trained on fair housing laws. Fair housing trainings provided by associations may also increase as a result of professionals wanting to stay better informed. Furthermore, enforcement directly benefits the unfairly treated person and provides them a remedy. Beyond the individual and their family benefiting, multiple residents may benefit from an individual's fair housing claim because the claimant property owner/manager is better informed of fair housing laws and, after the claim is brought, they may conduct better practices.

Several public and private agencies may receive complaints about unfair housing practices or housing discrimination. At the Federal level, the Office of Fair Housing and Equal Opportunity (FHEO) of the U.S. Department of Housing and Urban Development (HUD) receives complaints of housing discrimination. FHEO will attempt to resolve matters informally. FHEO may act on those complaints if they represent a violation of Federal law and FHEO finds that there is "reasonable cause" to pursue administrative action in Federal court.

HUD has two programs that provide funds to State and local agencies to conduct fair housing activities, called the Fair Housing Assistance Program (FHAP) and the Fair Housing Initiatives Program (FHIP). California Rural Legal Assistance and Fair Housing Council of Central California are the only two FHIP grant recipients that serve Stanislaus Urban County.

At the State level, the California Department of Fair Employment and Housing (DFEH) has a similar role to FHEO. DFEH also receives, investigates, attempts to settle, and can take administrative action to prosecute violations of the law. HUD and DFEH have some overlap in jurisdiction, and depending on the nature of the case, may refer cases to one another. DFEH is a HUD FHAP grantee for California, meaning that it receives funding from HUD to enforce Federal fair housing laws in California. While multiple State or local government agencies can be FHAP grantees, DFEH is the only FHAP grantee in California.

At the local level, Stanislaus Urban County and City of Turlock provide fair housing services through Community Development Block Grant (CDBG) funds. These services are contracted out to Project Sentinel, a local nonprofit. Project Sentinel's fair housing activities are also supported by HUD FHIP grant funds.

The DFEH and local agencies enforce both Federal and State fair housing laws, whereas the FHEO only enforces Federal fair housing laws. The Federal Fair Housing Act makes it illegal to discriminate against people in the sale or rental of housing based on race/ethnicity, color, religion, familial status, disability, national origin, and gender. For California agencies, the Fair Employment and Housing Act (FEHA) and the Unruh Civil Rights Act also make it illegal to discriminate based on ancestry, marital status, sexual orientation, source of income, or any other arbitrary forms of discrimination.

Private nonprofit fair housing organizations also process complaints and provide valuable outreach and education to potential renters/buyers and housing industry professionals in the area. In addition to Project Sentinel, local groups include California Rural Legal Assistance, Community Housing and Shelter Services, Habitat for Humanity-Stanislaus, and Fair Housing Council of Central California. Additionally, national advocacy organizations like the National Fair Housing Alliance promote fair housing policies and practices on the national, state, and local levels.

The U.S. Department of Justice has authority to bring fair housing–related claims as well, although its jurisdiction is limited compared to HUD and DFEH.

HUD estimates that the number of reported complaints represents less than 1 percent of the four million instances of housing discrimination that occur each year. Claims are underreported for several reasons: (1) the buyer/renter is unaware of the unfair practices; (2) the person does not know where to go for assistance; (3) the person believes nothing will be done about the problem; or (4) the person fears negative consequences such as eviction from a current or future place.

U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity

The San Francisco HUD office provided information on fair housing complaints and cases in Stanislaus County for the period January 1, 2012, through December 31, 2014. Over this three-year period, HUD reported 25 fair housing complaints originating in Stanislaus County. Nine of those originated in the Stanislaus Urban County and two were from the City of Turlock. This is an increase in the total number of claims as compared to seven total claims brought during a previous five-year period (2005–2010). Reasons for this increase are unknown, such as whether unfair practices have increased or whether potential renters/buyers experience the same but know where to seek assistance. Other possible factors include HUD’s recent increased efforts to enforce fair housing laws, including increased funds to state agencies and nonprofits for processing claims.¹⁵ Additionally, in response to the foreclosure crisis, Federal funding has increased for housing counseling services, which teach fair housing laws as part of homebuyer and rental education classes. As a result, more homebuyer and renters are aware of fair housing laws.

Each fair housing claim can be based on one or more violations against a protected class under Federal and State laws. Federal and State law differs on the types of protected classes. HUD will process claims based exclusively on Federal protected classes. For State specific categories or claims that involve both Federal and State, HUD refers those cases to DFEH. Eight of the eleven cases were transferred to or jointly filed with DFEH.

In both Stanislaus Urban County and City of Turlock, the most common basis for a claim was disability (physical or mental), reported at 90 and 100 percent, respectively. This is when an individual or a family is given different treatment in their housing selection or housing condition, such as being told no units are available to them when units are available, or a requested reasonable accommodation/repair is refused even when the tenant offers to pay. This high rate of disability bias is consistent with national and California State trends which find disability reported as the basis in about half the claims. The next highest categories in both Stanislaus Urban County and City of Turlock are retaliation and national origin. Under the Fair Housing Act, property owners or management companies cannot take negative action against a tenant for having asserted their fair housing rights. Due to the small number of claims (three in total) in Stanislaus Urban County and City of Turlock over the last three years, it may be helpful to consider the data from the entire Stanislaus County. Following, in order, Stanislaus County-wide data reveals the following order of bases, after disability: race, familial status, national origin, and sex. Except for retaliation, which is not measured as a separate basis in national data, this is parallel with national trends.

A breakdown of complaint basis for Stanislaus Urban County and City of Turlock can be found in **Tables 45 and 45.1** below. Note that the total number of complaint bases is more than the number of cases filed because each case filed can claim up to four bases.

¹⁵ National Fair Housing Alliance, *Fair Housing Trends Report (2012)*.

Two of the cases were settled or conciliated, while the other one closed due to “no cause.” Settled cases means the two parties came to an agreement, whereas cases that resulted in conciliation involve HUD as a third-party to the agreement. In conciliation, HUD is responsible for enforcing the agreement and may put additional requirements on the parties, such as requiring the landlord to complete fair housing training, and is responsible for enforcing the agreement. When a case is closed due to “no cause” this means that HUD initially found the claim to exhibit a violation of the law, but that after a thorough investigation, sufficient evidence was not found. While discrimination may have occurred, the evidence is inadequate for proving a violation.

California Department of Fair Housing and Employment (DFEH)

The California Department of Fair Employment and Housing provides records of housing complaints filed in the Stanislaus Urban County and City of Turlock. DFEH processed eighteen claims from the Stanislaus Urban County area, and eight claims from the City of Turlock from January 1, 2012, through December 31, 2014.

A claim can be filed either by phone or mail with the DFEH. Complaint forms are available online and can be submitted in English or Spanish. After a formal interview, DFEH may choose to investigate the claim, in which case the entity/individual accused is notified and given the opportunity to resolve the case informally and can do so at any time during the process. The parties are also given the opportunity, free of charge, to participate in dispute resolution or mediation. Once the investigation is complete, the case may be closed due to no violation of law, or if the case has merit, free, mandatory dispute resolution begins. If parties fail to achieve a resolution, DFEH will file the case in civil court.

The Stanislaus Urban County and City of Turlock statistics are dissimilar to statewide trends. The highest reported basis for fair housing claims was disability. In 2013, DFEH reported that most common bases statewide are, in order: disability, race/color, retaliation, and familial status. A slightly different order was reported in 2012: disability, national origin/ancestry, familial status, and race/color. In all of these years, the disability category stands well above the others, approximately one-third or one-fourth of the total. HUD and advocacy organizations have taken measures to address the need for disabled persons to access adequate housing, as discussed further in the section discussing Nonprofit Fair Housing Organizations below.

The second most common reported basis for Stanislaus Urban County was familial status. This is slightly higher than state trends. The second most common report basis for City of Turlock was a three-way tie: race, national origin, and religion. While national origin and race categories follow statewide trends, claims based on religious discrimination are less common compared to statewide statistics.

Stanislaus County and City of Turlock

Stanislaus County, on behalf of the Stanislaus Urban County’s Community Development Block Grant (CDBG), contracted with Project Sentinel, a HUD-certified fair housing agency, to carry out its Fair Housing Program. Using its own CDBG funds, The City of Turlock also contracted with Project Sentinel to provide identical fair housing services.¹⁶ Funds are used to provide services that enable and empower community members to have open and informed housing opportunities and to overcome housing discrimination. The primary objective is to enforce fair housing laws via investigation into claims of housing discrimination, as well as to raise the level of awareness of fair housing rights and responsibilities among potential renter or buyers, owners, managers, and the general public. Additional activities include providing fair housing information, housing counseling, and tenant/landlord mediation services. Project Sentinel provides housing advocacy to the residents through community forums, town hall meetings, and housing fairs.

¹⁶ The County and City of Turlock issued joint- requests for proposal for fair housing services.

Nonprofit Fair Housing Organizations

Housing advocates report that the majority of fair housing cases filed with HUD or their state FHAPs originate with private fair housing organizations. This is true in the Stanislaus Urban County and City of Turlock where the number of claims both received and processed by local nonprofits is significantly higher than the number received or processed with HUD or the California DFEH. To illustrate, in the Stanislaus Urban County and City of Turlock, Project Sentinel and California Rural Legal Assistance (CRLA) are nonprofits that processed over 130 fair housing claims over the last three years. This stands high above HUD and DFEH which only processed twenty-one claims for Stanislaus Urban County and City of Turlock. It is important to point out that CRLA and Project Sentinel engage in more fair housing activities than HUD or DFEH. HUD and DFEH process claims, whereas, these organizations not only file fair housing claims, but provide counsel or advice or will help the parties negotiate a settlement without litigation. Thus, their reported numbers of cases reflect this larger universe of activities. Habitat for Humanity-Stanislaus does not process claims; when it receives complaints, it refers them to one of the various agencies: HUD, California DFEH, CRLA, or Project Sentinel. Habitat for Humanity- Stanislaus referred approximately 150 fair housing inquiries to Project Sentinel for fair housing disputes from July 2013 to June 2014.

Additionally, most claims that originate with CRLA and Project Sentinel and proceed to litigation will be filed with HUD or DFEH for processing. CRLA/Project Sentinel may continue to support the claimant. Data is not available for separating out duplicative cases that might be part of both Project Sentinel/CRLA numbers and HUD/DFEH numbers. Therefore, there may be some overlap in the total number of claims reported in the data.

Since 2004, the Federal government's annual budget increased from \$20.25 million to \$40.1 million in 2014 for the Fair Housing Initiatives Program (FHIP), which is HUD's main source of fair housing-related funds. Project Sentinel, California Rural Legal Assistance and Fair Housing Council of Central California are all FHIP sub-grantees. Project Sentinel uses FHIP funding, as well as other sources, to supplement its fair housing services in Stanislaus County and City of Turlock. These three FHIP grantees will need to reapply for funds every one to three years, depending on the terms of their original grant. HUD funding for fair housing is determined on a yearly basis by Congress. Given these conditions, continued funding for these fair housing programs in Stanislaus is uncertain.

Project Sentinel – Stanislaus Urban County

From July 1, 2011, through June 2014, Project Sentinel processed 66 fair housing cases in Stanislaus Urban County¹⁷. It is important to note that outcomes for Project Sentinel will be different from HUD and DFEH because HUD and DFEH solely process claims whereas Project Sentinel may refer the claim to HUD or counsel the client without a claim being filed. Additionally, HUD only processes claims based on Federal-protected classes, whereas DFEH and nonprofits will advocate and process claims based on State-protected classes.

In Stanislaus Urban County, Project Sentinel processed 26 fair housing cases and 38 tenant/landlord cases in Fiscal Year 2011–2012.¹⁸ Of the 26 cases that were opened, 17 were disability related, 2 were race related, 1 was related to family status, 1 was related to gender, and 5 were related to source of income. Additionally, 45 tenant-landlord cases were successfully counseled and educated in fair housing and/or reached conciliatory agreements. In these disputes, Project Sentinel provides the tenant and the landlord with fair housing information.

¹⁷ Unless noted, all Project Sentinel data contained in this report cover Stanislaus Urban County geography.

¹⁸ Fiscal Year means the County's Fiscal Year, which is defined as July 1 through June 30 of the corresponding year. If the Fiscal Year is not mentioned before a specific year (i.e., 2013), then usually the period from January 1 through December 31 applies.

In Fiscal Year 2012–2013, Project Sentinel processed 25 fair housing cases. Of the 25 cases that were opened, 20 were disability related, 4 were income source related, and 1 was related to family status. Fifty-five tenant-landlord cases were successfully counseled and educated in fair housing and/or reached conciliatory agreements.

Throughout Fiscal Year 2013–2014, Project Sentinel processed 15 fair housing cases and 15 tenant/landlord cases. Services provided for these cases included testing, canvassing, statistical analysis, witness interviews, and counseling. Of the 15 cases that were opened, 9 were disability related, 2 were race related, 2 were related to familial status, 1 was related to gender, and 1 was related to intimidation and harassment. Six of the 15 tenant/landlord cases were successfully counseled and educated in fair housing and/or reached conciliatory agreements.

Project Sentinel – City of Turlock

From July 1, 2001 through June 2014, Project Sentinel processed 23 fair housing cases in the City of Turlock. The type of bases, in order, include: disability (12), race (4), familial status (2), source of income (2), and age (1), sexual orientation (1) and other arbitrary reasons (1).

California Rural Legal Assistance

CRLA processed 35 fair housing cases during 2012 and 2013, and an additional 35 cases in 2014, totaling 70 fair housing claims. CRLA did not have specific data available for discrimination basis or type of resolution for each claim. CRLA data covers all of Stanislaus County and was not available by City.

**Table 44
Fair Housing Cases per Agency*, Approximately 2012 to 2014****

Complaints per Agency	Number	Percentage
HUD	2	1%
DFEH	18	12%
Project Sentinel	66	42%
CRLA	70	45%
Total	156	100%

**HUD, DFEH, and Project Sentinel data includes Stanislaus Urban County geography, which includes cities of Ceres, Hughson, Newman, Oakdale, Patterson, and Waterford and the unincorporated area of the County. CRLA data was not available by city and covers the entire Stanislaus County.*

*** HUD, DFEH, and CRLA data is from January 1, 2012, to December 31, 2014; whereas Project Sentinel data is from Fiscal Year July 1, 2011, to July 30, 2014.*

**Table 44.1
Fair Housing Cases per Agency in City of Turlock, Approximately 2012 to 2014***

Complaints per Agency	Number	Percentage
HUD	1	3%
DFEH	8	25%
Project Sentinel	23	72%
CRLA	unavailable	n/a
Total	32	100%

** HUD, DFEH and CRLA data is from January 1, 2012, to December 31, 2014; whereas Project Sentinel data is from Fiscal Year July 1, 2011, to July 30, 2014.*

**Table 45
Fair Housing Cases by Basis,* Approximately 2012 to 2014****

Basis of Complaint	Number***	Percentage
Disability	58	66%
Race	4	5%
Familial Status	7	8%
National Origin	3	3%
Sex	3	3%
Other (religion, color)	0	0%
CA-Specific (2 retaliation, 9 source of income, 2 pregnancy)	13	15%
Total	88	100%

**Includes HUD, DFEH and Project Sentinel cases. CRLA cases were not included because they did not provide cases broken down by basis.*

*** HUD, DFEH, and CRLA data is from January 1, 2012, to December 31, 2014; whereas Project Sentinel data is from Fiscal Year July 1, 2011, to July 30, 2014.*

****HUD, DFEH, and Project Sentinel data includes Stanislaus Urban County geography only.*

**Table 45.1
Fair Housing Cases by Basis in City of Turlock*, Approximately 2012 to 2014****

Basis of Complaint	Number	Percentage
Disability	14	42%
Race	4	12%
Familial Status	2	6%
National Origin	4	12%
Sex	0	0%
Religion	4	12%
CA-Specific - Age	1	3%
CA-Specific - Source of income	2	6%
CA-Specific – Sexual orientation	1	3%
CA-Specific – Arbitrary reason	1	3%
Total	33	99%***

**Data includes HUD, DFEH, and Project Sentinel cases. CRLA cases were not included because they did not provide cases broken down by basis nor by city.*

***HUD and DFEH data is from January 1, 2012, to December 31, 2014; whereas Project Sentinel data is from Fiscal Year July 1, 2011, to July 30, 2014.*

****Total is due to rounding errors.*

Table 46
Fair Housing Complaints by Resolution in Stanislaus Urban County*
for HUD and DFEH, 2012 to 2014**

Outcome	Number	Percentage
Conciliated/Settled	5	24%
No Cause	6	29%
Withdrawn	1	5%
Transferred	1	5%
Open	5	24%
Other	3	14%
Total	21	99%***

*HUD and DFEH data includes Stanislaus Urban County geography only.

**HUD and DFEH data is from January 1, 2012, to December 31, 2014

***Total is due to rounding errors.

Table 46.1
Fair Housing Complaints by Resolution in Stanislaus Urban County*
for Project Sentinel, 2012 to 2014**

Outcome	Number	Percentage
Conciliated	6	9%
Counseled	40	61%
HUD referral	13	20%
DFEH referral	1	2%
Decline to pursue	2	3%
Other	4	6%
Total	66	101%***

* Project Sentinel data includes Stanislaus Urban County geography only.

** Project Sentinel data is from Fiscal Year July 1, 2011, to July 30, 2014.

***Total is due to rounding errors.

Table 46.2
Fair Housing Complaints by Resolution in City of Turlock*, 2012 to 2014**

Outcome	Number	Percentage
Conciliated/Settled	9	28%
No cause	1	3%
Counseled	14	44%
HUD referral	3	9%
Withdrawn	4	13%
Other	1	3%
Total	32	100%

*Data includes HUD, DFEH, and Project Sentinel cases. CRLA cases were not included because they did not provide cases broken down by resolution nor by city.

**HUD, DFEH data is from January 1, 2012, to December 31, 2014; whereas Project Sentinel data is from Fiscal Year July 1, 2011, to July 30, 2014.

Department of Justice

The U.S. Department of Justice also brings fair housing discrimination claims. Its jurisdiction includes cases involving a pattern or practice of housing discrimination. In 2013, the Department of Justice responded to more than 1,200 complaints and because most complaints were outside the Departments' jurisdiction, they opened 153 new cases for investigation. Forty-three cases were filed for patterns or practice of discrimination, which is higher than the 36 cases filed in 2012 and 41 in 2011. Of those 43 cases, five involved fair lending for home loans and 11 involved rental discrimination on the basis of race, disability, sex, familial status, national origin, or religions. In 2012,

Advocacy Organizations

Advocacy organizations like the National Fair Housing Alliance (NFHA) have been influential in decreasing fair housing law violations. Their influence can even be felt on a local level. For example, as a result of NFHA investigations, HUD and NFHA partnered to bring suit against bank-owned properties or REO (real estate owned) properties. They successfully reached a settlement with Wells Fargo. As part of the settlement, Wells Fargo will invest \$39 million in 45 communities to support homeownership, neighborhood stabilization, property rehabilitation, and housing development. Several of those cities are located in California's hardest hit foreclosure cities, including Modesto. Wells Fargo also committed to improving its maintenance and marketing practice with REO properties by extending the time that an REO is exclusively available to purchase by owner-occupants or nonprofit organizations. NFHA and HUD have filed suits with several other banks with REO properties. Future settlements could also impact Stanislaus County.

Outreach and Education

Nonprofit fair housing organizations provide a multitude of fair housing–related services in the Stanislaus Urban County. Project Sentinel, Habitat for Humanity-Stanislaus, California Rural Legal Assistance, and Community Housing and Shelter Services are local agencies that are active in educating the public and industry professionals on fair housing laws. Project Sentinel and California Rural Legal Assistance process fair housing claims, while Habitat for Humanity-Stanislaus and Community Housing refer fair housing claims to other entities.

Project Sentinel

Project Sentinel provided information and referral services to 1,104 individuals and participated in 82 fair housing events from July 1, 2011, through June 30, 2014.

During Fiscal Year 2011–2012, Project Sentinel provided 22 fair housing presentations to client groups or other agencies. These fair housing events encompass meetings and presentations where educational materials, fair housing literature, agency flyers, or business cards were distributed to the attendees or left at sites for public display.

Additionally, in Fiscal Year 2012–2013, Project Sentinel attended and participated in 36 events. Outreach activities were conducted at the Laos Central Baptist Church, Bridge Community Center, Black History Month Celebration, Stanislaus Board of Education, senior apartment complexes, Patterson School District, local property management companies, NAACP, Valley Regional Medical Center, Turlock City Hall, Turlock Main Library, Stanislaus County Public Works, Housing Authority of the County of Stanislaus (Housing Authority), Stanislaus Pride Center, and United Way of Stanislaus.

In Fiscal Year 2013–2014, Project Sentinel conducted 24 outreach activities, including outreach to the Stanislaus County District Attorney's Office, a local LGBT support group, League of United Latin American Citizens, Employment Development Department, Focus Health, Black History Month Celebration, Mo Pride Gay Pride celebration, Women's Haven, Turlock Housing Program Services, Turlock Housing Collaborative, Stanislaus County Family Justice Center, Area Agency on Aging,

Stanislaus County Superior Court Law Library, Turlock Chamber of Commerce, Stanislaus Catholic Charities, Stanislaus County Self-Help Center, Stanislaus County Social Services, and Community Impact Central Valley.

The fair housing hotline received a total of 446 tenant-landlord and fair housing calls during the period from July 1, 2011, through June 30, 2014. Tester training and recruitment was conducted throughout those years as needed. Tester training can be a valuable outreach tool to encourage education on better fair housing practices to the private sector. It is also one method of enforcement that is useful for uncovering discrimination that is difficult for potential renters and buyers to detect themselves. Testers go into the field, modeling a certain protected class, and determine whether a real estate professional, landlord, or property management company treats them unfairly.

Project Sentinel's fair housing programs served a total 1,104 individuals from July 1, 2011, to June 30, 2014. Fiscal Year 2011–2012 has been separated to show the large reduction in services in recent years.

Table 47
Project Sentinel's fair housing program, number of individuals served

City	Fiscal Years 2012 through 2014	Fiscal Year 2011–2012
Ceres	148	108
Newman	48	36
Oakdale	60	109
Patterson	127	89
Waterford	20	11
Other unincorporated areas	183	165
Turlock	299	250
Subtotal	586	518
County Total	1,104	

Project Sentinel strives to provide education and outreach because many residents and smaller mom and pop owners are unaware of their rights and responsibilities under fair housing laws.

In addition to the above services, Project Sentinel's housing and mortgage counseling services include reviewing files for potential fair housing issues. Moreover, Project Sentinel's housing counseling training sessions including first-time homebuyer classes, which include a component in fair housing laws.

California Rural Legal Assistance

CRLA began providing biweekly workshops on landlord-tenant disputes in Stanislaus County in July of 2014. To date, approximately, 240 residents have participated in this event and received information on fair housing laws.

Habitat for Humanity

Habitat for Humanity-Stanislaus provides monthly homebuyer education classes in Modesto. The course includes a component on fair housing. The organization refers fair housing claims to Project Sentinel.

Community Housing and Shelter Services

Community Housing and Shelter Services (CHSS) has several programs in which participants receive referral information on what agencies to contact if they have a fair housing issues. The number of people given this referral information is not tracked across all programs; however, CHSS was able to provide that data on two of their programs. For its Emergency Food and Shelter Program, CHSS provided 497 participants over a one year (10/2013-9/2014) period with this fair housing resource. Secondly, thirty-four participants received this resource under their fair housing counseling program. This is over the course of a typical month (3/2014) in their program. CHSS refers all fair housing questions and claims to Project Sentinel or California Rural Legal Assistance. This organization receives multiple calls and some relate to fair housing issues. They typically refer these persons to Project Sentinel; however, the number of these referrals is not tracked.

Fair Housing Council of Central California

Fair Housing Council of Central California is a FHIP grant recipient from HUD. They provide advocacy and outreach on fair housing issues. Their website provides tenants and homebuyers examples of what might be discrimination. They also produce a monthly radio program called Fair Housing – It's the Law! On KFCF 88.1 Free Speech Radio. The program hosts fair housing experts from the Central Valley.

Summary of Complaints and Enforcement Activity

Multiple entities are involved with providing assistance to citizens who face housing discrimination. While HUD and DFEH mainly process claims, nonprofits offer a variety of services to assist citizens and the private sector; including: advocating for those who experience unfair treatment; conducting outreach to both citizens and landlords; and providing valuable information and resources to citizens and landlords about their rights and responsibilities. Discrimination that occurs in home ownership activities such as mortgage lending is more difficult to detect and therefore enforce. Nonprofits that operate discrimination tests are helpful in identifying when it occurs. Additionally, when acting collaboratively with HUD, the nonprofit can help bring about claims that help improve the practices of the private sector. Additionally, outreach and education could be used to prevent discrimination in homeownership activities. Disability related discrimination remains the most common type of basis in Stanislaus Urban County and City of Turlock. By using the various entities, these communities can help reduce disability discrimination through both enforcement and outreach and education.

Government Barriers to Fair Housing

Housing Element Law and Compliance

The California Legislature has adopted requirements for the contents of housing elements. Among these legislative requirements is the following mandate: “The housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, mobile homes, and emergency shelters, and shall make adequate provision for the existing and projected needs of all economic segments of the community.”

Specifically, the element must contain:

- ◆ An assessment of housing needs and an inventory of resources and constraints relevant to the meeting of these needs, including:
 - ◆ Analysis of population and employment trends.
 - ◆ Analysis and documentation of household/housing characteristics.
 - ◆ Inventory of land suitable for residential development.
 - ◆ Identification of a zone or zones where emergency shelters are allowed.
 - ◆ Analysis of potential and actual government constraints.
 - ◆ Analysis of potential and actual non-governmental constraints.
 - ◆ Analysis of special housing needs (including persons with disabilities, including a developmental disability).
 - ◆ Analysis of opportunities for energy conservation.
 - ◆ Analysis of existing housing developments that are eligible to change from low-income housing during the next 10 years.
- ◆ A statement of the community’s goals, quantified objectives, and policies relative to the maintenance, improvement, and development of housing. The total housing needs identified may exceed the available resources and the community’s ability to satisfy those needs.
- ◆ A program that sets forth a schedule of actions the local government is undertaking or intends to undertake during the planning period, including:
 - ◆ Identifying adequate sites that will be made available with appropriate zoning and development standards.
 - ◆ Assisting in the development of adequate housing to meet the needs of extremely low-, very low-, low-, and moderate-income households.
 - ◆ Addressing, and where possible, removing governmental constraints.

- ◆ Conserving and improving the condition of the existing affordable housing stock.
- ◆ Promoting housing opportunities for all persons (fair housing program).
- ◆ Preserving for lower-income households the assisted housing developments.
- ◆ Including an identification of the agencies and officials responsible for implementation of the various actions.
- ◆ Including a diligent effort by the local government to achieve public participation of all economic segments of the community in the development of the housing element.

Procedural Requirements

Stanislaus County and cities in the County must consider guidelines adopted by the California Department of Housing and Community Development (HCD) when undertaking revisions to the Housing Element. Stanislaus County and cities in the County must submit drafts of their Housing Elements to HCD for review prior to formal adoption. They then must amend the draft Housing Element taking into consideration HCD's findings or make findings as to why the jurisdiction believes it is in substantial compliance with the law.

Housing for Persons with Special Needs

Housing for Persons with Disabilities

Stanislaus County

Compliance with provisions of the Federal Americans with Disabilities Act (ADA) is assessed and enforced by the Building Official in Stanislaus County and by the Building Departments in cities in the County. ADA access is enforced through the building permit entitlement process by the Building Permits Division of the Planning and Community Development Department and by the Building Departments in cities in the County.

Stanislaus County offices and cities in the County offices are accessible to those with disabilities. Disabled applicants are treated with the same courtesy as all applicants. Disabled applicants are provided one-on-one assistance to complete the forms for zoning, permits, or other building applications. Stanislaus County and cities in the County will accommodate any specific verbal or written request for assistance. Applications for retrofit are processed over the counter in the same process as for improvements to any single-family home.

In response to Senate Bill (SB) 520 and to ensure a fair and efficient process for persons with disabilities to make necessary accessibility adjustments to their homes, Stanislaus County will amend the Zoning Ordinance to create a reasonable accommodation procedure. In addition, as part of the Home Rehabilitation Loan program, Stanislaus County provides rehabilitation grants to disabled persons to improve access and mobility in their homes.

City of Turlock

Zoning and Reasonable Accommodations Procedure

Compliance with SB 520 is met by permitting supportive multi-family or single-family housing for the disabled in any residential zone that permits non-designated single- or multi-family housing. One assisted housing development, Denair Manor, houses the elderly as well as disabled adults of any age. In addition, as part of the Home Rehabilitation Loan program, the City of Turlock provides rehabilitation grants to disabled persons to improve access and mobility in their homes.

The City of Turlock offices are accessible to those with disabilities. Disabled applicants are treated with the same courtesy as all applicants. Disabled applicants are provided one-on-one assistance to complete the forms for zoning, permits, or other building applications. The City of Turlock will accommodate any specific verbal or written request for assistance. Applications for retrofit are processed over the counter in the same process as for improvements to any single-family home.

The City of Turlock continually reviews its ordinances, policies, and practices for compliance with fair housing laws. The City of Turlock has a broadened and revised definition of “family” to include State and Federal definitions relating to unrelated adults living together as a household unit.

Parking Requirements

All multi-family complexes are required to provide handicapped parking at a rate of one space for every 20 non-handicapped spaces. One parking space is provided for each dwelling unit designed for people with disabilities. Stanislaus County and cities in the County and the City of Turlock work with the developers of special needs housing and will reduce parking requirements if the applicant can demonstrate a reduced need for parking.

Licensed Community Care Facilities

Stanislaus County

A residential care facility or group home is a facility that provides 24-hour nonmedical care for more than six persons 18 years of age or older, or emancipated minors, with chronic, life-threatening illness in need of personal services, protection, supervision, assistance, guidance, or training essential for sustaining the activities of daily living or for the protection of the individual. This classification includes group homes, residential care facilities for the elderly, adult residential facilities, wards of the juvenile court, and other facilities licensed by the State of California. In Stanislaus County, residential care homes are permitted in the R-3 (Multiple-Family Residential) and C-1 (Neighborhood Commercial) zones with public services (water and sewer). The R-A (Rural Residential) zone allows residential care homes with a Use Permit. Program 2-10 in the Stanislaus County Draft Housing Element 2015-2023 is proposed to amend the County Zoning Ordinance to specify that group homes/residential care facilities are allowed by right in residential zones consistent with State law for small group homes and with a Use Permit for large facilities.

