



# 2023-2031 Housing Element Update

## Chapter 1 – Introduction

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# 1 Introduction

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## 1.1 Purpose of Housing Element

The availability of adequate housing is of statewide importance and requires cooperative participation to provide housing opportunities that meet the needs of every Californian. Decent housing and suitable living environments for every Californian is “a priority of the highest order” (Government Code Section 65580). Cooperation from all levels of government is required to accommodate the housing needs of all economic levels and households.

California Housing Element Law, established in 1969, requires that all local governments adequately plan to meet the housing needs of everyone in the community. It acknowledges that in order to address housing needs, local governments must adopt plans and regulatory systems that provide housing development opportunities for the private market for the establishment of long-range plans to meet their fair share of regional housing needs. As such, a jurisdiction’s ability to implement the Housing Element not only provides the most basic need for Californians, but directly affects the individuals and families who will live, work, and play in every community.

The Housing Element is the central tool used by the state to ensure local governments are appropriately planning for and accommodating enough housing across all income levels. This Housing Element covers the planning period 2023-2031 as part of the 6<sup>th</sup> cycle Housing Element update. The purpose of the Housing Element is to provide an assessment of current and future housing needs for the next eight years and establish housing goals, policies, and programs that identify housing needs, reduce barriers to development, and ensure compliance with state legislation. The California Department of Housing and Community Development (HCD) assumes responsibility for reviewing every Housing Element to certify it complies with state law. HCD’s approval is required before a jurisdiction can adopt the housing element as part of its overall General Plan.

The Housing Element must include:

- Identification and analysis of existing and projected housing needs, resources, and constraints;
- A statement of goals, policies, quantified objectives, and scheduled programs for preservation, improvement, and development of housing;
- Identification of adequate sites for housing; and
- Adequate provision for existing and projected needs of all economic segments of the community.

## 1.2 Relationship to Other General Plan Elements

The Housing Element is one of the seven elements of the County’s General Plan. The General Plan is a comprehensive, long-term plan for the community’s physical development and provides the framework for the vision of the community’s future. The Stanislaus County 2015 General Plan was adopted on August 23, 2016, and is comprised of mandatory elements including: Land Use, Circulation, Conservation/Open Space, Noise, Safety, and Housing. The Housing Element incorporated into the General Plan was previously adopted on April 5, 2016. The County has also adopted an optional Agricultural Element as part of the General Plan. California Government Code Section 65583(c) requires the Housing Element to maintain internal consistency with other General Plan elements. The most important aspect of consistency among General Plan elements is that policies

and implementation measures do not conflict but support one another to achieve the overall goals and vision of a general plan. In preparing the 2023-2031 Housing Element, the County reviewed goals and policies in the various elements of the General Plan. In coordination with the Housing Element update, the Safety Element was updated concurrently with the 6<sup>th</sup> cycle Housing Element update in accordance with State law and will be adopted separately.

Jurisdictions with disadvantaged communities must also address environmental justice in their general plans, per Senate Bill (SB) 1000, Government Code Section 65302(h). There are Disadvantaged Communities (DACs) in Stanislaus County, and therefore the County has identified and acted to reduce compounded health risks through the incorporation of Environmental Justice policies throughout the General Plan. Not only does the State recognize environmental degradation and the impacts to health on these communities, but also requires the jurisdiction to establish policies to reduce compounded health risks by reducing pollution exposure, improve air quality, provide public facilities, promote physical activity, and provide access to healthy foods and sanitary homes and environments. Additionally, the County has committed to update the Land Use Element and Zoning Ordinance for consistency with the Housing Element Update.

## 1.2.1 Organization of the Housing Element

Per California Government Code Sections 65580-65589, a housing element must consist of the following components:

- **Chapter 1: Introduction.** This section provides an overview of the County and Housing Element requirements.
- **Chapter 2: Housing Needs Assessment.** This section reviews the existing and projected housing needs of the community. It provides a profile of socio-demographic information, such as population characteristics, household information, housing stock, tenure, and housing affordability. The assessment also considers local special housing needs, such as seniors, farmworkers, homeless, large households, and female-headed households.
- **Chapter 3: Constraints.** This section identifies and analyzes governmental and nongovernmental impediments to housing production across all income levels.
- **Chapter 4: Assessment of Fair Housing.** This section provides an analysis of fair housing issues and a summary of contributing factors that serve as barriers to fair housing choice and access to opportunities in Stanislaus County. The purpose of the Assessment of Fair Housing is to replace segregated living patterns with truly integrated and balanced living patterns and to transform racially and ethnically concentrated areas of poverty into areas of opportunity.
- **Chapter 5: Sites Inventory and Analysis and Housing Resources.** The Housing Element must contain an inventory of land suitably zoned and available for residential development within the planning period. The Sites Inventory analysis describes the assumptions informing the Sites Inventory and the relationship of zoning and services to the sites. This section also describes administrative and financial resources available to housing development in the jurisdiction.
- **Chapter 6: Housing Plan.** This section provides a statement of the community's goals, quantified objectives, and policies to maintain, preserve, improve, and develop housing. It also provides a schedule of meaningful actions to be taken during the planning period to achieve the aforementioned goals, objectives, and policies. It includes quantified objectives for new construction, rehabilitation, and conserved units by income category to make sure that both the existing and the projected housing needs are met, consistent with the County's share of the RHNA.

