



2023-2031 Housing Element Update

Chapter 2 – Housing Needs Assessment

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2 Housing Needs Assessment

2.1 Population Trends

Housing needs are unique to each community. Factors such as population growth, race, ethnicity, age, and employment trends influence the type of housing needed and the ability to afford housing. The following section describes and analyzes the various population characteristics and trends that affect the housing needs throughout Stanislaus County, including drawing trends and comparisons between the incorporated and unincorporated cities and areas. In comparing incorporated and unincorporated areas throughout this section it is important to note that unincorporated areas are governed by the County, unlike an incorporated city, which has a separate governing body and land use controls. Since incorporated areas are required to have their own Housing Elements and their own Housing Needs Assessment, the focus of this analysis is on the unincorporated areas within Stanislaus County. Local Area Formation Commission (LAFCO) adopted spheres of influence (SOI) are also mentioned throughout the document, as these areas require cooperation between the applicable city and the County. These areas are typically unincorporated land adjacent to a municipality within the County. As a city grows in population, it may also grow in size and annex the land within its SOI to expand.

2.1.1 Population Growth

The rate at which an area grows is critical in determining future housing needs for communities. According to the Department of Finance, Stanislaus County had a population size of 552,878 in 2020, a 24 percent growth from 2000. Unincorporated areas had a population size of 111,593 residents in 2020 and experienced a one percent increase between 2010 and 2020. The year 2000 marked the greatest year for growth in the unincorporated areas at 13 percent, while incorporated cities grew at 26 percent in that same year. This increased growth was due to development in Salida, Keyes Bonita Ranch, as well as some development in Denair. Historically, unincorporated areas have grown at much smaller rates as compared to the incorporated areas in the County, as seen in Table 2-1.

Table 2-2 compares the population figures for Stanislaus County and includes the total unincorporated population and total incorporated cities population between 2010 and 2020. While the County grew in that period (7.5 percent), the population in the unincorporated area grew by only one percent. Cities that experienced the most growth included the City of Newman (20.8 percent), City of Patterson (16.5 percent), City of Hughson (12.7 percent), and City of Riverbank (9.6 percent). It should be noted that the cities of Hughson and Newman have smaller populations compared to the other cities mentioned which could factor into the higher rate of growth. Other cities experienced similar growth, closer to eight percent, such as Ceres, Modesto, and Waterford.

Table 2-1 Historic Population in Stanislaus County (1970-2020)

Year	Stanislaus County	Incorporated		Unincorporated	
		Population	Percent Change	Population	Percent Change
1970	194,506	100,171	(x)	94,335	(x)
1980	264,300	171,000	71%	93,300	-1%
1990	365,100	270,200	58%	94,900	2%
2000	446,997	340,212	26%	106,785	13%
2010	514,453	404,217	19%	110,236	3%
2020	552,878	441,285	6%	111,593	1%

Source: Department of Finance, E-5 and H-1

Table 2-2 Population Growth in Stanislaus County (2010-2020)

	2010	2020	2010-2020 Number Change	2010-2020 Percent Change
Stanislaus County	514,453	552,878	38,425	7.5%
City of Ceres	45,417	49,302	3,885	8.6%
City of Hughson	6,640	7,481	841	12.7%
City of Modesto	201,165	218,464	17,299	8.6%
City of Newman	10,244	12,351	2,127	20.8%
City of Oakdale	20,675	23,181	2,506	12.1%
City of Patterson	20,413	23,781	3,368	16.5%
City of Riverbank	22,678	24,865	2,187	9.6%
City of Turlock	68,549	72,740	4,191	6.1%
City of Waterford	8,456	9,120	664	7.9%
Total Incorporated	404,217	441,285	37,068	9%
Total Unincorporated	110,236	111,593	1,357	1%

Source: Department of Finance, E-5 and H-1

2.1.2 Age Characteristics

A community's current and future housing needs are in part determined by the age characteristics of its residents. Typically, each age group has distinct lifestyles, family types and sizes, incomes, and housing preferences. As people move through each stage of life, housing needs and preferences change. Traditional assumptions are that the young adult population (20-34 years old) tends to favor apartments, low to moderate cost townhomes/condominiums, and smaller single-family units. The older adult population (35 to 64 years old) represent the market for moderate to relatively high-cost townhomes/condominiums and single-family homes. The senior population (65 years and older) tends to prefer or need low to moderate-cost apartments and condominiums, small single-family homes, and group quarters.

Table 2-3 shows the age distribution in unincorporated Stanislaus County in 2010 and 2020. In 2020, the largest age group represented in unincorporated Stanislaus was the adult population 35 to 54 years old. While the adult population made up the largest portion of the age groups, from 2010 to 2020, this adult population saw a decline during the ten-year timeframe. However, ages 55 to 59 had a 15 percent increase and those age 60 to 64 had an 18 percent increase, indicating that the older

adult population may be aging in place from 2010 to 2020. In addition, children under nine showed a decline in the population, indicating that fewer families with young children are moving into unincorporated areas from 2010 to 2020. Followed by the older adult population, the younger adult population aged 20 to 34 make up the second largest age group and saw an increase in population by 13 percent from 2010 to 2020.

Table 2-3 Age Characteristics in Unincorporated Stanislaus

Age Group	2010	2020	2010-2020 Number Change	2010-2020 Percent Change
Under 5	8,503	7,687	-816	-10%
5 to 9	8,696	7,250	-1,446	-17%
10 to 14	9,046	11,863	2,817	31%
15 to 19	9,155	8,942	-213	-2%
20 to 24	7,490	6,920	-570	-8%
25 to 29	7,189	8,458	1,269	18%
30 to 34	6,856	8,190	1,334	19%
35 to 39	6,923	6,645	-278	-4%
40 to 44	7,274	8,046	772	11%
45 to 49	7,916	7,191	-725	-9%
50 to 54	7,644	5,713	-1,931	-25%
55 to 59	6,356	6,482	126	2%
60 to 64	5,315	7,753	2,438	46%
65 and over	11,873	17,518	5,645	48%

Source: U.S. Census Bureau 2010 Decennial Census and 2020 ACS 5-Year Estimates tabulation

2.1.3 Race Characteristics

Race characteristics are important to an analysis of housing needs and conditions. A community's racial and ethnic composition may have implications for housing needs to the extent that different groups have different household characteristics, income levels, and cultural backgrounds that may affect their housing needs and preferences.

California's population has increasingly become more diverse, and this trend is expected to continue. However, when compared to the State, unincorporated areas of Stanislaus County are less racially diverse than the State as a whole. In 2020, unincorporated areas of Stanislaus had a large portion of Hispanic residents (53 percent), a smaller representation of Asian (three percent) and Black or African American residents (one percent) than the State, as seen in Table 2-4. Residents that are White made up 39 percent of the population, which is a larger percentage compared to incorporated areas of Stanislaus County (37 percent) and the State as a whole (35 percent).

Because of increasing marriage among members of different racial/ethnic groups resulting in a growing number of multi-race children, the 2000 U.S. Census introduced a new category – "two or more races." This marked the first time that respondents were given the option to select more than one race on the Census. According to the Department of Finance, from 2010 to 2020, those who identified as two or more races increased by 75 percent in unincorporated Stanislaus from 2010 to 2020. As noted in the table below, the overall increase was only 1,619 people, but for low population numbers, any increase in population will result in a higher percentage change.

Table 2-4 Race and Ethnicity in Unincorporated Stanislaus

Race/Ethnicity	Unincorporated in 2010		Unincorporated in 2020		State of California in 2020		Unincorporated Area
	Number	% of Population	Number	% of Population	Number	Percent of Population	2010-2020 Number Change ¹
White (non-Hispanic)	51,019	46.3%	43,495	39.0%	13,714,587	34.7%	-14.7%
Hispanic	51,944	47.1%	58,517	52.5%	15,579,652	39.4%	12.7%
Asian	2,602	2.4%	3,251	2.9%	5,978,795	15.1%	24.9%
Two or more races	2,150	2.0%	3,769	3.4%	1,627,722	4.1%	75.3%
Black or African-American	1,452	1.3%	1,233	1.1%	2,119,286	5.4%	-15.1%
American Indian and Alaskan Native	618	0.6%	487	0.5%	156,085	0.4%	-21.2%
Some other race	162	0.1%	498	0.5%	223,929	0.6%	207.4%
Native Hawaiian and Other Pacific Islander	289	0.3%	343	0.3%	138,167	0.3%	18.7%

¹ Percent change is calculated by subtracting the 2010 population from the 2020 population and dividing this number by the 2010 population. It should be noted that a higher percentage of change may be because the total population number is low to begin with, making any increase in population a higher percentage in comparison to other numbers that are higher to begin with.

Source: U.S Census Bureau, 2010 and 2020 Decennial Census

Between 2010 to 2020, the population in unincorporated Stanislaus County identifying as White, as well as those identified as Black or African Americans, declined by nearly 15 percent. American Indian and Alaskan Natives declined by 21 percent. The largest population growth came from those that identified as Asian by almost 25 percent. The Hispanic community also saw a large increase in population at 13 percent, totaling nearly 53 percent of the total population, as compared to 39 percent of the state as a whole. While there were increases in the Hispanic and Asian populations, overall, the unincorporated areas between 2010-2020 became less diverse as compared to the state.

Immigration

Stanislaus County’s population is also comprised of undocumented immigrants. While these populations may be captured in U.S. Census Bureau data, some may not, and it is important to study housing needs specifically for immigrant populations. According to the California Immigrant Data Portal, there were 28,500 undocumented persons living in Stanislaus County in 2019, which is roughly five percent of the population at the time. As Table 2-5 shows, almost half of the undocumented immigration population has lived in the County between 11-20 years. Being an undocumented individual can affect a household’s access to housing and financial stability, due to the inability to apply for federal housing assistance programs like Housing Choice Vouchers or Section 8, to name a few. In 2019, roughly 34,800 households in Stanislaus County lived with an undocumented family member. Typically, households with undocumented individuals consist of either multiple generations living together or multiple families living under the same roof. The County’s current housing stock lacks affordable units for large families (three or more bedrooms). Lack of affordable units available for large families coupled with the inability for undocumented individuals to apply for housing aid, can lead to health and safety concerns such as overcrowding.