City of Turlock

The City of Turlock permits group homes with six or fewer persons in any residential zone, as well as in the agricultural and commercial office districts, without restriction or additional permits. This allows proponents to locate these facilities in any area they can afford without additional development or permit costs. The development of group homes is therefore a market issue, not a regulatory issue.

State-licensed group homes are permitted by right in residential districts, in the agricultural district with a Conditional Use Permit, and in the commercial office district with a staff-level Minor Discretionary Permit. There are no regulations relating to the siting of special needs housing in relationship to distance or location to one another.

The City of Turlock holds public hearings for every change or amendment to any ordinance, policy, program, procedure, funding, or other similar action. There is no public comment requirement for the establishment of a State-licensed group home, regardless of size. The Zoning Ordinance states (in part) that State-licensed group homes, foster homes, residential care facilities, and similar State-licensed facilities, regardless of the number of occupants, are deemed permitted by right in a residential zoning district, pursuant to State and Federal law. There are no special conditions for group homes that also provide services, such as counseling, if there will be six persons or fewer in residence, or if the larger

facility is located in a commercial zone or civic center. However, if the larger facility is planned in a residential zone, the service component will require a Use Permit.

Reasonable Accommodation

Stanislaus County

Reasonable accommodation is a procedure that can be codified or implemented at the policy level in response to requests for exceptions to zoning and land-use regulations and procedures which are necessary to make housing available to an individual with a disability protected under fair housing laws. These exceptions can include but are not limited to permit applications and access to affordable housing programs. Program 5-7 in the County Housing Element requires Stanislaus County to amend the Zoning Ordinance to create a reasonable accommodation procedure. This State requirement is also in response to SB 520.

City of Turlock

The Housing Element includes a policy that recognizes the City's efforts to comply with Federal law that requires reasonable accommodation of requests to improve physical access to structures for disabled persons, even if these requests (for example, a covered wheelchair ramp extending into a setback alongside a single-family house) violate the City's Zoning Ordinance. The July 12, 2011, amendment to the Turlock Municipal Code (TMC) revised Section 9-3-103 to allow deviations from the setback and height requirements for the purpose of providing accommodation for disabled access to an existing structure upon approval of a Minor Administrative Approval pursuant to Article 3 of TMC Chapter 9-5.

Housing for the Homeless

Transitional and Supportive Housing

Stanislaus County

Transitional housing is defined in California Government Code Section 65582(h) as buildings configured as rental housing developments but operated under program requirements that require the termination of assistance and recirculating of the assisted unit to another eligible program recipient at a predetermined future point in time that shall be no less than six months from the beginning of the assistance.

Transitional housing is defined by HUD in 24 C.F.R. 91.5 [Title 24 Housing and Urban Development; Subtitle A Office of the Secretary, Department of Housing and Urban Development; Part 91 Consolidated Submissions for Community Planning and Development Programs; Subpart A General] as "a project that is designed to provide housing and appropriate supportive services to homeless persons to facilitate movement to independent living within 24 months, or a longer period approved by HUD. For purposes of the HOME program, there is no HUD-approved time period for moving to independent living."

Supportive housing is defined by California Government Code Section 56682(f) as housing with no limit on length of stay, that is occupied by the target population, and that is linked to an on- or off-site service that assists the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community. Target population is defined in Health and Safety Code Section 56682(g) as persons with low incomes who have one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health condition, or individuals eligible for services provided pursuant to the Lanterman Developmental Disabilities Services Act (Division 4.5 (commencing with Section 4500) of the Welfare and Institutions Code) and may include, among other populations, adults, emancipated minors, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and homeless people.

Permanent Supportive Housing is defined by HUD per title IV of the Stewart B. McKinney Homeless Assistance Act (the McKinney Act) (42 U.S.C. 11381–11389) as “long-term, community-based housing that has supportive services for homeless persons with disabilities. This type of supportive housing enables special needs populations to live as independently as possible in a permanent setting. The supportive services may be provided by the organization managing the housing or coordinated by the applicant and provided by other public or private service agencies. Permanent housing can be provided in one structure or several structures at one site or in multiple structures at scattered sites. There is no definite length of stay.”

Under the current Stanislaus County Zoning Ordinance, transitional and supportive housing is not specifically identified but by practice has been considered under the definition of a residential care facility. Program 4-8 in the draft County Housing Element is proposed to amend the Zoning Ordinance within one year of adoption of the Housing Element to identify these uses separately as well as where they are permitted. By law, transitional and supportive housing must be treated as a residential use in all residential zones and only subject to those restrictions that apply to other residential uses of the same type in the same zone.

City of Turlock

The City of Turlock recognizes the need to address constraints to the establishment of supportive and transitional housing in the city. Housing Element Policy 1-3-2 contains four programs that will address the current constraints and bring the City of Turlock into compliance with the requirements of SB 2 (Cedillo). Program D addresses the need to provide supportive and transitional housing, which are critical components of ending individuals’ cycle of homelessness.

Existing transitional and supportive housing serving Stanislaus Urban County and City of Turlock include Behavioral Health and Recovery Services (BHRS), Salvation Army of Stanislaus County, Assistance and CICV’s Life Development Opportunity Program (HALO), Housing Authority of the County of Stanislaus (Housing Authority), The Modesto Men’s Gospel Mission and Women’s Mission, STANCO, Turning Point, Center for Human Services (CHS), We Care, and Family Promise.

Emergency Shelter

Stanislaus County

In effect since January 1, 2008, SB 2 (Cedillo, 2007) requires Stanislaus County to allow emergency shelters without any discretionary action in at least one zone that is appropriate for permanent emergency shelters (i.e., with commercial uses compatible with residential or light industrial zones in transition), regardless of demonstrated need. The goal of SB 2 was to ensure that local governments are sharing the responsibility of providing opportunities for the development of emergency shelters.

Emergency shelters are defined by HUD as “any facility, the primary purpose of which is to provide temporary or transitional shelter for the homeless in general or for specific populations of the homeless.”

Under the current Stanislaus County Zoning Ordinance, emergency shelters are not specifically identified but by practice have been considered under the definition of a residential care facility. Program 4-7 in the draft County Housing Element is proposed to amend the Zoning Ordinance within one year of Housing Element adoption to identify this use separately as well as where it is permitted. To that end, the legislation also requires that Stanislaus County demonstrate site capacity in the zone or zones (i.e., M (Industrial), H-1 (Highway Frontage), and/or C-2 (General Commercial)) identified to be appropriate for the development of emergency shelters. In the identified zone, only objective development and management standards may be applied, given they are designed to encourage and facilitate the development of or conversion to an emergency shelter.

Existing lots totaling over 3,300 acres with M (Industrial) zoning are sufficient in size (from 1 acre to several acres) with available infrastructure to support an emergency shelter in areas of Stanislaus County such as South Turlock, the Beard Industrial District south of Yosemite Avenue, and South Modesto. For lots of 3.5 acres or less in these areas, for example, South Turlock has 31 parcels, the Beard Industrial District has 230 parcels, and South Modesto has 56 parcels, at least 50% of which could accommodate an emergency shelter as a stand-alone use or in conjunction with an existing use. In addition, due to the recent economic downturn, numerous parcels larger than 3.5 acres with existing vacant industrial facilities in these same areas, with some modification, could be converted to an emergency shelter, similar to the existing Salvation Army shelter in South Modesto.

All of these areas are also on or near transportation routes and in proximity to cities where a variety of services are available. The M district allows uses such as wholesale and distribution establishments, service establishments, and public and quasi-public buildings, as well as uses in commercial zones such as churches, schools, day care centers, family day care homes, hospitals, community centers, and a variety of retail uses. Development standards permit buildings up to 75 feet in height with front yard setbacks of 15 feet.

City of Turlock

Three of the programs in Housing Element Policy 1-3-2 address the current constraints and bring the City of Turlock into compliance with the requirements of SB 2 related to emergency shelters. Program A implements the City of Turlock's recent amendment to its Zoning Ordinance to allow emergency shelters by right per SB 2 requirements. The City of Turlock initiated the amendment by seeking community input on a general SB 2 Study Area within which a specific location for an overlay zone for emergency shelters would be identified. Community members who participated in the SB 2 workshops identified access to services for the homeless, access to bus service, the ability to walk to services and commercial businesses, and the availability of land as the primary factors for selecting an area. The Planning Commission directed staff to engage nonprofit and business organizations that either serve the homeless community or have been involved in planning for homeless facilities to help develop a draft set of development standards, permissible under SB 2, for consideration. The SB 2 Technical Advisory Committee was formed consisting of representatives from City of Turlock staff and representatives of the Turlock Downtown Property Owners Association, the Turlock Gospel Mission, the We Care program, and the Disability Resource Agency for Independent Living (DRAIL). On February 8, 2011, the City Council and the Planning Commission held a joint meeting to review the draft standards and to provide more specific direction to staff on the boundaries for the proposed zoning overlay district and set the cap on the number of beds to be provided at 200.

Senate Bill 2 requires the City of Turlock to demonstrate that sufficient capacity exists within the SB 2 zoning boundary to meet the homeless sheltering needs in the City of Turlock. Staff conducted a windshield survey and collected real estate listings to prepare an initial list of available properties. The criteria for inclusion on this list included sites that are currently undeveloped (no buildings), sites with large portions of undeveloped land (underdeveloped properties), and sites that are listed for sale or lease. In addition, property owners contacted staff to add their properties to the list. With the potential size limitations for each district in mind, and based on the available land in each zoning district within the overlay area, staff calculated that approximately 1,200 beds could be developed within the proposed zoning district boundary. Based on this survey, the City Council determined that sufficient vacant land and/or for-sale/lease property may be available in the zoning overlay area to accommodate up to 200 beds to meet the City Council's initial goal.

A new section of Chapter 4 of Title 9 of the Turlock Municipal Code (Zoning Overlay Regulations) was adopted on July 12, 2011, establishing the boundary of the zoning district and the permitting process. The ordinance is summarized in Policy 1-3-2. The ordinance requires annual review of the district-wide cap on the number of beds. This will allow homeless service providers to provide input to the City Council on whether the cap constrains the ability of the City of Turlock to respond to its homeless sheltering needs.

Other programs under Policy 1-3-2 address compliance with other aspects of SB 2. Program B aims to support local nonprofit agencies in establishing a year-round emergency shelter. Program C also provides financial assistance to these agencies for establishing additional short-term beds for all segments of the homeless population, including the mentally ill and the chronically disabled.

Existing emergency shelters serving Stanislaus Urban County and City of Turlock include Hutton House, Helping Others Sleep Tonight (HOST), Modesto Men's Gospel Mission and Women's Mission, Mission Emergency Shelter, Salvation Army of Stanislaus County, Turlock Gospel Mission, Turning Point, and We Care.

Building Code

Stanislaus County

Stanislaus County has adopted and enforces the 2013 California Building Code. The only substantive changes were required by Measure X, a local initiative approved by Stanislaus County voters in 1990, which requires that any urban development in the unincorporated areas of the County occur in conjunction with primary and secondary sewage treatment if the lot was recorded after July 13, 1990 and is less than 10 acres in size. Farm worker housing, very low-income housing, and single-family uses on lots recorded prior to July 13, 1990, are permitted to utilize traditional septic tank and leach field systems. Although the changes were found to be more restrictive than those in the California Building Code, a finding was made that the changes were necessary due to local climatic, geological, or topographical conditions throughout Stanislaus County. These changes are intended to protect the health and well-being of residents in unincorporated areas of the County.

Health and Safety Code Section 17980(b)(2) requires local governments to give consideration to the needs for housing as expressed in the housing element when deciding whether to require vacation of a substandard building or to repair as necessary. The enforcement agency is required to give preference to the repair of the building whenever it is economically feasible to do so without having to repair more than 75 percent of the dwelling. Stanislaus County as a general rule will only recommend the vacation and/or demolition of a building when more than 75 percent of the building requires repair. In general, enforcement related to substandard buildings by the Building Division occurs either in response to the receipt of a citizen complaint or when discovered by Building Inspectors when making daily inspections.

The Building Division of the Community Development Department is aware of the various housing rehabilitation programs that are offered to homeowners. Inspectors will typically inform a property owner of Stanislaus County's programs in order to facilitate the rehabilitation and conservation of housing units in need of repair.

City of Turlock

At the time of its last Housing Element update, the City of Turlock had adopted the 2007 Uniform Building Code (UBC), Uniform Housing Code, and Uniform Code for the Abatement of Dangerous Buildings. New structures must conform to the standards of the UBC. When a project is plan checked, it is reviewed for minimum compliance with the 2007 California Building Code (CBC). This includes electrical, plumbing, mechanical (heating and cooling), structural, energy compliance, nonstructural (building exits, interior environment, etc.), and disabled access (commercial buildings). The Uniform Housing Code is not applicable to structural modifications or additions.

The Uniform Code for the Abatement of Dangerous Buildings applies to all buildings, old or new. These building codes ensure structural integrity and facilitate the City of Turlock's efforts to maintain a safe housing supply.

Resources and Incentives for Affordable Housing

Inclusionary Housing

Stanislaus County

Stanislaus County does not have an inclusionary housing ordinance in place.

City of Turlock

The City of Turlock does not have an inclusionary housing ordinance in place.

City of Ceres

The City of Ceres does not have an inclusionary housing ordinance in place.

City of Hughson

The City of Hughson does not have an inclusionary housing ordinance in place.

City of Newman

The City of Newman does not have an inclusionary housing ordinance in place.

City of Oakdale

The City of Oakdale does not have an inclusionary housing ordinance in place.

City of Patterson

Chapter 18.86 of the City of Patterson Zoning Ordinance is the Inclusionary Housing ordinance.

City of Waterford

The City of Waterford does not have an inclusionary housing ordinance in place.

Density Bonus

Stanislaus County

Chapter 21.08.080 of the County Zoning Ordinance addresses density bonuses.

City of Turlock

The City of Turlock provides cost reductions to developers through its adopted Density Bonus Ordinance when low- and very low-income housing units are proposed. Housing Element Policy 2-1-4 reflects the City of Turlock's updated density bonus ordinance, specifying that the City of Turlock will follow the criteria set forth in California Government Code Section 65915 regarding density bonus requests for affordable housing, in compliance with SB 1818. Since adoption of the City of Turlock's last Housing Element, additional changes have been made to State density bonus law. The City of Turlock expects to include a program in its 2015–2023 Housing Element to update the density bonus ordinance.

City of Ceres

Chapter 18.90 of the City of Ceres Zoning Ordinance addresses density bonuses.

City of Hughson

Section 17.03.016 of the City of Hughson Municipal Code addresses density bonuses and was updated in 2008.

City of Newman

Chapter 5.14 of the City of Newman Municipal Code codifies the City's Density Bonus Overlay district (DBO).

City of Oakdale

Chapter 36-18.20 of the City of Oakdale Zoning Ordinance addresses density bonuses.

City of Patterson

Chapter 18.88 of the City of Patterson Zoning Ordinance addresses density bonuses.

City of Waterford

Chapter 17.34 of the City of Waterford Municipal Code codifies the City's Density Bonus Overlay district (DBO).

Identification of Impediments and Actions to Address

The purpose of this analysis is to determine the possible existence of impediments to housing choices based on age, race, religion, sex (including pregnancy, childbirth, and related medical conditions), sexual orientation and identity, color, national origin, disability (physical or mental), ancestry, or marital status and where identified, to suggest necessary steps to reduce and/or eliminate such impediments. This section describes those impediments and the corresponding actions identified through the analysis.

To facilitate reporting of accomplishments and the association of planned activities with impediments and actions to address, each impediment and action is identified by a number. Actions are labeled according to the impediment they address. It is important to note that the identification of an impediment does not necessarily identify a deficiency. By identifying the presence of an impediment, this analysis is stating the nature of a problem which the actions to address will serve to mitigate. These may be affirmative actions as much as responses to current conditions.

Please note that State law requires local jurisdictions in California to assess barriers to affordable housing as part of the General Plan's Housing Element. Programs to address impediments to fair housing may be addressed through the implementation of the Housing Element.

Affordable Housing

- 1. Impediment: Insufficient supply of affordable housing.**
 - 1.1 Action:** Continue to provide assistance to preserve existing affordable housing and to create new affordable housing.
 - 1.2 Action:** Continue to offer regulatory relief and incentives for the development of affordable housing.
 - 1.3 Action:** Continue to ensure the availability of adequate sites for the development of affordable housing.

- 2. Impediment: Shortage of subsidies and strategies to promote affordable, accessible housing for low-, very low-, and extremely low-income households, including protected classes.**
 - 2.1. Action:** Continue to pursue available and appropriate State and Federal funding sources to support efforts to construct housing meeting the needs of lower-income households.
 - 2.2. Action:** Continue to support the Stanislaus Housing Authority Section 8 Housing Choice Voucher (HCV) Rental Assistance Program, including distribution of program information at the public counters for the Stanislaus County Department of Planning and Community Development, City of Turlock Housing Services, and all Stanislaus Urban County member jurisdictions. Stanislaus County and the City of Turlock will hold periodic meetings with representatives of the Housing Authority of the County of Stanislaus to discuss actions Stanislaus County, the City of Turlock, and Stanislaus Urban County member jurisdictions can take to coordinate housing program implementation.
 - 2.3 Action:** Follow through on the Housing Element policies and programs.

Discussion:

To understand the demand and supply of affordable housing in Stanislaus Urban County and City of Turlock, several factors can be considered, including income, poverty, household size, household characteristics (such as elderly and disabled) and housing characteristics. These factors reveal the affordable housing needs of the residents in the community, both in the number and type of housing needed to adequately house its population.

Income

Income levels within Stanislaus Urban County and City of Turlock demonstrate that a significant portion of the population is lower income. This means the Stanislaus Urban County and City of Turlock face a high demand for housing units that are priced at affordable rates.

Area median family income (AMI) categories are set by household size (2, 3, etc. persons in a household). For each household size, the income levels are determined according to increasing levels of income. The order, beginning with the lowest income, is extremely low-income (30 percent of the area median income), very low-income (50 percent of the area median income), low-income (50 percent of the area median income) and moderate income (120 percent of the area median income). The following AMI data¹⁹ was used to analyze City of Turlock and Stanislaus Urban County: for a household of two, \$15,930 to \$54,720 is the range from extremely low-income to moderate income; for a household of three, \$20,090 to \$61,560; for a household of four, \$24,250 to \$68,280. The average household size²⁰ in the City of Turlock and for the six members Ceres, Hughson, Newman, Oakdale, Patterson, and Waterford is approximately 3 persons per household.

Given the average household size is 3, the following is an analysis of the number²¹ of people living in extreme, very low-, low- and moderate incomes in those communities. The median household incomes²² (MHI), which represents the half-way point²³ not average of all incomes, for the City of Turlock, for all six members Ceres, Hughson, Newman, Oakdale, Patterson and Waterford, and for fifteen out of the twenty-one unincorporated areas of Stanislaus County fall under the moderate income level category of \$61,560, which means the majority of residents do not exceed beyond a moderate-income level. More specifically, when comparing the City of Turlock's MHI of \$50,862 to the City of Turlock's AMI for 3 person household (the City of Turlock's average household size is 2.96 persons) at \$41,950 for low-income and \$61,560 for moderate income levels, then it can be reasonable deduced that half of the residents are living below the moderate-income level. Additionally, more than half of the communities in the unincorporated areas have a median household income²⁴ that falls at or below the low-income level, and a handful fall under the very-low income level. Given that approximately half the population²⁵ of Stanislaus Urban County resides in these unincorporated areas, then this low-income group represents a significant portion of the Stanislaus Urban County residents.

Data mentioned above can also be found in the Background Section in **Tables 1, 6, 7, 8, 9, and 15.**

Poverty

¹⁹ FY 2015, HUD, Income Limits Summary, for Modesto, CA, Metropolitan Statistical Area (MSA)

²⁰ U.S. Census 2010

²¹ A precise amount is not calculable given that the data does not include what percentage of the total population is 2-person, 3-person, 4-person, etc. household.

²² ACS 2007-2011, 5-year estimates

²³ Median in median household incomes means that exactly half of household incomes fall below that point and half fall above; it is not an average.

²⁴ ACS 2007-2011, 5-year estimates

²⁵ Stanislaus Council of Governments, RTP 2010

Stanislaus Urban County and City of Turlock rank high amongst other county, state, and national rates in the area of poverty. The 2008-2012 American Community Survey, 5-year estimates reveals that Stanislaus Urban County and City of Turlock have poverty rates of 20.3 percent and 17.2 percent respectively are higher than the national average, 15 percent, and the State average, 15 percent. When comparing these same poverty rates to the other 58 California counties, both Stanislaus County and City of Turlock fall among the highest rated, 11th out of 58 and 24th out of 58. See Income and Poverty subsections of the Background Section, including incorporated tables.

Household characteristics

Children and elderly individuals are particularly sensitive to the amount and type of affordable housing available. Children need safe and stable homes and neighborhoods to live while growing up. This is key to their emotional well-being, ability to excel at school which also impacts their future earning ability²⁶. Elderly persons often have lower, fixed incomes. In other words, their earning potential cannot easily be increased, whereas a younger person can increase their income for housing by working more jobs, learning a new, more marketable skill, or by trying to get a higher paying job. Additionally, elderly persons may have limited physical capacities (i.e. health issues) that limit their ability to maintain or improve their housing conditions.

The average household size in the United States is 2.6 people per household and 2.9 in California²⁷; whereas, the City of Turlock and Stanislaus Urban County have an average of over three per household²⁸. Additionally, in California and nationally the percent of households with children, 37 percent and 33 percent respectively, is lower than the percent of households with children in the six communities of Stanislaus Urban County: Ceres - 49 percent, Hughson - 43 percent, Newman - 46 percent, Oakdale - 37 percent, Patterson - 49 percent, and Waterford - 47 percent. The City of Turlock has the same rate as California at 37 percent, but is higher than the national average. These communities on average have larger households with more children. Thus, these communities have a demand to provide adequate housing to house larger households and more children.

Approximately 19 percent of Stanislaus Urban County households and 21 percent of City of Turlock households are senior households. Of those senior households, an average of 80 percent in Stanislaus Urban County rent, while only 20 percent own. Whether there are a sufficient number of affordable rental units for seniors can be discerned from looking at the public housing wait-lists, vacancy rates, condition of housing, and number of disabled. Many elderly have disabilities. For example, in California, approximately 37 percent of the people aged 65 and over reported having a disability²⁹. This elderly population will need to find adequate and affordable housing in order to stay in these communities.

Ten and twelve percent of the California and United States population reported having a disability³⁰. This is a similar rate for City of Turlock and Stanislaus Urban County. (See **Table 18**, Background Section)

Data mentioned above can also be found in the Background Section in **Tables 15, 16, 17 and 18**.

Household Characteristics

While the City of Turlock and Stanislaus County have experienced a decrease in single-family home prices, this has not made homes more affordable to low-income due to instability in the job market (resulting in lack of steady income), stagnating real wages, and the general tightening of credit for new

²⁶ *Opening Doors to Rural Homeownership: Opportunities to Expand Homeownership, Build Wealth, and Strengthen Communities*, National Rural Housing Coalition (2012)

²⁷ ACS, 2008-2012 5-year estimates

²⁸ US Census 2010

²⁹ ACS, 2008-2012 5-year estimates

³⁰ Id.

home loans. The rental market is tightening as the vacancy rates remain low and rents are trending upward. However, HUD indicates that a vacancy rate of five percent is sufficient to provide choice and mobility in housing. Stanislaus Urban County has vacancy rates ranging from 6.4 to 11.0 percent, which shows that Stanislaus County has sufficient number of housing units available to meet the demand³¹. It should be noted; however, that the vacancy rate is calculated based on all types of vacant units, including seasonal, recreational, and occasional use. These types of units are intended for use only in certain seasons, weekends or other occasional use during the year, such as a housing reserved for seasonal workers or a vacation rental³². Also, without knowing the vacancy rate for specific types of housing, such as studio, 1-bedroom, 2-bedroom, 3-bedroom and more, it is unclear whether available housing units meet the housing demand for larger size families and families with children.

However, data on overcrowding can shed light on whether units are adequately sized for Stanislaus Urban County and City of Turlock families. Homeowner families in Stanislaus Urban County and City of Turlock experience a low percentage of overcrowding, 2.1 percent and 1.1 percent respectively. A low percentage also experiences severe overcrowding. HUD determines that households with more than 1 person per room are considered overcrowded and households with more than 1.5 persons per room are considered severely overcrowded. Renters and Stanislaus Urban County and City of Turlock have a different experience than the homeowners. Approximately, 3.4 percent of residents in Stanislaus Urban County experience overcrowding, and 2.8 percent of the City of Turlock residents. Similarly, 1.4 percent of Stanislaus County residents experience severe overcrowding and 1.3 percent for City of Turlock residents. Communities with the largest overcrowding and severe overcrowding of renters are Ceres, Patterson, and unincorporated areas³³. While most families are finding adequate sized housing, both to purchase and rent, the City of Turlock and Stanislaus County will take steps to see that housing of the appropriate size is available.

The number of housing units has declined overall in the Stanislaus Urban County. The City of Turlock; however, has experienced an increase of 0.4 percent³⁴. This decline and increase may be a reflection of demand for units.

Residents in both Stanislaus Urban County and City of Turlock face significant hurdles in finding housing that is within their budget. According to HUD, households that pay 30 percent or less of their gross income in housing costs have an adequate income left over to cover other living expenses. High, cost-burdened households (renters or homeowners) are those that pay between 30 and 50 percent of their gross income for housing, including rent, utilities, mortgages, insurance, taxes and/or condominium fees³⁵. Households that pay more than 50 percent of gross income are considered to have a severe, cost-burden. A high percentage of renters, 34 to 50 percent, within the six member communities of Stanislaus Urban County experience a high cost-burden³⁶. This averages to about 45 percent of residents being high cost-burdened, which is higher than the national average of 37 percent³⁷. Forty-nine percent³⁸ of City of Turlock renters are high, cost-burdened, which is also higher than the national average. California's state average is 48 percent, which is where these communities fall; however, California ranks high compared to other states³⁹. A significant percentage of renters in Stanislaus Urban County also experience severe, cost-burden in their housing, from 23 to 34 percent⁴⁰. This averages to 28 percent which is significantly

³¹ California Department of Finance Census 2010 (HCD data packet)

³² 2010 Census of Population and Housing

³³ Data from this paragraph is from 2008-2012 ACS

³⁴ California Department of Finance, 2000 and 2014 (HCD data packet)

³⁵ 2008-2012 ACS, 5-year estimate

³⁶ 2011 CHAS data, HUD State of the Cities Data System

³⁷ ACS 2008-2012, 5-year estimates

³⁸ 2011 CHAS data, HUD State of the Cities Data System

³⁹ ACS 2008-2012, 5-year estimates

⁴⁰ 2011 CHAS data, HUD State of the Cities Data System

higher than both the state and national averages of 23 and 17 percent⁴¹. Similarly, 28 percent of the City of Turlock residents experience severe, cost-burden in housing⁴².

Low-income households within the City of Turlock and six members of Stanislaus County experience a higher rate of housing cost-burden than the non low-income households. This is true for both homeowners and renters. For example, 60 percent of low-income home owners in Ceres experience high cost-burden and 30 percent of low-income residents in Ceres experience severe high cost-burden. The rate for all renters in Ceres, regardless of income is 17 percent⁴³. Similarly, 92 percent of very low-income renters in Ceres experience high cost-burden and 58 percent experience severe cost-burden⁴⁴. The amount of high and severe cost-burdened households increased with the decrease in income. For example, in Hughson, 100 percent of extremely low-income people experience high and severe cost-burden in their housing expenses. Similarly, in the City of Turlock, 86 percent of extremely low-income people experience high cost-burden and 78 percent experience severe cost-burden⁴⁵. This data demonstrates a need for housing at a lower cost to City of Turlock and Stanislaus Urban County residents that are low, very low, and extremely low income. An increase in housing subsidy programs would benefit these populations.

Data mentioned above can also be found in the Background Section, Housing Characteristics, Housing Growth, Housing Costs, Housing Affordability, and Overcrowding subsections.

The analysis above demonstrates the overall demand of affordable housing within the City of Turlock and Stanislaus County. With more than half of resident earning at or below the moderate-income level, with larger families needing larger units, with many residents experiencing a high, cost-burden, and with the high number of renting senior households, the City of Turlock and Stanislaus County will take steps to ensure the housing units are adequate in number, affordable and suitable in size/characteristics for housing its residents.

Private Practices and Mortgage Lending

3. Impediment: Differential origination rates based on race, ethnicity, and location.

3.1. Action: When selecting lending institutions for contracts and participation in local programs, Stanislaus County, the City of Turlock, and Stanislaus Urban County member jurisdictions may prefer those with a Community Reinvestment Act (CRA) rating of “Outstanding” and may exclude those with a rating of “Needs to Improve” or “Substantial Noncompliance” according to the most recent examination period published by the Federal Financial Institutions Examination Council (FFIEC). In addition, the Stanislaus Urban County and the City of Turlock may review an individual institution’s most recent HMDA reporting as most recently published by the FFIEC.

3.2 Action: Strengthen partnerships with lenders to discuss lenders’ community reinvestment goals, including home mortgages, home improvement loans, and community development investments to be made in low- and moderate-income neighborhoods in the Stanislaus Urban County and in the City of Turlock.

4. Impediment: Limited coordination with real estate industry.

⁴¹ ACS 2008-2012, 5-year estimates

⁴² 2011 CHAS data, HUD State of the Cities Data System

⁴³ 2011 CHAS data, HUD State of the Cities Data System

⁴⁴ 2011 CHAS data, HUD State of the Cities Data System

⁴⁵ 2011 CHAS data, HUD State of the Cities Data System

4.1 Action: Work cooperatively with the real estate industry to develop ways for local agents to become more familiar with Stanislaus Urban County and City of Turlock housing and rental assistance programs.