- **Appendix A: Public Outreach.** This section contains detailed summaries of community engagement as well as actual materials used in engagement events.
- **Appendix B: Review of Past Accomplishments.** This section reviews the results of the goals, policies, and programs adopted in the previous Housing Element and compares projected outcomes with actual achieved results.

## 1.3 Data Sources and Methods

Data from a variety of sources is used to complete the Housing Element. The most commonly cited source is the U.S. Census; the Census provides consistent demographic characteristics that are widely accepted. American Community Survey is a feature offered by the U.S. Census and includes five-year estimates on population and demographic characteristics. Other data sources include the following:

- Stanislaus Regional Housing Authority
- Stanislaus Council of Governments (StanCOG)
- California Department of Housing and Community Development (HCD)
- California Housing Finance Agency (CalHFA)
- California Tax Credit Allocation Committee (TCAC)
- US Department of Housing and Urban Development Comprehensive Housing Affordability Strategy (CHAS)
- California Department of Finance (DOF)
- Federal Financial Institutions Examination Council Home Mortgage Disclosure Act (HMDA) Data Browser
- Stanislaus County Regional Homeless Point-in-Time Count (PIT)
- State Employment Development Department (EDD)
- United States Department of Housing and Urban Development (HUD)

## 1.4 Community Profile

Stanislaus County is located in San Joaquin Valley, which is centered in California's Central Valley. The 1,521 square miles are intersected by two major north-south routes, Interstate 5 and State Route 99. Three major rivers run through Stanislaus County: the Stanislaus and Tuolumne Rivers, running east to west, and the San Joaquin River, running north to south. The county is bound by San Joaquin and Calaveras counties to the north, Tuolumne and Mariposa counties to the east, Merced County to the south, and Santa Clara and Alameda counties to the west. There are nine incorporated cities in Stanislaus County, including Ceres, Hughson, Modesto, Newman, Oakdale, Patterson, Riverbank, Turlock, and Waterford.

Stanislaus County is situated near the San Francisco Bay Area, providing County residents access to job markets. The high cost of housing in the Bay Area has pushed residents to seek cheaper housing in Stanislaus County, increasing development pressures in the cities within the County, where the majority of the population lives. Agriculture serves as the number one industry for economic output and employment in the county. Additionally, there are two large wineries that contribute to the economic base in the county.

Stanislaus County is home to approximately 553,000 people, as of 2020, and has experienced rapid population growth in the 1990s and early 2000s. As urban development throughout the county has grown, the economic base has continued to diversify, and pressures to convert agricultural lands to non-agricultural uses have increased over the years. From 2000 to 2010, the population of Stanislaus County grew by approximately 15 percent, mostly within the nine incorporated cities. Population growth in the unincorporated area slowed to around four percent between 2010 and 2015.

Population diversity in Stanislaus County is growing as the population increases. In the next 40 years, Asian and Hispanic or Latino populations are expected to increase at the highest rates. The diversity in cultures and languages spoken at home underscores the need for the County to provide equitable access to housing opportunities for all residents.

## 1.4.1 History of Stanislaus County

### Introduction

Stanislaus County was named after the Estanislao River, which was named in honor of Estanislao, a mission-educated renegade Native American chief who led a band of Native Americans in a series of battles against Mexican troops until finally being defeated by General Mariano Vallejo in 1826<sup>1</sup>.

### Land Grants

Between 1843 and 1846, when California was a province of independent Mexico, five Mexican land grants totaling 113,135 acres were granted in Stanislaus County including: Rancho Orestimba y Las Garzas (which is now the Newman area), Rancho Pescadero (now the Grayson and Westley area), and Rancho Del Puerto (now the Patterson area) located on the west side of the County, west of the San Joaquin River; and Rancho Del Rio Estanislao (now the Knights Ferry area) and Rancho Thompson (now the Riverbank and Oakdale area) on the east side of the County near the Stanislaus River. After cession of California to the United States following the Mexican-American War, the 1848 Treaty of Guadalupe Hidalgo allowed the land grants to be honored; these land grants were confirmed by the Public Land Commission between 1852-1853 and were later patented to subsequent landowners.<sup>2,3</sup>

### Gold Rush

Between 1848-1855 the gold rush brought many people through Stanislaus County to mine along the Stanislaus River, for trade on their way to the gold fields in the Sierra Nevada Mountains, and to farm to produce products to sell to the new influx of people coming into the area. In the early days of the gold rush the Stanislaus River, known as the "Southern Mines", and the eastern area of the Tuolumne River near La Grange, were gold-bearing streams; however, the gold in the rivers quickly dried up in Stanislaus County during the early part of the gold rush<sup>4</sup>.

Throughout the gold rush period, agriculture and ranching expanded throughout the County to meet the needs of the settlers, leading to the establishment of farming settlers in the area. Towards the end of the gold rush period, Stanislaus County was formed from a portion of Tuolumne County and was incorporated on April 1, 1854; the county seat was moved four times from 1854 – 1862 first

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<sup>1</sup> Historicmodesto.com, Early History, "Natives of Stanislaus, Chief Estanislao"

<sup>2</sup> Cowan, Robert G. (1977) p. 4. "Ranchos of California" a list of Spanish Concessions 1775–1822 and Mexican Grants 1822–1846. Academy Library Guild, Fresno, California

<sup>3</sup> "Spanish and Mexican Land Grant Maps, 1855–1875" Archived 2012-01-08 at the Wayback Machine, California State Archives

<sup>4</sup> "California Gold Rush, 1848–1864". Learn California.org, a site designed for the Secretary of State of California. Archived from the original on July 27, 2011. Retrieved August 22, 2011.

situated at Adamsville in June 1854, then moving to Empire in October 1854, then to La Grange in 1856, and then to Knights Ferry in 1862<sup>5</sup>.