Table 2-5 2019 Undocumented Immigration Population in Stanislaus County

Time Living in U.S.	Number of Undocumented Residents	Percentage
10 Years or Less	5,820	20.4%
11-20 Years	13,732	48.2%
21-30 Years	6,564	23.0%
30 Years or More	2,373	8.3%
Total Undocumented Population	28,489	100.0%

Source: California Immigration Data Portal: Stanislaus County, 2019.

Population growth in unincorporated areas has increased at very small rates as compared to incorporated cities. From 2010 to 2020, there has been a one percent increase in the unincorporated areas, while incorporated cities grew at nine percent. In addition, the housing needs and preferences of residents may be shifting based on age groups, calling for a diversity in housing type and an increase in housing preservation, as the elderly residents in unincorporated areas make up the largest growth in population, and are aging and staying in place. Young adults aged 20 to 34 make up the second largest age group in unincorporated Stanislaus. While there is growth in this group, there is a decline in children nine years old and under. This may indicate that fewer families with young children are moving into the unincorporated areas of Stanislaus. From 2010-2020, unincorporated areas have less racial diversity when compared to the State and saw a decline in White (non-Hispanic), Black or African-American, and American Indian and Alaskan Native populations. In conclusion, it is important to understand that the racial and ethnic composition within the County may have implications for housing needs. For example, factors such as immigration status may have implications related to housing location, type, and quantity commensurate with certain industries, such as agriculture. Various cultural backgrounds may also have greater multi-generational housing needs or rental housing needs that can accommodate larger family households. Overall, factors such as household characteristics, income levels, and cultural backgrounds affect housing needs and preferences in the County and will be discussed further in this assessment.

2.2 Economic Trends

Surrounded by agricultural land with rich soils and a mild Mediterranean climate, Stanislaus County has a major economic stronghold in agricultural and manufacturing employment opportunities. As of 2021, the County's gross value of agricultural production was \$3.5 billion, a two percent increase from the previous year¹. According to the County of Stanislaus Comprehensive Annual Financial Report, the healthcare sector is a fast-growing sector and a large contributor to the local economy. The major employers located in the County, as reported in the County's 2020 Comprehensive Annual Financial Report, are shown in Table 2-6. The second largest employer in 2020 was in agriculture and manufacturing of agricultural goods. Another large field of employment in Stanislaus County includes jobs in public services and educational services.

2.2.1 Employment

From 2016-2020, approximately 228,157 Stanislaus County residents were employed in the labor force, and an estimated 8.8 percent of the County is unemployed. Of these residents, nearly 80 percent of those in the labor force reside in the incorporated cities, and 20 percent reside in the

¹ Stanislaus County Agricultural Report, 2021 <https://www.stanag.org/pdf/cropreport/cropreport2021.pdf>

unincorporated areas of Stanislaus County. Similar to Stanislaus County as a whole, approximately 25 percent of the residents in the unincorporated areas had occupations in management, business, science, and arts. This is an important figure, as managerial jobs have higher earnings than other occupations. Nearly 22 percent of the residents held occupations in natural resources, construction, and maintenance occupations, and 19 percent had occupations in sales and office. Table 2-7 provides a summary of employment by occupation and job category for Stanislaus County residents living in the incorporated cities and unincorporated areas.

Table 2-6 Major Employers in Stanislaus County

Company	Product/Service	Employees
Save Mart Supermarkets	Retail/Grocery, manufacturing	10,500
E. & J. Gallo Winery	Agriculture, manufacturing	6,500
Stanislaus County	Government/ Public services	3,942
Modesto City Schools	Educational services	3,500
Doctors Medical Center	Hospital & Medical Services	3,000
Memorial Medical Center	Hospital & Medical Services	2,214
Foster Farms	Manufacturing, warehousing	2,134
Ceres Unified School District	Educational services	1,600
Stanislaus Food Products	Manufacturing, warehousing	1,500
Turlock Unified School District	Educational services	1,450

Source: County of Stanislaus, Comprehensive Annual Financial Report 2020

Table 2-7 Occupation of Stanislaus County Residents

Job Occupation/Category	Stanislaus County Number Employed	Incorporated Number Employed	Unincorporated Number Employed	Unincorporated Percent of Total
Occupation				
Management, business, science, and arts occupations	63,889	52,108	11,781	25.4%
Service occupations	40,386	32,512	7,874	17%
Sales and office occupations	48,829	40,204	8,625	18.6%
Natural resource, construction, and maintenance occupations	32,857	22,891	9,966	21.5%
Production, transportation, and material moving operations occupations	41,984	33,908	8,076	17.4%
Total	227,945	181,623	46,322	100.0%
Category				
Agriculture, forestry, fishing and hunting, mining	12,804	7,589	5,215	11.3%
Construction	18,678	13,708	4,970	10.8%
Manufacturing	27,394	22,476	4,918	10.7%
Wholesale trade	8,533	6,752	1,781	3.9%
Retail trade	28,622	23,276	5,346	11.6%
Transportation and warehousing, and utilities	15,688	12,844	2,844	6.2%
Information	2,406	2,101	305	.7%
Finance and insurance, and real estate and rental and leasing	7,682	6,136	1,546	3.4%
Professional, scientific, and management, and administrative and waste management services	19,335	15,211	4,124	8.9%
Educational services, and health care and social assistance	48,577	40,928	7,649	16.6%
Arts, entertainment, and recreation, and accommodation and food	19,559	15,819	3,740	8.1%
Other services, except public administration	10,532	8,438	2,094	4.5%
Public administration	8,365	6,793	1,572	3.4%
Total	228,175	182,071	46,104	100.0%

* Rounded percentages may not total 100 percent.

Source: U.S. Census Bureau, American Community Survey, 2016-2020.

Table 2-8 Mean Salary by Occupation – Stanislaus County

Occupation	Average Salary
Management Occupations	\$117,325
Healthcare Practitioners and Technical Occupations	\$110,946
Architecture and Engineering Occupations	\$83,541
Computer and Mathematical Occupations	\$83,378
Business and Financial Operations Occupations	\$79,958
Legal Occupations	\$77,542
Life, Physical, and Social Science Occupations	\$73,900
Educational Instruction and Library Occupations	\$63,299
Installation, Maintenance, and Repair Occupations	\$57,476
Construction and Extraction Occupations	\$56,849
Protective Service Occupations	\$56,549
Community and Social Service Occupations	\$55,912
Arts, Design, Entertainment, Sports, and Media Occupations	\$53,596
Sales and Related Occupations	\$45,576
Office and Administrative Support Occupations	\$44,403
Production Occupations	\$43,274
Building and Grounds Cleaning and Maintenance Occupations	\$40,617
Transportation and Material Moving Occupations	\$40,204
Personal Care and Service Occupations	\$37,116
Healthcare Support Occupations	\$36,318
Food Preparation and Serving Related Occupations	\$31,926
Farming, Fishing, and Forestry Occupations	\$31,604
All Occupations	\$54,382

Sources: California Employment Development Department, Occupational Wage data, 2021 Modesto Metropolitan Statistical Area

Agriculture and manufacturing of agricultural goods have been keystone economic drivers in Stanislaus County and are recognized internationally for agricultural innovation with top-producing crops. Industries related to agriculture (manufacturing, transportation, and warehousing) make up nearly 30 percent of total job categories. Due to the high percentage of agricultural-related employment in unincorporated Stanislaus County, and the overall cost of housing in the area, there is a need to address housing options for farmworkers, both in agricultural areas and in more developed areas where families may have better access to jobs, services, and schools. In addition to the agricultural and manufacturing economy, healthcare is a growing sector, where nearly 17 percent of residents hold jobs in healthcare-related industries. Occupational wages are highest in management occupations with an average salary of \$117,325, followed by healthcare practitioners and technical occupations with an average salary of \$110,946 (Table 2-8). In contrast, those working in the farming, fishing, and forestry industry have an average salary of \$31,604 annually. Those who work in educational instruction and library occupations, community and social service occupations, and healthcare support occupations are closer to the average salary with salaries of \$63,299, \$55,912, and \$36,318 respectively. It is vital to understand the economic predominance of the agricultural industry within the county and the relationship to salary. The salary of workers within that field is

under the mean income of all occupations, emphasizing the need for affordable and attainable housing for these essential workers.

2.3 Household Characteristics

The characteristics of the county's households can be further evaluated by examining the number of households, household size, composition, age, the proportion of family households (two or more related persons), the proportion of families with children, the number of single-parent households, and the age of members in the household. A change in any of the above characteristics can signify what the current and future demand of housing might be. These are important indicators in comparing demographic and population growth to housing demand. Table 2-9 provides an overall summary of household characteristics that include persons living in group quarters, vacancy, tenure, and household type for both the unincorporated and incorporated areas of Stanislaus County and the State of California.