4.2 Action: Encourage Realtors to seek fair housing training.

Discussion:

Education and outreach to home buyers and real estate professionals is key to preventing fair housing violations. Discriminatory practices in real estate transactions (buying a home) are more difficult to detect than in rental transactions because the buyer is often unaware that they are being steered away from certain property or treated differently than other buyers. Further, the buyer is not easily able to compare the professionals conduct compared with other buyers. While the real estate profession provides fair housing training to its licensees members, more could be done to provide additional education because of the concentration of poverty and minority groups within the Stanislaus Urban County and City of Turlock (see Background section, Areas of Minority Concentration subsection). Currently, no other local public agencies or private nonprofits provide training to real estate professionals within Stanislaus County. Opportunities are available for collaborating with The California Bureau of Real Estate and local real estate chapters to advertise and provide more training. Lastly, programs that conduct testing have been effective at finding and educating professionals in the property management field; perhaps, this method could be used more in the home buying industry.

Property management companies are not required to obtain a professional license as real estate professionals are required. Property management companies and “mom and pop” owners can voluntarily join an association. When they do, they can choose to attend any training, including fair housing. Additionally, if they decide to obtain a professional certification by the association then they will complete a fair housing training as part of the whole program. The majority of cases arise from property management companies or “mom and pop” owners that have not received fair housing training. Nonprofits and local agencies could assist in promoting members and attending fair housing training. Programs that conduct testing have been successful and should continue.

Denial and failure rates for applications by racial and ethnic minorities are higher than the average across all ethnic groups. Additional training and education could be done to address this. It is difficult to determine to what extent a person’s home loan application is being influenced by their race, ethnicity or income characteristics. Testing programs which have been successful in the rental field could be utilized here. Desegregating the areas of minority concentration groups will take coordination and policy changes across the financial and mortgage industry. The City of Turlock and Stanislaus County can work collaboratively with these industry professionals to set goal and monitor progress on those goals.

Fair Housing Education and Enforcement

5. Impediment: Limited knowledge of fair housing rights.

5.1 Action: Conduct more outreach to educate tenants, and owners and agents of rental properties, regarding their fair housing rights and responsibilities.

5.2 Action: Provide educational literature in English, Spanish, and other appropriate languages.

6. Impediment: Discrimination in rental housing.

6.1 Action: Support efforts to enforce fair housing rights and provide redress to persons who have been discriminated against.

- 6.2 Action:** Support efforts to increase the awareness of discrimination against all Federal and State protected classes.

Discussion:

Education and outreach efforts could be increased in the City of Turlock and Stanislaus Urban County to help promote fair and equitable housing choices for residents. Representatives from both Project Sentinel, who run fair housing programs for both entity, and the California Apartment Association revealed that discrimination usually occurs by those who have not been educated about fair housing rights and obligations. Major property management companies in Stanislaus County are not members of the California Apartment Association⁴⁶.

Additionally, most nonprofits in the City of Turlock and Stanislaus County provide resources on fair housing but do provide training. That is, they may provide referrals, typically to HUD, Project Sentinel or CRLA. The referral simply provides the agency's contact information, but it is not information on fair housing laws. When the referrals come in to the referral agency, like Project Sentinel, these organizations have flyers and provide phone assistance that explains fair housing laws and rights for residents and landlords alike. No trainings are available for landlords or tenants that are exclusively on fair housing laws. Landlords, including mom and pop owners, are not required to be trained on fair housing laws nor is training available to them outside of the CAA, which they can only attend if they are a member. As a part of other types of training, citizens can be informed of their fair housing rights. For example, a person may come to a nonprofit to receive housing counseling and as part of the program they will learn about fair housing rights. Lastly, HUD affirms that the number of claims is vastly smaller to the number of incidences, because most people are unaware of who to contact or their rights. For example, a property management company does not have to post a sign about fair housing laws in their office. All of these circumstances show the potential for providing additional outreach and education to citizens and landlords.

GOVERNMENT BARRIERS

- 7. Impediment: Local development standards and their implementation, e.g., zoning, building, or design standards, may constrain development of housing opportunities for minority and low-income households.**
- 7.1 Action:** Review zoning and related regulations to determine degree of adequate opportunity in the community for affordable housing to exist and to develop new affordable housing options.
- 8. Impediment: Inadequate access to employment opportunities, transportation, and public and social services, and infrastructure to support increased housing opportunities for lower-income households.**
- 8.1 Action:** Examine possible gaps in public infrastructure and services, especially for the needs of persons with disabilities, seniors, and low-income residents via a Disadvantaged Unincorporated Communities assessment. If significant gaps are found, explore methods to address the gaps and incorporate public improvements and services into local infrastructure and service plans.

⁴⁶ For more details see Private Practices, subsection Rental and Property Management

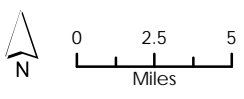
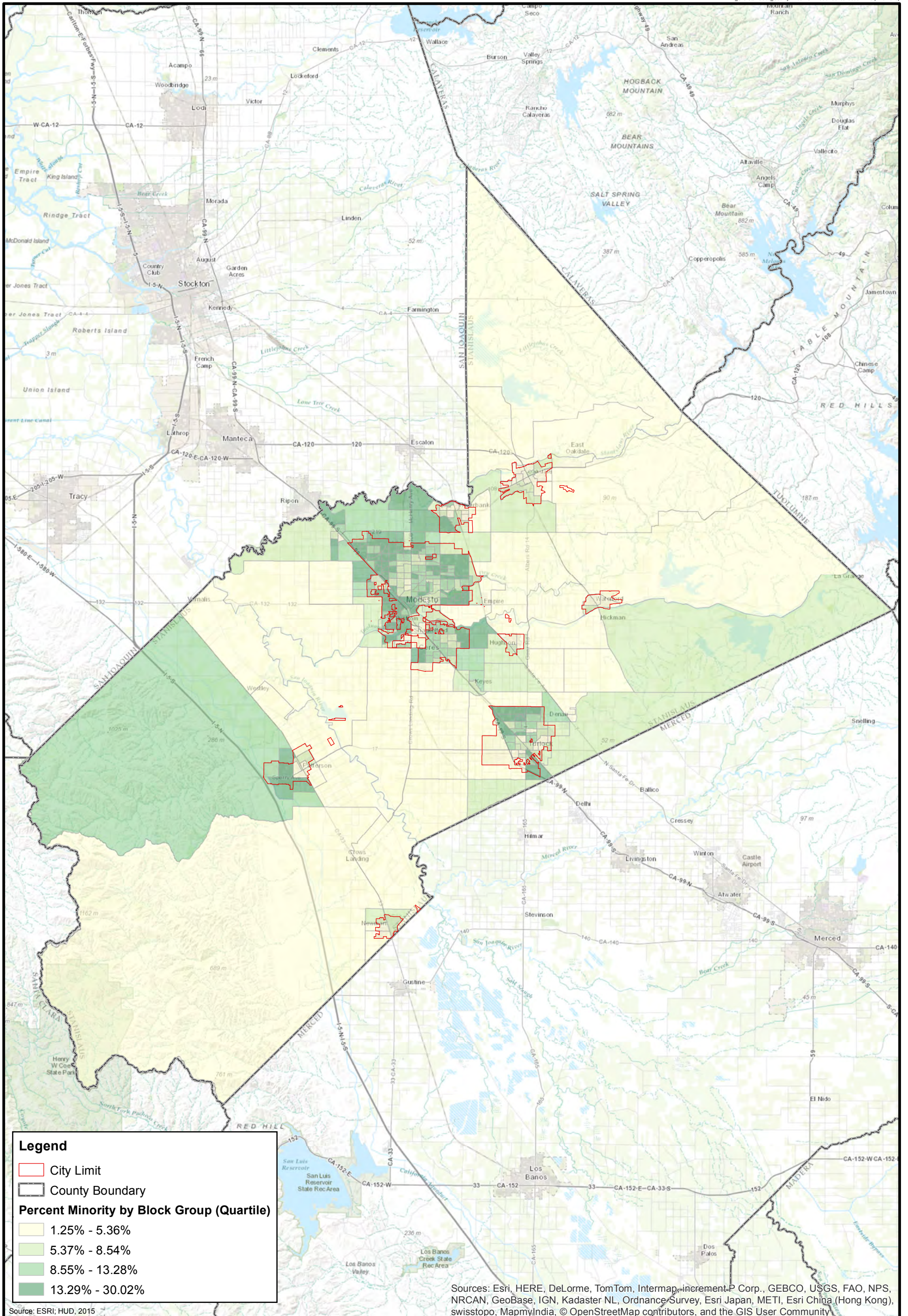
Discussion:

The City of Turlock and Stanislaus County prioritize transitional and supportive housing through their zoning. Stanislaus County's draft Housing Element is proposing to amend the Zoning Ordinance so to identify these uses separately as well as where they are already permitted. The City of Turlock has four programs in its Housing Element Policy 1-3-2 that will address the current constraints on transitional and supportive housing developments in the City of Turlock. Further, Program D addresses the needs for providing additional transitional and supportive housing which is critical ending homelessness. Emergency shelters provide temporary support to those that may be facing temporary or extended homelessness. To this end, the City of Turlock and Stanislaus County reviewed zoning ordinances and did not find obvious barriers; however, continuous review will be important.

Both Stanislaus County and City of Turlock do not have inclusionary housing ordinances. Both plan to update their density bonuses programs to comply with new density bonus law.

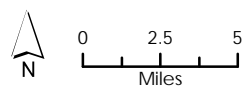
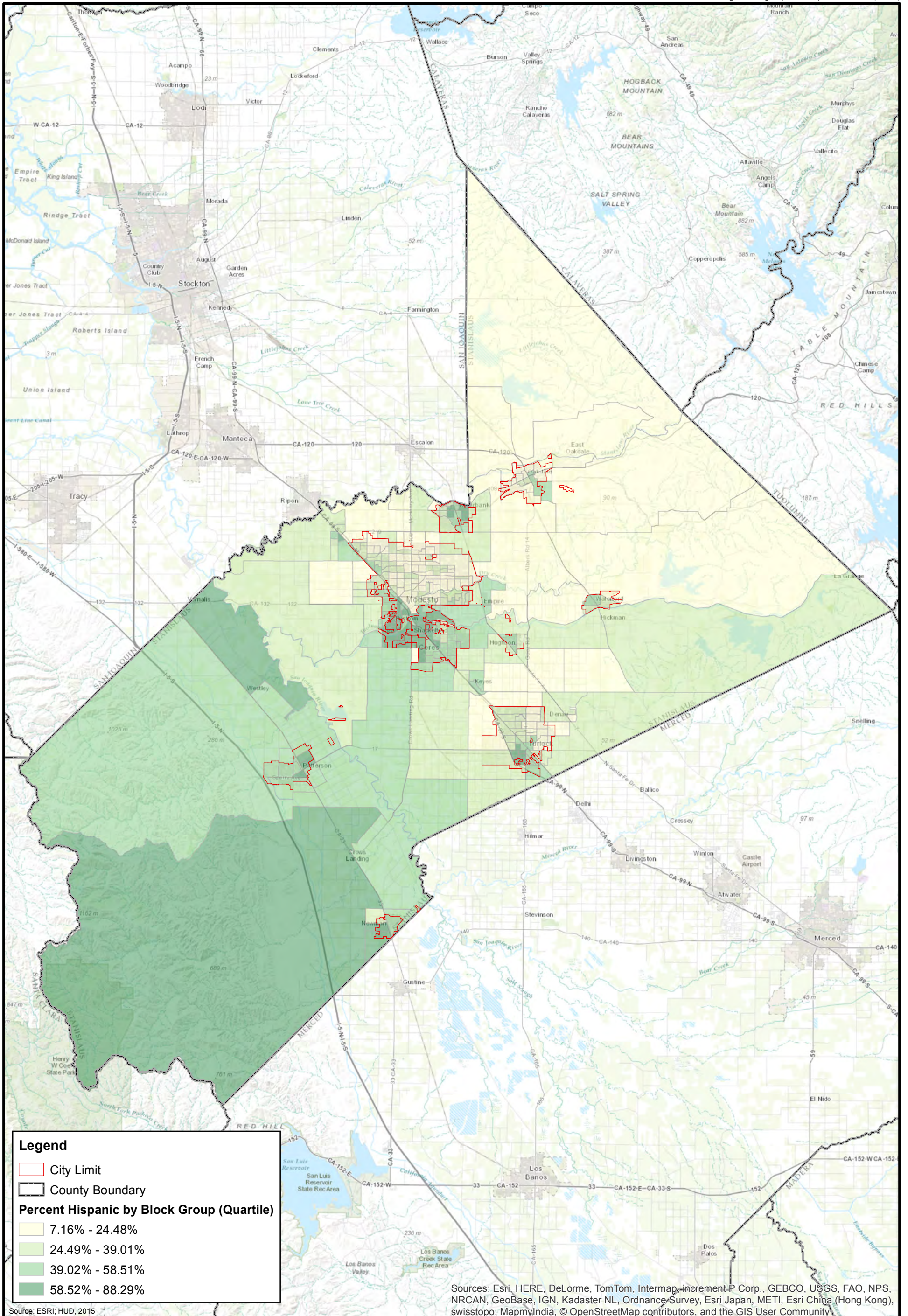
Appendices

APPENDIX 1.
AREAS OF MINORITY
CONCENTRATION



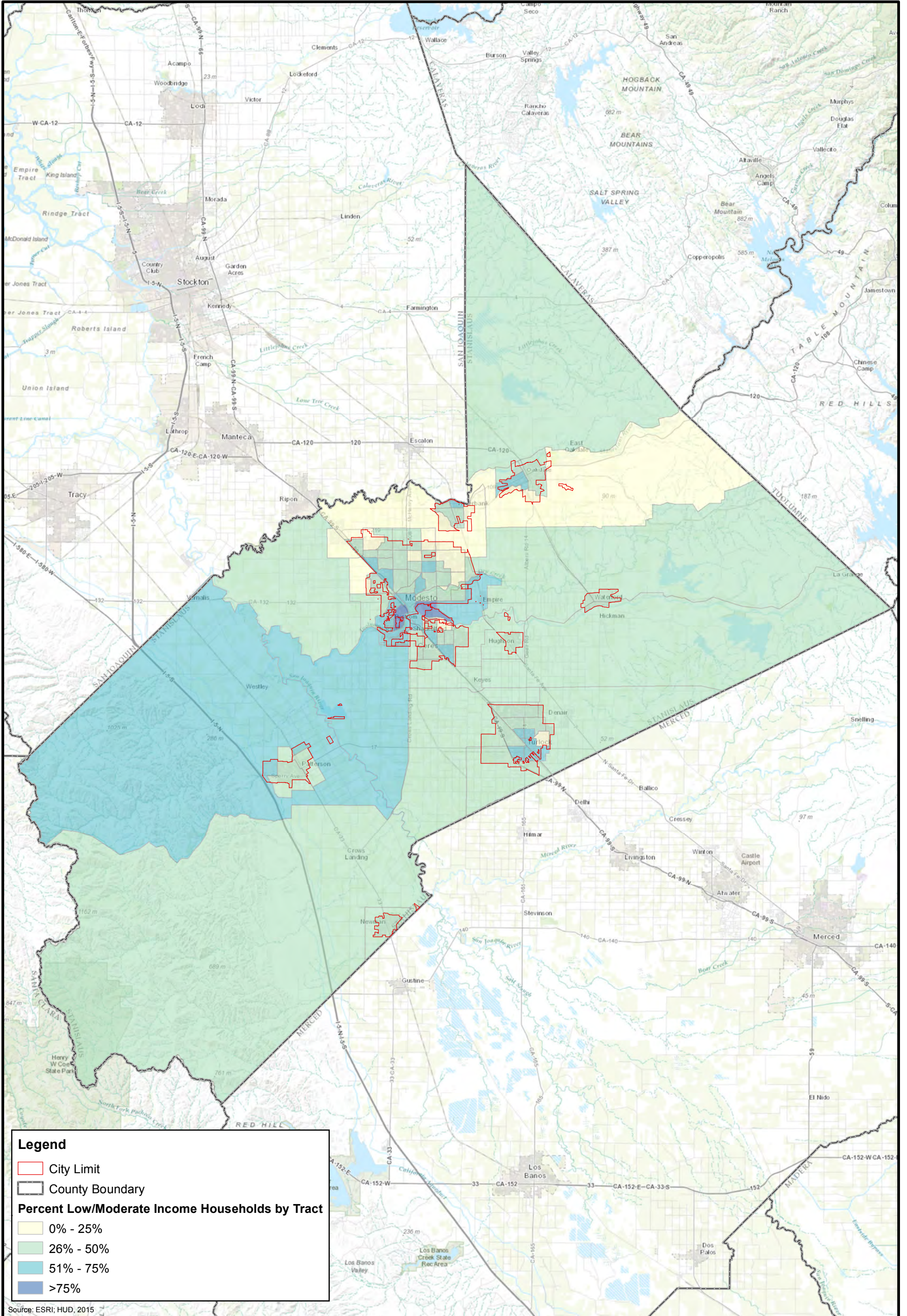
Map 1
Racial Minority Concentration in Stanislaus County

APPENDIX 2.
AREAS OF HISPANIC
CONCENTRATION



Map 2
Hispanic Concentration in Stanislaus County

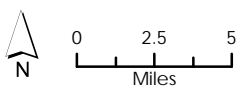
APPENDIX 3.
AREAS OF LOW-INCOME AND VERY
LOW-INCOME CONCENTRATION



Legend

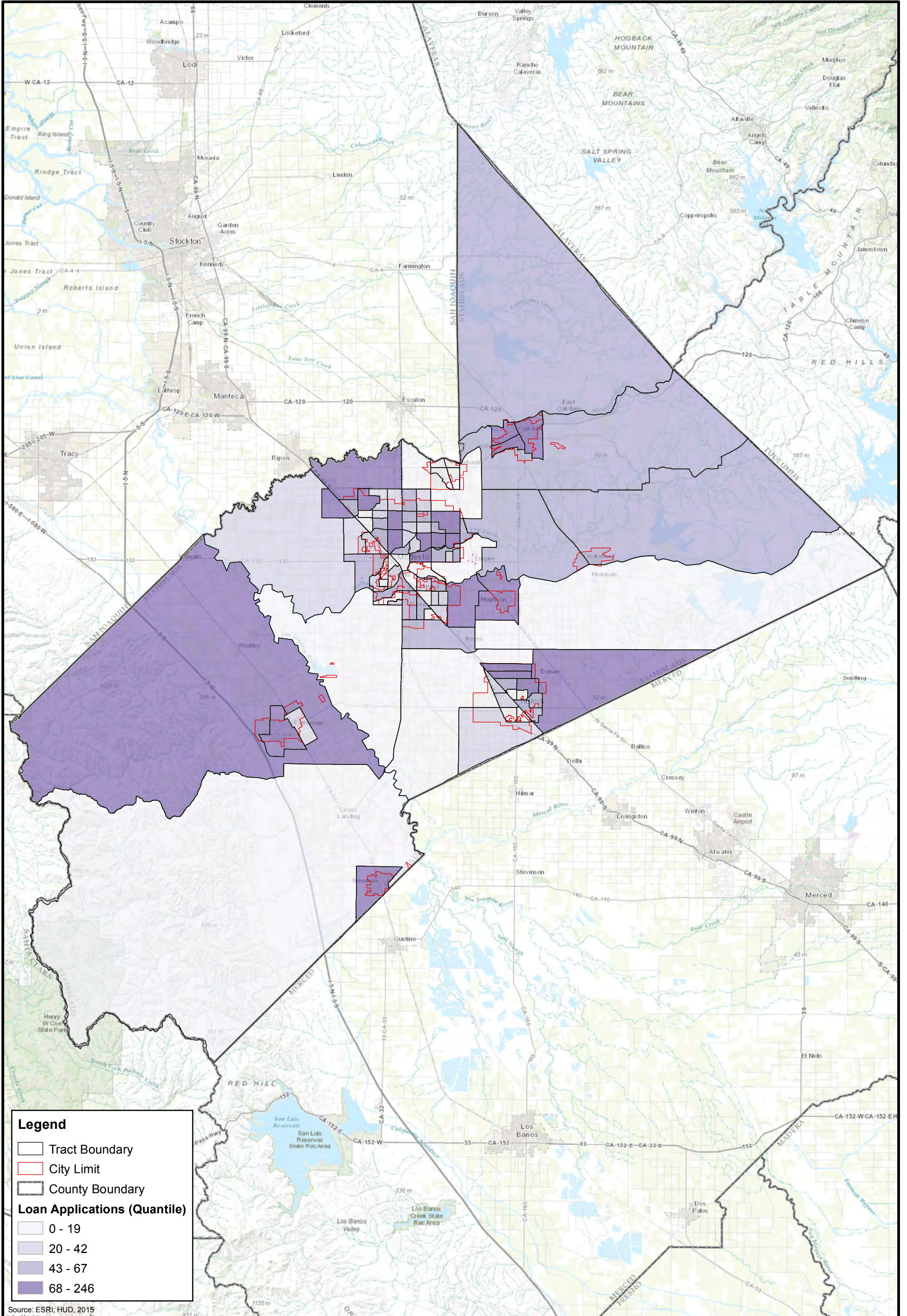
- City Limit
- County Boundary
- Percent Low/Moderate Income Households by Tract**
- 0% - 25%
- 26% - 50%
- 51% - 75%
- >75%

Source: ESRI; HUD, 2015

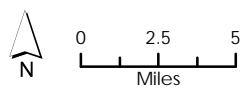


Map 3
Percentage of Low/Moderate Income Households in Stanislaus County

APPENDIX 4.
MORTGAGE LENDING PATTERNS

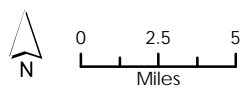
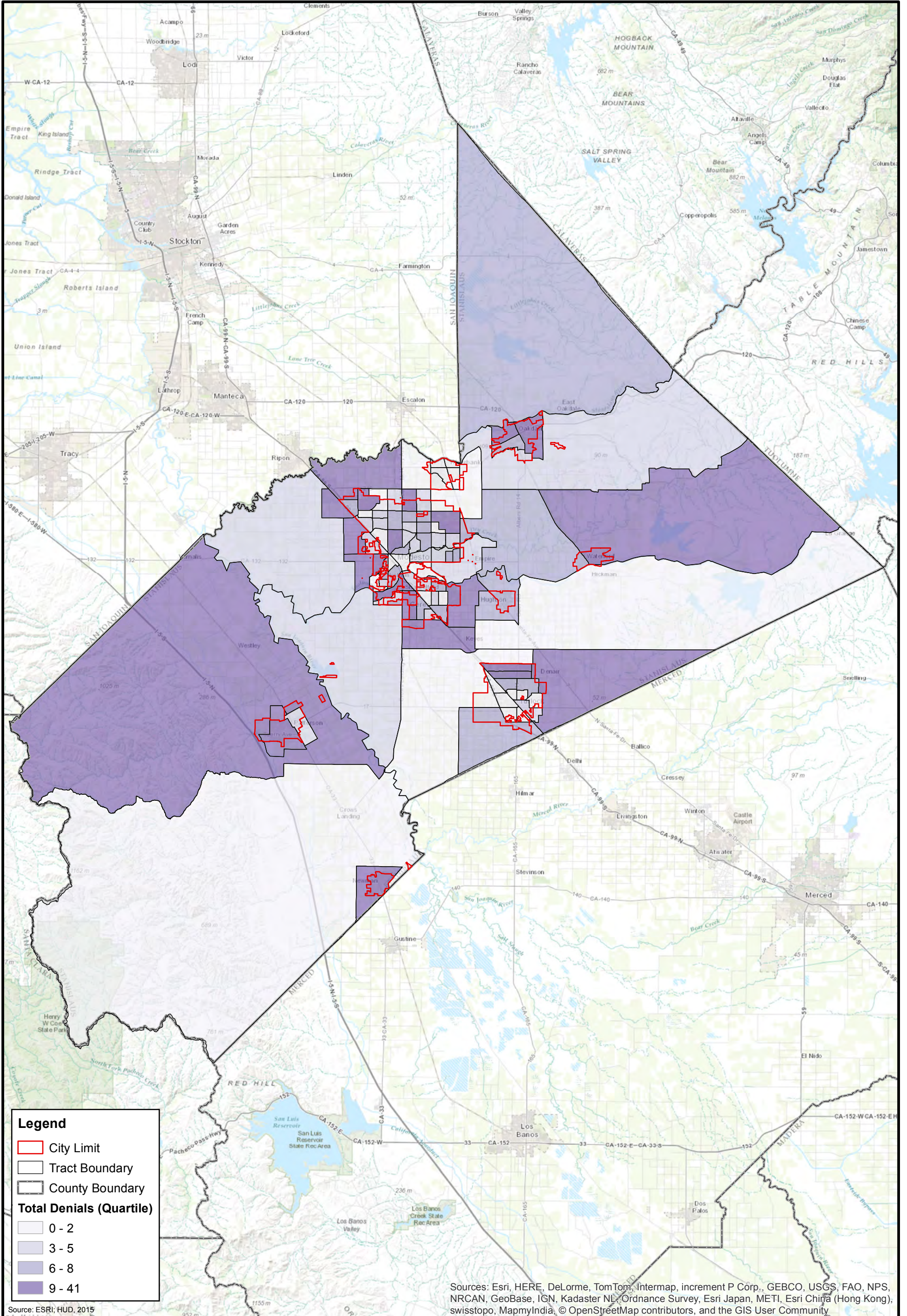


Source: ESRI; HUD, 2015



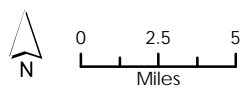
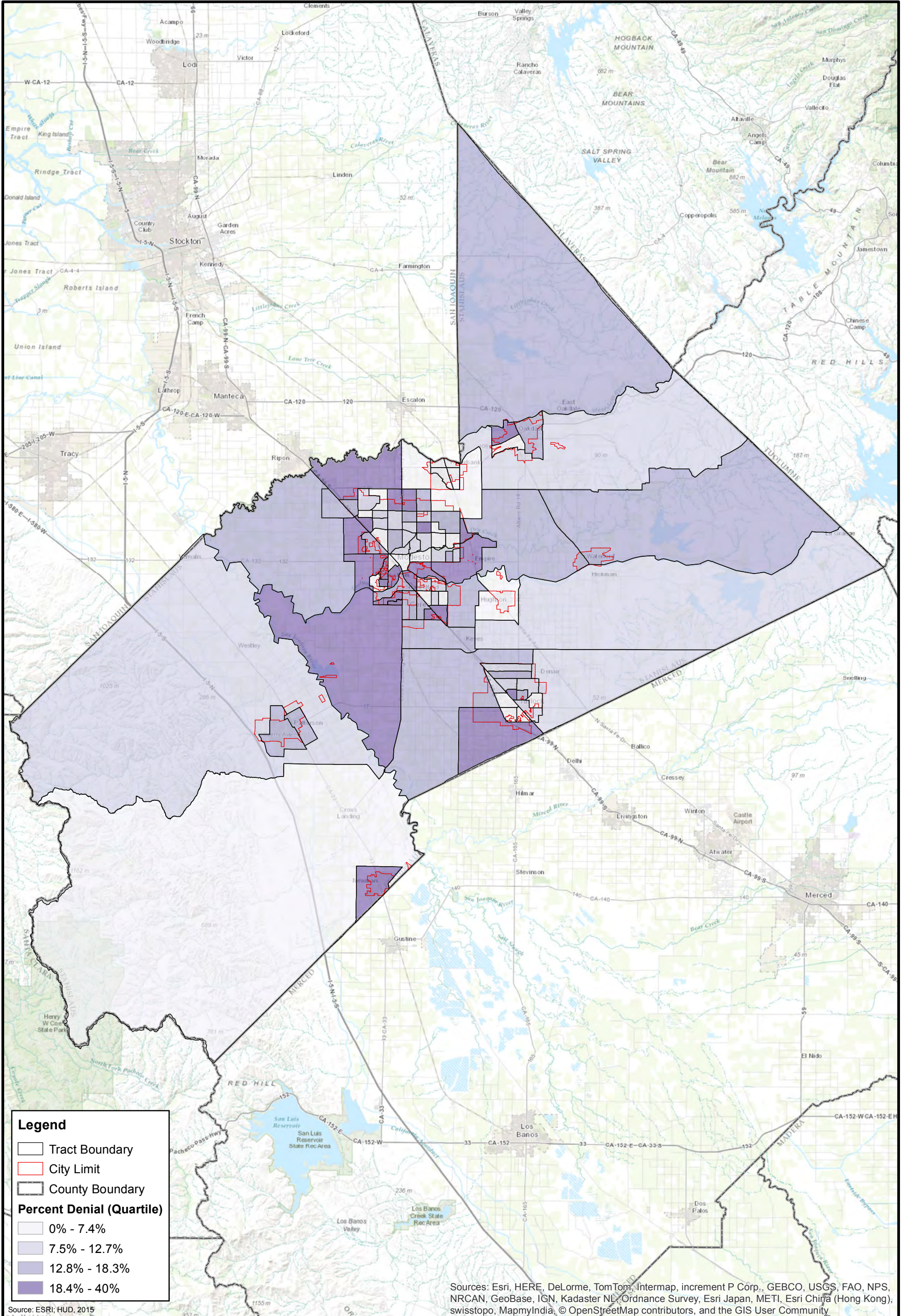
Map 4
Loan Applications