## Railroad

The Pacific Railway Act of 1862 authorized the issuance of government bonds and land grants for each mile of railroad that was constructed and by the late 1960's Stanislaus County had multiple railroads, including: the Central Pacific (now Union Pacific) Railroad, Southern Pacific Railroad, and Burlington Northern Santa Fe Railroad which run through Stanislaus County, north to south; and the Sierra Northern Railroad, which runs from the east to Riverbank where it merges with the Burlington Northern Santa Fe railroad.

Founded in 1870 (incorporated in 1884), Modesto especially saw a great deal of growth after the railroad was constructed. The arrival of the Central Pacific Railroad increased Modesto's importance and the county seat was moved from Knights Ferry in an election on September 6, 1871. The Modesto Interurban Railway was little used, however, and was sold to T.K. Beard, who renamed it Modesto & Empire Traction in 1911. The Beard family owned significant property near the railroad, located north of the Tuolumne River and south of Yosemite Boulevard (State Route 132) in a predominately unincorporated area located between the Cities of Ceres and Modesto, and began to develop that land in the 1910s. Modesto & Empire Traction shifted from primarily passenger to primarily freight traffic and ran the last passenger train in 1917. This area, now called the Beard Tract, is still a vital industrial area in Stanislaus County<sup>6,7</sup>.

## Industrialization and Residential Development from the Late 1800s to Today

The advent of the automobile and the expansion of roadways and highways was a major contributor to the development of Stanislaus County and its cities during the first decades of the 20<sup>th</sup> century. In 1910 the state legislature passed the State Highways Act, which allotted millions of dollars in bonds for a state highway system. The Golden State Highway (later State Route 99) was one of the earliest highways built in California, in 1915, which extends north to south through the Central Valley from Sacramento to south of Bakersfield. California's car-centric culture changed the way development occurred in California; no longer required to centralize services, proliferation of the automobile led to urban sprawl with the development of new suburbs, urban freeways, stores and malls with parking lots, and drive-in restaurants.

The Great Depression, which began in 1929, slowed growth in Stanislaus County and brought widespread unemployment. However, Stanislaus County's diverse agriculture and food processing industries helped Stanislaus County weather the Great Depression. Some of Modesto's largest packing and processing companies were established in the middle 1930s. Many immigrants fleeing the dust bowl conditions brought on by drought in the Midwest in the 1930s emigrated to Stanislaus County during this period. In 1936 the Beard Land & Investment Company created the Sierra Subdivision in the unincorporated pocket called the Airport Neighborhood, adjacent to the Modesto City-County Airport, which began operations on a single runway next to the Tuolumne River in 1929. Shortly thereafter the Airport Neighborhood became known as "Little Oklahoma," after its Dust Bowl-era migrant population.

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<sup>5</sup> George Henry Tinkham, 1821, History of Stanislaus County California, Historic Record Company, Los Angeles

<sup>6</sup> Historicmodesto.com, Early History, "A Railroad Town, Transformation of Paradise Valley"

<sup>7</sup> Cpr.org, Central Pacific Railroad, History.

During World War II, many citizens left to work on the war effort, leaving a labor shortage, which was particularly hard on farmers, who needed a substantial labor force to harvest crops. Local food processing plants were pressed into service to provide canned goods for the war effort. The military closed all west coast airports including Modesto's, except for military service. New construction ceased. Meanwhile, Americans were issued ration and coupon books for many household goods, also to assist the war effort.

Stanislaus County experienced rapid growth in the decades after World War II. The County's population of about 74,866 residents in 1940 rose to more than 157,294 by 1960. New housing construction was stimulated by the Serviceman's Readjustment Act of 1944 (also known as the "G.I. Bill"), which provided many benefits to war veterans including low-cost mortgages and business loans. These loans resulted in massive residential and commercial development and caused the spread of new development into the unincorporated areas of the county as large numbers of people were now able to afford a single-family house. Although this post-war suburban growth occurred throughout the County, the fastest growth for unincorporated Stanislaus County was seen in the unincorporated areas surrounding the City of Modesto<sup>8</sup>.

Residential development in California and Stanislaus County went through intermittent periods of booms and busts over the 80-year period covering 1940 to 2020, and the bust years saw steep declines in the number of housing units that were produced. Home building declined in the mid-1960s due to an interest rate spike following an overheated wartime economy. Again, in the early-mid 1970's, precipitated by the oil crisis, in the early 1980's, due to a spike in interest rates, and in the beginning of the 1990s, following the savings and loan crisis, housing construction decreased. Beginning in 2008, when the nation plunged into the Great Recession, home building numbers were significantly reduced. During the 1960s through 1980s, housing production in California tended to recover after each such recession and return to relatively robust levels. However, the same cannot be said, about more recent decades. During the three decades of the 1990s through the 2010s, each successive recession has been followed by a successively more anemic and inadequate homebuilding recovery. As shown on Figure 1-1, housing production has seen steady declines population numbers continued to increase. By 1970, Stanislaus County was home to nearly 194,506 people, 265,900 residents by 1980, 370,522 by 1990, 446,997 by 2000, 514,453 by 2010, and 552,878 by 2020<sup>9,10</sup>.