Table 2-9 includes a variety of household characteristics, including the number and percentage of persons living in households and those living in group quarters. Group quarters are defined as places where people live or stay in a group living arrangement that are owned or managed by an organization providing housing for residents. Group quarters include places like college residence halls, residential treatment centers, skilled nursing facilities, group homes, military barracks, correctional facilities, and workers' dormitories. Those living in group quarters make up just one percent of the total population for both the incorporated and unincorporated areas of Stanislaus County and two percent in the State of California. Though this percentage is small, it accounts for 1,489 people that live in specialized housing situations. Table 2-9 also includes the number of housing units that are occupied or vacant. A certain number of vacant housing units are needed in any community to moderate the cost of housing, allow for sufficient supply and housing choices, and to provide an incentive for landlords and owners to maintain their housing. Residential vacancy rates are a good indicator of how well the current supply of housing is meeting the demand for various types of units. As further discussed in the Housing Vacancy section, a typical vacancy rate of five to six percent for rental housing and 1.5 to two percent for ownership housing indicates a balance between supply and demand within the housing market. Comparatively, the proportion of occupied housing units and vacant units is similar for the incorporated and unincorporated areas of Stanislaus County and the state with a vacancy of about eight percent, which indicates a higher vacancy rate than what is typically considered balanced. While this is a trend that is consistent across the entire county and state it signifies that there is a decline in demand for housing based on the decline in population.

Housing tenure indicates if a housing unit is owned or rented. Tenure is an important indicator of wellbeing in a community because it reflects the cost of housing and the ability of residents to own or rent a unit. As shown in Table 2-9, in 2020, unincorporated Stanislaus County had a higher rate of owners (61 percent) than incorporated (58 percent) and California (55 percent). Between 2010 and 2020, all three jurisdictions had a decrease in owner-occupied units and an increase in renter-occupied units. This may be due to a variety of factors including the housing crisis between 2007 and 2011, which resulted in the foreclosure of thousands of homes.

Table 2-9 Household Characteristics for 2010 and 2020

	Unincorporated				Incorporated				State of California			
	2010		2020		2010		2020		2010		2020	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Total Population	110,236	–	113,060	–	404,217	–	441,871	–	37,253,956	–	39,648,938	–
Household Population												
Persons Living in Households	108,912	99%	111,571	99%	399,236	99%	436,459	99%	36,412,191	98%	38,796,056	98%
Persons Living in Group Quarters	1,324	1%	1,489	1%	4,981	1%	5,412	1%	841,765	2%	852,882	2%
Total Housing Units	36,684	–	36,350	–	142,819	–	146,718	–	13,670,304	–	14,330,043	–
Occupancy												
Occupied Housing Units (Households)	33,579	92%	33,327	92%	131,601	92%	139,333	95%	12,568,167	92%	13,246,622	92%
Vacant Housing Units	3,105	8%	3,023	8%	11,218	8%	7,385	5%	1,102,137	8%	1,083,421	8%
Tenure												
Owner-Occupied	22,315	66%	21,208	61%	79,511	61%	81,467	58%	7,112,050	57%	7,241,318	55%
Renter-Occupied	11,631	34%	13,449	39%	50,384	39%	58,702	42%	5,280,802	43%	5,861,796	45%
Total Households	33,946	–	34,657	–	129,895	–	140,169	–	12,392,852	–	13,103,114	–
Household Type												
Family Households	26,529	78%	26,771	77%	122,255	94%	130,057	93%	8,495,322	69%	8,986,666	69%
Non-family Households	7,417	22%	7,886	23%	7,640	6%	10,112	7%	3,897,530	31%	4,116,448	31%

* Rounded percentages may not total 100 percent.

Source: Bureau of the Census, American Community Survey, 2016-2020. Department of Finance, 2010 and 2020

In 2020, 50 percent of the owner-occupied households in unincorporated Stanislaus County, had a household income of \$75,000 or more while 25 percent of the renter-occupied households had a household income of \$75,000. This data indicates that higher income households are more likely to be homeowners, but more importantly, the greater percentage of low-income renters may indicate a need for sufficient housing stock to support this lower-income population.

2.4 Housing Stock

Housing Unit Types

Table 2-10 shows the estimated number of units in 2010 and 2020 by type of structure such as single-family homes, multi-family homes, mobile homes, and recreational vehicles. In 2020, a total of 30,795 single-family detached homes made up 84 percent of the housing units in unincorporated Stanislaus County, followed by 3,726 mobile homes, which made up 10 percent of the units. The remaining four percent of housing unit types includes duplexes, and multi-family homes. Similarly, in 2010, a total of 29,988 single-family detached homes made up 81 percent of the housing units, followed by 4,117 mobile homes, which made up 11 percent of the units. Between 2010 and 2020, there was a slight decrease in overall housing units (-0.6 percent). However, when looking at the percent change in unit types there was an increase in both single-family housing types and a decrease in multi-family units. This may be due to a lack of developer interest in building multi-family homes or other constraints including zoning constraints.

Table 2-10 Unincorporated Stanislaus County Housing Unit Type

Housing Unit Type	2010		2020		Percent Change 2010-2020
	2010 Units	Percent of Total	2020 Units	Percent of Total	
Total:	36,784	–	36,563	–	-0.60%
1, detached	29,988	81.52%	30,795	84.22%	2.69%
1, attached	910	2.47%	1060	2.90%	16.48%
2	688	1.87%	152	0.42%	-77.91%
3-4	529	1.44%	287	0.78%	-45.75%
5+	431	1.17%	403	1.10%	-6.50%
Mobile home	4,117	11.19%	3,726	10.19%	-9.50%
Boat, RV, van, etc.*	121	0.33%	140	0.38%	15.70%

* Boats, RVs, and vans may not be permitted as living units in Stanislaus County.

Source: Bureau of the Census, American Community Survey, 2016-2020.

Housing Age and Condition

The age and condition of the housing stock provides additional measures of housing adequacy and availability in many communities. The year a structure was built can be an indicator of the current condition of the housing unit. Homes with sound construction typically show signs of deterioration and need repair after 30 years if not adequately maintained—some even sooner depending on the construction technique and weather conditions. If not properly and regularly maintained, housing can deteriorate and discourage reinvestment, thereby depressing neighboring property values. Although age does not always correlate with substandard housing conditions, neighborhoods with homes more than 30 years old are more likely than newer neighborhoods to have a concentration of housing

problems related to deferred maintenance, inadequate landscaping care, outdated utilities or interior amenities, and a need for housing rehabilitation.

As mentioned above, the housing population data shows that there has been a general population increase, however, housing production has slowed for unincorporated Stanislaus County between 2010 and 2020. Table 2-11 shows the number of units built in Stanislaus County since 1939 or earlier. The housing stock in unincorporated Stanislaus County is older than that of the incorporated cities in the County. Over 72 percent of the housing units in unincorporated Stanislaus County are older than 30 years versus 65 percent in incorporated Stanislaus County. Additionally, about 41 percent of the housing units in unincorporated Stanislaus County were built over 50 years ago versus 26 percent of the incorporated housing units. This may indicate that a greater percentage of the homes in unincorporated Stanislaus County require extensive repairs.

Table 2-11 Stanislaus County Housing Production

Year Built	Unincorporated County	Percent Unincorporated	Incorporated County	Percent Incorporated	County Total	County Total Percentage
Built 2014 or later	444	1.2%	1,928	1.3%	2,372	1.3%
Built 2010 to 2013	300	0.8%	1,579	1.1%	1,879	1.0%
Built 2000 to 2009	4,325	11.8%	26,058	17.9%	30,383	16.7%
Built 1990 to 1999	4,939	13.5%	20,967	14.4%	25,906	14.2%
Built 1980 to 1989	4,827	13.2%	26,846	18.4%	31,673	17.4%
Built 1970 to 1979	6,500	17.8%	29,646	20.4%	36,146	19.8%
Built 1960 to 1969	3,866	10.6%	13,793	9.5%	17,659	9.7%
Built 1950 to 1959	4,251	11.6%	11,373	7.8%	15,624	8.6%
Built 1940 to 1949	3,434	9.4%	5,934	4.1%	9,368	5.1%
Built 1939 or earlier	3,677	10.1%	7,552	5.2%	11,229	6.2%
Total	36,563		14,5676		182,239	

Source: Bureau of the Census, American Community Survey, 2016-2020.

Table 2-12 shows U.S Census data regarding physical housing conditions in unincorporated Stanislaus County. These problems include lack of complete plumbing facilities and/or kitchen facilities. Of the estimated 34,657 occupied units, 131 lack plumbing facilities and 108 lack kitchen facilities. Lacking these facilities can greatly inhibit basic daily household functions, such as access to running water.

Table 2-12 Unincorporated Stanislaus County Substandard Units

Lacking Complete Facilities	Number of Units	Percent of Units
Total Occupied Units	34,657	—
Lacking Complete Plumbing Facilities	131	0.38%
Lacking Complete Kitchen Facilities	108	0.31%

Source: Bureau of the Census, American Community Survey, 2016-2020

According to Stanislaus County 2024 Assessor data, 596 units, or 1.6 percent of the total housing stock in unincorporated Stanislaus County, are classified as substandard and may be in need of rehabilitation or replacement during the planning period. While a recent Countywide survey of housing stock conditions is not available, information from the County’s Code Enforcement program and the Building Permits Division provides a good indicator of the extent of housing deterioration.

Data gathered from the Annual Progress Reports for the years 2015 through 2020 show that the County received an average of 105 housing complaints per year. During this time frame, the Building Division of the Stanislaus County Planning and Community Development Department received between four to 10 cases for dangerous buildings each year. Dangerous and abandoned buildings constitute any building or structure, which from any cause, endangers the life, safety, health, or welfare of the public or their occupants. In addition to complaints related to dangerous buildings and abandoned buildings, other housing complaints received were for various violations such as unpermitted sewer-hookups, unpermitted conversions of structures, or unpermitted construction of second units. Unpermitted structures that do not meet building code standards can cause environmental health issues, public nuisances and can endanger the safety and health of the occupants and neighboring residences. Table 2-13 shows the number of total housing complaints received and the number of cases that were received and processed for dangerous and abandoned buildings.