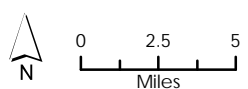
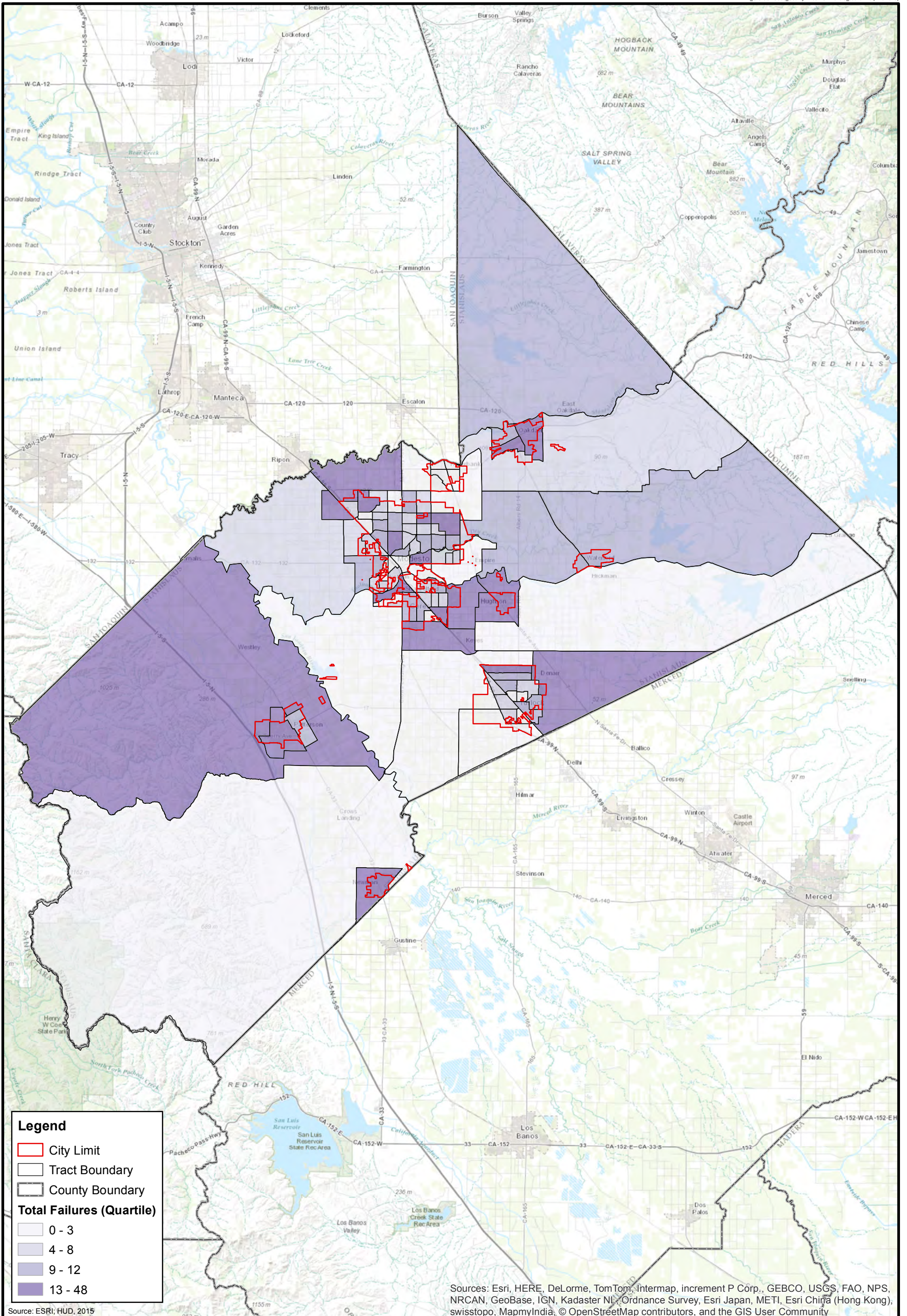


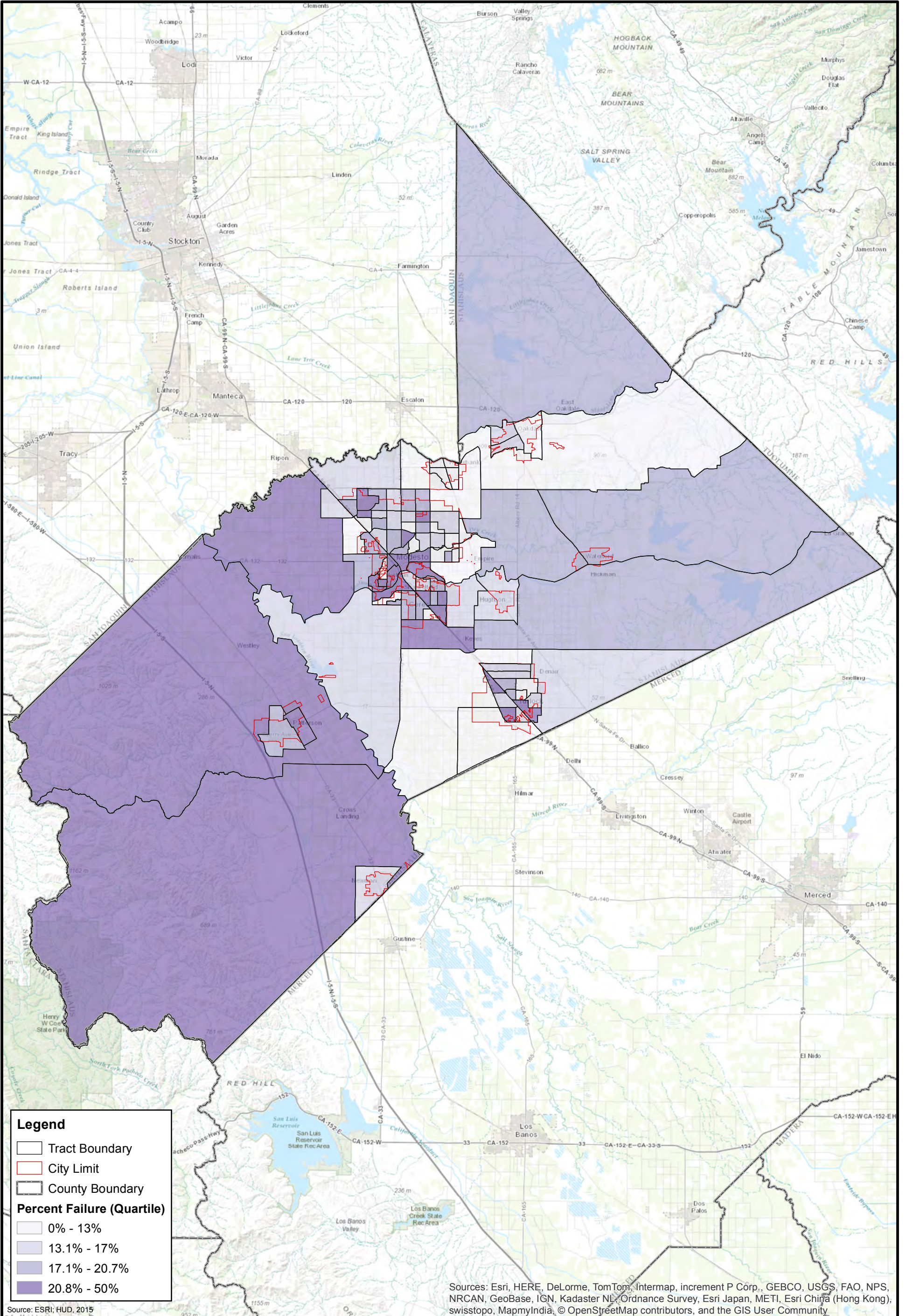


Map 5
Total Loan Denials

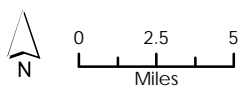


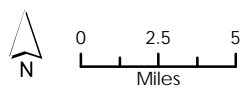
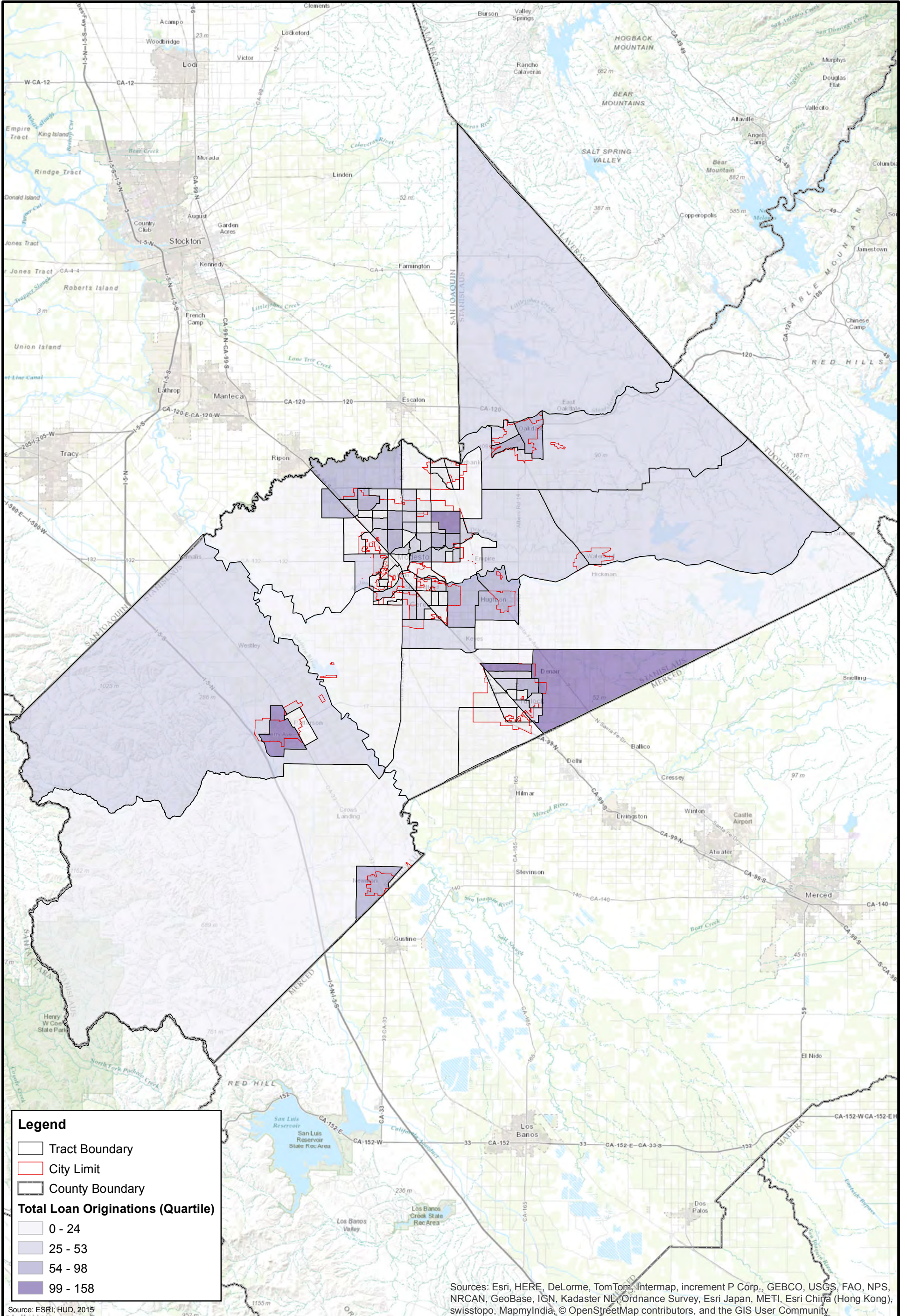


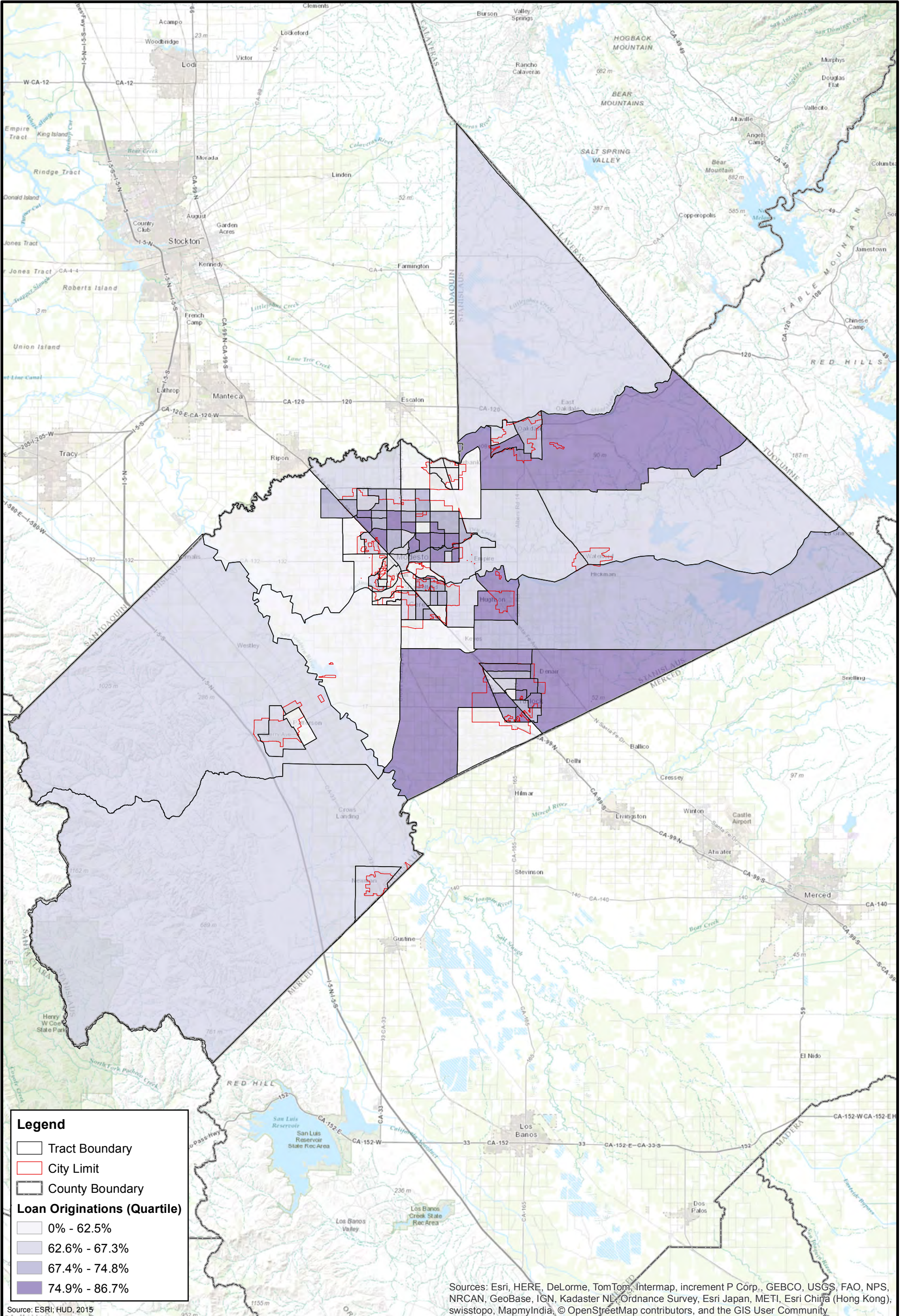




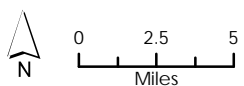
Source: ESRI; HUD, 2015



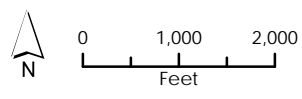
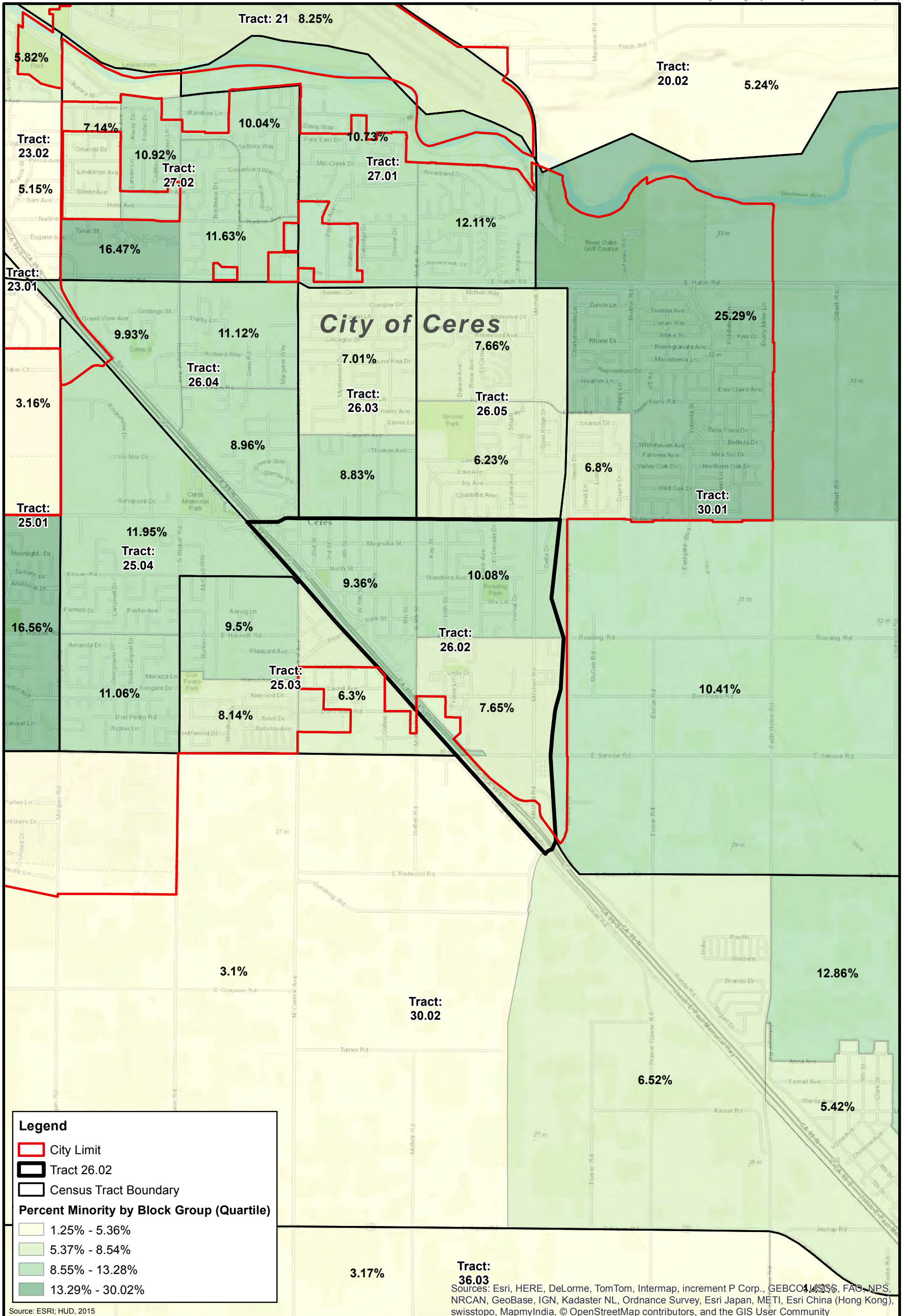


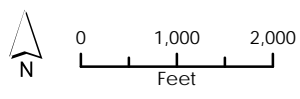
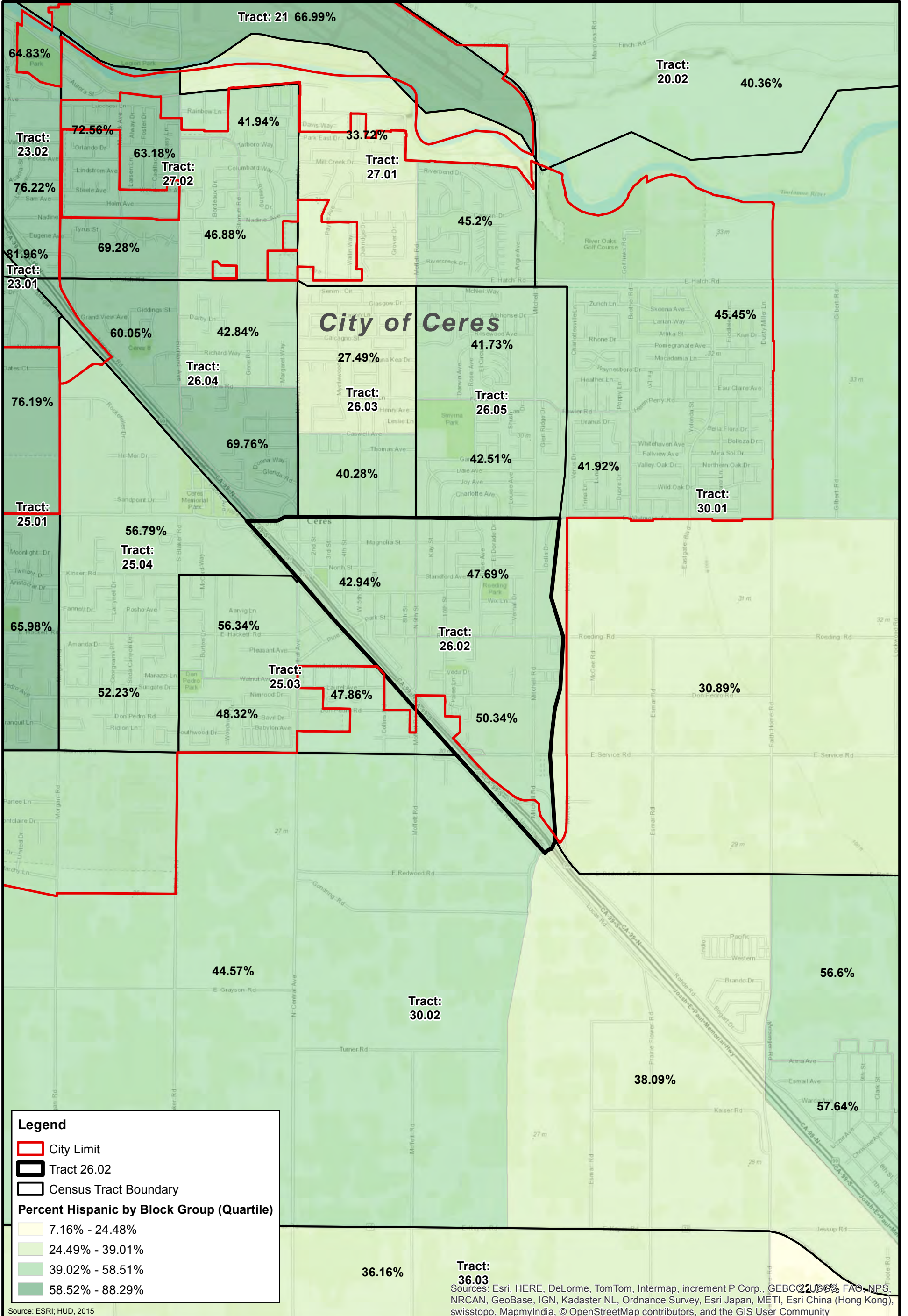


Source: ESRI; HUD, 2015



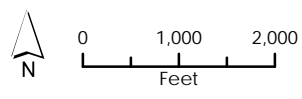
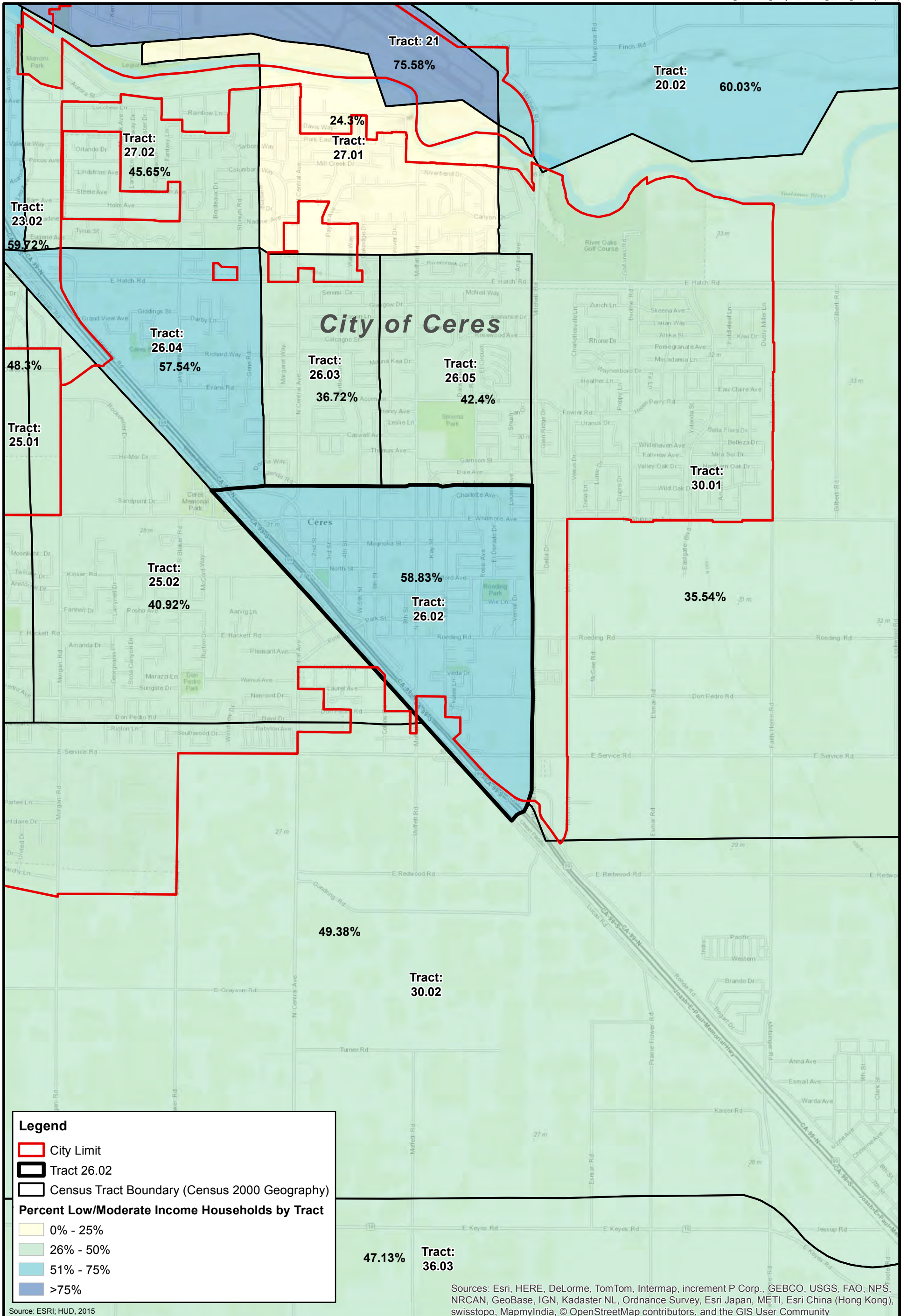
APPENDIX 5.
CENSUS TRACT 26.02





Map 12
Hispanic Concentration in Stanislaus County





Map 13
Percentage of Low/Moderate Income Households in Stanislaus County



Appendix 6.

Outreach Summary

COMMUNITY PARTICIPATION SUMMARY

INTRODUCTION

The community outreach process included four community workshops, one stakeholder meeting, a print and online survey, and agency phone and email consultations. Overall, more than 600 people provided their feedback on the Fiscal Year 2015-2020 Stanislaus Urban County/City of Turlock Regional Consolidated Plan (Con Plan) and Fiscal Year 2015–2023 Stanislaus County Housing Element. The following is a summary of the responses received during each portion of the outreach process. Overall trends and themes identified are located in the Community Themes section at the end of this summary. The Community Themes section takes into account results and feedback from all input events and methods. Complete meeting notes, sign-in sheets, survey data, and agency consultations are provided following this summary.

COMMUNITY WORKSHOPS

The workshops each began with a presentation; then, workshop participants were invited to provide their feedback at four activity stations set up around the room. The stations included posters where participants were asked to place dots (stickers) on the posters to prioritize issues and needed services and funding. The full dot voting results for all workshops are included at the end of this appendix.

COMMUNITY WORKSHOP 1 – CITY OF CERES (OCTOBER 15, 2014)

The following feedback was provided at the four activity stations set up around the room:

Station 1 – Consolidated Plan: Housing

Generally participants felt that unsafe neighborhood conditions and homelessness were very common and important to address. Emergency shelters, transitional housing, new affordable housing units, and improvements to the existing rental housing stock were all seen as very important to fund.

Station 2 – Consolidated Plan: Public Service and Facilities

Participants felt that funding for homeless prevention assistance, services for at-risk youth, and employment skills training were important to fund. Curbs and gutters as well as lighting improvements were also identified as very important to fund.

Station 3 – Consolidated Plan: Fair Housing

Participants felt that the greatest barrier to accessible housing was cost. Race and ethnicity was seen as the most common form of discrimination.

Station 4 – Housing Element

Building code enforcement and conserving and improving the existing housing stock were seen as important goals in the Housing Element.

Complete workshop materials, notes, and sign-in sheets are provided following this summary.

COMMUNITY WORKSHOP 2 – CITY OF TURLOCK (OCTOBER 20, 2014)

The following feedback was provided at the four activity stations set up around the room:

Station 1 – Consolidated Plan: Housing

Participants at Workshop 2 felt that new affordable rental housing and transitional housing for the homeless should be a priority for the next five years. Funding priorities were housing for lower-income households, mentally ill persons, and seniors. Services for homeless families with children and youth were also seen as very important to fund by workshop participants.

Station 2 – Consolidated Plan: Public Service and Facilities

In the public services category, participants felt services for low-income households, at-risk youth, and a job creation and retention program were very important to fund. Improvements including neighborhood facilities and street improvements were also categorized as very important to workshop participants.

Station 3 – Consolidated Plan: Fair Housing

Cost, accessibility, and supply were all identified as common barriers to finding housing. Discrimination based on race and ethnicity was identified as the most common form of discrimination. In addition, workshop participants felt that consumers were not aware of their rights under fair housing law.

Station 4 – Housing Element

Workshop participants identified first-time homebuyers programs, energy conservation, assistance for special needs housing, and conserving and improving existing housing as important goals for the Housing Element update.

Complete workshop materials, notes, and sign-in sheets are provided following this summary.

COMMUNITY WORKSHOP 3 – CITY OF OAKDALE (OCTOBER 22, 2014)

No participants attended this workshop.

COMMUNITY WORKSHOP 4 – CITY OF PATTERSON (OCTOBER 29, 2014)

The following feedback was provided at the four activity stations set up around the room:

Station 1 – Consolidated Plan: Housing

Rental housing affordability and overcrowding were identified as the most common housing concerns. Services for homeless families with children as well as individuals without children were very important to fund over the next five years.