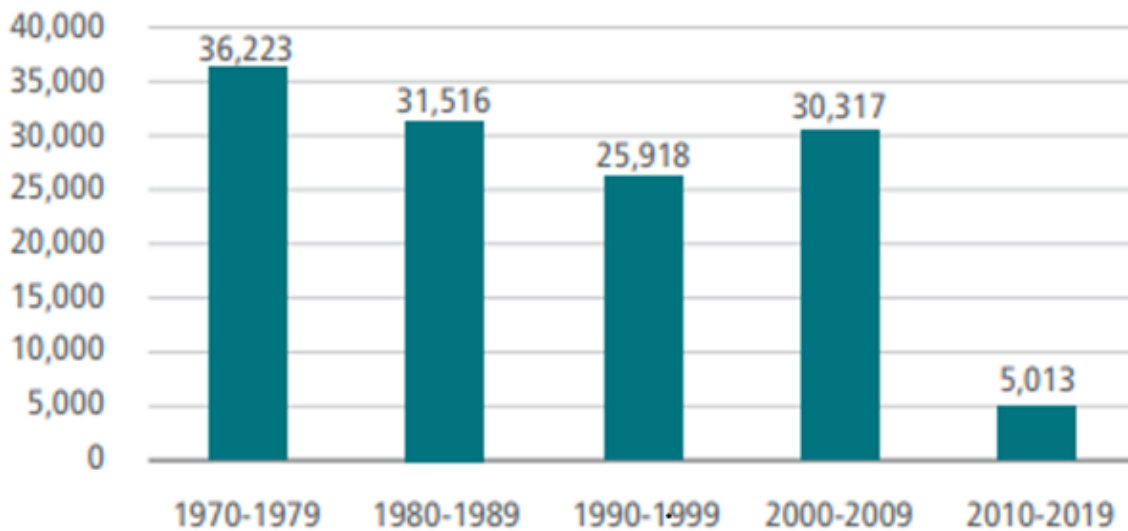
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<sup>8</sup> "How the Suburbs Shaped America, and California Shaped the Suburbs", Jonathan Vankin, Feb. 28, 2023, California Local online publication.

<sup>9</sup> "Population of Counties by Decennial Census: 1900 to 1990". United States Census Bureau. Retrieved May 31, 2014.

<sup>10</sup> The 40-Year Decline in California's Housing Production. Andrew R. Henderson. Feb. 22, 2021.



**Figure 1-1 Number of Housing Structures Built in Stanislaus County by Decade**

Source: U.S. Census American Community Survey 2021 5-Year Estimates, Table B25034

According to 2010 and 2020 Census data, the population of the County as a whole grew by seven percent, while the population of unincorporated Stanislaus County increased by only 1.2 percent. Most of Stanislaus County's population increase from 2010 to 2020 occurred within the nine incorporated cities, rather than the unincorporated area of the County. (Annual Estimates of the Resident Population: U.S. Census Bureau, Population Division). From 2021 to 2022, Stanislaus County is estimated to have had a -0.03 percent population decline, whereas unincorporated Stanislaus County saw a decline between 2021 and 2022 of -0.6 percent. Even though the population is not growing as rapidly as in previous years, there is still a prominent housing shortage. An Affordable Housing Needs Report produced by the California Housing Partnership in 2023 indicates that Stanislaus County as a whole has a shortfall of 14,486 residential units available at a price that can be afforded by the average renter household<sup>11</sup>.

## **Legal Agreements Involving Residential Development in Unincorporated Stanislaus County**

There have been two legal agreements over the last 30 years focused on residential development in unincorporated Stanislaus County.

The Low to Moderate Income (LMI) Housing Fund/1991 CRLA agreement, entered into between the Stanislaus County Redevelopment Agency (RDA) and California Rural Legal Assistance (CRLA) on November 15, 1991, required the RDA to: (1) set aside and expend at least twenty-five percent (25%) of gross tax increment revenue generated from property within the redevelopment area to expand and improve the supply of affordable housing; (2) prepare a Community Plan for the Airport, Shackelford, South 7th Street, and Butte/Glenn/Imperial neighborhoods; (3) ensure replacement housing and relocation assistance is provided in the Airport and South 7th Street neighborhoods when tenants are required to relocate due to private or public development activity and require noticing to any tenant within in the Airport and South 7th Street neighborhoods and CRLA when a project proposes to destroy low or very low income housing units (this applies to RDA and Stanislaus County

<sup>11</sup> Housing Stanislaus Report. Valley Vision. November 2023.

development applications); (4) make all legally required reports available to CRLA; and (5) include affordability and occupancy restrictions on low- and very-low income housing developed with RDA funding. The Stanislaus County Redevelopment Agency was dissolved in 2012, as mandated under state law.