Table 2-13 Code Enforcement Cases

Year	Cases Processed for Dangerous and Abandoned Buildings	Housing Complaints Received
2015	9	101
2016	6	125
2017	4	130
2018	6	129
2019	4	51
2020	10	96

Source: Stanislaus County Annual Progress reports 2015 through 2020

Housing Vacancy

Vacancy rates may be used as an indicator for the supply and demand for rental and for-sale units. Stated previously, vacancy rates of five to six percent for rental housing and 1.5 to two percent for ownership housing are considered a balance between supply and demand. Higher vacancy rates may indicate excess units, and therefore price depreciation, while a low vacancy rate may indicate a shortage of units which results in higher housing prices.

The overall vacancy for unincorporated Stanislaus County is 5.2 percent (Table 2-14). However, the vacancy rate for both homes for rent and for sale is much lower. Units for rent have a vacancy rate of 0.4 percent while units for sale have a vacancy rate of 0.3 percent. This is much lower than what is considered a balanced supply and demand of housing units. The low vacancy rates suggest that for-sale and rental markets are competitive, thereby increasing sale prices and market-rate rents. The majority of the homes that are vacant are categorized under “Other Vacant,” which are homes that are rented or sold, but are not occupied (i.e., abandoned or otherwise vacant). This high number of “Other Vacant” homes may be a result of abandoned homes that are older or in poor condition based on housing age, and may not afford ideal living conditions, which may in turn require rehabilitation or replacement.

Table 2-14 Unincorporated Stanislaus Vacancy Rates

Type	Number	Percent
For Rent	149	0.4
For Sale	121	0.3
Seasonal/Recreational Use	195	0.5
For Migrant worker	16	0.8
Other Vacant*	832	2.3
Overall Vacancy	1,906	5.2

* Includes units that are rented or sold, but not occupied (i.e., abandoned or otherwise vacant)

Source: Bureau of the Census, American Community Survey, 2020 5-year estimates

Overcrowding

Overcrowding is typically defined as more than one person per room. Severe overcrowding occurs when there are more than 1.5 persons per room. Overcrowding can result when there are not enough adequately sized units within a community, or when high housing costs relative to income force too many individuals to share a housing unit than it can adequately accommodate. Overcrowding also tends to accelerate deterioration of housing and overextend the capacity of infrastructure and facilities designed for the neighborhood.

Overcrowding typically results when either: 1) the cost of available housing with enough bedrooms for larger families exceeds a family’s ability to afford such housing, or 2) unrelated individuals (such as students or low-wage adult workers) share a dwelling unit due to high housing costs. Renters are generally more impacted by overcrowding due to the inability to find affordable rental units that are large enough to accommodate their household without causing overcrowding.

In 2020, nearly nine percent of the households in unincorporated Stanislaus County lived in overcrowded or severely overcrowded conditions. A higher percentage of renters experienced overcrowded conditions than owners. Nearly 10 percent of renter occupied units are overcrowded versus five percent of owner-occupied units. The disproportionate number of renters living in overcrowded conditions may indicate a lack of supply of larger sized and affordable rental units.

About 56 percent of the renter occupied units have three or more bedrooms while about 81 percent of owner-occupied units have three or more bedrooms, as shown in Table 2-15. A larger number of units and a greater ratio of renters have a household size of five or more people with 26 percent versus 21 percent of owners. This trend indicates that there is a need for affordable rental units to accommodate larger families or groups of renters. The data in Table 2-16 indicates there is a greater number of owner-occupied units than renter occupied units. Additionally, most renter- and owner-occupied units have at least three bedrooms. For owners alone, four-bedroom units comprise the next most common housing type, while two-bedroom units are the next most common housing type for renters. Overall, owner-occupied units tend to be larger than units that are for rent.

Table 2-15 Unincorporated Stanislaus County, Number of Bedrooms by Tenure

Number of Bedrooms	Owner Occupied	Percent Owners	Renter Occupied	Percent Renters
No bedroom	206	1.0%	180	1.3%
1 bedroom	538	2.5%	1,043	7.8%
2 bedrooms	3,310	15.6%	4,672	34.7%
3 bedrooms	11,539	54.4%	5,949	44.2%
4 bedrooms	4,765	22.5%	1,361	10.1%
5 or more bedrooms	850	4.0%	244	1.8%
Total	21,208	–	13,449	–

Source: Bureau of the Census, American Community Survey, 2016-2020.

Table 2-16 Unincorporated Stanislaus County, Overcrowded Housing Conditions

Condition	Owner-Occupied	Renter-Occupied	Total
Total Occupied Units	21,208	13,449	34,657
Overcrowded Units (>1 persons/room)	1,065	1,313	2,378
Percent Overcrowded	5.0%	9.8%	14.8%
Severely Overcrowded Units (.1.5 persons/room)	404	397	801
Percent Severely Overcrowded	1.9%	3.0%	4.9%

Source: Bureau of the Census, American Community Survey, 2020 5-year estimates

Housing costs are indicative of housing accessibility to all economic segments of the community. The cost of housing in a community is directly correlated to the number of housing problems and affordability issues. High housing costs can price lower-income families out of the market, cause extreme cost burdens, or force households into overcrowded or substandard conditions. This section summarizes the cost and affordability of the housing stock to Stanislaus County residents.

County Housing Prices

Housing prices across California vary by jurisdiction. Price context is a primary indicator of housing affordability within a region. The section below outlines the price context for Stanislaus County relative to the state.

The Fair Market Rent (FMR) for an area is the amount that would be needed to pay the gross rent (shelter rent plus utilities) of privately owned, decent, safe, and sanitary rental housing of modest (non-luxury) nature with suitable amenities. The U.S. Department of Housing and Urban Development (HUD) uses FMR for a variety of purposes, including to determine the eligibility of rental housing units for the Section 8 Housing Assistance Payments program. This information is critical for a number of reasons, including that Section 8 Rental Certificate program participants cannot rent units whose rents exceed the FMRs, and FMRs also serve as the payment standard used to calculate subsidies under the Rental Voucher program. HUD-defined FMR levels for Stanislaus County for the years 2021 and 2022 are shown in Table 2-17.

Table 2-17 Fair Market Rent in Stanislaus County (2022)

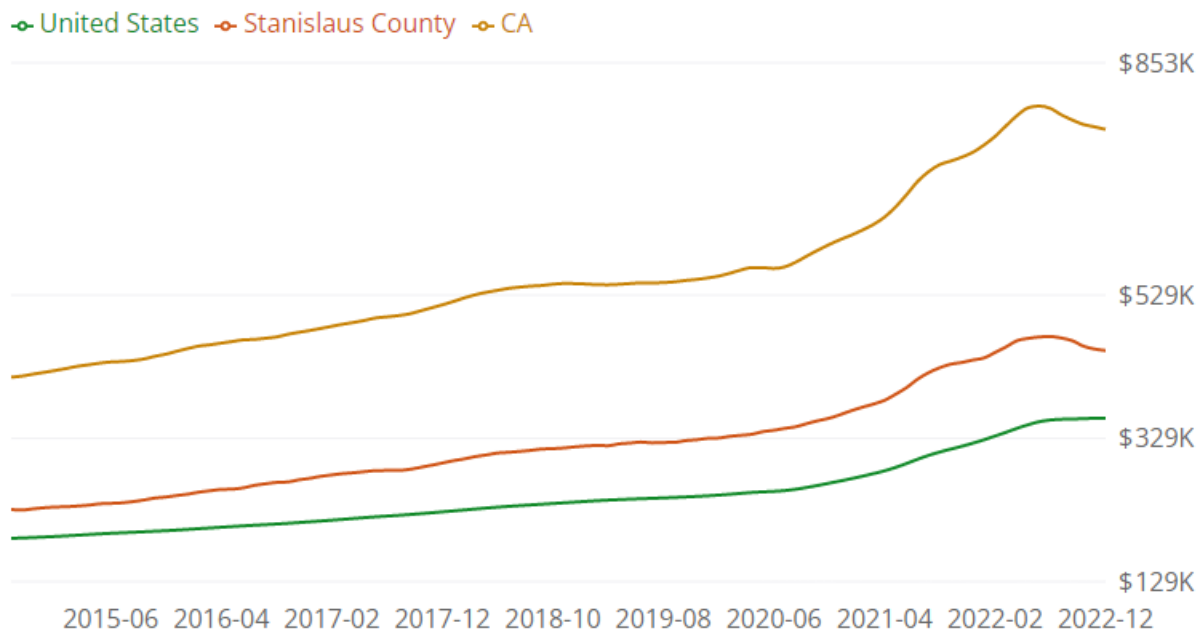
Bedrooms in Unit	Stanislaus County 2022	Stanislaus County 2021
1 Bedroom	\$1,001	\$987
2 Bedrooms	\$1,250	\$1,224
3 Bedrooms	\$1,761	\$1,733
4 Bedrooms	\$2,063	\$2,033

Source: HUD User Data Sets: 2021, 2022 FY FMR

Home Values

According to the Zillow Home Value Index (ZHVI), the typical home value in Stanislaus County at the end of 2022 was \$451,937. Home values have increased throughout the last five years throughout the county, state, and nation (Figure 2-1). Despite these increases across all geographies, current home values for 2022 in Stanislaus County remain notably lower than the typical value for the state.

Figure 2-1 Median Home Values (2022)



Source: Home Value Index, Zillow, 2022

The median sales price for homes in Stanislaus County assessed for the month of May in 2022 was \$475,000, as shown in Table 2-18. Notably, when comparing the county to its incorporated cities, trends in the median sales price across incorporated cities indicate notable disparities in the value of homes depending on location within the County.