Station 2 – Consolidated Plan: Public Service and Facilities

Participants identified facilities serving youth, child care facilities, street improvements, and improving the water supply as important to fund. Programs including homeless services, parent education, and financial literacy were also important to fund. Economic development funds should focus on technical assistance for businesses and employment skills training.

Station 3 – Consolidated Plan: Fair Housing

The most common barriers to housing were identified as cost, accessibility, and type of housing. Participants felt that reasons for discrimination include that consumers are not aware of their rights and landlords/owners are not aware of the law.

Station 4 – Housing Element

Workshop participants identified energy conservation, assistance for special needs housing, development of second units, conservation and improvement of existing housing, encouraging mixed-use development, and working with Habitat for Humanity and other agencies as very important for the Housing Element.

STAKEHOLDERS MEETING – STANISLAUS HOUSING AND SUPPORT SERVICES COLLABORATIVE COMMITTEE (STANISLAUS COC) (OCTOBER 16, 2014)

Generally participants felt that the collaborative programming between the County, cities, and nonprofits contributed to the success of Con Plan programs. Other things identified as working well included capital improvements, HOME Investment Partnership Program (HOME) and Neighborhood Stabilization Program (NSP) units, some programs for the chronically homeless (including comprehensive case management with a transition period before housing placement, supportive housing, and programs emphasizing home visits), and nonprofit capital facilities (i.e., shelters and transitional housing).

Participants identified that funding gaps were most common for extremely low-income households, chronically homeless, homeless youth, and those living in transitional shelters because they are not considered homeless by HUD.

Although some programs for the chronically homeless were noted amongst the successes, more participants felt there were barriers and funding gaps to providing enough services to the chronically homeless. It was noted that housing homeless youth is challenging because they are often not ready or willing to live in permanent housing. More transitional or emergency housing for homeless youth would be helpful. Another homeless subgroup identified as having a great need is homeless families with children.

Another question was regarding the top barriers to sustaining permanent housing. The group identified the demise of the redevelopment agencies, long waiting lists, lack of funding for case management, mental health issues, bad credit or rental history, projects not being able to pencil out for developers, and job development as some of the top barriers. Some of the top obstacles to housing placement were long waiting lists, drug and GED requirements for applicants, lack of employment, income documentation, timing considerations for the NSP program, and the lack of affordable housing units. Sheltered employment or employment that provides on-the-job training is needed.

Other comments included a discussion on economic development, NSP, coordination and referrals, and homeless prevention services.

Challenges to the success of homeless prevention services included income targeting requirements that are too low and too difficult to meet, uninhabitable substandard housing stock, cost of utility bills, insufficient mental health services, participants terming out of programs, lack of financial literacy and life skills amongst participants, inability of participants to document homeless status, need for willing landlords and employers, and the need to educate those in

substandard housing regarding available resources. Also, sufficient funding from a variety of funding programs for housing as part of homeless prevention programs was identified as a funding gap for homeless prevention. Prevention truly needs to be the focus for homeless prevention programs.

An overall greater level of funding for services and programs was mentioned repeatedly. Staffing the Stanislaus CoC was one suggestion related to funding. Funding for people to afford housing was mentioned repeatedly and lack of funding and overcrowding of emergency shelters was mentioned by several respondents.

The discussion questions, complete workshop notes, feedback forms, and attendance information are provided following this summary.

PRINT AND ONLINE SURVEY

An online survey was provided on the Stanislaus County website from October 20, 2014, to December 1, 2014. The option was also available to complete a written hard copy survey during this same time period. A total of 587 completed surveys were received: 585 English surveys and 2 Spanish surveys. The following survey results section includes results from both the online and print surveys completed.

Of those who indicated their affiliation or role when completing the survey, many worked for the government or a nonprofit organization. Others roles included agriculture, education, and concerned citizens.

SURVEY RESULTS BY QUESTION

Demographics

The first set of questions in the survey was regarding demographics. The majority of survey respondents identified themselves as homeowners (54%), followed by interested resident (41%) and public service provider (21%). Please note that respondents were able to select more than one category.

I am completing this survey as a(n)...		
Answer Options	Response Percent	Response Count
Interested resident	40.7%	239
Homeowner	54.2%	318
Renter	14.8%	87
Public/subsidized housing consumer	0.3%	2
Homeless individual	0.5%	3
Business owner	3.7%	22
Subsidized housing provider	0.7%	4
Landlord	5.1%	30
Public service provider	21.1%	124
Homeless service provider	4.3%	25
Housing advocate	2.6%	15
Health service provider	8.3%	49
Educator	7.2%	42
Municipal employee	10.1%	59
Other (please specify)	7.7%	45
Total	100%	587

Survey responses came from incorporated cities and unincorporated County, as well as outside of the County. The largest number of responses came from Modesto (34%), followed by Turlock (17%) and Salida (11%). Note that survey respondents that indicated that they are from Modesto may be from unincorporated areas of the County.

Parks and Community Centers

A majority of survey respondents felt it was important to fund facilities serving youth/after school programs (82%), facilities serving seniors (71%), improvements to parks (55%), and improvements to accessibility for seniors and disabled persons (61%). Respondents felt that neighborhood facilities and improvements to technology were maybe OK to fund. Other suggestions included facilities for the homeless and community service centers.

Please indicate the importance of investing funds in parks and community centers in your community.				
Answer Options	Yes, Important to fund	Maybe, OK to fund	No, Do not fund	Response Count
Facilities serving youth/after school programs	456	90	9	555
Facilities serving seniors	392	147	11	550
Neighborhood facilities	231	264	41	536
Facilities for child care	258	203	76	537
Improvements to parks	299	211	34	544
Improvements to accessibility for seniors and disabled persons	333	181	28	542
Improvements to technology	187	267	81	535
Other	45	14	29	88

Streets, Sewers, and Storm Drains

A majority of survey respondents felt it was important to fund street improvements (72%), install or repair curb and gutter (54%), install or improve sewer (59%) and storm drainage (62%), improve water supply (73%), install or repair sidewalks (57%), and install or improve street lighting (73%).

Please indicate the importance of investing funds for streets, sewer, and storm drainage related improvements in low-income communities throughout Stanislaus County.				
Answer Options	Yes, Important to fund	Maybe, OK to fund	No, Do not fund	Response Count
Street improvements	392	131	18	541
Install or repair curb and gutter	286	209	37	532
Install or improve sewer	314	191	28	533
Install or improve storm drainage	332	180	23	535
Improve water supply	388	127	16	531
Install or repair sidewalks	304	191	36	531
Install or improve street lighting	394	123	22	539
Other	29	8	21	58

Public Services Programs

Survey participants were asked to rank the importance of providing grant funds to programs that provide public services to low-income persons in their community. Respondents felt that the highest priority should be given to services for at-risk children/youth, seniors, and physically/mentally disabled persons. Lowest priority was to persons recently incarcerated or on parole, persons with substance abuse problems, and for financial literacy.

Economic Development and Business Assistance

Survey participants felt it was important to fund job creation/retention (79%), employment skills training (66%), start-up business assistance (five or fewer employees) (46%), and small business lending (45%). Participants felt it was maybe OK to fund commercial rehabilitation/facade improvement, commercial infrastructure, technical assistance for business expansion/improvement, and economic development studies, specific plans, and program development.

Top Concerns

Participants were asked to rank 21 potential areas or issues to prioritize in terms of housing choices and affordability, cost of living, special needs groups (seniors, those with disabilities, large families, homeless), energy conservation, housing conditions and safety, and infrastructure. Only one of the print surveys was filled in for this question and all issues were ranked equally. The three concerns receiving the largest percentage of the vote on the online survey were (in order of ranking):

1. Providing shelters and transitional housing for the homeless, along with services, to help move persons into permanent housing.
2. Establishing special needs housing for seniors.
3. Ensuring that children who grew up in Stanislaus County can afford to live in Stanislaus County.

Please indicate the importance of investing funds in the following economic development activities in your community.				
Answer Options	Yes, Important to fund	Maybe, OK to fund	No, Do not fund	Response Count
Commercial rehabilitation/facade improvement	98	275	122	495
Commercial infrastructure	119	274	104	497
Small business lending	225	215	55	495
Technical assistance for business expansion/improvement	133	266	92	491
Start-up business assistance (5 or fewer employees)	227	213	55	495
Employment skills training	332	138	31	501
Job creation/retention	394	89	15	498
Economic development studies, specific plans, and program development	156	258	79	493
Other	18	6	21	45

Homeless Needs

Survey participants were asked to rank the importance of meeting the needs of certain subpopulations of homeless persons in their community. Households with children was ranked as the highest priority followed by homeless veterans and then unaccompanied youth.

Participants were then asked to identify the greatest needs of certain homeless subpopulations in their community. For households with children, the greatest need was housing followed by case management and temporary rental assistance. For households/individuals without children, the greatest need identified was transitional housing followed by emergency shelter. Mental health services were identified as the highest priority for the chronically homeless. Case management was considered to be most important for unaccompanied youth. Permanent supportive housing was identified as being the most important for homeless veterans. Families and individuals at risk of becoming homeless were in greatest need of temporary rental assistance.

Housing Assistance Needs

Survey participants were asked to identify which housing assistance needs were important to fund. Health- and safety-related home repair (53%), energy efficiency improvements (50%), low-income housing acquisition (45%), and first-time homebuyer assistance (45%) were identified by participants as important to fund. Rehabilitation of public housing, lead-based paint abatement, homeownership/credit counseling, and fair housing/tenant landlord mediation were identified as maybe OK to fund.

In addition, 67 percent of survey respondents felt that providing shelters and transitional housing for the homeless, along with services to help move persons into permanent housing, was very important to fund. Other concerns that were very important included ensuring that children who grew up in Stanislaus County can afford to live in Stanislaus County when they become adults (66%) and establishing special needs housing for seniors (66%).

Please indicate the importance of investing funds for the following housing-related activities in your community.				
Answer Options	Yes, Important to Fund	Maybe, OK to Fund	No, Do Not Fund	Response Count
Rehabilitation of public housing	205	225	46	476
Energy efficiency improvements	237	179	62	478
Lead-based paint abatement	167	201	107	475
Low-income housing acquisition	215	181	78	474
Health- and safety-related home repair	256	176	47	479
First-time homebuyer assistance	216	178	83	477
Homeownership/credit counseling	187	198	88	473
Fair housing/tenant landlord mediation	186	219	68	473
Other	13	3	11	27

Housing Types

Participants were asked to identify housing types that were important to fund during 2015–2020. Participants identified emergency shelters (68%), permanent housing for special needs (57%), and transitional housing for the homeless (57%) as the highest priorities.

Please indicate the importance of investing funds in the following housing-related activities in your community.				
Answer Options	Yes, Important to fund	Maybe, OK to fund	No, Do not fund	Response Count
Emergency shelter	304	126	16	446
Transitional housing for the homeless	254	164	31	449
Permanent housing for special needs	257	162	29	448
Affordable rental housing	226	154	62	442
Affordable for-sale housing	189	154	100	443
Improvements to existing rental housing	136	205	99	440
Improvements to existing ownership housing	134	196	113	443
Other	8	4	12	24

Housing Populations

Participants were asked to identify which housing populations grant funds should be invested in. Survey respondents identified housing for senior persons (70%), housing for disabled persons (69%), and housing for aging-out foster youth (59%) as the highest priority.

Please indicate the importance of investing funds in housing for the following populations in your community.				
Answer Options	Yes, Important to fund	Maybe, OK to fund	No, Do not fund	Response Count
Housing for senior persons	310	113	18	441
Housing for disabled persons	305	124	11	440
Housing for homeless persons	224	166	45	435
Housing for large families (5 or more)	105	183	151	439
Housing for very low-income persons	202	173	61	436
Housing for aging-out foster youth	261	141	37	439
Housing for mentally ill persons	240	166	32	438
Housing for persons recently in jail or on parole	76	206	156	438
Other	7	2	12	21

Barriers to Equal Access to Housing

Cost was identified as the number one barrier to equal access to housing with 70 percent of respondents indicating that this is very common. Participants also felt that accessibility (for seniors and disabled persons) was also a barrier with 59 percent of the votes.

Please indicate how common and important it is to address the following barriers to equal housing in your community.				
Answer Options	Very Common, Important to Address	Somewhat Important to Address	Rare, Not Important to Address	Response Count
Cost	304	88	40	432
Accessibility (seniors and disabled persons)	260	146	35	441
Supply (new housing)	140	186	115	441
Proper size/type of housing	136	189	116	441
Other	8	8	9	25

Fair Housing

The next group of questions was regarding fair housing in Stanislaus County. Participants identified that discrimination was common and should be addressed in rental housing and mortgage lending. Discrimination was most common in regard to race/ethnicity and disability. The most common types of discrimination included deception regarding availability or price of housing and variation in price, rent, fees, or deposit information. Lack of enforcement, lack of reporting, consumers not being aware of their rights, and sellers/landlords not being aware of the law were all seen as reasons for unfair housing practices. Education was identified as the best method to combat housing discrimination.

Please indicate how common and important it is to address the following areas of housing discrimination in your community.				
Answer Options	Very Common, Important to Address	Somewhat Important to Address	Rare, Not Important to Address	Response Count
Rental housing	197	157	82	436
Housing for sale	154	169	111	434
Mortgage lending	171	152	110	433
Other	6	7	9	22

Please indicate how common and important it is to address the following areas of housing discrimination in your community.				
Answer Options	Very Common, Important to Address	Somewhat Important to Address	Rare, Not Important to Address	Response Count
Race/ethnicity	154	127	148	429
Language	141	141	146	428
National origin	107	156	165	428
Gender	91	142	192	425
Disability	193	134	102	429
Familial/marital status	99	149	180	428
Sexual orientation	97	133	198	428
Other	7	8	17	32

Please indicate how common and important it is to address the following areas of housing discrimination in your community.				
Answer Options	Very Common, Important to Address	Somewhat Important to Address	Rare, Not Important to Address	Response Count
Refusal to rent/sell	120	144	158	422
Refusal to show	90	145	184	419
Deception regarding availability or price	169	126	123	418
Different price, rent, fees or deposit	184	113	121	418
Other	5	5	15	25

Please indicate why housing discrimination might still happen in your community.				
Answer Options	Yes, This is One Reason	Maybe, Might be the Reason	No, Not the Reason	Response Count
Lack of enforcement	188	155	71	414
Lack of reporting	221	136	57	414
Consumers are not aware of rights	227	136	52	415
Sellers/landlords are not aware of the law	167	153	95	415
Other	13	3	10	26

Please indicate which are effective ways to combat housing discrimination in your community.				
Answer Options	Yes, This is Effective	Maybe, Might be Effective	No, Would Not be Effective	Response Count
Education	304	101	26	431
Enforcement	283	115	31	429
Reporting	277	124	27	428
Other	8	1	9	18

SURVEY RESULTS BY JURISDICTION

Survey results were further broken down based on location of the participant. The following is a summary of the responses received for Ceres, Hughson, Newman, Oakdale, Patterson, Turlock, and Waterford, as well as other areas of the county including Salida and Modesto.

Ceres

There were a total of 68 survey participants responding from Ceres. Participants from Ceres felt that the following programs and services are most important to fund:

- Job creation/retention
- Facilities serving youth/after school programs
- Housing for senior persons
- Facilities serving seniors
- Install or improve street lighting

Hughson

Thirteen survey participants indicated that they were from Hughson. The following programs and services were most important to fund for Hughson participants:

- Improve water supply
- Ensuring that children who grew up in Stanislaus County can afford to live in Stanislaus County
- Job creation/retention

Newman

A total of seven survey participants were from Newman. Participants indicated the following were most important to fund:

- Facilities serving youth/after school programs
- Facilities for child care
- First-time homebuyer assistance
- Job creation/retention
- Housing for senior persons and disabled persons

Oakdale

There were a total of 18 survey participants responding from Oakdale. Participants from Oakdale felt that the following programs and services are most important to fund:

- Facilities serving youth/after school programs
- Job creation/retention
- Providing shelters and transitional housing for the homeless, along with services, to help move persons into permanent housing
- Emergency shelter
- Housing for senior persons and disabled persons

Patterson

Of the survey participants, 30 were from Patterson. Participants from Patterson felt that the following programs and services are most important to fund:

- Street improvements
- Install or improve street lighting
- Job creation/retention
- Improve water supply
- Facilities serving youth/after school programs

Turlock

A total of 99 survey participants indicated they were from Turlock. Participants from Turlock felt that the following programs and services are most important to fund:

- Facilities serving youth/after school programs
- Job creation/retention
- Improve water supply
- Employment skills training
- Facilities serving seniors

Waterford

A total of 28 participants indicated that they were from Waterford. Results of the survey show that the program and services that are most important to fund are:

- Facilities serving youth/after school programs
- Establishing special needs housing for seniors
- Improve water supply

Other Areas

The remaining 329 survey participants were from Modesto, Salida, Riverbank, the unincorporated county, and a few were from other counties.

Salida

A total of 72 participants indicated that they were from Salida. Results of the survey in Salida show that the program and services that are most important to fund are:

- Install or improve street lighting
- Street improvements

Modesto and Surrounding Area

Of the survey participants, 203 indicated that they were from Modesto or unincorporated areas of the County adjacent to Modesto. Participants from this area felt that the following programs and services are most important to fund:

- Facilities serving youth/after school programs
- Street improvements
- Facilities serving seniors
- Improve water supply
- Job creation/retention

CONSULTATIONS

The primary trends in the input received during the consultations included:

- Need for more mental health services.
- As the economy recovers the people most likely in need will be those with fewer skills and less education.
- Shortage of experienced staff and lack of funding to employ experienced staff persons continues to be a problem.

COMMUNITY THEMES

The outreach effort for the Fiscal Year 2015-2020 Stanislaus Urban County/City of Turlock Regional Consolidated Plan and Fiscal Year 2015–2023 Stanislaus County Housing Element reached more than 600 interested participants and more than 40 local agencies. Overall, some general themes emerged throughout the process that will help guide the development of the Consolidated Plan and Housing Element. The themes can be broken down into the following six topic areas.

HOUSING FOR SENIORS, DISABLED PERSONS, AND YOUTH/FAMILIES

Housings for seniors, disabled persons, and youth/families were seen as a priority to both participants at the workshops and survey participants. Many participants agreed that homelessness was a priority to address in the next five years. Participants identified providing shelters and transitional housing for the homeless as important to fund.

PUBLIC SERVICES AND FACILITIES FOR YOUTH, SENIORS, AND DISABLED PERSONS

Respondents felt that the highest priority should be given to services for at-risk children/youth, seniors, and physically/mentally disabled persons. Facilities serving youth/after school programs were also identified as very important to many of the county's jurisdictions and was identified as a top priority overall.

HOMELESS SERVICES

Homeless services and needs were emphasized in the various forums. It was a focus of input from the Stanislaus CoC and was the top concern of the 21 issues ranked in the online survey. Homeless issues were identified as concerns and priorities at all three of the workshops where input was received. Eight percent of the "fill in the blank" comments on the survey in addition to the multiple choice responses were on the subject of homelessness.

HOUSING FOR HOMELESS HOUSEHOLDS WITH CHILDREN

Participants felt that homeless households with children were in the greatest need for support. Many felt that permanent supportive housing and temporary rental assistance was in great need for this subpopulation.

JOB CREATION AND RETENTION

The recession hit a lot of people in Stanislaus County at all educational and skill levels. Participants felt that job creation and retention was very important to fund over the next five years in almost all of the jurisdictions.

FAIR HOUSING

Cost and accessibility were generally identified as the most common barriers to finding housing. Discrimination based on race and ethnicity was identified as the most common form of discrimination.

MAY 2015



9:05am

5-5-15

PUBLIC COMMENT FOR CDBG FUNDS

BOARD OF SUPERVISORS

2015 MAY -4 P 3:53

Supervisor Mr. Jim De Martini

The Sheckelford community and its surrounding area are very low income and in great need of services. It's senior and youth populations are especially vulnerable and at high risk of mental and physical health problems, gang involvement, suicide and homelessness.

We have surveyed the community and they feel that a project to build a community center that could provide services and programs to them would be of great benefit. Many of them have signed a petition (SEE ENCLOSED), asking for help from the county to use CDBG funds to build such a center in the area.

Some of the activities and programs that would benefit the residents are:

1. Food programs and meals for the elderly, Zumba exercises, bingo games, movies
2. Parenting and counseling classes to prevent kids from being abused and/or going into foster homes
3. Afterschool programs for the kids to help them do well in school, computers, tutoring, hobbies
4. Health and wellness programs and classes on diabetes, high cholesterol, high blood pressure
5. Neighborhood watch and beautification groups

This community is greatly underserved and will cost the city and county more tax dollars if "front end" services are not immediately instituted.

Contact persons:

Miguel Donoso 209 345-6741

Manuel Valdez 209 324-1091 jua7rez@sbcglobal.net

Cc: Ms. Angela Freitas Director Planning Department

5-5-15

BOARD OF SUPERVISORS

PUBLIC COMMENT FOR CDBG FUNDS 2015 MAY -4 P 3:53

Ms. Angela Freitas Director Planning Departmen

The Sheckelford community and its surrounding area are very low income and in great need of services. It's senior and youth populations are especially vulnerable and at high risk of mental and physical health problems, gang involvement, suicide and homelessness.

We have surveyed the community and they feel that a project to build a community center that could provide services and programs to them would be of great benefit. Many of them have signed a petition (SEE ENCLOSED), asking for help from the county to use CDBG funds to build such a center in the area.

Some of the activities and programs that would benefit the residents are:

1. Food programs and meals for the elderly, Zumba exercises, bingo games, movies
2. Parenting and counseling classes to prevent kids from being abused and/or going into foster homes
3. Afterschool programs for the kids to help them do well in school, computers, tutoring, hobbies
4. Health and wellness programs and classes on diabetes, high cholesterol, high blood pressure
5. Neighborhood watch and beautification groups

This community is greatly underserved and will cost the city and county more tax dollars if "front end" services are not immediately instituted.

Contact persons:

Miguel Donoso 209 345-6741

Manuel Valdez 209 324-1091 jua7rez@sbcglobal.net

Cc: Supervisor Mr. Jim De Martini

PETITION TO BUILD YOUTH/SENIOR CENTER IN SHACKELFORD CUMMUNITY

We the undersigned request that the Stanislaus County use CDBG funds to build a Youth/Senior Center in our community. Both of these populations are at high risk and the center would help with preventive services and programs that in the long run, would be cost effective.

BOARD OF SUPERVISORS

2015 MAY -4 P 3:53

PETICION PARA HACER UN CENTRO PARA PERSONAS DE TERCER EDAD Y JOVENES

Nosotros, las personas que aqui firman, pedimos a la Condado de Stanislaus que use los fondos del CDBG para establecer un centro para jovenes y personas de tercer edad. Estos dos grupos estan en gran riesgo y el centro les ayudarian con servicios y programas.

Name

Address

Jose Sanchez 110 W. Sanchez Ave 95351

Maricela Zavala 1405 Imperial Av

Ellen Zavala 1405 Imperial Avenue 95358

Felipa Flores 1229 Santa Fe Av. 95351

Dora Durán 1241 Santa Fe Ave. 95351

Luz Pio 1329 Alamo Ave 95351

Martha Tatolla 1622 EXPOKE ST 95358

Lirica Perez 1218 Boulder Avem 95351

Fanny Velaz 312 crater Ave. 95351

Maria Diaz 1218 Boulder Av. M 95351

Angelica Ortiz 1217 Boulder Av 95351

Yolanda Guerra 1225 Alamo Ave 95351

VIRGINIA CALDERON 1305 Santa Fe

Francisca Mendez 433 S. 7th St #83 95351

Teresa Pulido 1621 Dover Ave

Nelfie Chavez 2037 1st Whitney Ct Modesto CA

PETITION TO BUILD YOUTH/SENIOR CENTER IN SHACKELFORD CUMMUNITY

We the undersigned request that the Stanislaus County use CDBG funds to build a Youth/Senior Center in our community. Both of these populations are at high risk and the center would help with preventive services and programs that in the long run, would be cost effective.

2015 MAY -4 P 3:53

PETICION PARA HACER UN CENTRO PARA PERSONAS DE TERCER EDAD Y JOVENES

Nosotros, las personas que aqui firman, pedimos a la Condado de Stanislaus que use los fondos del CDBG para establecer un centro para jovenes y personas de tercer edad. Estos dos grupos estan en gran riesgo y el centro les ayudarian con servicios y programas.

Name

Address

HECTOR MIGUEL MIZ 1118 BOULDER AVE MODESTO CA 95351
* Delia Aguilar 936 ALAMO AVE Modesto Ca 95351
Jose Aguilar 936 ALAMO AV.
Prina Velazquez 813 Watson AVE Modesto CA 95358
Hiacely Brisenó 1813 Dallas St Modesto CA 95358
Jose Cadenas 421 Broadway av Modesto Ca 95351
Paola Meza 421 Broadway ave Modesto CA 95351
* Rosario Medina 1226 Alamo Ave. Modesto Ca. 95351
Nancy Sanchez 1226 Alamo Ave Modesto CA 95351
Socorro Martinez 1226 Alamo Ave Modesto Ca. 95351
Tobias Valencia 727 Watson mod, 95351
Celsa Salazar 1124 Santa Fe AV-
Ramon Garcia 932 ALAMO AV-
Manuel Hernandez 1001 ALAMO AV. 95351
Maria Cruz 2725 Tarkenton DR Modesto CA 95358
SENGIO DONATE 1208 SAN AVE MODES CA 95350

PETITION TO BUILD YOUTH/SENIOR CENTER IN SHACKELFORD CUMMUNITY

We the undersigned request that the Stanislaus County use CDBG funds to build a Youth/Senior Center in our community. Both of these populations are at high risk and the center would help with preventive services and programs that in the long run, would be cost effective.

BOARD OF SUPERVISORS

2015 MAY 14 P 3:53

PETICION PARA HACER UN CENTRO PARA PERSONAS DE TERCER EDAD Y JOVENES

Nosotros, las personas que aqui firman, pedimos a la Condado de Stanislaus que use los fondos del CDBG para establecer un centro para jovenes y personas de tercer edad. Estos dos grupos estan en gran riesgo y el centro les ayudarian con servicios y programas.

Name	Address
Martha D	1830 Teresa St Modesto CA 95350
Luis G. D	1830 Teresa St Modesto CA 95350
VIJAY . Kalotiaj	Same as above
Luz Barraza	2298 Laurel Cir. Ceres Ca. 95307
Aurelia Ortega	5329 st H Keyes Calif 95328
Rocio Alvarez	1603 Graham Ln Ceres, ca 95307
Claudia Garcia	3015 Ferris Ave Ceres ca 95307
Patricia Cisneros	200 Kende ^{ro} Modesto CA 95351
Leidi Safelo	417 Grenache AVE Modesto, ca 95358
Platen Abundio	417 Grenache AVE Modesto
Christina Ortega	1525 Carthwright Ct Modesto 95358
Maria Garcia	313 Glacier Ave Modesto ca. 95351
Francisca Sanchez	571 W Hatch Rd. SPCATS Modesto CA 95351
Rigoberto Diaz	930 acacia st Modesto CA 95351
Livia Perez	1218 Boulder Ave Modesto ca 95351
Maya Santocual	1905 Evergreen Ave Modesto CA 95350

PETITION TO BUILD YOUTH/SENIOR CENTER IN SHACKELFORD CUMMUNITY

We the undersigned request that the Stanislaus County use CDBG funds to build a Youth/Senior Center in our community. Both of these populations are at high risk and the center would help with preventive services and programs that in the long run, would be cost effective.

BOARD OF SUPERVISORS
2015 MAY -4 P 3:53

PETICION PARA HACER UN CENTRO PARA PERSONAS DE TERCER EDAD Y JOVENES

Nosotros, las personas que aqui firman, pedimos a la Condado de Stanislaus que use los fondos del CDBG para establecer un centro para jovenes y personas de tercer edad. Estos dos grupos estan en gran riesgo y el centro les ayudarian con servicios y programas.

Name

Address

Katie Kelly 1609 Seattle St Modesto CA 95358

Maria Vega 1629 Seattle St Modesto CA 95358

Nancy Sanchez 1234 Alamo Ave Modesto

Kybi Kosels 1809 San Ramon Way Modesto CA 95358

Pedro Garcia 1809 San Ramon Way Modesto CA

Floyd Cassway 2209 Park Faith Ln Modesto 95358

Criselda Gonzalez 124 Fresno Ave Modesto CA

Evelin Cajardo 118 1/2 Litack Modesto CA, 95351

Maria Luna 232 Crockett Av.

Alice Lee 613 S 7th Sp #8

Silvia Ornelas 613 S 7th Sp #8

PATRICIA ESCOBAR 321 Amador Ave Modesto 95358

Idan Hernandez 1219 St Sebastian Way

JOE AERANDEZ 525 EL PASO AVE

Tablo Venegas 301 CROCKETT AVE

PETITION TO BUILD YOUTH/SENIOR CENTER IN SHACKLEFORD CUMMUNITY

BOARD OF SUPERVISORS

We the undersigned request that the city of Modesto use CDBG funds to build a Youth/Senior Center in our community. Both of these populations are at high risk and the center would help with preventive services and programs that in the long run, would be cost effective.

PETICION PARA HACER UN CENTRO PARA PERSONAS DE TERCER EDAD Y JOVENES

Nosotros, las personas que aqui firman, pedimos a la ciudad de Modesto que use los fondos del CDBG para establecer un centro para jovenes y personas de tercer edad. Estos dos grupos estan en gran riesgo y el centro les ayudarian con servicios y programas.

Name Address

Esther Montiel 201 Rio Grande Ave 95351

Jose L Galvan 300 Pueblo ave 95351

Cuna Mauriceez 1104 Crows landing Rd

Tony Manzanera 1104 Crowlanding Road.

Jody Purdy 908 Fall River Dr. 95351

Lricia Abundio 417 Grenache Ave 95358

Isabel Hibric 417 Grenache Ave 95358

Damiana M. 313 Pueblo Ave #C Modesto 95351

Rodolfo m 1509 SEATTLE ST Modesto CA 95358

Rodolfo M S 1509 Seattle St Modesto CA 95358

Blank lines for additional signatures and addresses.