On August 18, 2004, the Committee Concerning Community Improvement, et al sued the City of Modesto, and Stanislaus County, et al. in the Committee Concerning Community Improvements v. City of Modesto, et al. lawsuit. The Plaintiff's included the Committee Concerning Community Improvement (CCCI) and South United Neighbors (SUN), both of which were voluntary, community-based organizations made up of homeowners or leaseholders residing in the neighborhoods surrounded by the southwestern region of the City of Modesto, known informally as the "Bret Harte", "The Garden", "No Mans Land" (Hatch-Midway), and "Robertson Road" neighborhoods. The Plaintiff alleged that the City of Modesto and Stanislaus County had "...discriminated in the provision of service and facilities in connection with plaintiffs' housing including but not limited to an ongoing discriminatory failure to provide adequate law enforcement protection and emergency services, and other basic services such as lighting and sidewalks, street maintenance, refuse removal, and drainage to Plaintiffs based in substantial part on the race, ethnicity, ancestry, color or national origin of the residents of the Latino Unincorporated Neighborhoods...".

The 2011, Stanislaus County entered into a Settlement Agreement which requires three actions by implemented by the County: (1) Approval of a Residential Neighborhood Infrastructure Project List Rankings Criteria; (2) Approval of a Resolution supporting the annexation of unincorporated county residential pockets and islands; and (3) Authorization to work with the City of Modesto to amend the Master Property Tax Agreement

## 1.5 Regional Housing Requirements

State law requires that every housing element include an inventory of land suitable and available for residential development to meet the jurisdiction's share of the RHNA. Chapter 5, *Housing Resources*, documents the methodology and results of the housing Sites Inventory analysis conducted to demonstrate Stanislaus County's ability to satisfy its share of the regional housing need. The Stanislaus County of Governments (StanCOG) is responsible for developing a methodology for allocating the regional determination to each city and county in its region. The 6<sup>th</sup> Cycle RHNA is based on population projections, income distribution, and access to jobs.

The RHNA is broken down into affordability categories based on Area Median Income (AMI). For planning and funding purposes, the Department of Housing and Community Development (HCD) has developed the following income categories based on the AMI of a metropolitan area:

- **Very Low-Income:** Households earning less than 50 percent of the AMI
- **Low-Income:** Households earning between 51 percent and 80 percent of the AMI
- **Moderate-Income:** Households earning between 81 percent and 120 percent of the AMI
- **Above Moderate-Income:** Households earning over 120 percent of the AMI

StanCOG's final determination of need is 34,344 housing units, which includes all incorporated jurisdictions. A breakdown of the RHNA allocation in Unincorporated Stanislaus County is shown in Table 1-1.

**Table 1-1 Unincorporated Stanislaus County 2023-2031 Housing Target (RHNA)**

Income Category (Percent of Stanislaus County AMI)	Number of Units	Percent of Total Units
Very Low-Income (15-50% AMI)	574	23.2%
Low Income (50-80% AMI)	398	16.1%
Moderate Income (80-120% AMI)	458	18.5%
Above Moderate Income (>120% AMI)	1,045	42.2%
<b>Total</b>	<b>2,475</b>	<b>100.0%</b>

The RHNA will be met through a combination of planned, approved, and pending projects, accessory dwelling units (ADUs), and a list of housing opportunity locations and/or rezone sites, together known as the Sites Inventory. The Sites Inventory contains sites that could have the potential for new residential development within the housing element planning period (2023 to 2031). To facilitate housing development and achieve a greater buffer for the RHNA, the County is proposing to rezone sites. The goals, policies, and programs listed throughout the Housing Element are also intended to help reduce barriers to and create opportunities for housing production, including affordable housing.

## 1.6 Public Participation

The Housing Element must reflect the values and preferences of the community. Accordingly, community participation is an important component of the development of this Element. Government Code Section 6558(c)(8) states that the local government must make “a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element.” This process not only includes community members, but also participation from local agencies and housing groups, community organizations, and housing sponsors.

Stanislaus County provided opportunities to solicit input from stakeholders and community members through interviews, surveys, a project-specific website, community events, and public meetings. To jumpstart the outreach process, the County compiled and contacted stakeholders and organizations that serve special needs households and renters, provide affordable housing, and offer fair housing services to inform the organizations about the Housing Element update. Staff asked organizations to forward the information to their stakeholders and requested assistance and partnership in community outreach.

These entities were included in all notifications associated with the Housing Element update, including community events, housing survey, and a participatory map exercise. A summary of the public participation is detailed below. More detailed information on the public engagement program is available in Appendix A.

### 1.6.1 Project Website

To facilitate the distribution and gathering of information, a project website dedicated to the Housing Element update was created. The project website<sup>12</sup> provides detailed background information on the Housing Element, answers to frequently asked questions, links to upcoming and past event materials, links to articles and videos on the general plan topics, including the Housing Element. Educational materials include an introduction, informational flyers, and frequently asked questions specifically on

<sup>12</sup> Stanislaus County Housing Element Update website: <https://www.stancounty.com/planning/pl/housing-element.shtm>

housing element. Project materials associated with the Housing Element update were regularly posted on the project website, including documents available for public review, information for upcoming events, and virtual workshop PowerPoint presentations and video recordings. A link on the website enabled people to sign up for project email updates and provide comments at any time throughout the project process.

## 1.6.2 Community Workshops

The County held two community workshops prior to the draft Housing Element, both virtually and in person, to introduce Housing Element and General Plan goals and requirements to the community, educate the community on housing element requirements, and assess participants' housing needs, priorities, and concerns in their community.