Table 2-18 Median Sales Price of Homes in Stanislaus County (December 2022)

Location	Median Sales Price
State/County	
California	705,900
Stanislaus County	425,000
Incorporated Cities	
Ceres	425,000
Hughson	380,000
Modesto	402,500
Newman	351,750
Oakdale	515,000
Patterson	475,000
Riverbank	494,000
Turlock	427,450
Waterford	347,500

Source: Redfin, Accessed February 2023

Rental Costs

The median gross rent in the county is lower than the state median, as displayed in Table 2-19. The average gross rent for the county was \$1,210 for the year 2020, \$376 dollars less than the state average, with less than half of Stanislaus County households (38 percent) living in rental housing.

Table 2-19 Median Rent Values in Stanislaus County (2020)

	Stanislaus County	California
Median Gross Rent	\$1,210	\$1,586

Source: U.S. Census Bureau ACS 5-year Estimates 2016-2020

Rents increased throughout the nation during the 2009 recession in response to high foreclosure rates, lack of new housing development, and tightened standards for home loans. In addition, more people moved from homeownership to renting, which increased demand for rental housing. Post-economic recession, Stanislaus County continues to see demand for rental housing units as evidenced by housing tenure data and current local data sources. The median listing price for two-bedroom apartments found on Zillow.com was \$1,750 in March of 2024, and the overall median rental price in Stanislaus County, according to HotPads.com, was \$1,833².

Ability to Pay for Housing

Given the high rates of housing cost burden in Stanislaus County, it is evident that many county residents are residing in homes that they cannot afford. This section compares the 2022 income levels and the ability to pay for housing with housing cost to better understand the affordability for

² Stanislaus County Snapshot: What are the rental costs for houses in Stanislaus County, CA?. hotpads.com. Accessed March 2024. <https://hotpads.com/stanislaus-county-ca/houses-for-rent>

homeowners and renters in the county. Housing is classified as affordable if households do not pay more than 30 percent of income for rent or monthly homeownership costs.

As of 2022, the Annual Median Income (AMI) in Stanislaus County was \$80,300. The following income categories were used to classify the various household income levels in Stanislaus County.

- **Extremely Low Income:** 15- 30% of AMI
- **Very Low Income:** 30-50% of AMI
- **Low Income:** 50-80% of AMI
- **Moderate Income:** 80-120% AMI

Table 2-20 provides an overview of affordable housing costs by income category in Stanislaus County for the year 2022.

Table 2-20 Affordable Housing Costs by Income Category, Stanislaus County (2022)

Income Group	Annual Income Range Limit	Affordable Mortgage/ Rent Payment (Monthly)	Maximum Affordable Home Price
Extremely Low	\$27,750	\$694	\$97,600
Very Low	\$39,850	\$996	\$143,378
Low	\$63,750	\$1,594	\$242,579
Moderate	\$96,350	\$2,408	\$372,123

Source: HCD State Income Limits, 2022; Zillow.com Affordability Calculator, accessed July 2022.

As previously shown in Table 2-20, the 2022 HUD-defined FMR levels for a 1-bedroom unit in the County is \$1,001. According to the HCD State Income Limits in Table 19, very low-income groups in Stanislaus County could afford a monthly mortgage or rent payment of \$996. The County affordable mortgage and rent for very-low income groups is less than the FMR, meaning that households classified as very low-income would not be able to afford the rent for a 1-bedroom unit in the County. When looking at other AMI groups in the County, low-income households could afford rent for up to a 2-bedroom unit and moderate-income households could afford the rent for up to a 4-bedroom based on the HUD-defined FMR.

In comparing the HCD income data and HUD FMR calculations, very low-income households in Stanislaus County are likely to struggle paying for basic housing costs. Similarly, low-income households that require more than a 2-bedroom unit will likely to be limited to smaller housing units and may succumb to the burdens of overcrowding.

Although the FMR indicates that there are affordable units for rent for households within the moderate-income category, those households may still struggle with homeownership. Similarly, data from the Zillow Home Value Index indicates that the median home sales price for Stanislaus County in May of 2022 was \$475,000. Based on the median home sales price, households within the moderate-income and lower-income classification may struggle to find an affordable home in the County. Due to the geographic differences throughout the county, home prices may indicate that moderate-income households may find affordable housing within their price range. Affordable housing for these households is likely found in lower priced cities or other unincorporated communities throughout the county. For example, the 2022 median home sales price in the City of Ceres was \$440,606 and \$400,810 in the unincorporated Community of Keyes, which is just below the affordable range for a moderate-income household.

Affordability in Stanislaus County

The cost of housing compared to the income of local households is used to determine the affordability of an area. If costs are high relative to income, housing problems such as overcrowding, and cost burden are more likely to occur. The lack of affordable housing contributes to cost burden, overcrowding, and even homelessness. According to California Health and Safety Code Section 50052.5, “affordable housing cost” for lower-income households is defined in California law as not more than 30 percent of gross household income with variations. “Housing cost” commonly includes rent or mortgage payments, utilities (gas, electricity, water, sewer, garbage, recycling), and property taxes and insurance on owner-occupied housing.

The area median income (AMI) for 2022 in Stanislaus County was \$80,300. A “share of income” approach was taken to measure housing affordability in terms of the percentage of income that a household spends on its housing. Using the “share of income” approach, housing cost burden was assessed in relation to household sizes and income categories. The data in this section uses this Comprehensive Housing Affordability Strategy (CHAS) data from HUD’s State of the Cities Data Systems (SOCDS) website. A “moderate cost burden” is defined by HUD as gross housing costs between 31 and 50 percent of gross income. A “severe cost burden” is defined as gross housing costs exceeding 50 percent of gross income.

In Stanislaus County, 19 percent of all households had a moderate housing cost burden and 17 percent had a severe housing cost burden. Based on the CHAS data presented in Table 2-21 below, 72 percent of lower-income households in Stanislaus County had at least a moderate cost burden, with 41 percent of lower-income households classified as severely cost burdened. Housing cost burden was generally higher among renter households. For example, 77 percent of lower-income renter households had a moderate to severe cost burden compared to 63 percent of lower-income owner households. In Stanislaus County, 25 percent of renter households experience severe cost burden. In conclusion, affordable rent in the County is just as necessary as affordable homeownership.

Table 2-21 CHAS Table ACS Housing Cost Burden by Household Income Classification (Stanislaus County)

	Owner	Renter	Total
Household Income <= 80% AMI			
Total Households	24,075	40,445	64,520
Number w/ cost burden >30%	15,170	31,325	46,600
Percent w/ cost burden >30%	63%	77%	72%
Number w/ cost burden >50%	8,790	18,285	27,075
Percent w/ cost burden >50%	37%	45%	41%
Household Income > 80% AMI			
Total Households	75,000	33,160	108,160
Number w/ cost burden >30%	11,340	4,755	16,095
Percent w/ cost burden >30%	15%	14%	15%
Number w/ cost burden >50%	1,725	385	2,115
Percent w/ cost burden >50%	2.3%	1.2%	2%
All Households			
Total Households	99,080	73,605	172,680
Number w/ cost burden >30%	26,510	36,080	62,595
Percent w/ cost burden >30%	27%	49%	36%
Number w/ cost burden >50%	10,515	18,670	29,185
Percent w/ cost burden >50%	11%	25%	17%

Source: HUD ACS 2014-2018, Accessed July 2022

2.5 Special Groups

Certain segments of the population may have more difficulty in finding decent, affordable housing due to their special needs. Under Government Code Section 65583(a)(7)), groups that may have special housing needs include the elderly, persons with disabilities, large families, farmworkers, families with female heads of households, and families and persons in need of emergency shelter. These special needs groups are sometimes discriminated against based on their specific needs or circumstances, and often spend a disproportionate amount of their income to secure safe and decent housing. The majority of these special groups could be assisted by an increase in affordable housing, especially housing located near public transportation and other services. The following sections provide a detailed discussion of the housing needs facing each particular group as well as programs and services available to address their housing needs. Table 2-22 shows the size of each special needs group in unincorporated Stanislaus County.

Table 2-22 Special Needs Groups in Unincorporated Stanislaus County

Special Needs Group	Number of Persons or Households	Percent of Total Households
Households with Elderly Persons (Age 65+)	9,426	27.2%
Households with Persons with Disabilities	14,824	42.8%
Large Households (5+ persons)	7,021	20.3%
Female-Headed Households	4,399	12.7%
Female-Headed Households Living in Poverty	1,403	4%
Farmworkers (persons)	7,919	–
Homeless (persons)	2,107	–

Source: Bureau of the Census, American Community Survey, 2020 5-year estimates, 2020 Stanislaus County Homeless Point-In-Time Count, 2017 Census of Agriculture for total hired farmworkers in Stanislaus County including seasonal and permanent farmworkers
 *total households in unincorporated Stanislaus is 34,657 based on 2020 ACS 5-Year Estimates

2.5.1 Elderly Persons (Senior Households)

Elderly persons or seniors are defined as persons age 65 years and older, and senior households are households headed by a person 65 years or older. Seniors often face unique housing problems, and although many own their homes outright, typically seniors have fixed incomes which may not be adequate to cover rising housing, utility, and insurance costs. Furthermore, fixed incomes erode due to inflation and costs of home repairs can be a challenge, especially in rural areas where the housing stock is typically older as compared to some urban areas.

Housing needs of the elderly include a mix of housing options including supportive housing such as intermediate care facilities or group homes, or community living. Preferences may vary, as some seniors prefer to live in single-family detached homes, whereas others desire smaller, more affordable homes such as condos, townhouses or apartments that have access to public services and may be in proximity to public transportation.

According to the 2016-2020 ACS, approximately 17,518 seniors resided within the unincorporated areas of Stanislaus County, making up about 15 percent of the total population in unincorporated Stanislaus County. This representation is slightly above the senior population in incorporated cities within the County of Stanislaus, where seniors comprise about 13 percent of the population. Stanislaus County is slightly more compared to the state as a whole, by a margin of one percent, where the State has a total of 5,644,497 seniors, totaling 14 percent of the total population as seen in Table 2-23.