9:05am
Handout from
Miguel Dorosa

need of copy

- Housing and Community Development Needs
- Development of Proposed Activities
- Review of Program Performance

During a program year when Stanislaus County develops a Consolidated Plan, at least one public hearing will be conducted prior to Board of Supervisors consideration of the Consolidated Plan. This public hearing may be conducted jointly with the hearing to consider the Annual Action Plan. Stanislaus County, at its discretion, may conduct additional outreach, public meetings or public hearings as necessary to foster citizen access and engagement.

B. Public Hearing Notification

Notices will be printed/posted at least 14 days prior to the meeting date. Noticing may include:

- A Printing a public notice in newspaper(s) of general circulation in Stanislaus County;
- B Display ads and/or press releases; or
- Posting notices at County Administrative Office.

The law said
11 times
and
location
convenient
to potential
or actual
beneficiaries

(A) Hispanic newspaper
(B) Display ads
The law said
No may be

Notices will include information on the subject and topic of the meeting including summaries when possible and appropriate to properly inform the public of the meeting. Notices may be published in additional languages as appropriate and will be accessible to those with disabilities. Meeting location and access is described below.

C. Public Review/Comment Period

Public notices will be printed / posted prior to the commencement of any public review/comment period alerting citizens of the documents for review. The minimum public comment/review period for each Consolidated Plan document is listed below:

Document	Public Comment Period
Consolidated Plan	30 days
Action Plan	30 days
Substantial Amendments	30 days
CAPER	15 days
Analysis of Impediments	30 days
Citizen Participation Plan	30 days

(1) no dates
(2) no time
(3) and no places

Copies of all documents and notices will be available for public review at the following location:

Stanislaus County Planning & Community Development Department
1010 10th Street, Suite 3400
Modesto, CA 95354

A copy of each document will also be made available for public review at County libraries and at the Planning Departments of each Urban County member city.

Documents and notices will also be posted to the Stanislaus County website at: <http://www.stancounty.com/planning/cdbg/cdbg.shtm>

“A number of low income leaders and advocates find fair housing an effective tool for addressing some types of CDBG problems.”

laws, as well as several other laws that apply to all federal programs.

The key “certifications” include:

◆ **Consistency with the ConPlan.** Housing activities assisted with CDBG funds must be “consistent” with the Strategic Plan. All that is meant by “consistent” is:

1. The Consolidated Plan shows “need”;
2. A proposed activity is “consistent” with the long-range Strategy; and,
3. The location of a proposed activity is “consistent” with the geographic areas specified in the Strategy. [Sec. 91.225(a)(6) for localities]
[Sec. 91.325(a)(6) for states]
[Sec. 91.510(c)]

There are some serious limitations to this definition. See Page 67 the Consolidated Plan Action Guide for more.

◆ **Following the ConPlan.** The CDBG law requires entitlements to use CDBG money in ways that “follow” the Consolidated Plan. This applies to nonhousing activities as well as housing activities. The meaning of the word “follow” is defined in the CDBG regulations as “taking all of the planned action described in the Action Plan.” The regs go on to say that this means:

1. Seeking all resources that the jurisdiction said it would seek;
2. Being impartial when giving “certifications of consistency” to those who apply for HUD funds when the jurisdiction said it would support applications for those specific HUD programs; and,
3. “Not hindering implementation of the Consolidated Plan by action or willful inaction.” [Sec. 570.903(b)]

There are problems with this definition which make it difficult for lower income people to use the

“following” feature to better ensure that low income people adequately benefit from CDBG. See page 68 of the Consolidated Plan Action Guide for more.

◆ **Section 3 Job Preferences.** The jurisdiction must comply with Section 3, which calls on them to “ensure to the greatest extend feasible” that low income people will have opportunities for training and employment at construction projects assisted with CDBG and Public Housing dollars.

[Sec. 91.225(a)(8) for localities]

[Sec. 91.325(a)(8) for states]

[Sec. 570.607(b) for entitlements]

[Sec. 570.487(d) for states]

Section 3 has not been effectively used by low income community leaders and advocates to attempt to gain jobs for low income people at CDBG construction sites. In part it has not been fully used due to some limitations in the Section 3 regulations [24CFR part 135]. However, you might want to look into Section 3.

◆ **Fair Housing.** The jurisdiction must “affirmatively further fair housing.” This includes conducting an “analysis of impediments” to housing choice, and having a plan of action that the jurisdiction will take to overcome the effects of these impediments.

[CHAS, Sec. 105(b)(14)]

[Sec. 91.225(a)(1) for localities]

[Sec. 91.325(a)(1) for states]

[Sec. 570.601 for entitlements]

[Sec. 487(b) for states and small cities]

A number of low income leaders and advocates find fair housing an effective tool for addressing some types of CDBG problems. Be sure to study your jurisdiction’s “Analysis of Impediments” (AI) and its “action plan” of specific steps intended to overcome the impediments to fair housing which it identified. HUD has a “Fair Housing Planning Guide” which is a detailed description of what HUD expects an AI to look like, as well as the process to follow to develop an AI. Copies of the “Fair Housing Planning Guide” are free from your HUD field office.

8 copies

SECTION VI

RESULTS

Overview of the Sample

Three quantitative surveys were used with the intention of collecting data to examine if the creation of a Latino Senior Day Center is a necessity in the area of South Side Modesto. A total of 129 surveys were completed in Stanislaus County. The data were collected during two different tabling events, which were carried out after mass services in different church denominations (preliminary survey one and two). Subsequently, the final quantitative survey was developed and completed in the area of South Side Modesto. From the three surveys, a total of 79 participants responded that they live specifically in the South Modesto Area. The remaining sample belongs to other parts of the city of Modesto and from other additional cities in Stanislaus County.

The data collected in the three surveys were analyzed using the statistical software SPSS, and frequency distributions were generated for each item. The participants of these surveys were 47 males (37%) and 75 females (58%), and the gender was not identified in five surveys (4%). Of these 129 surveys, 37 were answered by people younger than 55 years old (29%), and 119 identified themselves as seniors age 55 and older (92%). One hundred and nineteen people reported to be Latino or of Latino descent, which equals 92% of the total sample. The rest of the surveys were completed by community members of Caucasian, Asian, and African-



**ANNUAL FUNDING AGREEMENT
DESIGNATING STANISLAUS COUNTY AS A SUB-RECIPIENT OF
HOME INVESTMENT PARTNERSHIPS PROGRAM FUNDS THROUGH THE
CITY OF TURLOCK/STANISLAUS COUNTY HOME CONSORTIUM
FISCAL YEAR 2015-2016**

THIS SUBRECIPIENT AGREEMENT is made and entered into this 26th day of May 2015, by and between the **CITY OF TURLOCK**, hereafter called "TURLOCK" and the STANISLAUS COUNTY, hereinafter called "MEMBER".

WITNESSETH:

WHEREAS, on June 11, 2013, TURLOCK and Stanislaus County ("County"), acting on behalf of the Stanislaus Urban County, entered into an Inter-Governmental Agreement Renewing the Turlock/Stanislaus County HOME Consortium ("Cooperative Agreement") for a period of three years, with the effective dates of October 1, 2013 through September 30, 2016; to qualify for HOME Investment Partnerships Program ("HOME") funds funded through the United States Department of Housing and Urban Development ("HUD"); and

WHEREAS, members of the Turlock/Stanislaus County HOME Consortium ("Consortium") include the City of Turlock and the Stanislaus Urban County, which includes the unincorporated areas of Stanislaus County and the Cities of Ceres, Hughson, Newman, Oakdale, Patterson, and Waterford (collectively "Consortium Members"); and

WHEREAS, TURLOCK serves as the lead agency of the Consortium, designated by HUD as the HOME Program Participating Jurisdiction; and

WHEREAS, TURLOCK shall disburse HOME funds for HOME-eligible activities in the Consortium Members' localities; and

WHEREAS, MEMBER must be designated a HOME Subrecipient in order to implement activities using HOME funds; and

WHEREAS, TURLOCK and MEMBER desire to enter into this Subrecipient Agreement ("Agreement") for the purpose of designating the MEMBER as a HOME subrecipient;

NOW, THEREFORE, IT IS MUTUALLY AGREED AS FOLLOWS:

- I. Consortium Allocation, Administration Funds, Program Activities, and Agreement Term
 1. Upon execution of this Agreement, MEMBER shall be designated as a HOME Sub-recipient for 2015-2016 fiscal year funds for the purpose of administering HOME-eligible activities, as further defined in subparagraph 2 below, in MEMBER'S locality, the funds for which shall be disbursed by TURLOCK.
 2. The maximum amount of fiscal year 2015-2016 HOME funds covered by this Agreement

shall be One Hundred Twenty-four Thousand Six Hundred Seven Dollars (\$124,607), of which One Hundred Twenty-two Thousand One Hundred Seven Dollars (\$122,107) shall be available for Homeowner Rehabilitation, Homebuyer, and Rental Development Program Activities as defined in subparagraphs a., b. and c. Two Thousand Five Hundred Dollars (\$2,500) shall be available for Program Administration. This funding will be disbursed on a reimbursement basis upon receipt of required program forms. In the event that HUD reduces the HOME allocation to the Consortium, MEMBER'S allocation may be reduced. Should MEMBER be unable to draw down all or a portion of its allocated administration funds by June 30, 2016, the remaining HOME funds will revert back to TURLOCK pursuant to the Re-Allocation Process described in Section I.6 below.

- a. Homeowner Rehabilitation funding will be provided for repairs and rehabilitation of owner-occupied units of income eligible person and families who meet the criteria of the HOME Program.
 - b. Homebuyer Program funding will be provided for down payment assistance for income eligible families and persons who meet the criteria of the HOME Program.
 - c. Rental Development activities will be used to acquire and or rehabilitate safe and affordable rental housing units of income eligible person and families who meet the criteria of the HOME Program.
3. This Agreement shall be in effect until June 30, 2016, or until all fiscal year 2015-2016 HOME funds are disbursed to MEMBER or for the duration of any affordability period required pursuant to 24 CFR Part 92 in conjunction with a project financed with fiscal year 2015-2016 HOME funds, whichever is longer.
 4. Any changes to this Agreement shall be subject to the review and approval of TURLOCK and shall be codified through execution of a written amendment to this Agreement.
 5. MEMBER acknowledges that there are timeliness deadlines in the commitment and expenditure of the funds in accordance with the HOME Program regulations. Failure to commit and expend the funds in a timely manner as set forth in this Agreement and as required under the 24 CFR Part 92 will result in funds being re-allocated to other Consortium activities.
 - a. MEMBER must commit funds under this Agreement to HOME-eligible projects within twelve (12) months ("Commitment Date") of the effective date of this Agreement in accordance with the definition of "commitment" as found in 24 CFR Part 92.2.
 - b. MEMBER must expend funds committed through this Agreement within four (4) years of the Commitment Date in accordance with 24 CFR 92.205(e)(2) and the definition of "project completion" as found in 24 CFR Part 92.2.
 6. **Consortium Funding Re-allocation Process** – At the end of Fiscal Year 2015-2016, HOME funds not committed by MEMBER by the Commitment Date shall be re-allocated to TURLOCK for use on other HOME-eligible activities in the Consortium, through the following process administered by TURLOCK and as outlined in the Consortium's *HOME Program Policies and Procedures Manual*.
 - a. Funding shall be available on a first-come-first-served basis to Consortium Members, with first priority given to Consortium Member jurisdictions who fully committed their annual funding allocation during Fiscal Year 2015-2016 and who demonstrate an active pipeline of homeowner rehabilitation and/or homebuyer projects which will be

completed within six (6) months after the end of the Agreement Term (i.e., by December 31, 2016).

- b. Re-allocated funding requests shall be made by Member Jurisdiction(s) no earlier than July 15, 2016 and no later than September 30, 2016.
- c. Funding not committed through the Re-allocation Process by September 30, 2016 shall be prioritized for development activities.

II. Activities and Program Delivery

1. As a subrecipient, MEMBER is responsible for identifying, selecting and implementing HOME-eligible activities within its jurisdiction. This includes contracting for the performance of these activities with other entities for HOME-eligible activities. In its role as subrecipient, MEMBER is responsible for fulfilling all the requirements of the HOME Program and for ensuring that HOME requirements are fulfilled by its contractors, as applicable.
2. MEMBER is responsible for managing Fiscal Year 2015-2016 HOME funds in a manner satisfactory to TURLOCK and consistent with the standards, policies and procedures required as a condition of providing these funds under 24 CFR Part 92 and as outlined in the Consortium's *HOME Program Policies and Procedures Manual*.
3. **Exhibit A** attached hereto contains MEMBER's projected HOME activities to be undertaken during the 2015-2016 fiscal year, including the number of units to be assisted through Housing Rehabilitation Activities, the number of units to be assisted through Homebuyer Activities, the number of units to be assisted through Rental Development, the projected budget for each activity, tasks to be performed, projected schedule for commitment of funding, projected schedule for completing the activity, and proposed sources of match.
4. MEMBER is responsible for preparing the environmental review record for any project assisted through this Agreement in compliance with the National Environmental Protection Act and 24 CFR 58. A copy of any such review shall be sent to TURLOCK for TURLOCK's review, approval and formal signature as Responsible Entity, prior to MEMBER entering into a commitment of HOME funds for the subject activity.
5. MEMBER agrees that prior to project commitment, it shall conduct an underwriting and subsidy layering analysis for each HOME-funded project proposed to be funded with Fiscal Year 2015-2016 HOME funds as required by the standards, policies and procedures outlined in the Consortium's *HOME Program Policies and Procedures Manual* and if applicable by activity type.
6. MEMBER agrees that any HOME-eligible activities funded through this Agreement shall be confirmed with a written contract that contains the provisions specified in 24 CFR Part 92.504. In addition, any contract made between MEMBER and another entity for the use of HOME funds pursuant to this Agreement shall comply with all applicable HOME regulations and shall be enforced by deed restriction where applicable. The form of the contract and deed restriction shall be approved by TURLOCK in advance of its execution. A copy of all contracts for HOME-funded activities shall be made available to TURLOCK upon request.
7. MEMBER agrees to abide by uniform administrative requirements stated in 24 CFR Part

92.505, specifically MEMBER agrees to comply with the requirements of 2 CFR Part 225 formerly Office of Management and Budget (OMB) Circular No. A-87 "Cost Principles for States, Local, and Indian Tribal Governments", and 24 CFR Part 85 (the "common rule"), "Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments". The requirements of 2 CFR part 230 formerly OMB Circular No. A-122 and requirements of 24 CFR part 84 apply to subrecipients receiving HOME funds that are nonprofit organizations and that are not a governmental subrecipient:

8. To comply with the HOME regulation at 24 CFR Part 92.502(c)(2) that funds be spent within 15 days of disbursement, MEMBER shall request reimbursement of expenditures from TURLOCK. The amount of the reimbursement request may not exceed the amount needed by MEMBER and MEMBER shall expend program income before requesting a reimbursement from TURLOCK.
9. MEMBER agrees that program income and assets will be retained by MEMBER and must be accounted for and kept separately from other funds in compliance with HOME regulations. MEMBER shall report on program income in compliance with the policies and procedures outlined in the Consortium's *HOME Program Policies and Procedures Manual*.
10. Loan repayments, interest or other return on MEMBER's investments of HOME funds disbursed through this contract shall be collected by MEMBER and MEMBER may retain payments for future activities funded with HOME funds in accordance with HOME regulations.
11. Upon expiration of this Agreement, MEMBER must transfer to TURLOCK any HOME funds on hand at the time of expiration and any accounts receivable attributable to the use of HOME funds.
12. TURLOCK and MEMBER will cooperate in the preparation of, and will furnish any and all information required for reports to be prepared as may be required by HOME regulations including but not limited to the Consolidated Plan, the annual performance report and any quarterly reports required by TURLOCK.
13. MEMBER shall ensure that written agreements with for-profit owners or developers, nonprofit owners or developers or sponsors, subrecipients, homeowners, homebuyers, tenants (or landlords) receiving tenant-based rental assistance, or contractors are prepared in accordance with 24 CFR 92.504. Such agreements must state if repayment of HOME funds or recaptured HOME funds must be remitted to TURLOCK or retained by MEMBER for additional eligible activities.
14. TURLOCK and MEMBER shall maintain, on a current basis, complete records, including, but not limited to, contracts, books of original entry, source documents supporting accounting transactions, eligibility and service records as may be applicable, a general ledger, personnel and payroll records, canceled checks and related documents and records to assure proper accounting of funds and performance of this contract in accordance with HOME regulations. To the extent permitted by law, TURLOCK and MEMBER will also permit access to all books, accounts or records of any kind for purposes of audit or investigation, in order to ascertain compliance with the provisions of this contract. Records shall be maintained for a period of five (5) years or in accordance with 24 CFR Part 92.508(c), whichever is longer.

III. Administrative and Financial Requirements

1. MEMBER shall comply with 24 CFR Parts 84.20 and 85.20 and Treasury Circular 1075 and comply with the following financial management standards.
 - a. *Accounting Standards* - MEMBER agrees to comply with 24 CFR 84.21–28 and agrees to adhere to the accounting principles and procedures required therein, utilize adequate internal controls, and maintain necessary source documentation for all costs incurred.
 - b. *Auditing* - MEMBER shall retain all books, records, and other documents to this contract for five (5) years after reconveyance and affordability period, whichever is longer. The U.S. Comptroller General and his representatives are vested with the authority to:
 - i. Examine any records of MEMBER or any of its subcontractors, or any State or local agency administering such contract, that directly pertain to, and involve transactions relating to, the contract or any subcontract; and
 - ii. Interview any officer or employee of MEMBER or any of its subcontractors, or of any State or local government agency administering the contract, regarding such transactions.
 - iii. Additionally, HOME provides authority for any representatives of an appropriate Inspector General to examine any records or interview any employee or officers of MEMBER or its subcontractors working on this contract. MEMBER is advised that any representatives of an appropriate Inspector General appointed have the authority to examine any record and interview any employee or officer of the contractor, its subcontractors, or other firms working on this contract. This right of examination shall also include inspection at all reasonable times of MEMBER plans, or parts of them, engaged in performing the agreement. Any deficiencies noted in audit reports must be fully cleared by TURLOCK within thirty (30) days after receipt by MEMBER. TURLOCK shall have, in addition to any other audit or inspection right in this Agreement, all the audit and inspection rights contained in this section, including the right to monitor MEMBER for its performance under the terms and provisions of this Agreement and MEMBER's use of fiscal year 2015-2016 HOME funds.
2. *Close-outs* - MEMBER's obligation to TURLOCK shall not end until all close-out requirements are completed. Activities during this close-out period shall include, but are not limited to: making final payments, disposing of program assets (including the return of all unused materials, equipment, unspent cash advances, program income balances, and accounts receivable to TURLOCK), and determining the custodianship of records. Notwithstanding the foregoing, the terms of this Agreement shall remain in effect during any period that MEMBER has control over HOME funds.
3. *Compliance* - MEMBER shall comply with current HUD policy concerning uniform administrative requirements and shall maintain inventory records of all non-expendable personal property as defined by such policy as may be procured with funds provided herein. All program assets (unexpended program income, property, equipment, etc.)

shall revert to the TURLOCK upon termination of this agreement. (Refer to 24 CFR Part 85).

4. *Procurement Standards* - Unless specified otherwise within this agreement, MEMBER shall procure all materials, property, or services in accordance with the requirements of 24 CFR 84.40-48.
5. *Fees* – MEMBER may not charge servicing, origination, or other fees for the costs of administering the HOME program, except as permitted by § 92.214(b)(1).
6. *Land Covenants* - This Agreement is subject to the requirements of Title VI of the Civil Rights Act of 1964 (P. L. 88-352). In regard to the sale, lease, or other transfer of land acquired, cleared or improved with assistance provided under this Agreement, MEMBER shall cause or require a covenant running with the land to be inserted in the deed or lease for such transfer, prohibiting discrimination as herein defined, in the sale, lease or rental, or in the use or occupancy of such land, or in any improvements erected or to be erected thereon, providing that the MEMBER and the United States are beneficiaries of and entitled to enforce such covenants. MEMBER, in undertaking its obligation to carry out the program assisted hereunder, agrees to take such measures as are necessary to enforce such covenant, and will not itself so discriminate.

IV. Other Federal Requirements

1. The Federal requirements set forth in 24 CFR Part 5, subpart A, are applicable to MEMBER, inclusive of: nondiscrimination and equal opportunity; disclosure requirements; debarred, suspended or ineligible contractors; and drug-free workplace.
2. MEMBER shall carry out each HOME activity in compliance with all Federal laws and regulations described in subpart H of the HOME Rule at 24 CFR Part 92, with the exception that TURLOCK shall review and approve the environmental review before HOME funds are committed, as noted in Section II.4 above. These requirements are further specified as follows:
 - a. *Affirmative Marketing* – MEMBER must follow the Consortium's affirmative marketing procedures and requirements for rental and homebuyer projects containing five (5) or more HOME-assisted housing units. Affirmative marketing requirements and procedures also apply to all HOME-funded programs, including, but not limited to, tenant-based rental assistance and down-payment assistance programs. Affirmative marketing steps consist of actions to provide information and otherwise attract eligible persons in the housing market area to the available housing without regard to race, color, national origin, sex, religion, familial status, or disability. If a written agreement with a project owner permits the rental housing project to limit tenant eligibility or to have a tenant preference in accordance with §92.253(d)(3), the Consortium's affirmative marketing procedures and requirements shall apply in the context of the limited/preferred tenant eligibility for the project.
 - b. *Affirmative Action - Approved Plan* - MEMBER agrees that it shall be committed to carry out pursuant to the applicable provisions of 24 CFR 92.351 the Affirmative Action Program in keeping with the principles as provided in President's Executive Order 11246 of September 24, 1966.

- i. *Women and Minority-Owned Businesses (W/MBE)* - MEMBER will use its best efforts to afford small businesses, minority business enterprises, and women's business enterprises the maximum practicable opportunity to participate in the performance of this contract. As used in this contract, the terms "small business" means a business that meets the criteria set forth in section 3(a) of the Small Business Act, as amended (15 U.S.C. 632), and "minority and women's business enterprise" means a business at least fifty-one (51) percent owned and controlled by minority group members or women. For the purpose of this definition, "minority group members" are Afro-Americans, Spanish-speaking, Spanish surnamed or Spanish-heritage Americans, Asian-Americans, and American Indians. MEMBER may rely on written representations by businesses regarding their status as minority and female business enterprises in lieu of an independent investigation.
 - ii. *Equal Employment Opportunity and Affirmative Action (EEO/AA) Statement* - MEMBER, in all solicitations or advertisements for employees placed by or on behalf of MEMBERS, will state that it is an Equal Opportunity or Affirmative Action employer, in accordance with 24 CFR 5.105.
 - iii. Public notices, job vacancies should be published in minority publications whenever possible.
- c. *Displacement, Relocation, and Acquisition* – MEMBER shall ensure that it has taken all reasonable steps to minimize the displacement of persons (families, individuals, businesses, nonprofit organizations, and farms) as a result of a project assisted with HOME funds. To the extent feasible, residential tenants must be provided a reasonable opportunity to lease and occupy a suitable, decent, safe, sanitary, and affordable dwelling unit in the building/complex upon completion of the project. MEMBER shall adhere to each of the provisions of 24 CFR 92.353 with respect to a person (family individual, business, nonprofit organization, or farm, including any corporation, partnership or association) that moves from real property or moves personal property from real property, permanently, as a direct result of acquisition, rehabilitation, or demolition for a project assisted with HOME funds. Temporary relocation is required pursuant to 24 CFR 92.353(b) for residential tenants who will not be required to move permanently, but who must relocate temporarily for the project. The acquisition of real property for a project is subject to the URA and the requirements of 49 CFR Part 24, Subpart B.
- d. *Labor Standards* – MEMBER shall ensure that every contract for the construction (rehabilitation or new construction) of housing that includes twelve (12) or more units assisted with HOME funds must contain a provision requiring the payment of not less than the wages prevailing in the locality, as predetermined by the Secretary of Labor pursuant to the Davis-Bacon Act (40 U.S.C. 276a-276a-5), to all laborers and mechanics employed in the development of any part of the housing. Such contracts must also be subject to the overtime provisions, as applicable, of the Contract Work Hours and Safety Standards Act (40 U.S.C. 327-332). The HOME Program requires that all laborers and mechanics employed by contractors and subcontractors on projects funded directly by or assisted in whole or in part by and through the Federal Government shall be paid

wages at rates not less than those prevailing on projects of a character similar in the locality as determined by the Secretary of Labor in accordance with subchapter IV of chapter 31 of title 40, United States Code. Pursuant to Reorganization Plan No. 14 and the Copeland Act, 40 U.S.C. 3145, the Department of Labor has issued regulations at 29 CFR parts 1, 3, and 5 to implement the Davis-Bacon and related Acts. Regulations in 29 CFR 5.5 instruct agencies concerning application of the standard Davis-Bacon contract clauses set forth in that section. The following standard Davis-Bacon contract clauses found in 29 CFR 5.5(a) are incorporated into this contract and any subcontracts for HOME-funded activities subject to the Labor Standards provisions of the Davis-Bacon Act.

- i. *Prevailing Wage* – MEMBER will comply with the minimum wage and maximum hourly provisions of the Fair Labor Standards Act, and applicable provisions of the Davis-Bacon Act and the Contract Work Hours Standards Act. Inquiries concerning the application of Davis-Bacon requirements to a particular federally assisted project should be directed to the Federal agency funding the project. The Secretary of Labor retains final coverage authority under Reorganization Plan Number 14.
- ii. *Salaries* - The salaries paid under this contract shall be in accordance with the following provision of 2 CFR Part 225 formerly OMB Circular A-87 and 24 CFR Part 92.207 (a) (1) Eligible Administrative and Planning Costs.
- iii. *General.* Compensation for personal services includes all remuneration, paid currently or accrued, for services rendered during the period of performance under the grant agreement, including but not necessarily limited to wages, salaries, and supplementary compensation and benefits. The costs of such compensation are allowable to the extent that total compensation for individual employees: (1) is reasonable for the service rendered, (2) follows an appointment made in accordance with State, Local, or Indian Tribal Government laws and rules and which meets Federal merit system or other requirements, where applicable. Compensation for employees engaged in federally assisted activities will be considered reasonable to the extent that it is consistent with that paid for similar work in other activities of the State, Local, or Indian Tribal Government. In cases where the kinds of employees required for the federally assisted activities are not found in the other activities of the State, Local, or Tribal Government, compensation will be considered reasonable to the extent that it is comparable to that paid for similar work in the labor market in which the employing government competes for the kind of employees involved. Compensation surveys providing data representative of the labor market involved will be an acceptable basis for evaluating reasonableness.
- iv. MEMBER may, at its discretion, complete a salary comparability study within the intent of 2 CFR Part 225 formerly OMB Circular A-87.
- e. *“Section 3” Clause* – Compliance with the provisions of Section 3 of the HUD Act of 1968, as amended, and as implemented by the regulations set forth in 24 CFR 135, and all applicable rules and orders issued hereunder prior to the execution

of this contract, shall be a condition of the Federal financial assistance provided under this contract and binding upon the TURLOCK. MEMBER certifies and agrees that no contractual or other disability exists that would prevent compliance with these requirements. MEMBER further agrees to comply with these "Section 3" requirements and to include the following language in all subcontracts executed under this agreement:

- i. *"The work to be performed under this agreement is a project assisted under a program providing direct Federal financial assistance from HUD and is subject to the requirements of Section 3 of the Housing and Urban Development Act of 1968, as amended (12 U.S.C. 1701). Section 3 requires that to the greatest extent feasible opportunities for training and employment be given to low- and very low-income residents of the project area, and that agreements for work in connection with the project be awarded to business concerns that provide economic opportunities for low- and very low-income persons residing in the metropolitan area in which the project is located."*
- ii. MEMBER further agrees to ensure that opportunities for training and employment arising in connection with a housing rehabilitation (including reduction and abatement of lead-based paint hazards), housing construction, or other public construction project are given to low- and very low-income persons residing within the metropolitan area in which the project is located; where feasible, priority should be given to low- and very low-income persons within the service area of the project or the neighborhood in which the project is located, and to low- and very low-income participants in other HUD programs; and award contracts for work undertaken in connection with a housing rehabilitation (including reduction and abatement of lead-based paint hazards), housing construction, or other public construction project to business concerns that provide economic opportunities for low- and very low-income persons; where feasible, priority should be given to business concerns that provide economic opportunities to low- and very low-income residents within the service area or the neighborhood in which the project is located, and to low- and very low-income participants in other HUD programs.
- iii. MEMBER certifies and agrees that no contractual or other legal incapacity exists that would prevent compliance with these requirements.
- iv. MEMBER agrees to send to each labor organization or representative of workers with which it has a collective bargaining agreement or other contract or understanding, if any, a notice advising said labor organization or worker's representative of its commitments under this Section 3 clause and shall post copies of the notice in conspicuous places available to employees and applicants for employment or training.
- v. MEMBER will include this Section 3 clause in every subcontract and will take appropriate action pursuant to the subcontract upon a finding that the subcontractor is in violation of regulations issued by the HUD. MEMBERS will not subcontract with any entity where it has notice or knowledge that the latter has been found in violation of regulations under

24 CFR Part 135 and will not let any subcontract unless the entity has first provided it with a preliminary statement of ability to comply with the requirements of these regulations.

- f. *Lead-based paint* - Housing assisted with HOME funds is subject to the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and implementing regulations at 24 CFR part 35, subparts A, B, J, K, M and R.
- g. *Conflict of Interest* - In the procurement of property and services by MEMBER and any subrecipients, the conflict of interest provisions in 24 CFR 85.36 and 24 CFR 84.42, respectively, apply. In all cases not governed by 24 CFR 85.36 and 24 CFR 84.42, the provisions of 24 CFR 92.356(b) through (f) apply. No member, officer, or employee of TURLOCK or MEMBER or their designees or agents, including employees, agents, consultants, officers, or elected or appointed official of community and advisory agencies that assist MEMBER in developing the projects, who exercises any functions or responsibilities with respect to the program during his tenure or for one (1) year thereafter, shall have any interest, direct or indirect, in any contract or subcontract or the proceeds thereof for work to be performed in connection with the program assisted under the grant. MEMBER agrees to incorporate or cause to be incorporated in all its agreements with its designees or agents, and including the above described groups, and in all agreements, contracts and subcontracts for work to be performed in connection with the program assisted under the grant, including agreements with MEMBERS as defined in 24 CFR 85.36 and 24 CFR 84.42, respectively, apply. In all cases not governed by 24 CFR 85.36 and 24 CFR 84.42, the provisions of this section apply.