Flyers advertising the workshops in both English and Spanish were posted on the County's website and sent out in email blasts in advance of the workshop series to encourage public attendance and participation. The flyers provided meeting details (dates, times, locations, zoom links), and the Housing Element update website and email. Translation services for Spanish were made available for each workshop upon request. Each workshop consisted of a presentation and opportunities for discussion and input in the form of a question-and-answer period.

A virtual workshop was held on June 23, 2022 to provide group discussions on housing, safety, and environmental justice. Participants noted the following issues were important to their community:

- Homeless and transitional housing is needed.
- Housing and services for special needs populations is needed, such as seniors and veterans.
- Appropriate zoning capacity is needed to meet the needs of affordable housing projects.
- There is a need for housing for youth coming out of foster care.
- Increases in rental up-front costs have been a constraint to accessing housing.
- Housing choice vouchers can be obtained but there are few available housing options.
- There is a significant need for housing in urban areas, especially near Modesto. Proximity to transportation and resources should be considered.
- Attracting developers is difficult.

An in-person workshop was held on October 11, 2022 to gather community input on the site selection component of the Housing Element, as well as on safety and environmental justice issues. During the workshop, participants were encouraged to provide specific input about the ideal location of new housing developments, as well as the type of housing they feel is most needed in the unincorporated county. Additionally, residents were provided information on the Safety Element update, including basic findings from the Vulnerability Assessment, as well as information on the requirement to include environmental justice policies into the update process, and asked to provide feedback on hazards and environmental issues in the county.

Participants were asked to view maps of each area of the county and to identify sites with potential for single-family or multifamily development. Input was received relative to the communities of Denair and Keyes and in the Modesto/Ceres area. A full summary of the public input from each workshop is provided in Appendix A.

### 1.6.3 Housing Element Presentations

In July and September of 2022, Consultant and County staff presented to the Planning Commission and the General Plan Update Committee (GPUC). The July presentations to the General Plan Update Committee and the Planning Commission consisted of an introduction to the housing element, the RHNA, State legislation, the Safety Element, environmental justice, and the project timeline. The presentation also included a discussion session on feedback on housing issues, hazards, and environmental justice issues in the county. The second presentation to the GPUC in September provided an overview of the housing element Sites Inventory. A third presentation to the GPUC on April 6, 2023, solicited feedback on proposed policy and program updates in the Housing Element Housing Plan. A fourth presentation was held on August 23, 2023 to present the Draft Housing Element, amended Housing Plan, and changes to the Sites Inventory.

### 1.6.4 Stakeholder Interviews

Throughout September and October 2022, one-on-one interviews were conducted with local housing developers, agencies, and housing and community health advocates to gain an understanding of the housing conditions, issues, and opportunities in Stanislaus County. The input received during these interviews provides context on housing needs and constraints in the community. The interviews included 11 participants from 10 organizations. Each interview lasted approximately one hour and was conducted via conference call or Zoom. After the consultants provided a brief project overview, stakeholders were encouraged to provide their thoughts on housing conditions and needs in the county. Although a broad range of opinions and ideas were expressed during the interviews, comments can be generally summarized into the following five categories:

#### 1. Regional Trends

- Investors and landlords are primarily from outside the community
- Not enough workforce housing
- Homeowners are approached constantly by investors wanting to buy their home
- Agricultural land conversion
- Development near incorporated cities
- Existing housing stock is single family homes and mobile home parks
- Most development is large market rate single-family homes

#### 2. Issues

- Difficulties in community outreach
- Lack of investment in communities
- Language barriers
- Lack of effective code enforcement
- Lack of transportation options
- Lack of Services

### **3. Needs**

- Housing rehabilitation
- Transitional/supportive housing and residents experiencing homelessness
- Workforce housing
- Senior housing
- Affordable housing in proximity to jobs
- Park access
- Fair housing issues
- Mobile home park displacement
- Identification of feasible housing sites

### **4. Constraints**

- Lack of infrastructure
- Cost of development
- Development fees
- Zoning
- Cost of entry
- Environmental requirements
- Coordinated entry system

### **5. Opportunities**

- Accessory dwelling units
- Grant funding
- Programs for prospective homeowners
- Wrap around services
- Partnerships with local developers, nonprofits, and regional agencies
- Affordable by design
- Alternative housing options
- Proactive rental inspections
- Community education and outreach
- Anti-displacement efforts
- Program/policy accountability
- HCD pro-housing designation

Additionally, after the public draft Housing Element was released, the County conducted several one-on-one interviews with stakeholders representing the interests of special needs populations. The interviews included local housing and community health advocates, farmworker housing advocates, and affordable housing consultants gain further understanding of the housing conditions, issues, and opportunities in Stanislaus County. These interviews provided additional details on housing concerns within the County and are summarized as follows:

- The County faces a high cost of rent, leading to overcrowding and difficulties for fixed-income households to find affordable housing. The wait list for Housing Choice Vouchers is extensive, and there is a shortage of local affordable housing developers. Development costs and insufficient grant funding hinder affordable housing projects. Changes in agricultural work hours have reduced farmworker incomes, and rural areas lack essential services. High resource areas have limited housing for lower-income households, and many affordable units are substandard.
- There is a need for consistent engagement with the County, integrated services in housing developments, and a variety of housing types, including large units and those for special needs populations. Additional farmworker housing is required, and privacy concerns need addressing. Up-skilling opportunities, childcare, and caregiver support are also essential.
- The County can support diverse housing types, use prefabricated construction on small parcels, ensure sites for emergency shelters, and engage developers on available sites. Modular development and grant funding for shelters can reduce costs. Project-based partnerships, fee waivers, affordable housing summits, and a continuum of services can enhance housing efforts. Quality of life programs, direct engagement with special needs households, weatherization, and meeting spaces for educational programming are beneficial. Improved transportation options are also crucial.