As mentioned above, seniors may have difficulty finding affordable housing that meets their needs and preferences due to fixed incomes. This is especially true for renters, as they are vulnerable to increasing rents as opposed to homeowners with fixed mortgages. According to ACS 2020 5-year estimates, 1,432 senior residents were renters in unincorporated Stanislaus County, and 7,994 seniors were household owners. As shown in Table 2-24, the unincorporated areas have a higher percentage of senior owners compared to the total households in incorporated cities throughout the county, by a margin of nearly 7 percent. Overall, the unincorporated areas of the county have a larger number of senior households per capita compared to incorporated municipalities.

Table 2-23 Senior Population Compared to the State

	Unincorporated		Incorporated		State of California	
	Number	Percent	Number	Percent	Number	Percent
Population	118,658	–	427,577	–	39,346,023	–
Number of Persons 65 years and over	17,518	–	53,712	–	5,644,497	–
Senior Population as % of the Total Population		14.8%		12.6%		14.3%

Source: Bureau of the Census, 2016-2020 5 Year Estimates, Table S0101

Table 2-24 Seniors by Tenure

	Stanislaus County	Incorporated	Unincorporated
Total Households	174,826	140,169	34,657
Owner			
Number of Senior Owners	31,275	23,281	7,994
% Senior Owners of Total Households	17.9%	16.6%	23.1%
Renter			
Number of Senior Renters	10,937	9,505	1,432
% Senior Renters of Total Households	6.3%	6.8%	4.1%

Source: U.S. Census Bureau, 2016-2020 5 Year Estimates, Table B25007

Seniors in unincorporated areas have especially difficult housing challenges. They may face isolation from public health services and socialization, contend with the old age of rural housing stock and related home repairs, and often have few residential options. Noted previously, in the unincorporated areas of Stanislaus County, senior households who rent make up approximately 4 percent of total households, and as a result almost half of renters in the unincorporated areas of Stanislaus are on fixed incomes. Households with senior owners comprise 23 percent of the total of household owners in unincorporated Stanislaus County, as compared to nearly 17 percent of senior household owners in incorporated cities. Seniors in unincorporated areas own their homes outright at larger numbers compared to the incorporated areas and are likely facing needed home repairs more than incorporated cities.

Resources

The special needs of seniors can be met through a range of services, including assisted multifamily housing, rent subsidies, community-based housing models such as cohousing or villages, housing rehabilitation assistance, and linking better housing and supportive services. Many seniors prefer to stay in their homes as long as possible, but challenges related to housing affordability, accessibility, and poor linkages to health services provide difficulty for aging in place. It is estimated that nearly 22 percent of those age 85 and older live in a household with no drivers, leaving this population especially vulnerable to social isolation. Available resources made available by Stanislaus County are listed below for Stanislaus County residents and include:

- In-Home services: tasks provided for elderly that are intended to keep seniors safe, such as vacuuming, laundry, meal preparation, assistance with bathing, dressing, medications, and general yard and house maintenance.

- Senior Housing Assistance: housing options such as senior independent living, assisted living, and skilled nursing facilities, and home repair assistance programs for lower-income seniors.
- Senior Luncheon site locations: nine senior lunch locations throughout Stanislaus County held at community centers.
- Meals on Wheels: home delivery for eligible homebound older adults, with priority given to those that live alone or are older and frail.
- Assisted transportation available by the Consolidated Transportation Services Agency: includes door to door services, volunteer drivers take oncology patients to medical appointments, Stanislaus Regional Transit, and BRIDGES Volunteer Driver Program that offer services to those needing to get to medical appointments, grocery shopping, and social activities.

Many services are available for elderly residents to age comfortably in their homes that include assistance with housing options, access to medical services through volunteer drivers, and home repair services. Further expansion of affordable housing may also help alleviate the challenges that seniors are facing. Based on a 2017 HUD Office of Policy Development and Research article³, affordability challenges among seniors are expected to grow, where declining incomes can prevent senior households from making home repairs and paying for health services. Strategies that link better and affordable housing to services can help seniors, especially in unincorporated areas, age in their home comfortably where they are socially connected and can continue to lead social and healthy lives.

The following program may address the housing needs of seniors and will be concluded in the Housing Programs section:

- Program 4-1: Housing for Special Needs Populations

Additional information on development standards for residential care facilities is found in the Constraints section of this Housing Element; however, not found to be a specific constraint to senior housing needs.

2.5.2 Farmworkers

Farmworkers comprise the majority of the larger agricultural sector and their primary incomes are earned through permanent or seasonal agricultural labor. According to feedback received through targeted stakeholder meetings with farmworker advocates, the farmworker population in Stanislaus County tends to be more permanent than migratory. Permanent farmworkers work in processing, field jobs, and other farm support roles on a year-round basis. Agricultural harvest periods are largely seasonal, when demand for labor increases during peak harvest season, contractors or migrant workers are often employed. Due to the seasonal nature of agricultural labor and limited income, farmworkers tend to have difficulty in securing safe and decent housing. Migrant workers might also face language barriers, or be unfamiliar or untrusting of government agencies, which can lead to underrepresentation or difficulty finding safe, affordable, and sanitary housing.

Farmworker households tend to have high rates of poverty, live disproportionately in housing that is in the poorest condition, have extremely high rates of overcrowding, and have low homeownership rates. In a 2023 Farmworker Health Study (FWHS) conducted by the UC Merced Community and Labor Center, 92 percent of farmworkers in California were likely to be renters, and many were subject to

³ Housing for Seniors: Challenges and Solutions, Summer 2017.
<https://www.huduser.gov/portal/periodicals/em/summer17/highlight1.html>

substandard housing conditions including overcrowding, with 55 percent living in households with two persons per room, and 25 percent of household where three or more persons share a room.⁴ Housing problems and crowded conditions can exacerbate respiratory and infectious disease. Farmworkers often have negative health outcomes related to various aspects of the job itself; long hours, underpayment, low benefits, and poor conditions contribute to the poor health and well-being of the group. As discussed in the Section 2.2.1, *Employment*, this group also receives the lowest average annual salary in the region compared to all other occupation groups, which contributes to the disproportionate need for fair housing.

When comparing the percentage of farmworkers to the State, farmworkers in Stanislaus County represent a larger percentage of employment with nearly six percent of those employed as farmworkers, compared to two percent of the State as seen in Table 2-25. Furthermore, the unincorporated area of Stanislaus County has a higher percentage of farmworkers as compared to the incorporated areas by nearly double the percent. In 2020, unincorporated Stanislaus County, had 5,215 farmworkers reported in the agriculture, forestry, fishing and hunting, and mining industry. This industry totals 11 percent of the labor force within unincorporated Stanislaus County, compared to four percent in the incorporated cities of Stanislaus County.

Table 2-25 Farmworkers in Stanislaus County

	Stanislaus County	Incorporated	Unincorporated	State of California
Total Employment	228,175	182,071	46,104	18,646,894
Agriculture, forestry, fishing and hunting, mining	12,804	7,589	5,215	394,290
Percent Total	5.6%	4.2%	11.3%	2.1%

Source: Bureau of the Census, American Community Survey, 2016-2020.

Table 2-26 Farmworker Employment by Workers

	Stanislaus County		State of California	
	Number	Percent	Number	Percent
Farm Operations with less than 10 Employees				
Permanent	2,389	49.8%	41,084	48.9%
Seasonal (less than 150 days)	2,405	50.2%	43,003	51.1%
Total	4,794	100%	84,087	100.0%
Farm Operations with 10 or more Employees				
Permanent	3,895	49.2%	146,791	50.0%
Seasonal (less than 150 days)	4,024	50.8%	146,715	50.0%
Total	7,919	100%	293,506	100.0%

Source: Census of Agriculture, 2017

Determining an accurate count for farmworker populations is difficult. There can be discrepancies in the definition of farmworkers based on job descriptions and length of employment, and the underrepresentation that migrant workers often face. The seasonality of farm work, lack of stable

⁴ Farmworker Health in California. UC Merced. August 2022.
https://clc.ucmerced.edu/sites/clc.ucmerced.edu/files/page/documents/fwhs_report_2.2.2383.pdf?_gl=1*1rg0e9w*_ga*MTU3Njc2MDMzNS4xNzA4OTk2Nzg*_ga_TSE2LSBDQZ*MTcwODk5Njc4MC4xLjAuMTcwODk5Njc4MC42MC4wLjA.

income, and low average annual salaries results in significant challenges for farmworkers to afford housing. As seen in Table 2-26, more than half of all the workers in farm operations are seasonal, meaning income is uncertain at varying seasons of the year for half of farmworkers in Stanislaus County. According to the 2017 Census of Agriculture,⁵ 6,429 farmworkers in Stanislaus County were seasonal and 6,284 workers were permanent. This trend is common throughout the state, where half of the total laborers are seasonal, regardless of the scale of farm operations.

Resources

Farmworkers are unable to compete for housing as they are usually low income and their employment status is often seasonal creating a disproportionate need for housing resources. The Stanislaus County 2022 Affordable Housing Needs report⁶ provided by California Housing Partnership (CHPC) shows that farmworkers make an average of \$2,573 per month. Housing types appropriate to accommodate the housing needs of seasonal and permanent farmworkers range from single-family to group quarters. In Stanislaus County, there are various options for permitting farmworker housing. Single mobile homes can be permitted as a Temporary Mobile Home for onsite farmworkers, usually for confined animal facilities. Additionally, a staff approval permit can be used to permit on-site farm worker housing to support on-site agricultural operations in the agricultural zoning district. And finally, farmworker housing for off-site workers may be permitted when a use permit is obtained.