V. General Requirements

1. *Architectural Barriers Act of 1968* - The Architectural Barriers Act of 1968 U.S.C. 4151 is applicable to this agreement and requires that the design of any facility constructed with funds from this title comply with the "American Standard Specifications for Making Buildings and Facilities Accessible, and Usable by, the Physically Handicapped," Number A-117.1-19 as modified (42 CFR 101-17.703). It will require that the design of any building constructed or rehabilitated with funds paid to MEMBER by TURLOCK under this Agreement will comply with the "American Standard Specifications for Making Buildings and Facilities Accessible to and Useable by the Physically Handicapped".
2. *Section 504* - MEMBER agrees to comply with all Federal regulations issued pursuant to compliance with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), which prohibits discrimination against the individuals with disabilities or handicaps in any Federally assisted program.
3. *Prohibited Activity* - MEMBER is prohibited from using funds provided herein or personnel employed in the administration of the program for: political activities; inherently religious activities; lobbying; political patronage; and similar activities. Likewise, MEMBER is prohibited from engaging in nepotism.
4. MEMBER shall comply with all applicable laws, ordinances and codes of Federal, State and local governments, in the performance of this Agreement.

5. MEMBER agrees to comply with all requirements, which are now, or which may hereafter be imposed by HUD for the HOME Program, as well as such requirements as may be imposed by the Consortium.
6. MEMBER agrees that it will comply with the Americans with Disabilities Act and Title VII of the Civil Rights Acts of 1964, and that no person in the United States shall, on the grounds of race, creed, color, disability, sex, sexual orientation, national origin, age, religion, Vietnam era veteran's status, political affiliation or any other non-merit factors be excluded from participation in, be denied the benefits of or be subjected to discrimination under any program or activity funded in whole or in part with funds made available to TURLOCK and MEMBERS pursuant to this contract.
 - a. Deny any services or other benefit provided under the program or activity;
 - b. Provide any service or other benefit which is different or is provided in a different form from that provided to others under the program or activity;
 - c. Subject to segregated or separate treatment in any facility in or in any manner or process related to receipt of any service or benefit under the program or activity;
 - d. Restrict in any way the enjoyment of any advantage or privilege enjoyed by others receiving any service or benefit under the program or activity;
 - e. Treat an individual differently from others in determining whether that individual satisfies any admission enrollment, eligibility, membership or other requirement or condition which individuals must meet in order to be provided any services or other benefit provided under the program or activity; or
 - f. Deny an opportunity to participate in a program or activity as an employee.
7. MEMBER shall comply with Executive Order 13166 to improve access to services for persons with Limited English Proficiency ("LEP") including developing a Language Access Plan.
8. MEMBER agrees to defend, indemnify and hold harmless TURLOCK and its officers, employees and agents from any and all acts, claims, omissions, liabilities, and losses by whomever asserted arising out of acts or omissions of MEMBER in the performance of the scope of work except those arising by reason of the sole negligence of TURLOCK, its officers, employees or agents.
9. TURLOCK agrees to defend, indemnify and hold harmless MEMBER and its officers, employees and agents from any and all acts, claims, omissions, liabilities, and losses by whomever asserted arising out of acts or omissions of TURLOCK in the performance of the scope of work except those arising by reason of the sole negligence of MEMBER, its officers, employees or agents.
10. If MEMBER withdraws from the Consortium and it becomes a HOME Participating Jurisdiction, at MEMBER'S request and with HUD approval TURLOCK shall transfer to MEMBER any accounts receivable attributable to MEMBER'S allocation of HOME funds, any MEMBER'S allocation of HOME funds, and any Program Income attributable to MEMBER'S HOME allocation on hand at the time that MEMBER withdraws from the Consortium. Along with this transfer, MEMBER shall assume all obligations and

responsibilities attributable to such funds, and TURLOCK shall be relieved of all such obligations and responsibilities.

11. If MEMBER withdraws from the Consortium and does not become a HOME Participating Jurisdiction, TURLOCK shall retain any accounts receivable attributable to MEMBER'S allocation of HOME funds, any MEMBER'S allocation of HOME funds, and any Program Income attributable to MEMBER'S HOME allocation on hand at the time that MEMBER withdraws from the Consortium. TURLOCK shall retain all obligations and responsibilities attributable to such funds.
12. If MEMBER materially fails to comply with any term of this Agreement, suspension or termination of MEMBER as a sub-recipient of HOME funds may occur as specified in 24 CFR Part 85.43. TURLOCK may utilize remedies for noncompliance as stipulated in §85.43(a).
13. Any and all notices, writings, correspondences, etc., as required by this Agreement shall be directed to MEMBER and TURLOCK as follows:

MEMBER

Angela Freitas, Director of Planning
and Community Development
STANISLAUS COUNTY
1010 10th Street, Suite 3400
Modesto, CA 95354
(209) 525-6330

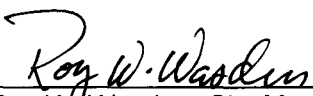
TURLOCK

Maryn Pitt, Manager
Housing Program Services Division
156 South Broadway, Suite 250
Turlock CA 95380
(209) 668-5610

14. This Agreement may be amended only by written agreement of the parties hereto.

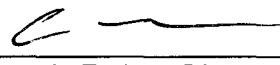
IN WITNESS WHEREOF, the parties have caused this Agreement to be executed by and through their respective officers' thereunto duly authorized.

CITY OF TURLOCK

By: 
Roy W. Wasden, City Manager

Date: 8/21/15

STANISLAUS COUNTY

By: 
Angela Freitas, Director of Planning and
Community Development

Date: 7.27.2015

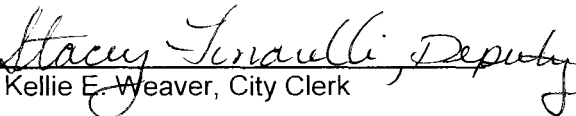
APPROVED AS TO FORM:

By: 
Phaedra A. Norton, City Attorney

APPROVED AS TO FORM:

By: 
Tom Boze, Assistant County Counsel

ATTEST:

By: 
Kellie E. Weaver, City Clerk

**EXHIBIT A to Subrecipient Agreement for HOME Funds between City of Turlock and Member Jurisdiction
Turlock/Stanislaus County HOME Consortium
ACTIVITY TYPE, GOALS, BUDGET, TASKS & SCHEDULE**

Member Jurisdiction Name:	STANISLAUS COUNTY	<i>*FY15-16 Allocation TOTAL is amount noted in FY15-16 Funding Agreement for Homebuyer and Homeowner Rehab Activities (total excludes Program Administration allocation). **Program Income amount is an estimate only; not included in amount in Section 1.2 of Agreement.</i>
Fiscal Year:	2015-2016	
Member's Program Activity Allocation (for Homebuyer & Rehab):	\$122,107	

		Goals by Household Income Level				
Homebuyer Downpayment Assistance	FY Goals	<30% AMI	31-50% AMI	51-60% AMI	61-80% AMI	TOTAL
Projected Number of Units to be Assisted	2				2	2
FY 2015-16 Allocation for Homebuyer Activity	\$60,000					
HOME Program Income (estimated)**	\$ 0					
Projected Commitments	2				2	2
Projected Completions	2				2	2
General description of tasks to be completed under activity: First Time Homebuyer Down Payment Assistance.						
Schedule for Completion of tasks: By two year commitment deadline						
Proposed source(s) of match (as applicable): Matching will be obtained through eligible sources as available to meet the HOME requirements.						

		Goals by Household Income Level				
Single Family Owner-Occupied Rehabilitation	FY Goals	<30% AMI	31-50% AMI	51-60% AMI	61-80% AMI	TOTAL
Projected Number of Units to be Assisted	2			2		2
FY 2015-2016 Allocation for Activity	\$62,107					
HOME Program Income (estimated)**	\$ 0					
Projected Commitments	2					2
Projected Completions	2					2
General description of tasks to be completed under activity: Housing Rehabilitation Program.						
Schedule for Completion of tasks: By two year commitment deadline.						
Proposed source(s) of match (as applicable): Matching will be obtained through eligible sources as available to meet the HOME requirements.						

		Goals by Household Income Level				
Total Annual Goals (All Activities)		<30% AMI	31-50% AMI	51-60% AMI	61-80% AMI	TOTAL
Projected Number of Units to be Assisted	4	0	0	2	2	4
FY 2015-2016 Allocation TOTAL*	\$122,107					
HOME Program Income (estimated)**	\$ 0					
Projected Commitments	4	0	0	2	2	4
Projected Completions	4	0	0	2	2	4

CDBG PUBLIC SERVICE AGREEMENT

This AGREEMENT is made and entered into by and between STANISLAUS COUNTY, State of California, as the implementer of the Community Development Block Grant Program (hereinafter referred to as "County") and **CENTER FOR HUMAN SERVICES (CHS)** (hereinafter referred to as "Organization") on **December 15, 2015**.

WITNESSETH

WHEREAS, County has received a Community Development Block Grant ("CDBG") from the Department of Housing and Urban Development ("HUD") under Title I of the Housing and Community Development Act of 1974, as amended (42 USC 5301 et seq.; the "Act"); and

WHEREAS, pursuant to such grant and to the Board of Supervisors Board Resolution No. **2014-165**, County is undertaking certain programs and services necessary for the planning, implementation, or execution of such a Community Development Program; and

WHEREAS, County desires to engage Organization to render certain services, programs, or assistance in connection with such undertakings of the Community Development Program;

NOW, THEREFORE, the parties hereto do mutually agree as follows:

1. **SCOPE OF WORK.**

1.1 **General Scope.** Organization shall provide services under its **Parklawn United Neighbors Community Assistance Project** as described in the Application for Funding in accordance with the provisions of Exhibit A "Budget" and Exhibit B "Project Summary" attached hereto and incorporated herein by reference.

1.2 **Term.** The services of Organization are to commence on **December 15, 2015**, and end on **June 30, 2016**, and shall be undertaken and completed in such sequence as to assure their expeditious completion in the light of the purposes of this Agreement. Time is of the essence of this Agreement.

2. **COMPENSATION.**

2.1 **Grant Amount Awarded.** Organization shall be paid a total consideration of **\$3,431.04** for full performance of the services specified under this Agreement that are in conformity with the approved Exhibit A "Project Budget" and Exhibit B "Project Summary" which is attached to this Agreement and incorporated herein by reference.

2.2 **Quarterly Draws.** All requests for grant fund draws shall be drawn at least once per quarter as follows: (1) Organization must request a first draw by **December 30, 2015**; (2) A second draw by **February 15, 2016**; (3) A third draw by **April 15, 2016**; and (4) A fourth and final draw **by June 30, 2016**. All complete draw requests must be received before June 30, 2016.

2.3 **Certification of Expenses.** In every case, draws will be dispersed to Organization subject to receipt of a Request for Funds "RFF" specifying and certifying that such expenses are in conformance with this Agreement, and that Organization is entitled to receive the amount requisitioned under the terms of this Agreement. With each RFF an official authorized to bind Organization shall certify that "By signing this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and

conditions of the Federal award. I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims or otherwise. (U.S. Code Title 18, Section 1001 and Title 31, Sections 3729-3730 and 3801-3812).”

Grant fund draw requests will be dispersed upon request provided: (1) The RFF is returned with an original authorized signature; (2) That all requests are accompanied with back-up documentation verifying all requested expenses are specific to carrying out the grant scope; (3) That a Budget Amendment Form be completed and returned with an original authorized signature for any request for grant funds that varies from the attached Exhibit A “Project Budget” and Exhibit B “Project Summary”. Budget Amendments shall be the same in amount to the originally approved grant budget and shall be requested prior to **March 15, 2016**, unless otherwise approved by County staff. Approval of the budget amendment will be evaluated based on the nature of the request in comparison to the grant scope, and shall be subject to prior-approval by HUD, if required, pursuant to 2 CFR 200.308. Organization agrees that the General Provisions for Selected Items of Cost (2 CFR 200.420-200.475) shall be used to determine the allowability of expenses.

2.4 Authorized Personnel. Person executing this agreement on behalf of Organization shall notify County in writing of all authorized personnel who shall be empowered to file requests for funds pursuant to this Agreement.

2.5 Reallocation of Grant Funds. If at the end of the second quarter, which commences on December 15 of each Fiscal Year, a funded agency that has been unable to spend down funds or meet their goal for numbers served in a timely manner (2nd quarter goal = 50% spend down of grant and 50% of total goal for numbers served), then funds may be recaptured and reallocated to a like activity. **Salaries.** Time sheets will be required to document expenses for staff and allowable time should be adjusted by the staff percentages of time allocated on the project as listed in the application. Time sheets shall list the grant specifically and hours spent on the grant noted. Only hours spent on the grant will be paid, based on the hourly rate. If the employee is on salary, salary will be calculated based on the hours worked. If the total number of hours worked is not listed, then hourly rate will be based on an average 80 hour work week. Fringe benefits, which includes taxes and insurance costs paid by the agency on behalf of the staff person working on the grant, but does not include overhead costs, are limited to 20% of total salary costs. Paid Time-off (PTO), paid to employees during periods of authorized absences from the job, such as vacation leave, sick leave, military leave, and the like, are NOT eligible expenses. Such costs are considered basic costs, not related to specific grant activity, and shall be covered by the agency. Overtime or bonuses are not allowable expenses. Expenses related to travel are ineligible, except where gas costs have been incurred directly related to implementation of program activities.

3. USE OF FUNDS.

3.1 General Use of Funds. Use of funds received pursuant to this Agreement shall be in accordance with the requirements of the Housing and Community Development Act of 1974 (as amended), 24 CFR Part 570, the Stanislaus County Desk Manual for the Community Development Block Grant (CDBG) Public Services and Emergency Solutions Grant (ESG) Programs, and other regulations governing the Block Grant Program, and any amendments or policy revisions thereto which shall become effective during the term of this Agreement. Further, any funded activity must be designed or so located as to principally benefit low/moderate income persons, aid in the prevention or elimination of slums or blight, or meet urgent community development needs, as defined in the program regulations.

3.2 **Compliance with Local Code.** Organization agrees to implement all activities supported with CDBG grant funds in compliance with all local codes and ordinances, including obtaining all necessary permits for such activities.

3.3 **In-eligible Uses of Funds.** In the event that Organization is found to have expended grant funds for in-eligible activities, pursuant to 24 CFR 570.207 and 2 CFR 200.420-200.475 (formerly OMB Circular No. A-122 “Cost Principals for Non-profit Organizations”), such funds shall be returned to the County.

3.4 **Program Income.** Program income shall be handled in accordance with Section 24 CFR 570.504(c) and in the manner described within the Stanislaus County Desk Manual for the Community Development Block Grant (CDBG) Public Services and Emergency Solutions Grant (ESG) Programs. Any program income derived from the project, if any, shall be re-distributed to be used for grant related costs that benefit program participants *or* to County for redistribution in CDBG. (1) Fees collected from any client for participation in the program shall be considered program income and must be used for the benefit of the client for like program costs; (2) Rental or utility deposits paid to a third party on behalf of the program participant shall not be considered program income. Such deposits shall, upon termination of the service or exit of unit, be returned to the grantee for use of a like activity. Such funds shall be tracked separately and reported to the County during quarterly monitoring.

3.5 **Termination of Contract.** Pursuant to 2 CFR 200.339, suspension or termination of this Agreement may occur if Organization materially fails to comply with any term of the grant agreement, or for convenience, as set forth in Section 12 below.

(1) Organization may not terminate an Assignment of Proceeds and Grant of Lien without written consent of County. All reports or accounting provided for herein shall be rendered whether or not falling due within the Agreement period.

3.6 **Reversion of Assets.** Upon grant expiration, termination, or upon Organization becoming insolvent, Organization shall transfer to County any grant funds on hand at the time of expiration and any accounts receivable attributable to the use of said grant funds. Any real property under Organization’s control that was acquired or improved in whole or in part with grant funds (including grant funds provided to Organization in the form of a loan) shall be utilized in accordance with Section 3.1 General Use of Funds, of this agreement, as long as needed for that purpose. When such property is no longer needed for the originally authorized purpose, set forth in Section 3.1 of this Agreement, County shall obtain disposition instructions from HUD which shall provide for one of the disposition alternatives set forth in 2 CFR 200.311. All returned grant funds or payments, if any, shall be treated by County as program income.

4. PROGRAM PARTICIPANT ELIGIBILITY.

4.1 **General Eligibility.** Eligibility of program participants, including but not limited to income, citizenship and Consortium area residency, shall be evaluated and documented prior to CDBG program entry by Organization to determine if they meet the eligibility criteria established under 24 CFR 570.208. Eligibility determinations must be made and documented in accordance with the Stanislaus County Desk Manual for the Community Development Block Grant (CDBG) Public Services and Emergency Solutions Grant (ESG) Programs.

4.2 **Income Standards.** Organization agrees to use the standards, in effect at the time of assistance to determine income eligibility and the verification requirements for entry into the CDBG Public Services Program. Income must be calculated and documented in accordance with the Stanislaus County Desk Manual for the Community Development Block Grant (CDBG) Public Services and Emergency Solutions

Grant (ESG) Programs. Grantees are required to continually update their intake forms and eligibility criteria using the most recent HUD issued Income Limit Summary for Stanislaus County.

4.3 **Prorating Assistance.** When providing financial assistance to Households or Families that include members who are citizens or have eligible immigration status and members who do not have eligible immigration status (or elect not to state that they have eligibility status), such assistance must be prorated. Prorated assistance is a calculation of subsidy based on the number of members who are citizens or have eligible immigration status. Divide the number of eligible family members (citizens and those with eligible immigration status) by the total number of members in the household to get a prorated percentage. Then multiply that percentage by the amount of financial assistance that the Household or Family was determined to be eligible to receive.

4.4 **Eligible Stanislaus Urban County Areas.** Program participants must have a current or previous address within the areas covered by the Stanislaus Urban County. These areas include the Cities of Ceres, Hughson, Newman, Oakdale, Patterson, Waterford and the unincorporated areas of Stanislaus County. Program participants receiving rental assistance may meet this requirement by moving to or from an eligible area. Program participants, who are determined to meet the definition of “homeless”, as defined within 24 CFR 576, are considered to be Urban County residents. Grant funded under a Neighborhood Revitalization Strategy Area (NRSA) plan must serve only residents from the NRSA community specified in their project description, as described within Exhibit B “Project Summary”.

5. DATA COLLECTION, REPORTING & MAINTAINENCE OF RECORDS.

5.1 **Documentation.** Implementation of program services, including determinations of eligibility, evidence of eligible program costs, client services provided, denial or termination of services, and fiscal management, shall be documented in accordance with the standards set forth within the Stanislaus County Desk Manual for the Community Development Block Grant (CDBG) Public Services and Emergency Solutions Grant (ESG) Programs.

5.2 **Quarterly/Closeout Reports.** Organization agrees to submit quarterly program status reports to County, in conformance with the requirements of CDBG and 2 CFR 200.301, including an estimate of the number of jobs created and/or retained by CDBG funds as well as any other information that is requested on the date of their monitoring appointment or by the deadline indicated within their monitoring letter. In addition, Organization shall submit, no later than 90 days after the expiration of this Agreement, any required close-out report, in conformance with the requirements of 2 CFR 200.343.

5.3 **HUD Sponsored Research.** Upon request, Organization shall participate in HUD-sponsored research and evaluation of CDBG during or after the completion of the program.

5.4 **DUNS Number Requirement.** Organization shall maintain an updated and valid DUNS number, which requires registering with Dun and Bradstreet and completing and annually renewing their registration in the Central Contractor Registration (CCR).

5.5 **Data Required.** Organization shall maintain racial, ethnic, gender, head of household and family size data, housing status and financial assistance received for each program participant; showing the extent to which these categories of persons have participated in, or benefited from, the project, and to provide such data in an activity report to County quarterly. Organization also agrees to report the number of jobs created with CDBG funds in the quarterly report to be provided to County.

5.6 **General Records.** Records must be kept in accordance with the Stanislaus County Desk Manual for the Community Development Block Grant (CDBG) Public Services and Emergency Solutions Grant (ESG) Programs. Organization will keep and maintain all project records, books, papers and documents for a period of not less than five (5) years after the project terminates and grants County the option of retention of the project records, books, papers and documents. Organization agrees to keep all necessary books and records, including property, personnel and financial records, in connection with the operations and services performed under this Agreement, and shall document all transactions so that all expenditures may be properly audited. County, HUD, and any authorized representatives shall have access to and the right to examine all records, books, papers or documents related to the project for the purposes of making audit, evaluation, examination, excerpts and transcripts during normal business hours and during the period such records are to be maintained by Organization. Further, County and HUD shall have the right at all reasonable times to audit, inspect or otherwise evaluate the work performed or being performed under this Agreement.

5.7 **Privacy Procedures.** Organization shall develop and implement reasonable procedures to ensure: (1) The confidentiality of records pertaining to all program participants; and (2) That program participant's addresses will not be made public, except to the extent that this prohibition contradicts a preexisting privacy policy of the Organization.

5.8 **Audit Provision.** Organization agrees to provide to County, at Organization's cost, a certified audit performed by an accredited certified public accountant, of all funds received or utilized by Organization, including the distribution of any CDBG Grant Funds for Fiscal Year **2015-2016** to be delivered to County by **December 30, 2016**. Organization agrees to provide additional audits upon request.

6. UNIFORM ADMINISTRATIVE REQUIREMENTS.

6.1 **General Uniform Administrative Requirements.** Organization shall comply with 24 CFR 570.502- Applicability of Uniform Administrative Requirements and the requirements and standards of 2 CFR 200.420-200.475 (formerly OMB Circular No. A-122, "Cost Principles for Non-profit Organizations").

6.2 **Reasonable Grant Costs.** The County reserves the right to determine whether or not a request for CDBG grant fund reimbursement is reasonable. A cost is considered to be reasonable if, in its nature or amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the costs. In determining the reasonableness of a given cost, consideration shall be given to: (1) Whether the cost is of a type generally recognized as ordinary and necessary for the operation of the organization or the performance of the award; (2) The restraints or requirements imposed by such factors as generally accepted sound business practices, arms length bargaining, Federal and State laws and regulations, and terms and conditions of the award; (3) Whether the individuals concerned acted with prudence in the circumstances, considering their responsibilities to the organization, its members, employees, and clients, the public at large, and the Federal Government; and (4) Significant deviations from the established practices of the organization which may unjustifiably increase the award costs.

6.3 **Allocable Grant Costs.** The County reserves the right to determine whether or not a request for CDBG grant fund reimbursement is allocable, consistent with applicable federal regulations. A cost is considered to be allocable if it: (1) Is incurred specifically for the award; (2) Benefits both the award and other work and can be distributed in reasonable proportion to the benefits received; or (3) Is necessary to the overall operation of the organization, although a direct relationship to any particular cost objective cannot be shown.

7. HOLD HARMLESS AND INDEMNITY AGREEMENT.

7.1 **General Indemnification.** Organization shall hold the County, its agents, officers, employees, and volunteers, harmless from and save, defend and indemnify them against any and all claims, losses, liabilities and damages from every cause, including but not limited to injury to person or property or wrongful death, with the indemnity to include reasonable attorney's fees, and all costs and expenses, arising directly or indirectly out of any act or omission of Organization, whether or not the act or omission arises from the sole negligence or other liability of Organization, or its agents, officers, employees, or volunteers relating to or during the performance of its obligations under this Agreement.

7.2 **Liability and Fees.** County shall not be responsible or liable for any debts, actions, obligations, negligence, or liabilities committed or incurred by Organization, its staff or program participants, and Organization hereby agrees to defend, hold harmless and indemnify County from and against any and all liabilities for debts, obligations, and negligence. No draw, however, final or otherwise, shall operate to release Organization from any obligations under this Agreement. Should either party be required to bring a legal action to enforce the provisions of this Agreement, the prevailing party shall be reimbursed for all court costs and all reasonable attorney's fees incurred in the prosecution or defense of said action.

7.3 **Required Insurance.** Organization shall take out, and maintain during the life of the Agreement, insurance policies with coverage at least as broad as follows:

(a) General Liability. Comprehensive general liability insurance covering bodily injury, personal injury, property damage, products and completed operations with limits of no less than One Million Dollars (\$1,000,000) per incident or occurrence. If Commercial General Liability Insurance or other form with a general aggregate limit is used, either the general aggregate limit shall apply separately to any act or omission by Contractor under the Agreement or the general aggregate limit shall be twice the required occurrence limit.

(b) Automobile Liability Insurance. If the Organization or the Organization's officers, employees, agents, representatives or subcontractors utilize a motor vehicle in performing any of the work or services under the Agreement, owned/non-owned automobile liability insurance providing combined single limits covering bodily injury, property damage and transportation related pollution liability with limits of no less than One Million Dollars (\$1,000,000) per incident or occurrence.

(c) Workers' Compensation Insurance. Workers' Compensation insurance as required by the California Labor Code. In signing this contract, the Organization certifies under section 1861 of the Labor Code that the Organization is aware of the provisions of section 3700 of the Labor Code which requires every employer to be insured against liability for workmen's compensation or to undertake self-insurance in accordance with the provisions of that code, and that the Organization will comply with such provisions before commencing the performance of the work of the Agreement.

(d) Professional Liability Insurance. If professional services are provided under the Agreement, then Organization shall also maintain professional errors and omissions (malpractice) liability insurance with limits of no less than One Million Dollars (\$1,000,000) aggregate. Such professional liability insurance shall be continued for a period of no less than one year following completion of the Organization's work under the Agreement.

7.4 **Deductibles.** All deductibles, self-insured retentions or named insureds must be declared in writing and approved by County. At the option of the County, either: (a) the insurer shall reduce or eliminate such deductibles, self-insured retentions or named insureds, or (b) the Organization shall provide a bond, cash, letter of credit, guaranty or other security satisfactory to the County guaranteeing payment of the self-insured retention or deductible and payment of any and all costs, losses, related investigations, claim administration and defense expenses. The County, in its sole discretion, may waive the requirement to reduce or eliminate deductibles or self-insured retentions, in which case, the Organization agrees that it will be responsible for and pay any self-insured retention or deductible and will pay any and all costs,

losses, related investigations, claim administration and defense expenses related to or arising out of the Organization's defense and indemnification obligations as set forth in the Agreement.

7.5 **Additional Insured.** The Organization shall provide a specific endorsement to all required insurance policies, except Workers' Compensation insurance and Professional Liability insurance, if any, naming the County and its officers, officials and employees as additional insureds regarding: (a) liability arising from or in connection with the performance or omission to perform any term or condition of the Agreement by or on behalf of the Organization, including the insured's general supervision of its subcontractors; (b) services, products and completed operations of the Organization; (c) premises owned, occupied or used by the Organization; and (d) automobiles owned, leased, hired or borrowed by the Organization. The Workers' Compensation insurance carrier shall agree to waive all rights of subrogation against the County and its officers, officials and employees for losses arising from the performance of or the omission to perform any term or condition of the Agreement by the Organization.

7.6 **Primary & Separate Coverage.** The Organization's insurance shall apply separately to each insured against whom claim is made or suit is brought, except with respect to the limits of the insurer's liability. The Organization's insurance coverage shall be primary insurance regarding the County and County's officers, officials and employees. Any insurance or self-insurance maintained by the County or County's officers, officials and employees shall be excess of the Organization's insurance and shall not contribute with Organization's insurance.

7.7 **Reporting.** Any failure to comply with reporting provisions of the policies shall not affect coverage provided to the County or its officers, officials, employees or volunteers.

7.8 **Notice of Cancellation.** Each insurance policy required by this section shall be endorsed to state that coverage shall not be suspended, voided, canceled by either party except after thirty (30) days' prior written notice has been given to County. The Organization shall promptly notify, or cause the insurance carrier to promptly notify, the County of any change in the insurance policy or policies required under the Agreement, including, without limitation, any reduction in coverage or in limits of the required policy or policies.

7.9 **Rating.** Insurance shall be placed with California admitted insurers (licensed to do business in California) with a current rating by Best's Key Rating Guide acceptable to the County; provided, however, that if no California admitted insurance company provides the required insurance, it is acceptable to provide the required insurance through a United States domiciled carrier that meets the required Best's rating and that is listed on the current List of Eligible Surplus Line Insurers maintained by the California Department of Insurance. A Best's rating of at least A-:VII shall be acceptable to the County; lesser ratings must be approved in writing by the County.

7.10 **Subcontractors.** Organization shall require all its subcontractors to comply with the insurance and indemnity requirements stated herein, or shall include subcontractors as additional insureds under its insurance policies.

7.11 **Proof of Insurance.** At least ten (10) days prior to the date the Organization begins performance of its obligations under the Agreement, Organization shall furnish County with certificates of insurance and with original endorsements establishing coverage required by the Agreement, including, without limitation, those effecting coverage for subcontractors of the Organization. The certificates and endorsements for each insurance policy are to be signed by a person authorized by that insurer to bind coverage on its behalf. All certificates and endorsements shall be received and, in County's sole and absolute discretion, approved by County. County reserves the right to require complete copies of all required insurance policies and endorsements, at any time.

7.12 **Insurance Limits.** The limits of insurance described herein shall not limit the liability of the Organization and Organization's officers, employees, agents, representatives or subcontractors. Organization's obligation to defend, indemnify and hold the County and its agents, officers and employees harmless under the provisions of this paragraph is not limited to or restricted by any requirement in the Agreement for Organization to procure and maintain a policy of insurance.