The Housing Plan was updated to incorporate this feedback into the Housing Plan. Programs 5-1i and 3-1i were added to address the comments regarding opportunities for economic mobility and facilitating development on oddly shaped parcels. Comments regarding inflexible grant implementation, reduced work hours for farmworkers, and modular development were not incorporated as they are outside the County’s jurisdiction to address. Language was added throughout the Housing Plan to address the remaining comments. Further details regarding stakeholder interviews can be found in Appendix A, Summary of Public Participation.

### 1.6.5 Public Comment Survey

The County conducted a community survey to inform the Housing Element update. A variety of outreach efforts were conducted to encourage survey participation. These efforts included the project website, email blasts to stakeholders and interested parties, and social media posts on Instagram and Facebook.

The survey was released to the public online on August 2, 2022 and remained open until August 15, 2022. The survey was also made available during various community outreach events. A total of 148 people responded to the survey. The following themes were collected from the community survey:

- A need for lower-priced rentals and homes was ranked as the highest priority.
- “Housing that is affordable for all,” “more opportunities for home ownership,” and “more rental housing,” were scored as the top three housing-related needs within the coming 10 years.
- A need for co-housing (housing with an emphasis on community living, i.e.: shared open spaces, or kitchens).
- Respondents identified affordability of housing as the most urgent housing issue in the county.
- Respondents identified areas near public transit stops, employment, and shopping centers as the most suitable for new housing development.
- Respondents identified landlord/tenant counseling and education/information on tenant rights as the two most-needed services in their communities.

- Respondents identified down payment assistance for lower-income first time homebuyers and home repair assistance for low-income homeowners as the most needed services.

### 1.6.6 Participatory Map Activity

Participatory mapping exercises are a type of survey that allows participants to view, comment, and prioritize specific topics related to the housing element. This participatory mapping exercise allowed community members to identify and rank potential opportunity sites, as well as solicited the community for any supplemental information needed to develop housing element policy.

The County made available a Geographic Information System (GIS) based housing opportunity sites survey from October 12, 2022 to October 31, 2022 on the project website. The sites survey gave the public an opportunity to provide comments and recommendations relating to the housing opportunity sites. The activity was sent out via email lists to interested parties and was advertised on the County's social media and website. The online participatory mapping tool garnered 177 total responses; 27 of these were general comments and feedback on the Sites Inventory. The remaining 150 responses were made regarding the inclusion of 98 of 381 potential sites presented. The following key themes were collected from community input:

- Support for concentrating new housing development within and adjacent to existing urbanized areas.
- Support for a variety of housing types including affordable apartments and smaller modular homes.
- An expressed interest in housing opportunities close to existing transit and services with pedestrian access.
- Concerns regarding access to existing sewer and water infrastructure.

Input gathered through this activity was used to guide the County's site selection process.

### 1.6.7 Municipal Advisory Council Meetings

Three presentations were made to Municipal Advisory Councils (MACs) in September and October of 2023. A MAC, as formed by California Government Code Section 31010, is an advisory body of local citizens elected by the community or appointed by the Board of Supervisors with the purpose of representing the community to the Board of Supervisors. The South Modesto MAC meeting was held on September 14, 2023, the Denair MAC meeting was held on October 3, 2023, and the Keyes MAC meeting was held on October 19<sup>th</sup>, 2023. No Empire MAC meeting was held during the public comment period due to a lack of quorum. Each presentation provided an overview of the Housing Element and the Site Inventory. The following input was collected from the MAC meetings:

- Desire for more clarity on the scale of development and location of the proposed Sites Inventory.
- Questions on the availability of rental units and desire for an inclusionary ordinance.
- Desire to coordinate with Stanislaus Regional Transportation Authority to ensure that bus route adjustments can be made to accommodate additional population density.
- Concerns about existing infrastructure capacity and the need for additional infrastructure in areas identified for additional housing.
- Concerns about the impact on traffic, flooding, emergency response times as a result of increased housing development.



- Desire to integrate more housing in existing commercial areas.
- Concerns about design and affordability of future housing.
- Concerns about specific Sites Inventory constraints.

### 1.6.8 Housing Stanislaus Initiative

Housing Stanislaus, a countywide initiative to develop a unified and actionable vision and strategy framework for housing in Stanislaus County, developed an outreach and community engagement strategy that aimed to establish a shared understanding of the needs, challenges, and opportunities for housing, and identify and prioritize projects and programs for housing development. Surveys and meetings were conducted between December of 2021 and July of 2022 with the incorporated cities and a wide range of local stakeholders, subject matter experts and industry professionals. This feedback was incorporated into policies and programs.