Certain programs and services are offered by agencies to support farmworkers and their families. According to organizations such as the National Migrant and Seasonal Head Start (MSHS) who provide comprehensive child development and family support services to infants, toddlers, preschool children and their families whose parents or guardians are migrant or farmworkers, these populations tend to live in poverty and substandard living. Currently, the Stanislaus Regional Housing Authority manages 224 housing units for migrant farm workers in Empire, Patterson, and Westley which are owned by the State of California and Office of Migrant Services. However, the 2017 Census of Agriculture⁴ indicated there were over 7,000 seasonal farmworkers and 6,284 permanent farmworkers in Stanislaus County.

As farmworkers are also subject to the problems of lower-income households, such as overcrowding and substandard housing conditions, programs intended to increase the availability of affordable housing would also benefit farmworkers. The County also aims to provide assistance specifically for farmworkers through its programs. The following types of programs may address the need for additional farmworker housing and will be identified in the Housing Programs section:

- Program 2-1: Affordable Housing Development Assistance
- Program 4-1: Housing for Special Needs Populations
- Program 4-2: Farmworker Housing

2.5.3 Persons with Disabilities (including Developmental Disabilities)

Some individuals have ambulatory impairments, self-care limitations, or other conditions that may require special housing accommodations or financial assistance. Individuals with such disabilities may have a variety of special needs that distinguish them from the population at large, including:

⁵ Census of Agriculture County Profile: Stanislaus County California, 2017. https://www.nass.usda.gov/Publications/AgCensus/2017/Online_Resources/County_Profiles/California/cp06099.pdf

⁶ Mazzella, Danielle(Agency?). Stanislaus County Housing Needs Report, May 2022. <https://chpc.net/resources/stanislaus-county-housing-need-report-2022/>

- Individuals with ambulatory difficulties (such as those confined to wheelchairs) may require special accommodations or modifications to their homes to allow for continued independent living. Such modifications are often called “disabled access.”
- Individuals with self-care limitations (which can include persons with mobility difficulties) may require residential environments that include in-home or on-site support services ranging from congregate to convalescent care. Support services can include medical therapy, daily living assistance, congregate dining, and related services.
- Individuals with developmental disabilities and other physical and cognitive conditions that prevent them from functioning independently may require assisted care or group home environments.
- Individuals with disabilities may require financial assistance to meet their housing needs because a higher percentage than the population at large are low-income and their special housing needs are often more costly than conventional housing.

In unincorporated Stanislaus County, those with ambulatory difficulty make up the largest percentage of those with disabilities at approximately six percent of the total population. The second largest group is those with a cognitive difficulty, at 4.8 percent of the total population in the unincorporated area, similar to the 5.3 percent county as a whole. A total of 14,824 are living with a disability in unincorporated areas, and 70,846 total in the county (Table 2-27).

Table 2-27 Disability by Type in Stanislaus County

	Stanislaus County			Unincorporated		
	Total	With Disability	Percent with Disability	Total	With Disability	Percent with Disability
With a vision difficulty	–	14,665	2.70%	–	3,062	2.72%
With a cognitive difficulty	–	26,959	5.30%	–	5,399	4.79%
With an ambulatory difficulty	–	36,203	7.20%	–	7,124	6.32%
With a self-care difficulty	–	15,130	3.00%	–	2,893	2.57%
With an independent living difficulty	–	28,252	7.10%	–	5,251	4.66%
Total civilian noninstitutionalized population	543,166	70,846	13.00%	112,745	14,824	13.15%

Source: Bureau of the Census, 2016-2020 5 Year Estimates

Resources

Those with severe physical or mental disabilities may require supportive housing, care facilities or home modifications for accessibility. Additionally, those with disabilities that rely on Social Security income may not be able to afford market rate housing or adaptability modifications. State and federal legislation mandates that a percentage of units in new or substantially rehabilitated multi-family apartment complexes must be made accessible to individuals with limited physical mobility. For example, accessibility requirements for federally assisted housing with five or more units requires at least five percent of the dwelling units to be accessible for persons with mobility disabilities. The County does fund supportive housing projects for persons with disabilities, but such housing projects

are typically developed within cities due to the proximity to services. However, unincorporated Stanislaus County does not have multi-family apartments or developments that are government funded which is a gap in local resources.

A variety of Stanislaus County programs and volunteer programs provide transportation assistance and at home chores to individuals with disabilities such as Angels on Wheels, Dial-A-Ride, Free Mobility Training, Disability Resources Agency for Independent Living (DRAIL), and Bridges Volunteer Driver Program. These programs are often linked with housing-related assistance, including in-home service programs, which are available in the county and provide services such as basic domestic chores, personal care, and paramedical tasks.

The following types of programs may address the need for additional resources for persons with disabilities and will be included in the Housing Programs section:

- Program 1-1: Home Rehabilitation Program
- Program 2-1: Affordable Housing Development Assistance
- Program 2-3: Housing Choice Vouchers
- Program 4-1: Housing for Special Needs Populations
- Program 4-3: Homelessness

2.5.4 Large Families

Large households are defined as households of five or more individuals. Large households often face special challenges in the housing market because they need housing of sufficient size to prevent overcrowding and do not always have sufficient income to purchase or rent such housing, even if it is available. According to the 2016-2020 American Community Survey, there are an estimated 7,021 large households in unincorporated Stanislaus County. This accounts for approximately 20 percent of occupied households in the unincorporated County. In comparison, an estimated 16 percent of the incorporated County occupied households are large households (Table 2-28).

Table 2-28 Unincorporated Stanislaus Household Size by Tenure

Household Size	Owner-Occupied Households	Percent of Owner-Occupied Households	Renter-Occupied Households	Percent of Renter-Occupied Households
Unincorporated				
1-4 Persons	17,155	20.3%	10,137	17.0%
5+ Persons	3,414	21.1%	3,607	26.1%
Incorporated				
1-4 Persons	67,212	79.7%	49,366	83.0%
5+ Persons	12,795	78.9%	10,212	73.9%

Source: Bureau of the Census, 2016-2020 5 Year Estimates

Resources

Large families may face housing issues such as overcrowding due to the lack of adequate housing with three or more bedrooms. In Stanislaus County a large percentage of renters have households with five or more people which indicates a need for more affordable rental units with three or more bedrooms. Currently, Stanislaus County funds non-profits which have rental assistance and utility assistance programs based on household size and income. To further accommodate large households,

the County can facilitate the development of rental housing with three or more bedrooms. Large households may also result due to multiple generations and extended family members living together to share housing costs. In this case housing assistance programs can help families find affordable housing options. Renters can apply for the Emergency Rental Assistance program or for Housing Choice (Section 8) voucher program. However, the demand for housing assistance often exceeds the limited resources available and therefore long waiting periods are common. Options for owner occupied large households may include Accessory Dwelling Units (ADUS). Establishing an ADU grant program can help relieve overcrowding in multigenerational or extended family households by providing financial assistance to build an accessory dwelling unit on the property.

The following types of programs may address the need for additional housing for large families and will be included in the Housing Programs Section:

- Program 2-1: Affordable Housing Development Assistance
- Program 4-1: Housing for Special Needs Populations

2.5.5 Female Households

Female-headed household is used to describe a household in which an adult female is the sole or main provider. Most female-headed households are either single elderly women or single mothers. Traditionally, these two groups have been considered special needs groups because their incomes tend to be lower, making it difficult to obtain affordable housing, or because they have supportive service needs related to housing (such as childcare or assisted living support). Single mothers tend to have trouble obtaining suitable, affordable housing because they are supporting children or a family with only one income and need housing with two or more bedrooms.

Table 2-29 shows the number and percent of female-headed households in the incorporated and unincorporated county. There are an estimated 4,399 female headed households in unincorporated Stanislaus County. This accounts for about 16 percent of the total households in unincorporated Stanislaus County. Of the unincorporated female headed households 1,403 live under the poverty level which is 31 percent of the total female headed households.

In comparison, the incorporated area has approximately 21,428 female-headed households which is 21 percent of the total households in incorporated Stanislaus County. Of the incorporated female headed households 10,001 live under the poverty level which is 47 percent of the total female headed households. There is a greater number and percentage of female headed households in the incorporated county than the unincorporated county. Additionally, the proportion of female headed households living under the poverty level is greater. Nevertheless, there is a large number of female-headed households in both incorporated and unincorporated areas that need affordable housing with access to resources such as childcare centers and public transportation.

Table 2-29 Unincorporated Stanislaus Female Headed Households and Poverty Level

Household Size	Stanislaus County	Incorporated Number	Incorporated Percent	Unincorporated Number	Unincorporated Percent
Total Households	130,057	103,286	79.42%	26,771	20.58%
Total Female-headed households	25,827	21,428	83.0%	4,399	17.0%
Total families under the poverty level	13,534	10,001	26.1%	3,533	26.1%
Female-headed households under the poverty level	6,138	4,735	77.1%	1,403	22.9%

Source: Bureau of the Census, 2016-2020 5 Year Estimates

*Percentages listed are the percentage of the total household in the area

Resources

Female-headed households often face a variety of unmet needs such as lack of adequate childcare or job training services. Single female headed households with low incomes may also be unable to find affordable housing. The Stanislaus Regional Housing Authority offers programs that may help female-headed households such as the Family Self Sufficiency (FSS) program. The FSS program provides case management and referrals to supportive social services such as childcare, transportation, budgeting, counseling, education, parenting classes, job search, food nutrition, and stress management. This service is provided by non-profit family resource centers throughout the county, and the family does not have to be a public housing or Section 8 participant which as mentioned above has long waitlists or waitlists that are closed. As female-headed households may sometimes need more than just affordable housing the following types of programs may address the need for additional resources for female-headed households:

- Program 2-1: Affordable Housing Development Assistance
- Program 4-1: Housing for Special Needs Populations