8. NON-DISCRIMINATION & EQUAL OPPORTUNITY

8.1 **Compliance with Fair Housing and Civil Rights Laws.** During the performance of this Agreement, Organization and its officers, employees, agents, representatives or subcontractors shall not unlawfully discriminate in violation of any federal, state or local law, rule or regulation against any employee, applicant for employment or person receiving services under this Agreement because of race, religion, color, national origin, ancestry, physical or mental handicap, medical condition (including genetic characteristics), marital status, age, political affiliation or sex:

(1) Organization agrees to comply with all applicable fair housing, non-discrimination and civil rights requirements including all applicable Federal, State and local laws and regulations related to non-discrimination and equal opportunity, including without limitation; (a) the County's nondiscrimination policy; (b) the California Fair Employment and Housing Act (California Government Code sections 12900 et seq.); (c) Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended; (d) California Labor Code sections 1101, 1102 and 1102.1; the Federal Civil Rights Act of 1964 (P.L. 88-352), as amended; (e) Section 504 of the Rehabilitation Act of 1973; (f) Section of Title I of the Housing and Community Development Act of 1974; (g) Title II of the Americans with Disabilities Act of 1990; (h) Section 24 CFR 5.105 of the Code of Federal Regulations 24 CFR 5.105; (i) all applicable regulations promulgated in the California Code of Regulations or the Code of Federal Regulations.

(2) Organization agrees to post in conspicuous places, available to employees and applicants for employment, notices to be provided setting forth the provisions of this nondiscrimination clause.

(3) Organization will, in all solicitations or advertisements for employees placed by or on behalf of Organization, state that all qualified applicants will receive consideration for employment without regard to race, color, religion, sex, age, handicap, sexual orientation, ancestry, national origin, familial status, or any other basis prohibited by applicable law.

(4) If the procedures that the grantee intends to use to make known the availability of services are unlikely to reach persons of any particular race, color, religion, sex, age, national origin, familial status, or disability who may qualify for such services, then Organization must establish additional procedures that will ensure that such persons are made aware of the services.

8.2 **Equal Participation of Religious Organizations.** Under CDBG, religious organizations retain their independence from federal, state, and local governments, and may continue to carry out its mission, including the definition, practice, and expression of its religious beliefs, provided that it does not use direct CDBG funds to support any inherently religious activities, such as worship, religious instruction, or proselytization. Faith-based organizations may use space in their facilities to provide CDBG-funded services, without removing religious art, icons, scriptures, or other religious symbols. If CDBG funds are to be used to acquire, construct, rehabilitate or renovate a structure which will be used for both grant eligible and inherently religious activities, CDBG funds may not exceed the cost of those portions of the acquisition, construction, or rehabilitation that are attributable to eligible activities. In addition, a CDBG-funded religious organization retains its authority over its internal governance, and it may retain religious terms in its organization's name, select its board members on a religious basis, and include religious references in its organization's mission statements and other governing documents. An organization that participates in the CDBG program shall not, in providing program assistance, discriminate against a program participant or prospective program participant on the basis of religion or religious belief.

8.3 **Section 3 Compliance.** Organization agrees to comply with the rules and regulations set forth under Section 3 of the Housing and Urban Development Act of 1968 (12 USC 1701u), as amended, and the HUD regulations issued pursuant thereto under 24 CFR Part 135. This act requires that, to the greatest extent feasible, opportunities for training and employment be directed to low and very-low income persons, particularly those recipients of government assistance for housing, and to business concerns that provide economic opportunities to low and very-low income persons. .

8.4 **Americans with Disabilities Act (ADA) of 1990 and Architectural Barriers Act of 1968.** Organization shall comply with the Architectural Barriers Act of 1968 (42 U.S.C. § 4151, et seq.), which insures that all federally funded facilities be designed, constructed, or altered to insure accessibility and use by disabled persons, and the Americans with Disabilities Act (ADA) of 1990 (42 U.S.C. § 12101, et seq.), which prohibits discrimination on the basis of disability, as well as all applicable regulations and guidelines.

8.5 **Labor Standards.** Organization shall comply with all applicable labor standards, as set forth in section 110(a) of Title I of the Housing and Community Development Act of 1974, as amended (42 U.S.C. 5301, et seq.). The use of volunteers shall comply with the regulations in 24 CFR Part 70.

8.6 **Displacement, Relocation, Acquisition & Replacement of Housing.** Consistent with 24 CFR 570.606, Organization shall take all reasonable steps to minimize the displacement of all persons as a result of Project activities.

8.7 **Eligibility Restrictions.** Organization agrees to comply with applicable eligibility restrictions for certain resident aliens, as set forth in 24 CFR 570.613 and 24 CFR Part 49.

9. CONFLICTS OF INTEREST.

9.1 **Hatch Act Incorporated.** Neither Organization program nor the funds provided therefore, nor the personnel employed in the administration of the program shall be in any way or to any extent engaged in the conduct of political activities in contravention of the Hatch Act (Chapter 15 of Title 5, United States Code).

9.2 **Conflict of Interest.** Organization shall comply with 2 CFR 200.112 (formerly 24 CFR 84.42) and all applicable federal standards of ethical conduct, which prohibit any employee, officer, or agent of Organization from participating in the selection, award, or administration of a federally funded contract if a real or apparent conflict of interest would be involved. With respect to all other decisions involving the use of CDBG funds, the following restriction shall apply: No person who is an employee, agent, consultant, officer, or elected or appointed official of the Organization and who exercises or has exercised any functions or responsibilities with respect to assisted activities, or who is in a position to participate in a decision-making process or gain inside information with regard to such activities, may obtain a personal or financial interest or benefit from the activity, or have an interest in any contract, subcontract, or agreement with respect thereto, or the proceeds thereunder, either for himself or herself or for those with whom he or she has family or business ties, during his or her tenure or for one year thereafter.

9.3 **Lobbying and Disclosure Requirements.** Organization certifies that no State or Federal appropriated funds have been paid, or will be paid for lobbying activities, in contravention of 2 CFR 200.450, or the Byrd Amendment (31 U.S.C. 1352) and its implementing regulations at 24 CFR part 87. If any funds other than federally appropriated funds have been paid or will be paid to any person for influencing or attempting to influence this Agreement, Organization shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

9.4 **Campaign Contribution Disclosure.** Organization certifies that it has complied with the campaign contribution disclosure provisions of the California Levine Act (Government Code § 84308) and has provided the appropriate disclosures to County.

10. DRUG-FREE WORK PLACE.

10.1 **Drug-free Workplace.** Organization will maintain a drug free work place and will comply with the Drug-Free Workplace Act of 1988 (41 U.S.C. 701, et seq.) and HUD's implementing regulations at 24 CFR part 21.

11. ENVIRONMENTAL LAW COMPLIANCE.

11.1 **Lead Poisoning Prevention Act.** Organization agrees to uphold the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4801 et seq.), as amended by the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851 et seq.) and implementing regulations at 24 CFR part 35, subparts A, B, M, and R.

12. TERMINATION OF SERVICES & REVERSION OF ASSETS.

12.1 **Denial, Discharge, or Termination of Client Services.** The denial, discharge or termination of client services must be provided in writing, except in the case of an assessment conducted over the phone, in accordance with the standards set forth within the Stanislaus County Desk Manual for the Community Development Block Grant (CDBG) Public Services and Emergency Solutions Grant (ESG) Programs. The recipient or sub-recipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases. (1) To terminate rental assistance or housing relocation and stabilization services to a program participant, the required formal process, at a minimum, must consist of: (A) Written notice to the program participant containing a clear statement of the reasons for termination; (B) A review of the decision, in which the program participant is given the opportunity to present written or oral objections to a third party; and (C) Prompt written notice of the final decision to the program participant. (D) For the purposes of this policy a "Third Party" is defined as another agency staff person who has not previously evaluated the client for eligibility. (2) All grant recipients must have clear written policies and procedures for the denial, discharge or termination of program services. (3) Ability to provide further assistance. Termination under this section does not bar the recipient or sub-recipient from providing further assistance at a later date to the same family or individual.

12.2 **Termination of Contract and Reversion of Assets.** It is expressly understood and agreed that either party shall have the right to terminate this Agreement upon fifteen (15) days written notice to the other party. Such notice shall include the reasons for termination. (1) Organization may not terminate an Assignment of Proceeds and Grant of Lien without written consent of County. All reports or accounting provided for herein shall be rendered whether or not falling due within the Agreement period. (2) County reserves the right to terminate this Agreement or to reduce the Agreement compensation amount for cause, or if Organization fails to comply with the terms and conditions of the award, including: (a) Failure of Organization to file required reports; (b) Failure of Organization to meet project dates; (c) Expenditure of funds under this Agreement for ineligible activities, services or items; (d) Failure to comply with written notice from County of substandard performance in scope of services under the terms of this Agreement. (3) Should County choose to terminate this Agreement the following steps shall be followed: (a) Written warning to Organization by County including steps to bring project into compliance with time frame; (b) Notification by County that said project has been determined deficient and that continued support of the project is not providing an adequate level of

FY 2015-2016 Stanislaus County CDBG Grant Agreement

services to low/moderate income people; (c) Written notification from County that said Agreement is to be terminated and program funds curtailed, withdrawn, or otherwise restricted. (4) Upon expiration or termination of this Agreement, Organization shall transfer to the County any CDBG funds on hand at the time of expiration or termination and any accounts receivable attributable to the use of CDBG funds.

12.3 **Insolvency.** If the Organization becomes insolvent, all unused CDBG funds shall be returned to the County for disposition.

13. GENERAL TERMS AND CONDITIONS.

13.1 **Debarment, Suspension, and Other Responsibilities.** Organization certifies and warrants that neither the Organization nor any owner, partner, director, officer, or principal of Organization, , nor any person in a position with management responsibility or responsibility for the administration of funds: (1) is presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any federal or state department or agency; (2) has within the three-year period preceding this Agreement, been convicted of or had a civil judgment rendered against it for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (federal, state, or local) transaction or contract; violation of federal or state antitrust statutes; or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property; (3) is presently indicted for or otherwise criminally or civilly charged by a government entity (federal, state, or local) with commissions of any of the offenses enumerated in paragraph “b” above; or (4) has within a three-year period preceding this Agreement, had one or more public transactions or contracts (federal, state, or local) terminated for cause or default. This provision shall be incorporated in any subcontract entered into as a result of this Agreement.

13.2 **Other program requirements.** Organization agrees to carry out each activity in compliance with all Federal laws and regulations described in subpart K of 24 CFR 570, except that: (1) Organization does not assume County environmental responsibilities described within 24 CFR 570.604; and (2) Organization does not assume County responsibility for initiating the process of reviewing federal financial assistance programs under the provisions of 24 CFR 52.

13.3 **Collaboration, Coordination and Resource and Referral Services.** All CDBG Public Services and ESG grantees must make a best effort to assess client needs, to connect them to needed resources and to refer them to the appropriate service provider. Participation and attendance to the Continuum of Care (CoC) meetings are recommended. Levels of participation may be part of future funding considerations.

13.4 **Assignment.** Without written consent of County, this Agreement is not assignable by Organization, either in whole or in part.

13.5 **Amendment.** No amendment to, alteration of or variation in the terms of this Agreement shall be valid unless made in writing and signed by the parties hereto.

13.6 **Provisions Required by Law Deemed Inserted.** Each and every provision of law and clause required by law to be inserted in this Agreement shall be deemed to be inserted herein, and the Agreement shall be read and enforced as though it were included herein, and if through mistake or otherwise any such provision is not inserted, or is not correctly inserted, then upon the application of either party, the Agreement shall forthwith be physically amended to make such insertion or correction.

13.7 **Construction.** Headings or captions to the provisions of this Agreement are solely for the convenience of the parties, are not part of this Agreement, and shall not be used to interpret or determine the validity of this Agreement. Any ambiguity in this Agreement shall not be construed against the drafter, but rather the terms and provisions hereof shall be given a reasonable interpretation as if both parties had in fact drafted this Agreement.

13.8 **Integration.** This Agreement represents the entire understanding of County and Organization as to those matters contained herein and supersedes all prior negotiations, representations, or agreements, both written and oral. This Agreement may not be modified or altered except in accordance with sections 13.5 or 13.6.

13.9 **Notice.** Any notice, communication, amendment, addition or deletion to this Agreement, including change of address of either party during the term of this Agreement, which Organization or County shall be required or may desire to make shall be in writing and may be personally served or, alternatively, sent by prepaid first class mail to the respective parties as follows:

To County: County of Stanislaus
Department of Planning and Community Development
Attention: Director
1010 Tenth Street, Suite 3400
Modesto, CA 95354

To Organization: Center for Human Services (CHS)
Cindy Duenas, Executive Director
2000 W. Briggsmore Avenue, Suite I
Modesto, CA 95350

13.9 **Governing Law and Venue.** This Agreement shall be deemed to be made under, and shall be governed by and construed in accordance with, the laws of the State of California. Any action brought to enforce the terms or provisions of this Agreement shall have venue in the County of Stanislaus, State of California.

13.10 **Authorization.** Organization has authorized the undersigned person signing as officers on behalf of Organization, to enter into this Agreement on behalf of said Organization and to bind the same to this Agreement, and, further that said Organization has authority to enter into this Agreement and that there are no restrictions or prohibitions contained in any article of incorporation or bylaws against entering into this Agreement.

13.11 **Counterparts.** This Agreement may be signed in counterparts and shall bind each signatory to the Agreement.

–Signatures on following page –

IN WITNESS WHEREOF, the parties have executed this Agreement on the day and year first hereinabove written.

COUNTY OF STANISLAUS

CENTER FOR HUMAN SERVICES (CHS)

By:



Angela Freitas, Director
Planning and Community Development

"County"

By:



Cindy Duenas
Executive Director

"Organization"

APPROVED AS TO FORM:



Thomas E. Boze
Assistant County Counsel

Exhibit A

Proposed Project Budget

Project: PARKLAWN UNITED NEIGHBORS
COMMUNITY ASSISTANCE

Agency: CENTER FOR HUMAN SERVICES

Please fill out the form below noting the total amount of funding requested for each line item. The "Total Project" amount should be the total budget for the proposed **activity** and should be equal to the amount requested in the "CDBG" column plus the amount shown in the "Other Funding" column. **Failure to complete this Budget form will cause the application to be incomplete and thus not eligible for funding. You will be required to follow each line item amount detailed in this budget for your draw requests.**

Line Item	Stan County CDBG	Other Funding (should match Exhibit B)	Total Project
Personnel Costs:			
Salaries : (total from Exhibit C)	\$0.00		
Benefits/Taxes (<i>capped at 20% of salary</i>):	\$0.00		
Subtotal:			
Non-Personnel Costs:			
Rent/Lease of Space (<i>project only</i>):	\$0.00		
Janitorial:	\$0.00		
Utilities:	\$0.00		
Telephone/Internet Services:	\$0.00		
Kitchen Supplies:	\$0.00		
Office Supplies:	\$0.00		
Printing:	\$0.00		
Rental/Maintenance Equipment:	\$0.00		
Food:	\$1,400.00		
Automobile/Transportation/Mileage:	\$0.00		
Staff Training/Conferences:	\$0.00		
Professional Fees (<i>specify _____</i>):			
Subtotal:			
Other Project Costs (<i>be specific</i>):			
Items: blankets, sweaters, etc.	\$2,031.04		
Toys for children ages 0-12		\$800.00	

Subtotal:			
	\$3,431.04	\$800.00	
GRAND TOTAL:	\$3,431.04	\$800.00	\$4,231.04



Stanislaus County
Community Development Block Grant (CDBG)
Public Service Grant Application
For Fiscal Year 2015-2016

EXHIBIT B

Neighborhood Revitalization Strategy Area (NRSA)

Airport Neighborhood Parklawn Neighborhood

A. Project Summary

A-1 Project Title PARKLAWN UNITED NEIGHBORS COMMUNITY ASSISTANCE PROJECT

Amount Requested \$3,431.04.

(One application per project)

Total Project Cost \$3,431.04 (should match Budget "Exhibit A")

A-2 Legal Name of Agency Requesting funding: CENTER FOR HUMAN SERVICES

DBA: CERES PARTNERSHIP FAMILY RESOURCE CENTER

Agency Address: 2000 W BRIGGSMORE AVE, MODESTO, CA 95350

Phone: 209-526-1476

Fax: 209-526-0908

Incorporated year: 1970 501(c)(3): Yes or No Tax ID number: 94-1725620

DUNS Number (9 digit No.): 038119202

A-3 Contact Name: LORI SCHUMACHER Title: PROGRAM DIRECTOR

Contact Address (if different than above): SAME

Contact E-Mail Address: LSCHUMACHER@CENTERFORHUMANSERVICES.ORG

Contact Phone: 209-526-1476

Fax: 209-526-0908

A-4 Agency Type (check all that apply):

Non-Profit Government Faith-Based Education

A-5 Number of unduplicated persons and households you anticipate serving for this project: (I) 60 (H) 20

A-6 Other measurements of program success (Ex: Number of Ind. provided Shelter, or Connected to Employment):

20 Low Income or Very Low Income households will have received emergency food assistance for the Christmas holiday, as well as, winter apparel, i.e. blankets, etc.

A-7 Summarized Project Description: In the area below, provide a brief description of the proposed project and what it plans to accomplish:

Center for Human Services-Ceres Partnership will assist twenty Parklawn families who are in the very low income to low-income categories with food baskets. The families will also receive blankets and winter clothing. Parklawn United Neighbors (PUN) will hold its annual Holiday Giving Event on December 19th, 2015 at the Modesto Revival Center, located at 1601 Midway Avenue, Modesto. In addition, PUN will provide toys and goodie bag for children ages 0-12 who live in the Parklawn neighborhood. PUN will donate the toys and goodie bag from the funds raised in 2015 by the neighborhood group.

AMENDED EMERGENCY SOLUTIONS GRANTS (ESG) AGREEMENT

This AGREEMENT AMENDMENT is made and entered into by and between STANISLAUS COUNTY, State of California, as the implementer of the Emergency Solutions Grants (ESG) Program (hereinafter referred to as "County") and the **WE CARE PROGRAM- TURLOCK** (hereinafter referred to as "Organization") on **April 21, 2017**.

WHEREAS, due to unspent federal ESG funds, and due to the need to spend down 100% of grant funds by June 30, 2017; and

WHEREAS, Section 2.1 – Grant Amount Awarded of the Emergency Solutions Grants (ESG) Agreement is being revised;

NOW, THEREFORE, the parties hereto do mutually agree to amend the ESG Agreement, executed between Organization and Agency on July 1, 2015, as follows:

1. Paragraph 2.1, Compensation Grant Amount Awarded, is amended to read as follows:

2.1 **Grant Amount Awarded.** Organization shall be paid a total consideration of \$11,558.05, which is a decrease of \$17,861.95, for full performance of the services specified for the We Care Rapid Re-Housing Program under the July 1, 2015, Agreement, and Attachment A "Amended Budget" which is attached to this Amended Agreement and incorporated herein by reference.

2. The Organization has authorized the undersigned person signing as officers on behalf of Organization, to enter into this Agreement on behalf of said Organization and to bind the same to this Agreement, and, further that said Organization has authority to enter into this Agreement and that there are no restrictions or prohibitions contained in any article of incorporation or bylaws against entering into this Agreement.

IN WITNESS WHEREOF, the parties have executed this Agreement Amendment on the day and year first hereinabove written.

COUNTY OF STANISLAUS

WE CARE PROGRAM-TURLOCK

By:



Angela Freitas, Director
Planning and Community Development

"County"

By:



Maris Sturtevant
Executive Director

"Organization"

APPROVED AS TO FORM:

John P. Doering
County Counsel

By:



Thomas E. Boze
Deputy County Counsel

Assisted

**Budget Amendment
ESG FY 15-16**

Agency: We Care Program-Turlock
 Project: Rapid Re-Housing Program
 Date: 21-Apr-17

BUDGET AND PROGRAM OBJECTIVE MODIFICATIONS:

Line Item	Awarded	Revised
STREET OUTREACH		
Essential Services		
Salaries : (total from Exhibit C)	\$0.00	\$0.00
Benefits/Taxes (capped at 20% of salary):	\$0.00	\$0.00
Transportation	\$0.00	\$0.00
Subtotal:	\$0.00	\$0.00
EMERGENCY SHELTER		
Essential Services		
Salaries : (total from Exhibit C)	\$0.00	\$0.00
Benefits/Taxes (capped at 20% of salary):	\$0.00	\$0.00
Transportation	\$0.00	\$0.00
Subtotal:	\$0.00	\$0.00
Operational Costs		
Rent:	\$0.00	\$0.00
Utilities:	\$0.00	\$0.00
Maintenance (specify _____)	\$0.00	\$0.00
Insurance, supplies misc food etc.:	\$0.00	\$0.00
Subtotal:	\$0.00	\$0.00
Renovation		
Conversion	\$0.00	\$0.00
Major Rehabilitation	\$0.00	\$0.00
Renovation	\$0.00	\$0.00
Subtotal:	\$0.00	\$0.00
HOMELESS PREVENTION/RAPID RE-HOUSING		
Essential Services		
Salaries : (total from Exhibit C)	\$4,904.00	\$2,673.89
Benefits/Taxes (capped at 20% of salary):	\$980.00	\$418.47
Transportation	\$0.00	\$0.00
Subtotal:	\$5,884.00	\$3,092.36
Financial Assistance Costs		
Rental Application Fees	\$0.00	\$0.00
Security Deposits:	\$3,600.00	\$1,955.00
Last Month's Rent:	\$0.00	\$0.00
Utility Deposits:	\$1,600.00	\$0.00
Utility Payments:	\$0.00	\$440.00
Moving Costs:	\$0.00	\$0.00
Services Costs:	\$0.00	\$0.00
Short-term Rental Assistance (0-3 mos.):	\$3,500.00	\$2,675.00
Medium-term Rental Assistance (4-24 mos.):	\$14,116.00	\$2,221.00
Subtotal:	\$22,816.00	\$7,291.00
HMIS		
Essential Services		
Salaries : (total from Exhibit C)	\$0.00	\$0.00
Benefits/Taxes (capped at 20% of salary):	\$0.00	\$0.00
Subtotal:	\$0.00	\$0.00
Other Costs		
Participation Fees:	\$0.00	\$0.00
Training:	\$0.00	\$0.00
Technical Assistance:	\$0.00	\$0.00
Other (specify _____ Inspections):	\$720.00	\$174.69
Subtotal:	\$720.00	\$174.69
TOTAL:	\$29,420.00	\$11,558.05

Mario Stastrow 4-28-17
 Signature of Project Director or Authorized Person is required Date:

TO BE COMPLETED BY CD MONITORING STAFF:	
CD Staff Recommendation: <input checked="" type="radio"/> Approve <input type="radio"/> Deny (Circle one)	
<i>[Signature]</i>	4/28/17
Signature of Stanislaus County CD Official	Date:



STANISLAUS URBAN COUNTY & CITY OF TURLOCK

FISCAL YEAR 2015-2020 REGIONAL CONSOLIDATED PLAN

FISCAL YEAR 2015-2016 ANNUAL ACTION PLAN

FISCAL YEAR 2015-2020 REGIONAL ANALYSIS OF IMPEDIMENTS TO
FAIR HOUSING



2015-2020 REGIONAL APPROACH

Stanislaus Urban County:

- **CDBG** – Community Development Block Grant
- **ESG** – Emergency Solutions Grant

City of Turlock/Stanislaus Urban County:

- **HOME** – HOME Investment Partnership Program

City of Turlock:

- **CDBG** – Community Development Block Grant





PLAN DEVELOPMENT AND CITIZEN PARTICIPATION

- Community Workshops
- Stakeholder Outreach
- Online & Print Survey
- Municipal Advisory Councils
- City Councils & Staff of Member Jurisdictions
- County's Community Development Committee





FISCAL YEAR 2015-2020 CONSOLIDATED PLAN

- Describes and discusses priority needs of the community – focusing on housing and community development needs;
- Identifies the resources available to address those needs; and
- Describes a plan to meet those needs using HUD funds.





FISCAL YEAR 2015-2020 CONSOLIDATED PLAN

CDBG/ESG Program Goals:

1. Provide decent housing;
2. Provide a suitable living environment; and
3. Expand economic development.





FISCAL YEAR 2015-2020 CONSOLIDATED PLAN

Identified Needs and Priorities:

- Infrastructure Improvements
- Economic Development
- Affordable Housing /Housing Assistance
- Fair Housing Services
- Public Services
- Homeless Shelter Services
- Homeless Prevention and Rapid Re-Housing Services
- Homeless Services Data Collection





FISCAL YEAR 2015-2020 CONSOLIDATED PLAN

New Tools for Urban County Members:

- Voluntary “Shifting” of Fiscal Year Allocations;
and
- Use of State CDBG Program Income via Urban County.





FISCAL YEAR 2015-2020 CONSOLIDATED PLAN

Neighborhood Stabilization Program (NSP) 1 and 3 Continuing Efforts:

- Abandoned and Dangerous Building Program.
- Liquidating NSP inventory (six homes) by finding eligible first time homebuyers.
- Development or liquidation of a vacant NSP property within the City of Oakdale.



FISCAL YEAR 2015-2016 ANNUAL ACTION PLAN

- Component of Consolidated Plan.
- Describes the specific programs and projects to be undertaken during the upcoming fiscal year.





FISCAL YEAR 2015-2016 ANNUAL ACTION PLAN

Stanislaus Urban County Allocation:

CDBG: \$2,197,687*

ESG: \$ 190,669**

TOTAL \$2,388,356

* reflects 2% increase compared to FY 2014-2015

** reflects 11% increase compared to FY 2014-2015





FISCAL YEAR 2015-2016 ANNUAL ACTION PLAN

Urban County Member	Activities	Administration	Total
Ceres	\$244,987	\$15,209	\$260,196
Hughson	122,532	15,209	137,741
Newman	139,147	15,209	154,356
Oakdale	153,530	15,209	168,739
Patterson	138,993	15,209	154,202
Waterford	127,609	15,209	142,818
Stanislaus County	611,854	323,013	934,867
Public Services	219,768		219,768
Fair Housing		25,000	25,000
CDBG Subtotal	\$1,758,420	\$439,267	\$2,197,687
ESG	176,369	14,300	190,669
Total	\$1,934,789	\$453,567	\$2,388,356



FISCAL YEAR 2015-2016 ANNUAL ACTION PLAN

Urban County Member Infrastructure Projects:

- Stanislaus County: Airport Sewer & Empire Storm Drain
- City of Ceres: Nadine Ave & Evans Road
- City of Hughson: 2nd Street Project
- City of Oakdale: Davitt Ave Project Phase II
- City of Patterson: Fourth Street Project
- City of Waterford: La Gallina Infrastructure Project
- * City of Newman: Inyo Avenue Phase II





FISCAL YEAR 2015-2016 ANNUAL ACTION PLAN

Fair Housing Program:

- HUD mandated. Aimed at combating fair housing impediments through education, investigation, and litigation

Economic Development (ED): *(prior year funding)*

- ADA Compliance Assistance Program and Small Business Technical Assistance Program





FISCAL YEAR 2015-2016 ANNUAL ACTION PLAN

Public Service Funds:

- 10% (\$219,768) of CDBG allocation set aside for public services

Changes for Fiscal Year 2015-2016 Award Process:

- Focus on Prevention Grant
- Full Funding for Recommended Awards



FISCAL YEAR 2015-2016 ANNUAL ACTION PLAN

Competitive Award Scoring Criteria:

- Capacity & Experience
- Need/Extent of the Problem
- Soundness of Approach
- Methodology
- Accomplishments
- Funding Resources
- Achievement Results & Program Evaluation
- Grant Submittal (*Accuracy, Completeness, and Quality*)



FISCAL YEAR 2015-2016 ANNUAL ACTION PLAN

Consolidated Plan Priority Scoring Criteria:

(0-5 points based how high the service is prioritized)

- **High:** At-risk children/youth, senior services, physically/mentally disabled persons, and homeless services.
- **Medium:** Victims of domestic violence, homeless prevention, emergency food assistance, and parent education.
- **Low:** Utility assistance, financial literacy, recently incarcerated or on parole, persons with substance abuse problems, and general low/moderate income services.





FISCAL YEAR 2015-2016 ANNUAL ACTION PLAN

Public Services Grants (PSG)

- Received 26 competitive applications(\$480,798)
- Nine recommended for funding (\$179,812)
 - Court Appointed Special Advocates (CASA)
 - Center for Human Services (3 grants)
 - Children's Crisis Center
 - Salvation Army Red Shield
 - Second Harvest (2 grants)
 - We Care Program



FISCAL YEAR 2015-2016 ANNUAL ACTION PLAN

Focus on Prevention Grant (FPG)

- Received 5 competitive applications (\$185,006)
- One recommended for funding (\$39,539)
 - Central Valley Youth for Christ



FISCAL YEAR 2015-2016 ANNUAL ACTION PLAN

Emergency Solutions Grants (ESG)

- Received 10 competitive applications (\$333,185)
- 7 recommended for funding (\$176,369)



FISCAL YEAR 2015-2016 ANNUAL ACTION PLAN

ESG funding recommendations:

- **\$80,685 Emergency Shelter funds:**
 - Family Promise
 - We Care
 - Children's Crisis Center (Verda's and Marsha's House)
- **\$80,685 Homeless Prevention & Rapid Re-Housing Funds:**
 - Family Promise
 - We Care
 - Community Housing & Shelter Services
- **\$14,999 Homeless Management & Information Systems Funds:**
 - Community Housing & Shelter Services





FISCAL YEAR 2015-2016 ANNUAL ACTION PLAN

Non-profit Agency Responses to Recommended Grant Awards:

- The Stanislaus County Commission on Aging
- The Salvation Army
- The United Samaritans Foundation



ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Purpose:

- Determine current state of fair housing.
- Examine conditions that may impact equal access to housing.
- Identify “impediments” to fair housing.
- Create a fair housing plan.





ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Impediments to fair housing:

- Shortage of affordable housing supply
- Shortage of subsidies and strategies to promote affordable, accessible housing for lower-income households, including protected classes
- Differential origination rates based on race, ethnicity, and location.
- Improved coordination with real estate industry
- Improved knowledge of fair housing rights
- Discrimination in rental housing





ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

- Analysis of Impediments includes planned actions to address each impediment.
- The identification of an impediment does not necessarily identify a deficiency but the nature of a problem that the recommended actions will serve to mitigate.





STAFF RECOMMENDATIONS

Take actions 1 - 7 as outlined in the Board of Supervisors Staff Report necessary for approval and implementation of the FY 2015-2020 Regional Consolidated Plan, FY 2015-2016 Annual Action Plan, and FY 2015-2020 Regional Analysis of Impediments.