The Housing Stanislaus Initiative produced a report outlining various constraints and strategies. Those strategies applicable to the unincorporated area have been incorporated into this Housing Element:

- Increasing local gap funding for housing development (i.e. developing a local Housing trust)
- Integrating more housing options into low-density residential zoning districts (i.e. Missing middle housing)
- Conducting developer and property owner outreach

Utilizing the stakeholder engagement from the Housing Stanislaus Initiative, along with housing element update specific engagement, this element identified the highest priority factors limiting or denying fair housing choice or access to opportunity to fair housing to be:

- Need for additional public and private investment in specific neighborhoods
- Low supply of affordable housing
- Location and type of affordable housing and land use and zoning law

### 1.6.9 Equity Advisory Committee

The purpose of the Equity Advisory Committee (EAC) is to inform the development of equitable and meaningful Housing Element policies and approaches. The EAC consisted of members of the following organizations:

- Tuolumne River Trust
- Valley Improvement Projects
- South Modesto Municipal Advisory Council
- Denair Municipal Advisory Council

The County will coordinate with the EAC to gather input on the Draft Housing Element update, specifically related to the goals, policies, and programs detailed in Chapter 6, Housing Plan.

## 1.7 Public Review

Six comment letters were received during the public review period of August 31 to September 30, 2023. The letters received are included in Appendix A, Summary of Public Participation. Following

Public Review of the Housing Element, County staff met with the California Rural Legal Assistance (CRLA) on March 1, 2024 to discuss CRLA's present concerns with the Housing Element.

An overview of comments and how they were addressed in this draft are as follows:

- Outreach
  - Commenters were concerned with the level of community engagement that was conducted over the course of the Housing Element process.
  - Housing Needs Assessment
  - Clarification of details on service providers.
- AFFH
  - Request for additional information in the Fair Housing enforcement and outreach capacity section.
  - Request to incorporate local knowledge throughout the analysis.
  - Request for more analysis of patterns and trends of segregation and integration and disparities in opportunities.
  - Request for more analysis of disproportionate housing needs.
  - Comments regarding contributing factors and prioritization of actions.
  - Comments regarding the distribution of sites with regard to opportunity areas.
  - Request to discuss flood risk to sites in inventory.
  - Request for more sites in higher-resource areas.
- Constraints
  - Clarification of onsite wastewater treatment requirements for farmworker housing.
  - Encourage County to continue to utilize by-right development review processes.
- Sites Inventory
  - Request to include residential land in Salida in Sites Inventory and request for clarification of role of Modesto infrastructure planning in Salida's infrastructure availability.
  - Request from a property owner to include a single parcel in the Sites Inventory. Property did not meet the County's criteria as it is zoned for agriculture.
  - Reiteration of Sites Inventory criteria and suggestions for additional criteria to consider. The County did not formally incorporate these additional criteria, but sites in inventory were selected for proximity to services, infrastructure availability, and development capacity in compliance with state law. The criteria for site selection and limited availability of services are discussed in detail in Section 5.5 Sites Inventory Methodology and Justification.
- Programs
  - Clarified that certain programs speak to the County's existing role and responsibility or requirements to comply with State law.
  - Request to increase rehabilitation objectives.
  - Request for additional tenant protections and anti-displacement program actions.
  - Request to remove an action in Program 2 regarding outreach to developers regarding new density bonus programs.

- Request for additional actions regarding implementation of the Surplus Land Act.
- Request for a program action to reduce barriers to manufactured home installation,
- Request for fee deferral program, existing in Policy 3P.
- Utilities
  - Additional information from the Modesto Irrigation District regarding availability of utilities. No action was required to address these comments.

The following changes were made to the Draft Housing Element to respond to public comments received:

- Introduction
  - Added description of MAC meetings and Equity Advisory Committee meeting to this introduction.
- Housing Needs Assessment
  - Made corrections and added details about homeless service providers.
- AFFH
  - Added a description of fair housing entities operating in Stanislaus County and their activities and described fair housing issues specific to Stanislaus County.
  - Throughout the AFFH analysis, more context was given to data, using public input and local knowledge. Added analysis of overlapping trends and patterns.
  - In segregation and integration analysis, incorporated additional sources of data and adjusted conclusions accordingly.
  - In discussion of racially/ethnically concentrated areas of poverty (R/ECAPs), provided more context regarding relationship of unincorporated R/ECAPs to the City of Modesto and historical disinvestment trends.
  - In displacement risk analysis, added context and more local knowledge regarding demographic characteristics of areas at risk of displacement.
  - Discussed CalEnviroScreen data in more depth.
- Constraints
  - Added a discussion of flood risk in the county.
  - Clarified that a portion of Salida is included in the City of Modesto’s Water Master Plan and Sanitation Plan.
  - Clarified that existing regulations regarding manufactured home installation are consistent with State law.
- Sites Inventory
  - Removed sites that had a low likelihood of redevelopment and expanded analysis on nonvacant sites.
  - Revised realistic capacity and allowable densities of rezone sites consistent with Government Code section 65583.2(i).
  - Added a breakdown of the Sites Inventory by each geographic area.

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- Modified the inventory maps to more clearly show each site and the associated address and other relevant information.
- Added a more robust discussion of infrastructure constraints and the status of public investment in alleviating those constraints.
- The Sites Inventory was modified to include moderate- and above moderate-income units on sites suitable for the development of housing affordable to lower-income households.
- Housing Plan
  - Removed an action in Program 2-2 regarding outreach to developers regarding new density bonus programs.
  - Added an action to Program to 3-2 to maintain an administrative list of Measure E impacted lands that may be added to the Sites Inventory if and when the Annual Progress Report indicates that sufficient sites may not exist to accommodate the County's remaining RHNA.