2.5.6 Extremely Low-Income Households

Extremely low-income (ELI) households are defined by HCD as households with income less than 30 percent of AMI, which in unincorporated Stanislaus County is a \$27,750 annual income for a family of four, as of 2022. ELI households have a variety of housing problems such as overpayment, overcrowding, and substandard housing conditions, as well as accessibility issues due to their limited incomes. Many ELI households overlap with other special needs groups including seniors, persons with disabilities, farmworkers, or female-headed households, which furthers the need for supportive or affordable housing. Additionally, ELI households are more likely to be renters. As discussed in *Ability to Pay for Housing*, lower-income renter households were more likely to face moderate to severe cost burden compared to lower-income owner households. As discussed in Chapter 5, *Housing Resources*, StanCOG estimates that around 50 percent of the allocated very low-income housing units in unincorporated Stanislaus County would be needed for ELI households, or 275 projected housing units during the planning period.⁷

⁷ StanCOG. Final Regional Housing Needs Allocation (RHNA). 2022

Resources

ELI households are disproportionately affected by fair housing issues including cost burden, housing problems, and displacement. These households may also need assistance with housing subsidies and other supportive housing services. Future housing needed for ELI would likely be rental housing; therefore, resources for renters at all income levels would also benefit ELI households. Currently, Stanislaus County funds non-profits which have rental assistance and utility assistance programs based on household size and income. Additionally, renters can apply for the Emergency Rental Assistance program or for Housing Choice (Section 8) voucher program. Households that are considered ELI due to their fixed incomes, such as seniors and persons with disabilities, would benefit from the County's supportive housing projects for seniors and persons with disabilities, such as in-home services, assisted housing, and transportation services. However, such housing projects are typically developed within cities due to the proximity to services. Unincorporated Stanislaus County does not have multi-family apartments or developments that are government funded.

The following programs are included in the Chapter 6, *Housing Plan* to address the need for additional housing and resources for ELI households:

- Program 1-1: Home Rehabilitation Program
- Program 2-1: Affordable Housing Development Assistance
- Program 2-3: Housing Choice Vouchers
- Program 4-1: Housing for Special Needs Populations
- Program 4-2: Farmworker Housing

2.5.7 Homelessness

California Housing Element Law (California Government Code Section 65583(1)(6)) requires municipalities to address the special needs of individuals experiencing homelessness within their jurisdictional boundaries. Individuals experiencing "homelessness" as defined by the U.S. Department of Housing and Urban Development (HUD) Title 42 U.S. Code Section 11302, describes an individual (not imprisoned or otherwise detained) who:

- Lacks a fixed, regular, and adequate nighttime residence; and
- Has a primary nighttime residence that is:
 - A supervised publicly or privately operated shelter designed to provide temporary living accommodations;
 - An institution that provides a temporary residence for individuals intended to be institutionalized; or
 - A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.

This definition does not include persons living in substandard housing, (unless it has been officially condemned); persons living in overcrowded housing (for example, doubled up with others), persons being discharged from mental health facilities (unless the person was homeless when entering and is considered to be homeless at discharge), or persons who may be at risk of homelessness (for example, living temporarily with family or friends.)

Homelessness continues to be a growing regional and State crisis. A lack of affordable housing compounded by a lack of job training and supportive services to treat mental illness, substance abuse,

or domestic violence leaves many individuals and families without housing. Services and facilities available for the homeless in Stanislaus County are organized as a continuum of care, an integrated system that guides homeless individuals and families throughout the housing process. Efforts are coordinated by the Stanislaus Community System of Care (StanCSOC), where prevention and reduction of homelessness is managed by combining efforts from several sectors including government, business, health, non-profits, education, faith, neighborhood, media, arts and entertainment to promote health and well-being.

According to the 2021 annual homelessness Point-in-Time (PIT) count, homelessness spiked in the region. The 2021 PIT recorded a record number of homeless since providers began counting in 2005. Since 2021, there has been a decrease of homeless individuals in the county. Factors that may have contributed to the decrease from the 2021 count include impacts from weather conditions, fewer volunteers, and homelessness encampment sweeps prior to the count.

Table 2-30 Homelessness in Stanislaus County

	2016	2017	2018	2019	2020	2021	2022
Number	1,434	1,661	1,356	1,923	2,107	2,927	1,857
Percent Change	–	15.8%	-18.4%	41.8%	9.6%	38.9%	(36.6%)

Source: Point-in-Time

In 2022, a total of 1,857 people experienced homelessness in Stanislaus County, a 37 percent decrease from 2021 as seen in Table 2-30. In 2020, there were a total of 1,632 beds, where 1,114 were beds for households with no children, and 496 beds for households with children, and 22 beds for households with only children. Of those experiencing homelessness, nearly 75 percent were unsheltered, and 25 percent were sheltered. The largest group counted were primarily single adults or households without children representing nearly 75 percent of the total population, where 612 households were unsheltered and 413 were sheltered. The second largest group were family households, where 459 were unsheltered, and 102 were sheltered. Unaccompanied youth made up the third largest group that is unsheltered, with 85 unsheltered and 23 sheltered. Households with youth who are parents were unsheltered at a count of 77 and a count of eight sheltered. Veterans were mostly sheltered, however, 28 were unsheltered and 43 were sheltered.

Typically, it is more common for males to represent most of the homeless population. According to the Stanislaus County 2021 Regional Homeless Strategic Plan (Strategic Plan)⁸, in 2022⁹, men represented 65 percent of the homeless within the system of care and increased by nine percent from 2021 to 2022. Another disparity among the homeless population is LGBTQ, as transgender and gender non-conforming people experience homelessness nearly one out of three times and may be underreported out of fear of disclosing their identity.

Based on the Strategic Plan, race is another determination of homelessness. In Stanislaus County, Black people experience homelessness at a rate of four times their proportion to the general population, and black families experience homelessness at a rate of six times their proportion to the general population. The County and members of Stanislaus Community System of Care (CSOC) have expressed a commitment to addressing racial disparities in the system of care and have called for community understandings to address racial equity.

⁸ 2021 Stanislaus Regional Homeless Strategic Plan. <https://www.stanCounty.com/bos/agenda/2022/20220712/Dis03.pdf>

⁹ 2022 Stanislaus County Homeless Point-In-Time Count. <https://www.stanCounty.com/newsfeed/pdf/20220613-resch-pit.pdf>

Resources

The Stanislaus Continuum of Care (CoC) and the Homelessness Action Council merged efforts in 2017 to form CSOC, a 25-member council regional planning body that coordinates housing and services funding for homeless families and individuals. Efforts focus on the well-being of the community through the alignment of community partners to prevent and reduce homelessness. Stanislaus County has passed a Focus on Prevention initiative, where the focus shifts from isolated interventions and fosters community well-being through a system of care.

Through the CSOC framework, programs and services are offered through a combination of County and City departments, non-profits, religious organizations, and other private entities. This includes various levels of community engagement, coordinated access to supportive services, and finally transitional housing, permanent supportive housing, rapid re-housing, homeownership support and subsidized rental housing. The aim is to support individuals and families through services such as behavioral health treatment, employment and job training, and peer and community support groups.

Prevention efforts include aiding those who are at-risk of becoming homeless by offering services such as CalFresh benefits, Medi-Cal benefits, CalWORKs, connection to employment training and case management, connection to mental health service, and connection to substance abuse treatment. In addition, for those individuals and families that are experiencing homelessness, agencies such as the Center for Human Services provide shelter, including emergency shelters, transitional housing, and rapid re-housing for youth and young adults. Community Housing and Shelter Services, a non-profit agency, also provides resources such as emergency shelters for families, rapid re-housing, and permanent supportive housing for chronically homeless families and families in recovery. We Care also provides a variety of housing and shelter services to individuals and families in need.

The CHPC 2022 Housing Needs report states that in 2021 there were 649 beds for persons experiencing homelessness. The 2022 Stanislaus County Homeless Point-In-Time Count identified 1,857 homeless individuals. The number of beds to homeless individuals is at a difference of nearly 1,200, meaning that there is a shortage of shelters and resources for homeless individuals. Throughout California the population for homeless individuals is increasing. In Stanislaus County homelessness has increased overtime except for 2022 which had a decrease in number. This is due to several factors including the different data collection method used due to the pandemic and health concerns, weather factors, and fewer volunteers.

The following program may address the need for additional resources for homelessness and will be included in the Housing Programs section:

- Program 2-1: Affordable Housing Development Assistance
- Program 2-6: Regional Collaboration to Facilitate Housing Throughout Stanislaus County
- Program 3-6: Zoning for a Variety of Housing Types
- Program 4-1: Housing for Special Needs Populations
- Program 4-3: Homelessness

2.6 Affordable Housing at Risk of Conversion

Government Code Section 65583(a)(8) requires an analysis of existing assisted multi-family housing developments for low-income renters that are eligible to change to market-rate units during the next ten-year period due to termination of subsidy contracts, mortgage prepayment, or expiration of restrictions on use. The analysis must inventory each development by project name and address, the

type of government assistance received, the earliest possible date of change from low-income use, and the total number of senior and non-senior units that could be lost from the local low-income housing stock. In addition, the analysis is required to assess the conversion risk and displacement of low-income tenants, estimate and analyze the costs of replacement versus preservation of at-risk units, identify entities qualified to preserve at-risk units, and identify financing and subsidy resources.

After extensive research of all assisted units in the County through the Stanislaus Regional Housing Authority, HCD resources, and County staff it was determined that the unincorporated area of Stanislaus County has no at-risk units; all at-risk units are in incorporated areas. The Westley Farm Labor Center, operated by Stanislaus Regional Housing Authority, provides 84 affordable housing units for migrant farmworker households, and is not at risk of conversion to market-rate. This property has a restrictive use covenant and USDA loan through 2037, securing housing options for very low-, low-, and moderate-income tenants. Additionally, new deed-restricted affordable housing developments built during the planning period would typically have a longer term than the ten-year planning period and would not be at risk.

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